



Planning and Transportation Committee

Date: TUESDAY, 14 JULY 2020

Time: 9.30 am

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)
<https://youtu.be/0jiHvVghSY0>

Members:	Deputy Alastair Moss (Chair)	Christopher Hill
	Sheriff Christopher Hayward (Deputy Chairman)	Alderman Robert Hughes-Penney
	Munsur Ali	Deputy Jamie Ingham Clark
	Rehana Ameer	Shravan Joshi
	Randall Anderson	Oliver Lodge
	Adrian Bastow	Natasha Maria Cabrera Lloyd-Owen
	Peter Bennett	Andrew Mayer
	Mark Bostock	Deputy Brian Mooney (Chief Commoner)
	Deputy Keith Bottomley	Sylvia Moys
	Henry Colthurst	Graham Packham
	Deputy Peter Dunphy	Susan Pearson
	Alderman Emma Edhem	Judith Pleasance
	John Edwards	Deputy Henry Pollard
	Sophie Anne Fernandes	James de Sausmarez
	Marianne Fredericks	Oliver Sells QC
	Alderman Prem Goyal	William Upton QC
	Tracey Graham	Alderman Sir David Wootton
	Graeme Harrower	

Enquiries: Gemma Stokley
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Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:
<https://youtu.be/0jiHvVghSY0>

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 23 June 2020.

For Decision
(Pages 1 - 42)

4. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Information
(Pages 43 - 46)

5. **MILLENNIUM BRIDGE HOUSE, 2 LAMBETH HILL, LONDON EC4V 4AG**

Report of the Interim Chief Planning Officer and Development Director.

For Decision
(Pages 47 - 198)

6. **1 PAUL'S WALK, LONDON, EC4V 3QH**

Report of the Interim Chief Planning Officer and Development Director.

For Decision
(Pages 199 - 272)

7. **CITY FUND & CITY ESTATE HIGHWAY DECLARATION SURPLUS DELEGATED AUTHORITY REQUEST - 80 FENCHURCH STREET, EC2**

Report of the City Surveyor.

For Decision
(Pages 273 - 278)

8. **CITY CLUSTER AREA- UPDATED DELIVERY PLAN**

Report of the Director of the Built Environment.

For Decision
(Pages 279 - 310)

9. **CITY OF LONDON CORPORATION PARTICIPATION IN E-SCOOTER TRIALS**

Report of the Director of the Built Environment.

For Decision
(Pages 311 - 322)

10. **CONSULTATION ON DRAFT S106 PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT**

Report of the Director of the Built Environment.

For Decision
(Pages 323 - 354)

11. **NAMING OF NEW CITY WALKWAY AND ASSOCIATED OPEN SPACE: BAZALGETTE EMBANKMENT**

Report of the Director of the Built Environment.

For Decision
(Pages 355 - 358)

12. **GATEWAY 1-5 TRAFFIC ENFORCEMENT BY CCTV**

Report of the Director of the Built Environment.

For Decision
(TO FOLLOW)

13. **TOWER BRIDGE - REPLACEMENT OF DEFECTIVE BRIDGE DRIVING MACHINERY HYDRAULIC COMPONENTS**

Report of the Director of Open Spaces.

For Decision
(TO FOLLOW)

14. **REOPENING THE HOSPITALITY SECTOR: ALFRESCO EATING AND DRINKING UNDER THE BUSINESS AND PLANNING ACT 2020**

Report of the Director of Markets and Consumer Protection.

For Decision
(TO FOLLOW)

15. **REVENUE OUTTURN 2019/20**

Joint report of the Chamberlain, the Director of the Built Environment, the Director of Open Spaces and the City Surveyor.

For Information
(Pages 359 - 370)

16. **2019/20 BUSINESS PLAN UPDATE Q4**

Report of the Director of the Built Environment.

For Information
(Pages 371 - 384)

17. **BRIDGE HOUSE ESTATES STRATEGY: BRIDGING LONDON, 2020 - 2045**

Report of the Chief Grants Officer and Director of City Bridge Trust.

For Information
(Pages 385 - 396)

18. **CITY STREETS: TRANSPORTATION RESPONSE TO SUPPORT COVID-19 RECOVERY**

Report of the Director of the Built Environment.

For Information
(Pages 397 - 414)

19. **DISTRICT SURVEYORS ANNUAL REPORT 2019/20**

Report of the Director of the Built Environment.

For Information
(Pages 415 - 428)

20. **PUBLIC LIFT REPORT**

Report of the City Surveyor.

For Information
(Pages 429 - 432)

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

Report of the Interim Chief Planning Officer and Development Director.

For Information
(Pages 433 - 442)

22. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**

Report of the Interim Chief Planning Officer and Development Director.

For Information
(Pages 443 - 450)

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

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

25. **EXCLUSION OF THE PUBLIC**

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

For Decision

Part 2 - Non-public Agenda

26. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 23 June 2020.

For Decision
(Pages 451 - 452)

27. **BAYNARD HOUSE CAR PARK - DECLARATION OF SURPLUS OF PART OF PREMISES**

Joint report of the Director of the Built Environment and the City Surveyor.

For Decision
(Pages 453 - 456)

28. **DEBT ARREARS - BUILT ENVIRONMENT (P&T COMMITTEE) - PERIOD ENDING 31ST MARCH 2020**

Report of the Director of the Built Environment.

For Information
(Pages 457 - 464)

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

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

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PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 23 June 2020

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 9.30 am

Present

Members:

Deputy Alastair Moss (Chair)
Sheriff Christopher Hayward (Deputy Chairman)
Rehana Ameer
Randall Anderson
Peter Bennett
Mark Bostock
Deputy Keith Bottomley
Henry Colthurst
Deputy Peter Dunphy
Alderman Emma Edhem
John Edwards
Marianne Fredericks
Alderman Prem Goyal
Tracey Graham
Graeme Harrower

Christopher Hill
Alderman Robert Hughes-Penney
Deputy Jamie Ingham Clark
Shravan Joshi
Oliver Lodge
Andrew Mayer
Deputy Brian Mooney (Chief Commoner)
Sylvia Moys
Graham Packham
Susan Pearson
Judith Pleasance
Deputy Henry Pollard
Oliver Sells QC
William Upton QC
Alderman Sir David Wootton

Officers:

Gemma Stokley	- Town Clerk's Department
Angela Roach	- Assistant Town Clerk
Lorraine Brook	- Town Clerk's Department
Julie Mayer	- Town Clerk's Department
Rhiannon Leary	- Town Clerk's Department
Kerry Nicholls	- Town Clerk's Department
Amelia Ehren	- Town Clerk's Department
David Farnsworth	- Chief Grants Officer and Director of City Bridge Trust
Shani Annand-Baron	- Media Officer
James Gibson	- IS Services
Peter Digby	- City of London Police
Fleur Francis	- Comptroller and City Solicitor's Department
Deborah Cluett	- Comptroller and City Solicitor's Department
Paul Wilkinson	- City Surveyor
Peter Young	- City Surveyor's Department
Nicholas Gill	- City Surveyor's Department
Alison Bunn	- City Surveyor's Department
Chris Bonner	- City Surveyor's Department
Gwyn Richards	- Interim Chief Planning Officer and Development Director

Carolyn Dwyer	- Director of the Built Environment
David Horkan	- Department of the Built Environment
Zahur Khan	- Department of the Built Environment
Maria Herrera	- Department of the Built Environment
Bruce McVean	- Department of the Built Environment
Leah Coburn	- Department of the Built Environment
Beverley Bush	- Department of the Built Environment
Ian Hughes	- Department of the Built Environment
Paul Monaghan	- Department of the Built Environment
Ben Eley	- Department of the Built Environment
Gemma Delves	- Department of the Built Environment
Neel Devlia	- Department of the Built Environment
Helen Kearney	- Department of the Built Environment
Tom Nancollas	- Department of the Built Environment
Joanna Parker	- Department of the Built Environment
Stefania Pizzato	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Craig Stansfield	- Department of the Built Environment
Dom Strickland	- Department of the Built Environment
Clarisse Tavin	- Department of the Built Environment
Jon Averbs	- Director of Markets & Consumer Protection
Rachel Pye	- Markets & Consumer Protection
Peter Davenport	- Markets & Consumer Protection
Robin Whitehouse	- Markets & Consumer Protection
Paul Forster	- Markets & Consumer Protection

In Attendance:

Deputy Edward Lord – Common Councillor

Tijs Broeke – Common Councillor

Sharon Ament – Director of the Museum of London, MoL Application

Gregory Lawrence – Common Councillor and Chairman of the Smithfield Market Tenants Association (SMTA), MoL Application

Roy McGowan – Momentum Transport, Highways Advisor, MoL Application

Rawdon Pettitt – Architect, Stanton Williams, MoL Application

Jeremy Randall – Partner, Gerald Eve, MoL Application

Paul Williams – Lead Architect, Stanton Williams, MoL Application

Peter Bovill – Montagu Evans, 81 Newgate Street Application

John Bushell – KPF, Montagu Evans, 81 Newgate Street Application

George Kyriacou – Applicant, 81 Newgate Street Application

Chris Miele – Montagu Evans, 81 Newgate Street Application

Alec Shaw – Project Director – Smithfield, Museum of London, MoL Application

Louis Vorster – KPF, Montagu Evans, 81 Newgate Street Application

Introductions

The Town Clerk opened the meeting by introducing herself and stating that the Committee was quorate.

A roll call of Members present was undertaken by the Town Clerk who also reminded those participating to alert her to any technical issues they might experience as the meeting progressed.

1. **APOLOGIES**

Apologies for absence were received from Natasha Lloyd-Owen and James de Sausmarez.

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

Oliver Sells QC declared a non-pecuniary interest in agenda item 6 by virtue of the fact that he is also a member of the Capital Buildings Committee and may be perceived, in this capacity, as having predetermined the application. He clarified that he would not, therefore speak or vote on this item.

Judith Pleasance declared a non-pecuniary interest in that she is a member of the Board of Governors of the Museum of London and would also not be speaking or voting on agenda item 6.

Mark Bostock declared a non-pecuniary interest, stating that he is a member of the Markets Committee but that, as that committee had not taken a lead on the plans for the Museum of London, he intended to both speak and vote on agenda item 6.

The Comptroller and City Solicitor advised that participation in Agenda items in which Members have a non-pecuniary interest, needed to be considered by the Member on a case by case basis in accordance with the Code of Conduct (para 14). Whether there is a real danger of bias is a matter for individual Members, knowing all the facts, but if having turned their mind to any previous involvement they might have had in taking decisions on the new museum, they are of the view that they can be impartial and decide the application on the planning merits, then it would seem to be within the range of reasonable decisions for them to conclude there was no real danger of actual or apparent bias and that they are therefore able to speak and vote. It would equally be acceptable for them to decide that they did not wish to participate in the decision on this application. She added that paragraph 34 of the City's Guidance to Members on the Code of Conduct advises that it is good practise to declare non-pecuniary interests at meetings where they arise, in the interests of transparency.

The Deputy Chairman, Sheriff Christopher Hayward declared a non-pecuniary interest in that he was also a serving member of the Capital Buildings Committee but was satisfied that he had in no way pre-determined this application and would therefore speak and vote on agenda item 6.

Alderman Sir David Wootton, Deputy Keith Bottomley and Deputy Jamie Ingham-Clark also declared non-pecuniary interests as serving members of the Capital Buildings Committee but stated that they intended to speak and vote on agenda item 6.

Finally, Peter Bennett declared a non-pecuniary interest as a member of both the Capital Buildings and the Markets Committee but stated that he would also be speaking and voting on agenda item 6.

3. **MINUTES**

The Committee considered the public minutes and non-public summary of the virtual meeting held on 2 June 2020 and approved them as a correct record.

MATTERS ARISING

E-Scooters (page 16) – Officers clarified that a report on e-scooters that they had originally hoped to bring to this meeting had been delayed as Department for Transport (DfT) guidance on e-scooter trials had not been published in sufficient time for them to be considered ahead of the paper deadline for today. They highlighted that this report would now therefore be put to the 14 July meeting of this Committee.

Changes to the Congestion Charge (page 19) – Officers reported that the letter sent by the Chair and Deputy Chair to the Mayor of London on this matter had been circulated to all Members of the Committee. It was highlighted that the temporary changes to the congestion charge came into effect yesterday and that TfL had confirmed that the reimbursement scheme for NHS and care home staff would be extended to local authority workers and charity workers providing certain support services during the ongoing pandemic. This would include domiciliary care workers providing services on behalf of a local authority. The deadline for applying for residents' discounts had also been extended to 1 August 2020 to provide those residents not currently registered with additional time to submit their applications. Finally, Members were informed that Officers were still awaiting clarification as to the timetable and process for reviewing these temporary changes and would look to bring updates on this to the Committee when they were available.

A Member commented that he was disappointed in the limited response received to the Chair's letter. He added that a lack of clarification around the temporary period was also concerning as was the 1 August cut-off date for new applications from residents. He asked that the Chair and Officers continue to pursue these points.

Officers reported that they understood that the Chair would receive a formal response to his letter from the Mayor's office in due course. The Chair reassured Members that he had been in personal contact with the Mayor's office and confirmed that they had proactively reached out to the City Corporation as a result of the letter. He undertook to continue to pursue the concerns of Members in terms of residents' discounts and access to places of worship. The Chair went on to provide some further context by reporting that how the City Corporation was implementing its local arrangements/schemes as lockdown eased was a locally based approach and he had therefore suggested to the Mayor's office that how exemptions and the like were dealt with should also be dealt with at a local/borough level. The Chair was now waiting to see if this proposal would gain any traction.

4. **PUBLIC MINUTES OF THE STREETS AND WALKWAYS SUB COMMITTEE**
The Committee received the draft public minutes of the virtual meeting of the Streets and Walkways Sub Committee held on 26 May 2020.

RECEIVED.

5. **OUTSTANDING ACTIONS**
The Committee received a report of the Town Clerk detailing the Committee's outstanding actions.

Barbican and Golden Lane Conservation Area

A Member highlighted that a Conservation Management Plan was still awaited for this area in the form of a Supplementary Planning Document. He added that this was originally approved by this Committee in October 2018 and that he had requested an update on progress on several occasions since. He asked that this also now be included within the list of Outstanding Actions so that it was not lost sight of entirely.

The Interim Chief Planning Officer and Development Director reported that Officers were scheduling to bring this matter to Committee in Autumn 2020 and that the document was currently in draft form.

The Town Clerk undertook to update the list of Outstanding Actions accordingly.

Supplementary Planning Document (SPD) re: Housing

Officers reported that the intention was to bring something on this matter to the next meeting of this Committee on 14 July 2020. Work was currently underway to finalise whether this would be a full review of the SPD or a partial review looking at affordable housing elements only.

The Chair added that Officers were trying to balance making concessions to developers where it was felt that they were appropriate in relation to economic recovery from the current pandemic with the need to reflect the Committee's wishes to correct current practices regarding affordable housing.

RECEIVED.

6. **POULTRY MARKET AND GENERAL MARKET AND THE ANNEXE BUILDINGS WEST SMITHFIELD LONDON EC1A 9PS**

The Committee considered a report of the Interim Chief Planning Officer and Development Director regarding an application for the Poultry Market and General Market and The Annexe Buildings West Smithfield London EC1A 9PS. With regard to the General Market - proposals involved the partial demolition, repair, refurbishment and extension of the existing building known as the General Market at 43 Farringdon Street on the basement, ground, first and roof levels; creation of a new entrance structure on West Poultry Avenue (and

associated refurbishment of the existing canopy over West Poultry Avenue) with new facades to West Smithfield and Charterhouse Street; new entrances on the corner of Farringdon Street and Charterhouse Street; Change of use to provide a museum and ancillary uses and areas, together with a flexible retail, restaurant, drinking establishment and leisure (gym) use for the perimeter 'houses'.

Proposals for the Poultry Market included partial demolition, repair, refurbishment and alteration of the existing building known as the Poultry Market, Charterhouse Street at basement, ground and first levels; change of use to a museum and ancillary uses and areas.

Proposals for the Annexe Site (Red House, Iron Mountain, Fish Market and Engine House) include the partial demolition, refurbishment and extension of the existing buildings known as the Annexe Site at 25 Snow Hill and 29 Smithfield Street at basement, ground, first, second and third levels; creation of a triple height canopy above a public realm space; change of use to a flexible museum, offices, retail, restaurant, drinking establishment, events and functions use. Refurbishment of and minor alterations to the existing building known as the Engine House at West Smithfield at basement and ground levels; Change of use to a flexible retail and museum use.

(The proposal would provide 33,340sq.m of Museum floorspace (Class D1), 4254sq.m of flexible A1/A2/A3/A4/B1/D1 & D2 floorspace, 2459sq.m of flexible B1/D1 floorspace, 812sq.m of flexible A3/A4/D1 & D2 floorspace, 23sq.m of flexible A1/D1 floorspace and 86sq.m of flexible A1/A3/A4/D1 floorspace.)

The report also covers considerations under application reference 19/01344/LBC, which is an application for listed building consent in relation to the following works to the Poultry Market :

Part demolition, repair, and refurbishment of the building known at the Poultry Market, Charterhouse Street at ground, first and basement levels, associated with a change of use of the building to provide a museum and ancillary uses and areas; including: works associated with an entrance structure on West Poultry Avenue; internal alterations including creation of a part new first floor; fabric removal and refurbishment on all floors; replacement glazing; facade cleaning and other facade repair; levelling of ground floor; works of repair to the roof; installation of new heating and cooling equipment; new M&E services; repurposing of the south service bay and associated infill structure; remodelling of the north service bay; internal decoration; replacement balustrade; and other associated works as shown on the submitted plans and drawings.

The Interim Chief Planning Officer and Development Director presented the application to Members, beginning by reporting that there was an update that, whilst not strictly a planning matter, did provide clarity on parliamentary issues. He highlighted that reference was made at paragraph 74 of the report to the fact that Smithfield Market is regulated by a series of Acts of Parliament, amongst them the Metropolitan Meat and Poultry Act, 1860 and the London Central Markets Act, 1875. Section 21 of the 1875 Act provides that the markets established under the 1860 act and the 1875 act shall be designated collectively as London Central Markets. Section 25 of the 1875 Act empowers the City Corporation to “... *appropriate and use for any purpose, any lands acquired by them for purposes of the London Central Markets, or any of them, but not required to be retained by them for those purposes*” It is currently intended that the Bill will lift all the restrictions as to use as a market from the Smithfield site. However, if a surplus resolution is passed by the City in respect of the Poultry Market, then that has the effect of removing the restrictions from that part of the site and in those circumstances the development under consideration today will not be reliant on the passage of the Bill.

The Interim Chief Planning Officer and Development Director went on to state that, as paragraph 76 of the report noted, the planning system operates as a separate and self-contained statutory code. The grant of planning permission would not override the provisions of the relevant Act of Parliament. Members were informed that the planning application should be determined on its own planning merits and that it will be for any future user of the site to ensure that any relevant parcels of land are able lawfully to be used for the purposes proposed, whether through appropriation or amendment to the Acts of Parliament or otherwise.

Officers went on to refer to the additional information on the application provided to Members in the form of a virtual site visit and fly-through animation of the site as well as an addendum report and PowerPoint presentation. They stated that they would provide a further overview of the scheme today as an aide memoire.

Members were informed that the site in question was as the western end of Smithfield and included three separate buildings – the General Market, Poultry Market and the Annexe buildings. The proposed new Museum would occupy the General and Poultry Market with a mixed-use scheme on the Annexe buildings to the south. Officers reported that the General Market is a Horace Jones building 1883 and is not listed. The building had been subject to numerous alterations in the 1950s due to bomb damage. The Poultry Market is a Grade II listed building built in 1963 by T.P. Bennett and Ove Arup. The Annexe site is made up of four separate elements – the Fish Market (an 1880 Horace Jones building), the Iron Mountain site (a 1961 warehouse), the Red House (an 1899 purpose built Victorian coal store) and the Engine House (built in 1898).

The Interim Chief Planning Officer and Development Director reported that the approach to the scheme was a conservation and restoration-based approach

with some modern elements alongside this. The concept involved a very permeable and accessible public building both day and night with multiple entrances. West Poultry Avenue would be Stopped Up and was proposed as the principle entrance to the new Museum. Other access points would be located on West Smithfield and Hart's Corner. Officers went on to highlight the vehicular and other servicing points across the site as well as access to the educational facilities and where servicing points for the Poultry Market would remain.

Members were informed that the Museum concept was 'A Journey Through Time', utilising the depth of the building from the very imposing basements to the upper storeys to create flexible/adaptable spaces to depict from past time all the way through to future, imagined time.

The presentation proceeded to focus specifically on the General Market building, comprised of three elements, the imposing and spacious civic space at ground floor-level which celebrates the views to the roof and the dome as well as the Phoenix Columns. This was intended as a flexible programming/events space. The outer crust of the building (a term referring to the shops and houses around the periphery of the Market) was intended to be a rich mix of entrances to the new Museum, museum displays, educational facilities, retail units, bars and restaurants with vibrant frontages onto Smithfield and also in to the central space. The uses were designed to have a collaborative synergy with the Museum.

Members were shown images of the existing view of the General Market building, currently under restoration, to provide a clear idea of the spacious and imposing nature of its interior. The outer crust would rise up to first and second floor level with, again, ancillary retail and educational uses leading onto the Museum and facing out to the surround streets. The outer crust proposals would involve a light touch approach of conservation and new openings to provide flexible spaces for educational uses and the like. In terms of the central space here, proposed to be a very flexible and adaptable space for exhibitions displays and gatherings. Members were also shown images of the rear elevation of houses on the periphery where, again, a light touch conservation approach was proposed with selected new openings. The houses, when originally built, were quite an eclectic series of facades and proposals were to continue to reflect this eclectic mix with a diversity of approaches to shop fronts, retaining and restoring any original or existing shop fronts of merit on the site but also proposing new shop fronts within certain tenant design guidelines and creating new windows which would offer views into the Museum and its activity as well as display windows which would contain artefacts, artwork and other creative items.

At the entrance, Members were shown images of a very imposing staircase with a lift core down to the basement of the market (a particularly exceptional example of Victorian brick and steel engineering with brick vaults which reach down to Roman level making it, potentially, one of the most captivating spaces in London). Access through this point and on the landing of the stairs would be intended to celebrate the engineering scale and imposing proportions of the

space. At the end of this area, there were proposals for a café area where visitors would be able to see, hear and feel trains on a live railway track passing by through a windowed area which would be a unique experience at almost Roman levels.

Members were shown computer generated images of the look and feel of the space and the interior.

At roof level, the approach proposed was generally to restore the existing pitch roofs, however, some (which were generally concealed from any vantage point including Holborn Viaduct) would be removed and replaced with a green roof. This was considered acceptable due to the minimum impact it would have on public views.

The Interim Chief Planning Officer and Development Director reported that the current General Market building itself was currently somewhat understated and restrained. The dynamic approach to creative displays proposed as well as the reinstatement of the original blinds would help to rectify this.

With regard to Poultry Avenue, Members were shown existing views of the site with an oppressive brick beam across what was proposed as the main entrance to the new Museum. This would be Stopped Up, but the Museum would commit to 7am-midnight opening to the public which would be managed through an access management plan with reviewing scope to offer enhanced access outside of these hours. On top of the entrance would be a mesh LED screen depicting images of the displays, collections and exhibitions currently on show in the Museum. The space inside was proposed to be a curative, flexible space to allow the public to pass through most hours of the day.

From West Poultry Avenue, heading east, access could be gained to the Poultry Market, a building characterised by pop-art architecture as well as a very imposing shell concrete dome roof. Proposals for the Poultry Market involved a mixture of display and events with a large temporary gallery, basement collection stores, workshops and also a research centre. The Committee were shown existing plans of the building and Members attention was drawn to Buyer's Walk, the east to west spine of the existing building. When proposed floorplans were displayed, Members were shown how Buyers Walk was picked out in a subtle way but with a new temporary gallery inserted. Officers explained that temporary galleries were increasingly important in terms of generating income and attracting new audiences.

Visitors would enter the building from West Poultry Avenue and walk into a very spacious area. Officers highlighted that one of the major debates around this application had been the arrival experience of the shell roof. Instead of celebrating the east-west axis of the roof, proposals would remove existing traders stalls and celebrate the north-south axis to give a very good appreciation of the ingenious structural aspects of the roof and these were therefore considered acceptable in historic building terms. The space would be 5.6m high and would enable the curation of world-class new exhibitions. With regard to the educational facility for schools, Officers highlighted that the

strategic goal of the Museum was to engage with every school child in London and this facility would enable them to do so by accommodating an average of 30 school visits per day. To the east on East Poultry Avenue, would be the entrance to the lecture theatre.

At first floor level, Members were shown an existing view featuring market stalls and a rather unexceptional roofscape. Proposals involved the removal and replacement of these with a new, slightly higher level, insert to provide another flexible space for exhibitions. It would also create a powerful vantage point to appreciate the fine curved roof and allow views, on the north side of the building, into the centre for research, restoration and conservation and critical back of house elements currently not visible to the public.

An element of the scheme that was contentious in historic building terms was the removal of the clerestory glazing and its like for like replacement. Many retention options had been explored, however, the replacement was considered to be acceptable (including the replacement of the 'fritting'), firstly because it would match the original joinery and details of the windows and secondly because it would allow the Museum to take a passive energy approach. This would, however, be conditioned.

Members were shown the entrance from ground floor level down to the basement, where the proposal was for the museum to allow visitors to go down and immerse themselves in their rich collection stores, much of which was not currently accessible to the public.

Finally, with regards to the Annexe sites to the south-west, Officers reported that this part of the development was not within the curtilage of the Museum but would serve as rich ecosystem of office use (aimed at SMEs and those working in the creative industry), retail, restaurants and gyms amongst others to complement the Museum setting. Members were informed that the existing Fish Market was currently being stabilised and that proposals here involved a conservation approach to celebrate and reinvent the existing architect. As with the General Market building, the brick vaults within the Annexe buildings were hugely impressive and it was proposed to open these up to the public with active uses. The Red House would provide office floor space. A roof terrace would also be provided here as would a new 'Iron Mountain' canopy between the Fish Market and the Red House. The canopy was intended to celebrate the rich legacy of steelwork and architecture of the market buildings and was considered to be a very convincing, contemporary reinterpretation of this.

The Interim Chief Planning Officer and Development Director reported that the Red House, originally designed as a coal store, would see a new two storey extension as well as alterations to the windows. The proposal involved a very sensitive/sympathetic creation of new window openings to provide light to the new office accommodation within. The new roof extension was a contemporary design, setback to be deferential to the main building. It would, however, be designed in a manner which picks up on the architecture of the existing building.

Finally, Members were shown images of the proposed new Iron Mountain canopy, an imposing steel structure which would sit over a new wedge-shaped area of adaptable, flexible public realm which could be utilised throughout the year and also throughout the night.

With regard to the Engine House, Members were informed that proposals were to celebrate and re-enliven the existing building with the addition of a new green roof and to utilise the building as a new A use building.

Officers concluded by discussing the key planning issues and the recommendations before Members, indicating that the report was very clear and acknowledged that the proposal would be contrary to Local Plan policies that seek to support the continued presence of Smithfield Market as market uses will be displaced from the Poultry Market. Although there would be a diminishment in the capacity of Smithfield Market through the loss of the Poultry Market, the majority of traders in units operate from within the east and west market which would continue as part of the proposal. Critically, the scheme had been designed to co-exist alongside an operational meat market, the operational times of the two uses complement each other with only a small element of overlap that would be carefully managed.

Members were informed that very careful consideration had been given to potential Section 278 works and the delivery of servicing arrangements and the impact that the proposal would have on the market during construction of the Museum. These were considered proportional and reasonable by the Market Superintendent, who oversaw the operation of the market, to allow the market to continue to function unhindered. The Transport addendum which forms part of the scheme demonstrates that there is a solution, however, this would continue to be refined in consultation with all relevant stakeholders.

Officers reported that the proposed Museum use was supported on the basis of the City's wider cultural aspirations and the vision of the Smithfield area as part of the Culture Mile and the very substantial wider public benefits the scheme offers in an area characterised by diverse uses including cultural attractions. It was also highlighted that the scheme was a strategic development which would generate significant employment, spending and tourism which would benefit the economy. It would secure a long-term occupier for these buildings, breathing life into and enlivening these and the surrounding public realm. It would transform the market buildings into a world class museum, retail and office use area – uses that would inevitably require physical change to the historic fabric. These alterations to original features through the remodelling of the Poultry Market interior will, to a degree, diminish the original layout and fabric however, any harm is considered to be clearly outweighed by the wider public benefit. It is considered that the proposed changes are justified, sensitive and skilful in the way that they successfully weave together Victorian, 20th century and contemporary architecture. The site would enable the museum to enhance its visitor offering and to showcase more of its collection and back of house research/conservation work to the public for the first time. The social benefits of the scheme are considered substantial, allowing all sections of the community, irrespective of economic and social position, to access and appreciate the

interiors of such historically significant buildings and the Museum's collection. The scheme also provides the opportunity for the museum to expand its work with communities around wellbeing and social inclusion and will provide enhanced learning space allowing more engagement with schools.

Officers stated that they considered the scheme to be exemplary in its environmental and sustainability credentials. The circle economy principles adopted with the re-use and salvaging of existing fabric is also considered exemplary as well as the connection to Citigen. The scheme is considered as an exceptional and world-class example of the sensitive restoration and reuse of historic buildings whilst maximising economic and socially inclusive public access.

In conclusion, overall, the scheme was considered as an exceptional opportunity to sensitively revive an underutilised area of Smithfield into a new destination of London, if not UK-wide, importance that would be accessible to all groups in the community and have significant social, educational, cultural, economic, historic buildings and environmental benefits and was therefore recommended favourably to the Committee.

In advance of the Chair calling speakers to address the Committee, a Member raised a point of order stating that he and other members of the Committee had been sent an email from the Chairman of the Smithfield Market Tenants Association (SMTA) this morning containing some representations that he wished to draw to their attention. He stated that he was aware that this correspondence had been sent to the Case Officer on Friday afternoon and was therefore surprised that it had not been shared with Members in advance of this meeting, particularly when a further addendum containing representations sent after those from the Chair of the SMTA and his association was circulated yesterday. He questioned what Members and the applicant ought to now do with these representations and why they were not included in the addendum. The Chair responded that he was aware of this and intended, at this stage, to ensure that all Members had now received this information and had had adequate time to read through it. The Interim Chief Planning Officer and Development Director reported that, in essence, this was external correspondence between two third parties and not directed to the City Corporation. He added that if Officers were to include all similar types of correspondence between parties involved in an application, background papers would be immense. Officers had, however, considered the correspondence and the issues raised in it and noted that it reiterated issues that had already been made as part of the objectors' statement and were therefore addressed in the report. The Chair asked that the Town Clerk now circulate the correspondence sent by the SMTA this morning to allow Members time to read this whilst the Committee were addressed by speakers.

The Chair introduced Mr Gregory Lawrence, a registered objector, in his capacity as Chairman of the SMTA and invited him to address the Committee. Mr Lawrence clarified that he was speaking on behalf of the SMTA and as a market trader within the central markets. He reported that the markets had been very successfully operating from this site for hundreds of years and

intended to do so for the foreseeable future as they had long, strong leases that were capable of being renewed. He also highlighted that Smithfield Market was here by Royal Charter. Whilst the SMTA did not oppose the principles of regenerating the redundant Smithfield General Market, they consider there to be substantial and significant gaps in the submitted planning application and a lack of certainty and cohesiveness around the long-term plans for the market complex, meaning that they felt that the application was premature. Mr Lawrence reported that the SMTA had submitted a detailed representation to this effect in February 2020 and that their concerns had yet to be fully addressed. The SMTA were also concerned about the potential conflict of interest for various Members of this Committee who also sit on the Markets Committee, the Capital Buildings Committee and the Board of Governors of the Museum of London, all of whom would seem to have a vested interest in seeing the Museum of London's proposals approved. They were also concerned about a lack of consultation from the applicant, specifically the SMTA had not been consulted on the developing details of servicing, traffic and public realm. Whilst the applicant had consulted the Market Superintendent, he is employed by and represent the City Corporation and not the SMTA. The SMTAs input would have helped to inform the proposed development, chiefly, proposals regarding traffic, pedestrian movement and the public realm. Mr Lawrence went on to assert that there were a series of inaccuracies within the planning application, highlighting that, importantly, the Poultry Market is not, as indicated, surplus to requirements. He added that the Poultry Market was an active part of the central markets, accounting for up to 35% of the trade of the whole of Smithfield and that employment figures referenced within the planning submission were also wholly inaccurate and misleading in the context of this application.

Mr Lawrence commented that, whilst the applicant had explored the economic benefits associated with the relocation of the Museum of London, they have not considered the disruption and disturbance caused to market traders and the economic implications of this. Insufficient information had been provided to establish how the Museum and Central Markets could operate alongside each other without operational conflicts, particularly in terms of servicing and deliveries. The application contains too much flexibility in terms of the range and quantum of uses proposed making it difficult for Officers and Members to truly understand and make an informed judgement. This flexibility also made it challenging to establish appropriate planning obligations, affordable housing contributions and CIL contributions. He commented that the planning application lacked any detail for the public realm which would be severely compromised by the applicants expected 2 million new visitors per annum. This concern had also been raised by the GLA who had requested further information in relation to a number of technical queries including costs, phasing and deliverability of public realm measures.

Mr Lawrence concluded by stating that the SMTA believed that the application was premature in so far that it assumes the short and long-term relocation of the markets when no such plans had been agreed with them and the principle of long-term relocation is founded on emerging rather than adopted planning policies. Mr Lawrence commented that the SMTA had raised other technical matters which he did not have time to cover today but added that he trusted

that Members had read their submissions and would seek clarity from Officers on all such matters. He stated that a comprehensive approach was required for this sensitive and important London site and not the piecemeal approach that created uncertainty around the longer term future of Smithfield Market and the businesses that trade there or those suppliers and customers who are dependent on the markets. In summary, he highlighted that the SMTA felt that there were substantial and significant gaps in the submitted planning application which made it impossible for the City Corporation to establish the true impacts of the proposed development which should be refused or deferred until the issues outlined had been addressed.

The Chair thanked Mr Lawrence for his contribution and invited questions from Members.

A Member questioned Mr Lawrence on a lack of consultation with traders which it was suggested had been carried out through the Market Superintendent only. She also referred to the suggestion that the market would need to relocate ancillary facilities and questioned how important these were to the running of the market as well as whether Mr Lawrence had any view as to where they might be relocated to.

Mr Lawrence reported that the SMTA were in talks with the Director of the Museum of London in 2015-2017 but that these were concerning the Museum of London relocating to the Annexe buildings – the Red House, the General Market and the basement of the Poultry Market. At no time was utilising the whole of the Poultry Market discussed up until the beginning of 2018. Mr Lawrence went on to reference several meetings between the Museum of London and the SMTA that had taken place from 2018 onwards, highlighting that, on 23 November 2018, the SMTA were presented with detailed designs for the upper floor of the Poultry Market but had refused to consider these as tenants had no plans to vacate the building which was made clear at the meeting as was the fact that if these plans were publicly consulted on the SMTA would have to oppose them. At subsequent meetings, the Director of the Museum of London had been asked to look at a phased move, but it was highlighted that this would be more costly for the Museum. The SMTA advised the Director, at this stage, to hold back on the consultation at the end of February 2019 until tenants had more information which she agreed to. Mr Lawrence went on to report that on 26 June 2019, the public consultation display images were delivered to the SMTA containing images of the whole market. A meeting between the SMTA and the Director which took place on 28 June 2019 was for the purpose of providing updates only and no subsequent meetings took place by way of consultation.

With regard to the ancillary facilities, Mr Lawrence stressed that these were absolutely vital to the running of Smithfield Market and that the SMTA had no idea as to where they could be satisfactorily relocated. He added that there were currently ten successful and vital businesses operating out of the Poultry Market and that the SMTA also had concerns as to where these would be relocated despite suggestions that they could be housed in the East and West Market. Mr Lawrence went on to question how Smithfield Market would be

expected to run at 60% of what it currently does without the Poultry Market. He also questioned how this project would ever work should the Barking project not proceed.

Another Member wished to explore the issue of co-existence further with Mr Lawrence. He referred to paragraph 111 of the report which stated “the City as landlord and manager of the markets has been investigating the relocation of these facilities as part of the market’s consolidation programme. Re-location of the facilities into City owned 79-83 Charterhouse Street, the Rotunda Basement Carpark and areas within the East and West Markets would be possible”. And questioned whether any of this had been discussed with the SMTA. He went on to question how many basements there were in the Poultry Market that tenants were currently using, how the SMTA had arrived at a figure of 35% for the Poultry Market and whether it was possible to phase the move so that the General Market could be the primary focus for the Museum with the Poultry Market being phased in thereafter. He went on to refer to the SMTA’s views that the application today was premature and questioned whether this was because there may be a better scheme to come forward. Mr Lawrence reported that the Museum had touched upon relocating certain facilities within Grand Avenue which the SMTA did not think was feasible. With regard to the figure of 35%, Mr Lawrence stated that this was arrived at through analysing tonnage and turnover and added that it would have been preferable for the Committee to visit Smithfield Market in the early hours of the morning to see exactly how it operates and how busy the Poultry Market is.

With regard to basements, Mr Lawrence reported that some but not all businesses located here had a basement. He added that there was also vacant space that needed to be let in the Poultry Market at present.

The Deputy Chairman asked Mr Lawrence what he regarded as the most significant planning objections/considerations that Members could legitimately consider in making their decision today. Mr Lawrence stated that servicing was vital in this respect as was the conflict in terms of co-existence given the SMTA’s views that there was too much flexibility in the application in terms of the range and quantum of uses proposed and the difficulties this created in terms of establishing appropriate planning obligations.

A Member asked for clarity as to whether the ongoing discussions around SMTA members leases and the potential future location of the Market, whilst important, were planning matters. The Comptroller and City Solicitor advised that it was not uncommon, when considering a redevelopment scheme, for planning permission to come forward very early in the process, ahead of any compulsory purchase order. This meant that there were often leaseholders or owners still in occupation. Members were informed that these were essentially commercial arrangements that would need to be resolved before a development could be commenced. They were not, however, material to planning. That being said, the desirability of retaining a market and market operations on site was material.

The Chair invited Sharon Ament, Director of the Museum of London, speaking in favour of the application, to address the Committee. On consultation, the Director stated that she was genuinely saddened to hear from Mr Lawrence on the SMTAs concerns. However, she added that she was really confident about the Museum's extensive approach to consultation and looked forward to productive dialogue with the SMTA in the future. The Museum would relish the opportunity to operate alongside and in harmony with a thriving wholesale meat market. The Director went on to report that, since 2015, when the Museum had first announced its intent to move, they had been in active consultation and had engaged with over 13,000 people. During the 2019 public consultation, it became evident that there was a very strong public backing for this scheme with 96% of respondents voicing their support. Since submission of the scheme over 70 letters of support had also been received. Of particular note in this regard, were the positive, strong letters of support from heritage organisations – Historic England, SAVE and the Victorian Society amongst them. However, in spite of all of this support, the Museum did also recognise the objection that had just been made on behalf of the SMTA and it that regard the Museum team had worked extremely hard to ensure that the new Museum could work successfully alongside the functioning meat market through both the construction phase and operation.

The Director went on to refer to social need, highlighting that the Museum was a civic space, a place of learning, exploration and social interaction. The Museum would be able to do all of this with much greater effect via this project and, in particular, to better fulfil its ambitions of enabling schools/young people and future generations to engage in the history of London and to better understand and participate in their City. The designs for the West Smithfield site and the proposed world-class learning facilities would help meet society's current demands around engagement, empathy and understanding and would give the Museum the opportunity to better reflect the breadth of London's diverse communities (BAME, women and LGBTQ+).

In terms of economic and environmental impact, the Director stated that the aim was for this project to create very real social and public value. 1,700 new jobs would be created in the Museum and through its supply chain. Meanwhile, the 2 million people visiting each year would benefit businesses in the local area. The new Museum was also expected to generate a huge £755 million in GVA to the economy over a ten-year period and that economic growth would be spread right across London to all boroughs. With regard to climate change, Members were informed the Museum were aiming for a BREEAM rating of excellent with an extensive plan that would see their CO2 emissions reduced by 42%, all of which were part of the design principles which encompass and embrace the circular economy.

Finally, the Director spoke on the Museums vision and this extraordinary, once in a generation, opportunity created through this design for its galleries, shops and places where people can meet, research and delve into the London Collections. The Museum's plan was to be the most open, accessible and connected museum ever. As well as connecting with people, the Museum would connect with the surrounding neighbourhood and they themselves would

also be connected with unparalleled transport links, right in the centre of the City of London. The Director concluded by thanking Officers for their diligence in bringing this application forward and stated that she was joined today by several colleagues – Paul Williams, Lead Architect, Stanton Williams and his colleague Rawdon Pettitt. Roy McGowan, Highways Advisor, Momentum Transport, Alec Shaw, the Museum of London's Project Director and Jeremy Randall, Partner, Gerald Eve LLP – all of whom were able to respond to any technical questions Members might have.

The Chair thanked the Director for her contribution and invited questions from Members.

A Member questioned why the Museum were fixed on visitor numbers of 2 million per annum which was a significant increase on the Museum of London's visitor numbers over the past two years but was much less than some of the main competitor museums in London which attracted 4-6 million per annum and therefore seemed rather modest. The Director reported that a number of studies had been carried out from the beginning of this project, through to the present day, looking at the likelihood of visitor numbers and needed to arrive at a number for the Museum's business case. Others had similarly suggested that this was a rather modest projection but for business planning purposes and to create the design of the museum with all of its functionality, this number had been arrived at and plans were now working around this to create the facilities to accommodate this number of visitors. The Director stated that she hoped that in the future, the Museum would be dealing with the problems of absolute success, but the current projections had been based on a wealth of information and intelligence.

The Member went on to state that, in his opinion, the design did not take full advantage of the logistical advantages that the site offered and was disappointed to see that, with approximately 80% of visitors to the new museum presumably set to arrive from Farringdon Station and being directed up to the museum via Cowcross Street, a huge opportunity was being missed in not having a dedicated and safer route particularly for visiting school parties. He questioned whether the Director was disappointed at not being able to secure this. The Director stated that the Museum was hugely ambitious as an organisation but were working within the designs which they felt are appropriate. The Director asked Roy McGowan to also comment on this particular point. Mr McGowan confirmed that there were conversations with Islington Council, TfL and the City of London Corporation very early on in the project and in the early stages of the Crossrail proposals but it was clear that this would be a very difficult route to achieve. More recent conversations with Islington Council's Transport Department had confirmed that a dedicated route for the Museum would not be achievable now given how far advanced the Crossrail station works are.

Another Member repeated that he remained very concerned about coexistence. Members were being told that, because of the Act, that it may be that the Poultry Market may take some time to be declared surplus. His question to the Director was therefore whether it was possible to phase the development to

enable a period of transition where the General Market and those areas that were surplus could be developed but the Poultry Market was not so that the Market could continue operations until it was able to be properly relocated whether that was to Barking or elsewhere in due course. Secondly, the Member questioned coexistence in terms of operational hours and deliveries and asked whether the Director would accept that there should be restrictions placed on the Museum to ensure that the meat market was still able to function as it needs to. The Director reported that the issue of phasing had been looked at in great depth but that it was virtually impossible to do a phased design. She asked Paul Williams to comment further on the technicalities of this. Mr Williams reported that plans for the Poultry Market involved a temporary gallery but also a permanent collection and research laboratories below ground all of which were a key part of the Museum's vision. Without these and the educational areas and loading bays as part of the overall plan, it was unlikely that this would be a viable option. Consideration was given to using parts of the Annexe building for this purpose as part of a phased development but the spaces that this offered were not appropriate for housing this, even in the interim. The Director clarified that this application was for the full scheme. In terms of operational hours, the Director reiterated that the Museum would very much relish the opportunity to work alongside a functioning meat market and felt that this would help to tell the story of London in a very evocative and compelling way. She felt that the Museum had provided assurances around how the hours of its operation would work with those of the market and invited Roy McGowan to comment further. Mr McGowan reported that this had been examined in great detail and reported that there was a servicing area located underneath the General Market accessible via a ramp previously utilised for the Crossrail construction works. This could be fully self-contained for the needs of the market and waste management. A further servicing area would be situated to the north side of the Poultry Market within an area that was not currently heavily utilised by vehicles for the market itself. All of the servicing for the new Museum could be accommodated within this area as detailed within the transport reports. There would be limited on-street servicing for when the museum held events, and this would be in the late afternoon period and therefore not impact on market operations. From the studies undertaken, when the large market vehicles begin to arrive in the evening, there was plenty of capacity to accommodate them. The Market loading areas began to be more fully utilised from midnight onwards and, again, the museum operations would not impact on this. The market area was generally cleaned from 7-8am each morning and returned to commuter/pedestrian movements soon afterwards which is when the museum would expect to see the arrival of visitors to the area. Co-existence, from all of the detailed studies carried out by the applicant, therefore looked to work well.

A Member questioned why the BREEAM ratings for the Annexe buildings would only seek to be 'very good' which fell short of policy requirements. More broadly, he asked how the carbon target reduction figure of 58% based on the energy statement had been arrived at within the context of all now wanting to see net zero carbon within a reasonably short space of time and certainly within the early life of the proposed development. The Director responded that it was really important to recognise that the new museum would be inhabiting old

buildings which came with inherent issues around this. She also asked Members to consider the fact that the development would be re-using an old building itself as being a very sustainable approach. The Director invited Rawdon Pettitt to comment further. Mr Rawdon commented that he felt it was clear from the submission that the applicant was committed to environmental and sustainable causes and that this was at the core of these proposals. He added that they were also trying to work within the context of existing buildings. With regard to BREEAM ratings both the design team and the applicant have ambitions to achieve the highest credentials possible but, in calculating ratings, several factors are taken into account around the extent of work being carried out. With regard to the Red House, what was referred to as a 'category A' fit out would be undertaken which would provide additional points and achieve an excellent rating, however, with the fish market, a 'shell and core' approach was being carried out to provide maximum flexibility and also to retain a lot of the historic character of the space – this meant that less points were awarded taking the rating to just below excellent. The design team had, however, continued to look at ways in which they might be able to gain further credit and it was their intention to work with the applicant to explore this in future stages as development progressed. Jeremy Randall spoke to state that the scheme was exemplary in energy terms and that a 58% reduction in carbon was extremely good having regard to the nature and fabric of the buildings. The proposed connection to Citigen also helped with the overall reduction. Members were informed that the 58% reduction was set against a benchmark of the Building Regulations, Part L, 2013 and the Stage 3 assessment carried out had considered this. As the development progressed through further stages this was expected to improve. Some of the carbon reduction achieved would be dependent on how Citigen operates and decarbonises in coming years.

Another Member spoke to commend the vision, stating that she could not think of a more appropriate site to move the museum to. She went on, however, to seek further clarity and assurances around co-existence with the existing market which could remain on site for some years. She noted that the Museum had submitted a further consultation addendum in May 2020 which addressed relocating the markets ancillary facilities, the public realm and highway proposals but questioned whether the Director felt, given that this had been submitted in the midst of the current pandemic, that the market traders had had sufficient opportunity to digest and respond to this information. Finally, she asked whether the Director was assured that, if the market did not move from its current site, this scheme was viable, particularly if the Poultry Market were not available. The Director reiterated that this planning application was for the General Market, the Poultry Market and the Annexe buildings and that the Museum believed that the relocation of the market was a City of London Corporation matter.

The Chair asked that Members now move to debate the application.

A Member spoke to record his strong support for the application which he felt would provide a great new home for the Museum of London to expand in a location with the best accessibility in London. It would also provide a major anchor for the Culture Mile and primed the regeneration of this area, especially

the General Market and Annexe buildings. He added that, over the past 25 years, he had been involved with this site, including with the two previously aborted schemes for these buildings where it had been clear from the eventual outcome of the two applications that the Government's Planning Inspectorate was not prepared to countenance a commercially viable solution for the site. Instead, they were prepared to see the site deteriorate until a funder could be found to expend huge resource just to retain buildings. He felt that the City were therefore very fortunate, after a quarter of a century, to find both a very suitable occupier and funders prepared to pay the cost of building retention and hoped to see the scheme before the Committee approved today and eventually fully developed. However, he stated that the cost to the public purse as a result of previous decision delays occasioned by the Planning Inspectorate should be publicly recognised and steps taken to avoid a similar repetition.

Another Member stated that he had some questions arising from both the applicant and the objector speeches. He added that this application was for a site within his Ward and had both positive and negative attributes. The positive would be moving the museum into a building which could suit its future needs, the negative was around the need to coexist with what was already on site. He went on to state that this was not an application for the General Market building only but also for the Poultry Market and that he remained unsatisfied that this aspect of the scheme could work. He noted that Officers had confirmed that the development of the Poultry Market would not be permitted until the Act was changed and that it was presumably unlawful, therefore, to expect this to go forward in the absence of this. This could perhaps be overcome by phasing the scheme but, as the applicant had stressed, this could not be done. The Member noted that the GLA had also posed a very specific question around whether, despite a loss of 27 market stalls, the overall functionality of the remaining east and west central market would be unaffected. That assurance was not, however, given, neither was information as to where the ancillary facilities could be relocated despite reference at paragraph 111 to this being investigated by the City as landlord. The Member concluded by stating that he was keen for the museum scheme to work but, in the absence of a phased approach and no guarantees as to the market vacating this site, he was not satisfied that it could whilst also ensuring that the overall functionality of the remaining market was not affected as per the planning steer from the Mayor. He stated that he was deeply disappointed to be presented with this report which did not resolve the problems around co-existence that were discussed over two years ago and that a solution around phasing had not been identified. This was a land-use matter, with a public duty for the City Corporation to maintain a market in the centre of London until such time as Parliament directed otherwise. Planning Policy also underlined the need to support the market. He was of the view that the Museum had now extended the scheme to the maximum with no interim plan as to how the market could continue to provide its critical function as they had done during the current pandemic. He asked that the applicant revisit these issues within this complex and important project in which coexistence was critical and not adequately covered by conditions and planning obligations as currently drafted. He asked Officers whether they would agree that, at the moment, the remaining function of the east and west central market is affected. The Interim Chief Planning Officer and

Development Director reported that, on coexistence in terms of servicing, these elements had been reviewed by the City's own highways team, TfL, the Market Superintendent and Momentum who had addressed the Committee earlier. He added that there were plans for some facilities within the Poultry Market to relocate into the General Market and that it was his understanding that the applicant would be willing to have this as a condition of permission, to ensure that these works were in place before implementation. The Chair requested that Officers seek some clarity from the applicant on exactly what that condition would be so that Members could be updated prior to a decision being taken.

Another Member referred to the Museum of London wishing to relocate from its present site and wishing to have planning permission granted now to facilitate its raising of funds for a proposed opening on site in 2024 given that both matters were mentioned within the report. He questioned Officers as to whether these matters were relevant planning considerations. The Interim Chief Planning Officer and Development Director confirmed that funding arrangements were not a relevant planning consideration and did not inform Officers recommendations. The fact that the museum wished to relocate from their current site was, however, thought to be relevant and a material consideration as it underpinned their rationale for this application. The Member responded to question why funding had therefore been included in the report without highlighting that it was not a relevant planning consideration to ensure that Members did not decide the application for the wrong reasons and to make it clear that there was no urgency attached to this. The Interim Chief Planning Officer and Development Director stated that this was background information in terms of information submitted by the applicant in support of the application but was not a key driver in terms of the recommendations. He accepted that this point could have been made clearer in the report and that there was no urgency around approving the application in relation to funding as this was not a relevant planning consideration.

Another Member spoke to comment on the fact that these proposals were around a very clearly underdeveloped and underutilised part of the City which many would like to see rejuvenated, enlivened and brought to greater public and social benefit. He added that it was very important now that Officers were absolutely clear as to what could practically and realistically be conditioned in so far as coexistence was concerned. His specific question, given the embracing and acceleration of the use of active transport, was around the provision for short stay cycle parking. He remarked that, bearing in mind the projection for 2 million visitors a year, this scheme needed to work a lot harder to provide for this. The Interim Chief Planning Officer and Development Director responded that the key part of this scheme to enable coexistence was the Section 278 works which would be refined to ensure that these broad stakeholders were taken into account. The information contained within the transport addendum was one potential solution and the scheme would have a 5-year condition. In terms of short-term cycle spaces, Officers reported that cycle parking had now become much more critical in current circumstances with people needing to avoid public transport in a way that was not previously the case. As a result, including significant amounts of public cycle parking around the museum and around the Culture Mile area more broadly would be a

key consideration in developing both the Section 278 and the Culture Mile proposals.

The Chief Commoner spoke to report that he had campaigned for over two decades now to get the meat market moved from the centre of London to a more suitable location. He commented that, beyond planning, this was also a huge political issue and that he had sympathy with the SMTA's views that this application was premature. He asked that the Chair consider discussing this matter with the Chair of the Policy and Resources Committee and others to ask that negotiations take place with all of the Smithfield Traders so that an overall positive political climate in which to foster and advance plans for the market could be established. The Interim Chief Planning Officer and Development Director stated that he did not feel that there were grounds for deferral of this application on the grounds that it was premature.

The Chair interjected to clarify that the Committee were here to decide on this planning application and to weigh up the public benefits versus the loss of some of the market and market facilities as very clearly summarised by the Chief Interim Planning Officer and Development Director in concluding his original presentation. The working of the market alongside the museum, if consent was granted, was an important planning consideration but was a separate matter in relation to the physical space given to those various elements. He added that it appeared that Officers were indicating that there was some latitude as to the facilities that could be afforded to the market in terms of relocation and asked that they clarified this point or whether Members were actually faced with a decision as to the potential loss of these facilities to be weighed up against any overall public benefits. The Interim Chief Planning Officer and Development Director reported that Officers could come up with a Grampian condition to ensure that the future of these facilities was satisfactorily addressed prior to the commencement of works. The Chair asked that the details of this be clarified for Members in due course.

Another Member spoke to commend Officers on a very comprehensive report and reported that he had also written to request some of the supporting information around the transport assessment. He went on to state that his main concern was that the Committee seemed to be considering a planning application for a very interesting project but one that was done in isolation in terms of the public realm and wider proposals for West Smithfield and that he would have liked to have seen a sort of Masterplan in terms of this. He added that much of the public realm appeared to be confined to a small area around the market and the Annexe buildings and would be subject to a Section 278 agreement which had not yet been agreed. Officers made reference to this at paragraph 443 of the report and indicated the areas they hoped to reach agreement on but the Member stated that he was surprised that there were not proposals for the pedestrianisation of the west part of Smithfield Road (the road between the new museum and the Annexe buildings) as he felt that this could help ensure the safety of visitors, particularly school parties. He concluded by stating that this was pre-emptive in a sense as a lot of the short stay cycle bays were being situated around the Rotunda.

At this point, the Chairman sought approval from the Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.

Officers reported that the concept for the Section 278 works were being done in close coordination and cooperation with the emerging public realm in this area. The Museum had been in close contact with the Culture Mile team and those designing the public realm to ensure that the bigger picture was not lost sight of. The proposals were operating at slightly different timescales, but this did not mean that they could not and would not be appropriately coordinated. In terms of changes to the public realm and the highways that were being considered as a result of the museum's application, these fell into two categories – one was essential, including the facilitating of school children circulating safely around the site and a second category of changes that was desirable in terms of creating a world-class public realm around a world-class museum. It was unclear at this stage whether this second category of changes would be delivered as part of the initial Section 278 agreement, a subsequent 278 agreement or as part of the Culture Mile proposal. This would depend, to some extent, on the timing around these proposals being brought forward and the timing of the markets move to Barking if that were to proceed as currently planned. The second category of desirable but not necessary works would include the pedestrianisation of west Smithfield and it was recognised that this was probably not achievable in the first instance where significant HGV access would still be required to the museum. This had therefore been assessed specifically and Officers considered that widening the footways would allow the museum and the market to coexist safely without necessarily needing to pedestrianise the area. The Chair added that a Public Realm Working Party had also been established for this area which he was chairing and was taking a wholistic approach to how this area should look and feel with work moving at pace.

The Deputy Chairman stated that he was of the view that this was one of the most important and exciting cultural applications that this Committee had considered during his tenure. If supported today, the scheme would contribute hugely to the regeneration of a fundamental part of the City that this organisation had backed as the Culture Mile. He commended the applicant on the very sensitive ways that they were planning to use these remarkable buildings to create a huge visitor attraction for the City, the rest of London and beyond. He commented that it was rare for this Committee to be presented with a scheme that had so many public benefits and underlined that it was important for Members to focus on the application before them today. A lot of important debate had been engaged upon thus far around issues that were fundamentally important to many different stakeholders but were not the scheme presented today. This was not a phased proposal or an application for some of the buildings to be used and not others. He stated that he was very conscious, as were all Members, that there were major negotiations underway with the market tenants in the background but that those were not issues for this Committee to consider today. Political leadership was, indeed, needed over these issues as the Chief Commoner had suggested. The Deputy Chair went on to note that the Interim Chief Planning Officer and Development Director had made reference

to the Act and that Members had subsequently debated this but that this was also not relevant to the Committee's deliberations. Often planning consent was granted where other issues still needed to be resolved outside of the planning process before works could ever commence and this would undoubtedly be one such scheme where this applied. He concluded by stating that he believed that this application should be granted and that, if it were, it would add to the City Corporation's global status not only as a business city but also as a number one cultural destination.

Another Member spoke to reiterate that she thought that this was a fantastic vision for one of the most appropriate buildings in London. She did, however, still have concerns around the need to coexist with a busy market which was the current situation on site and could well be for some time. She agreed with the points already made by other Members around the application being premature and also around the great extent of the planning application which now included the still functioning Poultry Market. According to one of the representations, the City had now stopped leasing units in the Poultry Market which she found concerning. In fact, the Market may, in due course, need to expand because of increased business demand and there appeared to be a void of information as to how the market and the new museum would operate side by side successfully with this factored in or, indeed, if the facilities that were vital to the running of the market were to be relocated if the Museum was to expand into the Poultry Market. She added that the piecemeal approach being taken to the public realm also seemed to be a missed opportunity. Members needed to ensure that what was granted was deliverable and that both operations – the market and a new museum – could safely coexist and thrive given that the market itself was clearly a huge public benefit. She concluded by stating that she was of the view that this application was premature for all of the reasons she had outlined.

Officers robustly reiterated that they did not consider this application to be in any way premature and underlined that the Committee should not underestimate the vast amount of work undertaken by the applicant to ensure that, operationally, the market and museum could coexist without compromising one another. This had also been agreed with the Superintendent of the Market who oversee the operation of the market. Officers went on to read the suggested wording of the Grampian condition that they would be happy to impose concerning the ancillary market uses which currently exist within the Poultry Market. It was proposed that this read: "That no development take place in respect of the Poultry Market until the supporting facilities (which include but are not limited to APP facility, ancillary office areas, workshop stores, welfare areas, palette and packaging collection and forklift storage) have been satisfactorily relocated to an equivalent level of provision". Officers requested delegated authority to finalise the wording of the condition in consultation with the Chair and Deputy Chairman. A Member commented that, as the Deputy Chairman also sat on the Capital Buildings Committee where this scheme had already been debated, the wording of the condition should be negotiated with the Chair and another Member to avoid any potential misunderstanding from objectors. The Deputy Chairman commented that had he felt that there was any bias or predetermination on his part he would not have taken part in this debate

and would not vote, as he intended to, on this application. He added that he was absolutely clear that the Capital Buildings Committee had looked at the scheme from the City Corporation's perspective but did not get involved in any planning deliberations whatsoever. He therefore felt able to be part of this debate/vote and subsequently the consultation around a Grampian condition and ensuring that this was carried out.

In order to provide further assurances around concerns about prematurity, the Comptroller and City Solicitor reiterated that it was not unusual for many planning applications to have background issues that needed to be resolved ahead of development commencing. In terms of any concerns around existing leaseholders still being present on site, it was highlighted that this was also often the case and that, often, the granting of planning consent was conducive to moving forward any negotiations that were relevant to the site but outside of planning considerations. With regard to ancillary facilities and the issue of coexistence, Officers had proposed what was felt to be an enforceable planning obligation that should address Members concerns.

The Member came back to state that there were traders in the Poultry Market at present and that there was not scope for them to move into the east or west market. She questioned whether this matter would also, therefore be conditioned, so that existing traders would not be displaced until such time as adequate space was found for them to allow them to continue their business. The Interim Chief Planning Officer and Development Director clarified that this condition was not being proposed and that the report was very clear that there would be a diminishment in the traders from the Poultry Market. The Markets Team were trying to find alternative locations for the traders but had been unable to do so to date. The Chair added that Members were balancing the loss of some of the market against wider public benefit.

A Member spoke to state that he felt that this an incredibly exciting project, not least in educational terms, for what he felt was a rather unsung institution. However, he was struggling with this application for all of the reasons already outlined and also felt that it was therefore premature in coming forward. If, as he understood it, there was no scope for deferral, even for a short period, to resolve these points he would find it very difficult to support the application. Officers reiterated that the work already undertaken to date provided sufficient comfort to them on all of the points raised today and stressed that this work would continue under Section 278. The application was therefore for decision today.

Another Member spoke to state that he disagreed that this application was premature. He spoke on the current state of the building which he described as terrible and underlined that he therefore did not think that the Committee should delay a decision as this would only lead to the further deterioration of the building and the historic fabric.

Another Member spoke to express concern that many Members seemed to still be referring to issues that were not planning considerations. He underlined that planning permission could be put forward for land that an applicant did not yet

own. Clearly if there was legislation that needed to be overcome in order for the development to proceed then that was the case, but it was not for this Committee to hold up the application on the basis that that legislative obstacle needed to be otherwise overcome. He added that he did not think deferring the application was an option and that he would be voting in favour for it today, putting aside non-planning considerations.

A Member highlighted that the report illustrated the sensitivity of the site and the strong feelings around its development. The issues for the meat traders needed to be resolved but, as had now been made clear by many, were not planning considerations. He added that these proposals would safeguard the future of these buildings after a hiatus of some 30 years and would bring significant social, cultural, educational and economic benefits to London and the UK. He urged fellow Members to join with him in strongly supporting this application.

A Member spoke again to make a point on the general application, noting that the report stated that “the scheme is driven by conservation and enhancement of the existing buildings which will be repaired and renewed to best conservation practice”. He commented that this preservation of our heritage which lies at the heart of the scheme, and is rightly celebrated, was not attributable to the City Corporation. He went on to state that, in the recent past, this Committee granted planning permission to demolish the General Market and Annexe – buildings that were saved by the intervention of the campaigning organisation Save Britain’s Heritage and, ultimately central government who overrode the City Corporation’s decision. Since Save Britain’s Heritage had been instrumental here, he asked that this Committee listen carefully to the views of this organisation on any future applications that come before Members.

The Chief Commoner spoke again to seek assurances from the Chair and the Interim Chief Planning Officer and Development Director that they would really seek to re-engage with the SMTA so that, should this application be approved, a harmonious relationship was established. The Chair stated that, whilst he clearly agreed with the sentiment of what the Chief Commoner was saying, it had been made clear via Officer advice and by a number of Members now that this Committee were here to make planning decisions and it was his task to shepherd this debate along these lines. He added that he was involved in the Public Realm Working Party as he had previously stated and offered Members his assurance that a wholistic approach was being taken to this. However, again, at this stage, it was not appropriate for the Committee to look beyond the application in this regard, other than to note that the City Corporation had very large aspirations in this regard in its transportation capacity.

The Committee then proceeded to vote on the recommendations before them. The Town Clerk noted that Judith Pleasance and Oliver Sells QC had indicated that they would not be participating in this vote. The vote was conducted by rollcall led by the Town Clerk with those Members present and eligible to vote asked to also confirm that they had been present for and able to hear the entirety of this item.

Votes were cast as follows: IN FAVOUR – 20 votes

OPPOSED – 2 votes

There were 3 abstentions – 1 Member who had missed part of the Officers presentation due to connectivity issues and 2 Members who had joined the meeting in the middle of the debate .

RESOLVED - That:

- (1) Planning permission be granted for the above proposal in accordance with the details set out in the schedule attached to the report and subject to:
 - (a) the Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);
 - (b) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.
- (2) Agreement in principle be granted that the land affected by the building, currently public highway and land over which the public have right of access, including West Poultry Avenue, may be Stopped Up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and making of a Stopping-up Order for the various areas under the delegation arrangements approved by the Court of Common Council.

(NB: The consideration of the Listed Building Consent application (19/01344/LBC) was set out in the report for the planning application, but the recommendation and draft decision were not set out in the Committee papers and therefore this application for LBC will be determined under delegated authority pursuant to the Scheme of Delegations to Officers (Adopted 18th July 2019).

7. 81 NEWGATE STREET LONDON EC1A 7AJ

The Committee considered a report of the Interim Chief Planning Officer and Development Director in respect of 81 Newgate Street, London EC1A 7AJ - Part refurbishment and part demolition, excavation and redevelopment involving the erection of an additional four storeys to provide a ground plus 13 storey building with publicly accessible route through the site, incorporating gym and swimming pool (Use Class D2) at basement levels, gym and flexible floor area uses (Use Classes A1-A5, B1, D2) at basement level, retail (A1-A5) at ground floor level with access to offices and rooftop restaurant and public viewing gallery, office accommodation (Use Class B1a) from levels 1-13, roof

top restaurant (Use Class A3) and publicly and privately accessible roof terraces, landscaping and other associated works.

Officers presented the scheme highlighting that it supports the circular economy as it part adaptation and part new build, retaining the super structure and floor plates in so far as possible, reusing materials and working with existing foundations. This would all be secured by conditions. The scheme would be reimagining an existing, dated building, turning it into an animated, outward facing development in a pivotal location, maximising the opportunities of the gateway to the Culture Mile and the north/south route from the Tate Modern.

With regard to plans to the existing and proposed plans for ground floor level, in the north-east and southern elements, the curved corners were retained as part of the existing buildings that is adapted. In the south-west corner, the staggered footprint of the newly proposed intervention was visible. The vehicle loading area which currently existed on Angel Street was to be reused and there was also a cycle entrance on the Angel Street elevation. Three atria defined the entrances on the south, east and west and an important new public route from Saint Martins-Le-Grand to King Edward Street would also be established. Members were presented with some flexible floor layouts for approval to respond to market conditions, with retail offerings which would wrap around the south, east and west and plans showing how the development could be more robust by dividing into smaller retail units which would also include a north-south public route if it was felt that sub-division would respond better to market demands. The public routes would be open from 6am – midnight every day and would be covered by Section 106. At the southern end of the plans was dedicated public access to the public roof terrace.

Escalators would take visitors up to the first floor with office space intended from 1st-12th floor. Cycling storage and a gym would be situated at the lower ground floor.

Basement level plans were fully compliant with the London Plan in terms of secure cycle parking storage and showers.

Proposed first floor plans showed that escalators would take visitors up via escalators, through as secure entrance to the office lobby, then into lifts that would take office workers up to all other levels. Office space would look down on to the retail area at ground floor as well as the public through route and the Grade I listed Greyfriars church.

Floorplans for other levels showed that the retained/adapted envelope of the existing building would be consistently visible as would the stepping back of the south-west corner where there would be multiple roof terraces with greening. Visitors to the dedicated public access roof terrace would exit lifts at 12th floor level and would then follow a staircase upwards to access the roof terrace area. The public roof terrace would be 568 square meters and could accommodate 120 users. There would also be a meadow to the right of this which is the largest outdoor space at roof level. This would not be accessible but would be

very visually attractive. Roof level would also include a restaurant and office terrace area. The roof terrace would mirror the 50 Fenchurch Street model within Section 106 as set out within paragraph 18 of the report and would be open from 10am -7pm or nautical dusk. A management plan would be established for the public roof terrace and the restaurant terrace area within Section 106.

With regard to the public realm and trees, Members were shown images of the trees to be removed and replaced at ground floor level – three of these were on the west side of the site, on private land. They were plain, category A trees which had been underperforming in this location and had not reached their full maturity. There were also four trees on the Angel Street elevation at ground floor level which were underperforming Beech trees and would also be removed and replaced. There were four existing trees on the south-west corner of the site that would be retained and supplemented by the planting of 19 new trees. This would result in a total of 30 trees around the site on a mixture of private and highways space as detailed at paragraph 4 of the report, turning what was currently a quite hostile island site into a much greener area particularly when coupled with additional planting as part of public realm around the south western corner.

Members were shown elevations to provide a sense of the massing increase on site. The west elevation, on the left-hand side, showed the retained architecture and extended architecture which had a much more vertical feel. The right-hand side depicted a more dynamic series of tiered volumes. The most pronounced increase in massing and height was primarily to the north part of the site towards the Angel Street elevation. The east elevation showed a stepping down in massing from the north down towards Newgate Street. The south elevation facing Newgate Street also showed the fusion between the new architecture and the adapted/retained building. The Committee were also shown sections of the building – the east/west section which showed a 2-3 storey increase in some parts of the building. There would also be a curated art wall in this location. The north/south route was also shown. It was noted that there was no impact on St Paul's depths in this particular view.

With regard to St Paul's heights, Members were shown a 3D visual of the western elevation of the site facing Greyfriars church and where the existing building broke through the St Paul's Heights policy area. It was highlighted that, whilst there would still be some exceedance in this area, this development would actually reduce this. Some areas of existing exceedances in the St Paul's heights policy area would be entirely removed, opening up a new vista of St Paul's and its dome. In relation to other views, Officers highlighted that the existing building was within the existing area/viewing threshold for Alexandra Palace. The proposed building would also therefore break through the threshold in terms of a quantitative assessment. In terms of the qualitative assessment, the proposed building would come slightly closer in closure to St Paul's but, when looking at the context of other emerging developments such as the Aylesbury Estate buildings, the harm caused would be negligible in the view of Officers with the appreciation of St Paul's retained. The view from Blackfriars Bridge was not an LVMF view and, at present, to the north west

tower, one could see Bastion House which sat quite low and in proximity to the north west towers of St Pauls. In the proposed view, the development would sit in front of Bastion House but not in front of St Pauls creating a very slight change of setting with a negligible impact. There would also be a slight impact on the view from Southwark Bridge which is an LVMF view. At present, the tower of St Augustine church near St Paul's was visible, in the proposed view there would be some massing appearing in the background behind this. St Paul's Cathedral would, however, remain appreciated and very distinctive in this view, with Officers therefore concluding that there would be no demonstrable harm caused. Officers went on to report that the view from Millennium Bridge was another important view, where the proposed view depicted some massing including the balustrades for the roof terraces, below the silhouette of St Paul's.

Proposed views from King Edwards Street depicted the larger glazed features of the new development and new geometric bays introduced to complement the curved architecture of the building. The greening of the elevations was also clearly appreciable in this view.

Officers depicted a number of other existing and proposed views of the new development including from Cheapside, Newgate Street, Greyfriars churchyard, Gresham Street and Saint Martins-le-Grand and finally the Golden Gallery.

Officers concluded by stating that the benefits of this application were multiple – it embraces the circular economy through a creative adaptation, was targeting an outstanding BREEAM rating and exceeding the urban greening factor. A free public roof terrace would be introduced, providing a cultural dimension which would be supported further by the installation of a new digital art wall in the public route. The public route itself was another benefit of the scheme. The development would also bring economic benefits in terms of the active retail offerings which would complement and support the Cheapside retail offerings. The development would offer increased office space and the architectural changes would result in a much more aesthetically pleasing design in this important part of the City. Finally, Section 278 works would support some hugely beneficial pedestrian enhancements around the site. The scheme would therefore bring social, environmental, economic, architectural and cultural benefits and was recommended to Members for approval today.

The Chair thanked Officers for their presentation and, in the absence of any registered objectors, invited his fellow Ward Member Tijs Broeke, speaking in favour of the development, to address the Committee.

Mr Broeke, Common Councillor for the Ward of Cheap began by stating that he had been impressed by how the team had worked alongside local stakeholders to develop and evolve the scheme. In particular, he felt that the links to Culture Mile, the improved connections through creating a new public route and the creation of a free public roof terrace would all constitute a significant improvement to the current site and surrounding area. He clarified that there were four main reasons why he was speaking in support of the transformation plans – firstly, the transformation approach is reducing the environmental

impact associated with a full demolition or rebuild scheme whilst also introducing sustainability improvements to the existing building. The design also enhanced the public realm and was much more attractive for the local area and created new, modern office space. At the same time, the transformation would create a new retail experience on the ground floor connecting the site to One New Change and Cheapside through a new public route and, importantly, linking it as a gateway to the Culture Mile. Most of all, the transformation of 81 Newgate Street would allow City workers, residents and visitors to see London from a new perspective. The transformed building would create additional space for retail, culture and leisure, including the new roof terrace with spectacular views of St Pauls.

The Chair thanked Mr Broeke for his contributions and opened the debate on the application.

A Member questioned the accessibility at ground floor levels, stating that it looked from the plans as though the main entrance and retail units were all accessible by stairs from street level. In general, she stated that she applauded the fact that this was a refurbishment and not a wholesale demolition scheme and that the stone façade was to be reused – as such she intended to support the application and its improvements to public realm with additional planting a– however, she added that she did find the gratuitous use of greening disappointing which was possibly not appropriate in the City and this location. She went on to comment that a lot of planting on buildings to date had mutated from biodiversity to survival of the fittest and she hoped that, in the execution of this scheme, the planting was well considered and constrained. With regard to access, Officers confirmed that the east/west route would be ramped at grade through the building and that there were entrances to retail units via this route. Because this was a circular economy scheme, the economy would have to work with the existing building levels which made it difficult and, at present, there was a difference on the east, west and south elevations where the pavement levels were higher than the interior spaces. Where there were entrances on those elevations, there were steps into retail space and lifts were also situated at each of these locations. The Member questioned whether this was legal. Officers reported that there was a condition imposed that the whole development needed to provide level access to all parts and confirmed that it was fully accessible but would rely on the use of lifts in certain locations, it did therefore comply with all legal requirements in terms of accessibility. With regard to greening, Members were informed that there were conditions around the maintenance of this in perpetuity.

Another Member stated that the City Corporation had, in the past, seriously considered eliminating the gyratory and bringing Angel Street back into better use. He questioned whether this scheme would preclude this. Officers reported that this scheme had been very much designed as flexible and able to link into an enhancement to St Pauls Gyratory should this come to fruition in the future. This was set out in paragraph 19 and would be fed into Section 278.

The Committee then proceeded to vote on the recommendations before them. The vote was conducted by rollcall led by the Town Clerk with those Members

present and eligible to vote asked to also confirm that they had been present for and able to hear the entirety of this item.

Votes were cast as follows: IN FAVOUR – 23 votes

OPPOSED – 0 votes

There were no abstentions.

RESOLVED - That Planning permission be granted for the above proposal in accordance with the details set out in the attached schedule and subject to:

- a) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highways Act 1980 in respect of those matters set out in the report; the decision notice not to be issued until the Section 106 obligations have been executed.
- b) 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 Highways Act 1980.

8. CITY STREETS: TRANSPORTATION RESPONSE TO SUPPORT COVID-19 RECOVERY - PHASE 3

The Committee considered a report of the Director of the Built Environment in respect of the Transportation response to support Covid-19 recovery (Phase 3): City Streets.

A Member congratulated Officers on their rapid progress, creativity and agility in this area and questioned whether if, as anticipated, social distancing guidelines were to be imminently amended from 2m to 1m, what changes, if any, would be made to existing Phase 1 works and whether this would also have implications for phases 2 and 3. He went on to note that this report made no mention of Guildhall Yard which was a substantial space with small permanent and temporary seating provisions available and questioned whether this was therefore an oversight. The Chair reported that the Prime Minister had just announced that social distancing was to be reduced from 2m to 1m as of 4 July 2020. Officers highlighted that this was the change that all had anticipated. In terms of Phase 1 works, Officers were moving towards changing the initial, coned areas established to more semi-permanent measures which could still be easily removed if required. This would also offer the opportunity to revise or tweak these in accordance with today's announcement. Similarly, as Phase 2 works began to be rolled out, these could be assessed as they progressed. Officers clarified that they did not, however, think that this change in social distancing would make a significant difference to plans for Phases 1 and 2. Even on streets with wider pavements such as Cheapside, additional space would be needed to accommodate queuing outside premises as well as space for pedestrians to pass by at a safe distance. In terms of Phase 3 proposals, adequate space and seating would still need to be identified to help support food and drinks retailers regardless of any relaxations. With regards to Guildhall Yard, Officers were aware of the need to look at this site, but this would not be

an on-street change and was not therefore covered by these proposals. However, the City Corporation would be looking internally at opportunities to increase the use of this space.

Another Member questioned what the current pedestrian utilisation of streets under consideration was and what that use was in normal times. He went on to note that the City had recently put out a statement saying that only one in twenty five people who normally use the City were travelling in at present under current social distancing and other measures introduced on public transport. There was no evidence yet that walking, and cycling had in any way displaced that form of commuting into the City. He went on to ask what increases were expected if there was to be a change in social distancing rules which was obviously now highly relevant and, given the answers to these questions, he asked whether there was any reasonable prospect of any of the City's current streetscape being insufficiently wide to provide safe access for expected levels of utilisation. Finally, he noted that the Retail Alliance had made it very clear that the change in social distancing measures would mean utilisation rates would increase to approximately 70% in retail spaces. He could not therefore imagine that this change in policy would not be extremely helpful and reduce the need to introduce extensive measures. Officers reported that they did not collect live data on utilisation at present but that they were actively looking at other data sources to gain an understanding of what was happening in the City. It was, however, safe to say that numbers were well below what they would usually be. For example, the number of people entering and exiting underground stations last week was just 7.6% of the comparable date in 2019. These figures were increasing on a weekly basis albeit quite gradually at the moment. Officers went on to state that it was difficult to predict how the City would fare and how people would start to return although conversations that the City Corporation had been having with City businesses suggest that at least a quarter of the City's workforce would have returned to the City by the Autumn (approximately 125,000 people). In terms of the impact of the relaxation of social distancing requirements, this may well reduce the need for queuing outside of premises and the space required for this but it was expected that it would also accelerate the rate at which people would return to the City, not least because it will also increase capacity on public transport, which was currently one of the biggest obstacles in terms of people returning to the workplace. With regard to whether pavements in the City were sufficiently wide, Officers reported that there were many streets in the City (many of which were included within Phase 1 and Phase 2 proposals) where pavements are less than 3m, and in some cases 2m wide so the need to reallocate space was still there although this would be kept under review as the works were rolled out with each Phase intended to be both flexible and adaptable with the ability to scale up or down as necessary.

The Member responded to reluctantly speak against these proposals adding that, in the long-term, he would like to see more pedestrianisation and a greater use of green spaces in the City but he did not agree with the fact that these works were being seemingly rushed through under what amounted to emergency powers without much scrutiny beyond that provided by Officers and without consulting residents. The reasons set out within the report as to why

these interventions were essential was not an evidence based case and there was no evidence at all that this was needed in order to make the City safe for people to return in the context of social distancing and COVID-19. What was clear, three months into lockdown, was that the principal barrier to people returning is public transport. Again, there was no evidence that people would opt for walking or cycling into work in place of this and this was certainly not what had occurred to date. People were opting, instead, to stay home. He asked that Officers therefore rethink this approach, particularly the need for consultation, to ensure that these changes, whether temporary or not, did not create unintended consequences or cause harm. Specifically, about 30-40% of the real economy was currently shut down, which would cause devastating damage over the next year with many businesses and therefore the servicing of those businesses not returning, the last thing those businesses therefore needed were road closures which they had not been properly consulted on. He concluded by stating that he remained unassured that this had been taken seriously and, on that basis, would oppose the recommendations. Officers spoke to clarify both the pace that these works were moving at and the approach to engagement/consultation. It was highlighted that it was made clear from the outset that these works were moving quickly and that this was in response to the need to provide safe space and social distancing. The challenge here was how much of this should be provided in anticipation of a possible return to the City and how much should be reactive to a situation. At present, works were very much preparatory to ensure that people were confident that they would have safe space on their return. Officers added that it was fair to say that in discussions that had been had with businesses to date, they were largely supportive of the overall approach, albeit with potential concerns around particular changes on particular streets. With regard to wider consultation, Officers reported that the online portal to gather public feedback would be launched imminently and promoted to local businesses and residents. This feedback would, if necessary, translate to changes on the streets – indeed this had already happened in some Phase 1 locations in response to feedback from businesses and construction sites on affected streets. The Chair added that, from his perspective, the City Corporation could not be distracted by the fact that National Rail Services and other routes into the City were not currently ideal. Statistics showed that approximately 140,000 people live close enough to use active travel to get into the City and, as was well known, the majority of those without access needs would use walking and cycling to reach their eventual destination. The major public policy issue at present was perceptions of safety and the City Corporation had a statutory duty imposed by the DfT that we create this safe space. The messaging around this therefore needed to be very strong that the City is open for business and that as many people as needed to return would be able to do so as soon as Government guidance changes. This was fundamentally about increasing public space, something which had been identified pre-COVID as part of the Transport Strategy. The Chair stressed that work on this should not be deflected by the fact that the evidence was not yet available in relation to this as this would come in time. As Officers had clarified, the City Corporation was not afraid to have to change and adapt these measures where necessary and the Chair highlighted that this had been the way in which transport changes in the City had recently been

successfully introduced – via experimental schemes that were subsequently tweaked and adapted as required.

A Member commented that the report seemed to indicate that Phase 1 works on Cannon Street were complete but the signage here did not seem to be finished and it was not clear that what had been installed was a two way cycle path with some interpreting this as one lane for cycling and one for pedestrians. He also questioned whether there was any way that Officers could ensure that any newly installed planters were not used by smokers for the disposal of cigarettes as was the case elsewhere in the City. Officers clarified that they could look again at signage on Cannon Street but clarified that what was installed this was intended to be a cycle contraflow with a one-way cycle route and the extra space there provided for footway widening. In terms of cigarette disposal, Officers were working with colleagues in Open Spaces to look at how they should design and plant planters so this could be factored into the design process. Officers were also working alongside colleagues in Cleansing on the layout of all of these schemes to understand how they would impact on cleansing regimes and this point could also be explored further with them.

Another Member stated that she was very interested in the City Corporation's role in helping to get retail and hospitality open again and very much welcomed the news today around the relaxation of social distancing measures. She questioned whether Officers could use connections with the City network of HR professionals to build forecasts of how and when staff would return to work. It was felt that this would be extremely helpful to businesses planning for when large scale numbers would return to the City. Officers thanked the Member for a helpful suggestion. They reported that they had been working with Officers in Innovation and Growth to try and understand what a return to work would look like but would discuss with them the possibility of reaching out to HR networks in the City on this point.

A Member commented that she was pleased to hear that some carparking spaces would be repurposed for cycle parking spaces and questioned whether she could also urge that the existing cycle spaces that were situated on pavements were also similarly relocated. She went on to comment on space outside of tube stations and asked whether this had been looked at across the City. At some locations, such as Bank, pavements had been widened but places like Barbican with just one exit, a pedestrian crossing and a bus stop could mean that the arrival of even a half empty tube would lead to pedestrian congestion here. Officers reported that they would keep the location of current dockless cycle bays under review both longer-term and as part of these immediate measures to aid the City's recovery. At the moment proposals were to create additional bays in addition to those already in existence. In terms of tube entrances and exits, Officers reported that whilst this was the third phase of these proposed works it was possibly not the final phase and some future proposals would need to drill down into specific locations and look at providing smaller pockets of additional space where this was needed. Members were informed that the Barbican had been flagged in discussions as being one such area already.

Another Member spoke further on the importance of a well-informed, data driven base of information and highlighted that the Commissioner had quoted some comprehensive statistics based on a broad engagement with City businesses on the numbers of people that they were expecting to return to the workplace at a meeting of the Police Authority Board yesterday. He questioned whether Officers could confirm that this data was coming from the Police on a regular basis and avoid any duplication of efforts in terms of approaching businesses. Officers confirmed that Innovation and Growth and CPAT colleagues were leading in terms of engagement with businesses and undertook to look into whether this data was also being shared with the Police or vice versa. They commented that data gathered to date was beginning to provide a good picture of what a return to work would look like by the Autumn.

A Member commented that, whilst she realised that this was a dynamic situation, the point on consultation was a very important one. The lessening of social distancing requirements and announcements around the reopening of pubs and restaurants from 4 July 2020 would also bring up once more the question of outside space requirements. Pubs with off-sales and punters drinking outside needed to be allocated sufficient space whilst still ensuring that pavements were accessible (particularly for those with disabilities) and everything possible needed to be done to assist these businesses in reopening and thriving. For this reason, the Member asked that Officers look at the matter more holistically and plan quickly and accordingly for a return to normal.

A Member stressed that, whilst work was being undertaken to facilitate safe movement around the City, spaces also needed to be actively and flexibly created to assist with and support the reopening of businesses.

RESOLVED – That :

1. The budget for Phase 3 be approved in principle, at a maximum of £650,500, subject to the confirmation of funding at Gateway 5.
2. The overall forecast project budget for all three phases of £1,699,244 (excluding risk) be noted.
3. The proposal for a review report on all measures be submitted to committee after six months of the first measures being implemented (in December 2020), as set out in paragraphs 18-19 of the report.
4. Up to 1,900 new cycle parking locations, at a maximum cost of £82,000, be approved in principle, split by:
 - a. A maximum of 50 car parking spaces within the City's five car parks being reallocated to provide up to 500 cycle parking spaces, as set out in paragraphs 48-49 of the report.
 - b. A maximum of 81 on street parking bays/motorcycle bays to be reallocated to temporary cycle parking and/or seating as part of Phase 3, as set out in paragraphs 50-55 of the report. NB: This

equates to a maximum 13% reduction in on-street parking bays to provide up to 650 cycle spaces.

- c. The reallocation of other carriageway and possibly footway space to provide up to a further 650 spaces, and potentially up to 100 spaces on private but publicly accessible land, subject to necessary legal agreements and consents being obtained.
5. The 12 seating/greening locations listed in table 2 in section 12 of the report and the proposed interventions be approved, the indicative total cost of £480,500 to deliver all of the interventions be noted and; it be noted that if full funding is not available to deliver all locations, they will be prioritised in the order shown in the report.
6. The implications of approving recommendations 4 and 5 above be agreed; i.e. - that this may result in the possible reduction of up to £336K of parking income being transferred to the Parking Reserve Account (if the temporary measures are in place for six months).
7. The procurement route to purchase the infrastructure to enable seating, greening and activation via the City Corporation's Highways Term Contract be approved, accepting an additional mark-up 8-10% on the total cost, as set out in paragraph 86 of the report.
8. The proposal to introduce a "school street", which involves closing the street outside Charterhouse Square School during the school starting and finishing times, using an Experimental Traffic Order be approved and, if successful, this be made permanent.
9. Approval for design, for making of Orders and Notices and related procedures and for implementation and operation for Phase 3 be delegated to the Director of the Built Environment, in consultation with the Chair and Deputy Chairman of Planning & Transportation Committee and the Chairman and Deputy Chairman of the Streets & Walkways Sub Committee, subject to the receipt of funding.
9. **TABLES AND CHAIRS - ASSESSMENT CRITERIA, FINANCIAL IMPLICATIONS AND PROCESSES IN RESPONSE TO COVID-19 LOCKDOWN AND EASING THEREOF**

The Committee considered a report of the Director of Markets and Consumer Protection in respect of the assessment criteria, financial implications and processes in response to COVID-19 lockdown and easing thereof in respect of tables and chairs licences, which had been suspended during lockdown.

A Member commented that Officers needed to ensure that any interaction with businesses was expedited as granting these licences would be an existential issue for many food and beverage outlets. Whilst not wishing in any way to slow the process down, he also questioned whether there could be any Member oversight of applications. Officers reported that they had already proactively reached out to businesses during lockdown in this respect and had

listened keenly to their concerns. They were obviously keen to maximise their opportunities and work in partnership with the City Corporation in order to do so. Once Members had reached a decision today, site by site decisions would be turned around very quickly and fed back to businesses so that they were able to use this in their planning. Officers also undertook to look at introducing Member visibility to the process.

Another Member encouraged a more positive and proactive as opposed to a regulatory approach in terms of identifying sites that could be used for tables and chairs and those businesses looking to introduce these opportunities to get the City back up and running. The Chair noted that this report was written from the perspective of those businesses that already had licences and would like to see them reintroduced but there were, of course, those premises who had not traded using outside space previously, that also needed to be proactively targeted which Officers had undertaken to do.

A Member stated that he hoped that Officers could very quickly understand where they may be additional opportunities in this respect but added that he did not understand why the report referred to only 40 of 107 existing licences being reintroduced. Officers reported that this was an estimate based on a paper-based analysis. However, this week, Officers would be on-street to ascertain what else could be facilitated in the context of public safety, queuing space and safe passage. Other spaces such as reallocated carriageway spaces were also being actively worked on by both Licensing and Transportation teams to determine which of these might be appropriate for tables and chairs and engaging with businesses in these locations. This was very much a work in progress. The Chair added that businesses also required sufficient lead in time in order to reopen and that it was therefore very important not to make false promises.

Another Member questioned whether a change in national legislation on licensing and other legal provisions for drinking outdoors played into this. Members were informed that Officers had anticipated the changes in relation to off-sales although this would not necessarily impact on what was being done in terms of tables and chairs licences as this was essentially about the allocation of highways space. The off-sales point would be looked at from a licensing perspective and what impacts this may have. The Chair stated that some London Boroughs were, however, facing issues of the conflation of off-sales and tables and chairs on the street so it would be important to take into account.

A Member stressed that she hoped that, in terms of guiding principles, Officers were looking to legislation and not government guidelines. She added that the reduction in social distancing requirements from 2m to 1m should also help more than 40 businesses to re-establish tables and chairs licences. She added that she had requested, at the outset, for Officers to actively identify space for tables and chairs and stressed that premises would only be able to reopen and be profitable with the use of outside space. In terms of off-sales, if there was no current condition on licences prohibiting this, it would be permissible and space for this therefore needed to be secured.

A Member spoke again to suggest that he felt there was a need to pool resources across the Corporation to actively identify these spaces. He mentioned, for example, the CPAT team who worked directly with and acted on behalf of businesses, working alongside Licensing and DBE to provide a full picture as quickly as possible.

RESOLVED – That:

1. The criteria officers will apply in line with the five principles, when reinstating tables and chairs licences to the City over the coming phases of lockdown easing, as outlined in Appendix 2 of this report, be agreed.
2. The proposed way forward, as outlined in paragraphs 16 and 17 of this report be agreed.
3. The financial implications as outlined in paragraph 19 of this report be noted.

10. PUBLIC LIFT REPORT

The Committee received a report of the City Surveyor regarding public lift operations.

A Member commented that this was at least the second time that the Silk Street lift had experienced an extensive outage due to the BT telephone circuit. He questioned whether Officers had looked into making this a wireless connection to overcome this issue. The City Surveyor reported that this was exactly what Officers were investigating at present.

The City Surveyor confirmed that all other lifts were now back in service with the exception of the London Wall Up escalator which continued to be worked on and would be in service by the end of this week.

A Member referred to the Blackfriars Bridge escalator being out of service at present. The Chair asked that Officers discuss this matter further with the Member offline.

RECEIVED.

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

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

RECEIVED.

12. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**

The Committee received a report of the Interim Chief Planning Officer and Development Director detailing development applications received by the Department of the Built Environment since the report to the last meeting.

RECEIVED.

13. **REPORT OF ACTION TAKEN BETWEEN MEETINGS**

The Committee received a report of the Town Clerk advising Members of action taken by the Town Clerk since the last formal meeting of the Committee, in consultation with the Chair and Deputy Chairman, in accordance with Standing Order No. 41.

RESOLVED – That Members note the report.

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

There were no questions.

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

There were no additional, urgent items of business for consideration.

16. **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 of business 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 as follows:-

<u>Item No(s)</u>	<u>Paragraph No(s)</u>
17	3
18	7
19	3 & 5
20 – 21	-

17. **NON-PUBLIC MINUTES**

The Committee considered the non-public minutes of the virtual meeting held on 2 June 2020 and approved them as a correct record.

18. **SECURE CITY PROGRAMME - GATEWAY 4C REPORT**

The Committee considered and approved a joint report of the Director of the Built Environment and the Commissioner of the City of London Police concerning the Secure City Programme.

19. **BRIDGE HOUSE ESTATES STRATEGIC REVIEW - UPDATE FOUR**

The Committee received a joint report of the Town Clerk and Chief Executive and The Chief Grants Officer and Director of City Bridge Trust providing Members with an update on the work that has been undertaken as part of the Bridge House Estates strategic governance review since the last report in December 2019/January 2020.

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

There were no questions raised in the non-public session.

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

There were no additional, urgent items of business for consideration in the non-public session.

The meeting closed at 1.32 pm

Chairman

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PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	18 March 2019 2 April 2019 30 April 2019 24 May 2019 18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019 28 Jan 2020 18 Feb 2020 6 March 2020 2 June 2020 23 June 2020	<p><u>Daylight/Sunlight – Alternative Guidelines</u></p> <p>Chief Planning Officer and Development Director</p> <p>A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight, and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.</p>	<p>UPDATE: Following a report to the 30 July Committee Members requested that this matter remain on the list of Outstanding Actions until a further report was brought back to them responding more specifically to the various points raised and taking into account any BRE guideline changes.</p> <p>To be completed: Target of July 2020</p>
2	18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019 28 Jan 2020 18 Feb 2020 6 March 2020	<p><u>Construction Works</u></p> <p>Chief Planning Officer and Development Director</p> <p>A Member referred to the many construction sites within her Ward that were causing noise/disturbance issues. She asked if officers could look at how this matter might be improved and more effectively controlled and questioned whether any restrictions could be placed on construction</p>	<p>To be completed: Target of July 2020</p>

	2 June 2020 23 June 2020	<p>when applications were first approved/granted consent.</p> <p>The Chair reiterated that Members had also requested, at the last meeting of this Committee, that Officers consider what powers, if any, might be used with regard to construction time periods and how construction in any given area might 'dovetail'.</p>	
3	5 Nov 2019 12 Dec 2019 28 Jan 2020 18 Feb 2020 6 March 2020 2 June 2020 23 June 2020	<p><u>Supplementary Planning Document (SPD) re: Housing</u></p> <p>Paul Beckett</p> <p>A Member requested that the need for a Supplementary Planning Document on Housing be added to the list going forward so that this was not lost sight of.</p>	<p>UPDATE: Officers reported that the intention was to bring something on this matter to the next meeting of this Committee on 14 July 2020. Work was currently underway to finalise whether this would be a full review of the SPD or a partial review looking at affordable housing elements only.</p> <p>To be completed: SPD to Committee July 2020.</p>
4	6 March 2020 2 June 2020 23 June 2020	<p><u>Member Training</u></p> <p>Chief Planning Officer and Development Director / Director of the Built Environment</p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to</p>	<p>To be completed: Target of July 2020 (draft programme/budget for training?)</p>

		all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning & Transportation Committee are expected to undertake regular training.	
5	23 June 2020	<p><u>Barbican and Golden Lane Conservation Area SPD</u></p> <p>Interim Chief Planning Officer and Development Director</p> <p>A Member highlighted that a Conservation Management Plan was still awaited for this area in the form of a Supplementary Planning Document. He added that this was originally approved by this Committee in October 2018 and that he had requested an update on progress on several occasions since. He asked that this also now be included within the list of Outstanding Actions so that it was not lost sight of entirely.</p>	<p>UPDATE: The Interim Chief Planning Officer and Development Director reported that Officers were scheduling to bring this matter to Committee in Autumn 2020 and that the document was currently in draft form.</p> <p>To be completed: SPD to Committee in Autumn 2020.</p>

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Committee:	Date:
Planning and Transportation	14 July 2020
Subject: Millennium Bridge House 2 Lambeth Hill London EC4V 4AG Refurbishment and extension of the existing building involving the partial demolition and partial infilling of the existing structure and the introduction of a new facade to all elevations and extension to the building at all floors, introduction of roof terraces at fifth and sixth floors, including a public viewing terrace and associated lobbies at second and sixth floors, alongside a part change of use at ground floor from Office to Retail/Cafe/Restaurant (Class A1/A3); a part change of use at first from Office to either Office or Retail/Restaurant (Class A1/A3/B1); second floor from Office to either Office or Retail/Restaurant (Class A1/A3/B1) and a change of use from Office to Retail/Cafe/Restaurant (Class A1/A3); a part change of use at sixth floor from Office (Class B1) to either Office or Restaurant/Bar (Class B1/A3/A4) and a change of use from office to restaurant/bar (Class A3/A4) use together with public realm works to Peter's Hill (including the removal and relocation of the southern HSBC gates), Lambeth Hill, Trig Lane and Paul's Walk (part of the Thames Path) and associated works, this part of the proposal include the rescission of part of the City Walkway.	Public
Ward: Queenhithe	For Decision
Registered No: 20/00214/FULMAJ	Registered on: 24 February 2020
Conservation Area:	Listed Building: No

Summary

This report deals with two related planning applications:

Application A: The refurbishment and extension of Millennium Bridge House (Application ref: 20/00214/FULMAJ)

Application B: The removal of louvred upstands and raised terrace structure and the introduction of new hard and soft landscaping at 1 Paul's Walk

(Application ref: 20/00235/FULL)

Application A:

The refurbishment and extension of Millennium Bridge House includes the introduction of new façades to all elevations and extensions to the building at all levels to provide:

- 27,275sq.m of refurbished office floorspace (Class B1);
- 1,776sq.m of flexible office/retail floorspace (Class B1/A1/A3/A4);
- 2,432sq.m of retail floorspace (Class A1/A3/A4); and
- 375sq.m of publicly accessible roof terrace.

Associated public realm enhancements to Paul's Walk, Trig Lane and Peter's Hill, including the replacement of the Corporation's inclinator with a new vertical, enclosed public lift and the removal and relocation of the HSBC gates from Peter's Hill to improve pedestrian flows.

Objections to the applications have been received from residents of Southwark and neighbouring residents regarding overlooking, daylight and sunlight, and noise and visual impacts from the proposed roof terrace and restaurant.

The proposed development has appropriate mix of uses and an attractive design that would result in the optimisation of the building to enhance the office offering and to provide flexible retail uses that would activate the Thames Path and Millennium Bridge.

The proposed development is of high architectural quality and is of a composition, height, massing and detailing appropriate to the site.

The development has been designed to take account of the setting and significance of the Grade I listed St Paul's Cathedral and St Mary Somerset Church Tower. There would be minor intrusions and breaches of St Paul's Heights as a result of the development, but these would be less obtrusive when compared to the existing building and would result in a significant improvement to views of the Cathedral from the south bank by bringing more of its important architectural features into public view from the River.

The scheme offers significant public benefits including improved access and public realm around the building and a free publicly accessible roof terrace affording new and expansive elevated views along and across the River and towards St Paul's Cathedral.

Application B: 1 Paul's Walk:

The removal of the existing louvred upstand and the replacement with a lower terrace of natural stone paving to the same level as Paul's Walk and soft landscaping would improve access and increase biodiversity.

The proposals accord with the principles of the NPPF, the London Plan and Local Plan policies and the emerging London Plan and Local Plan policies.

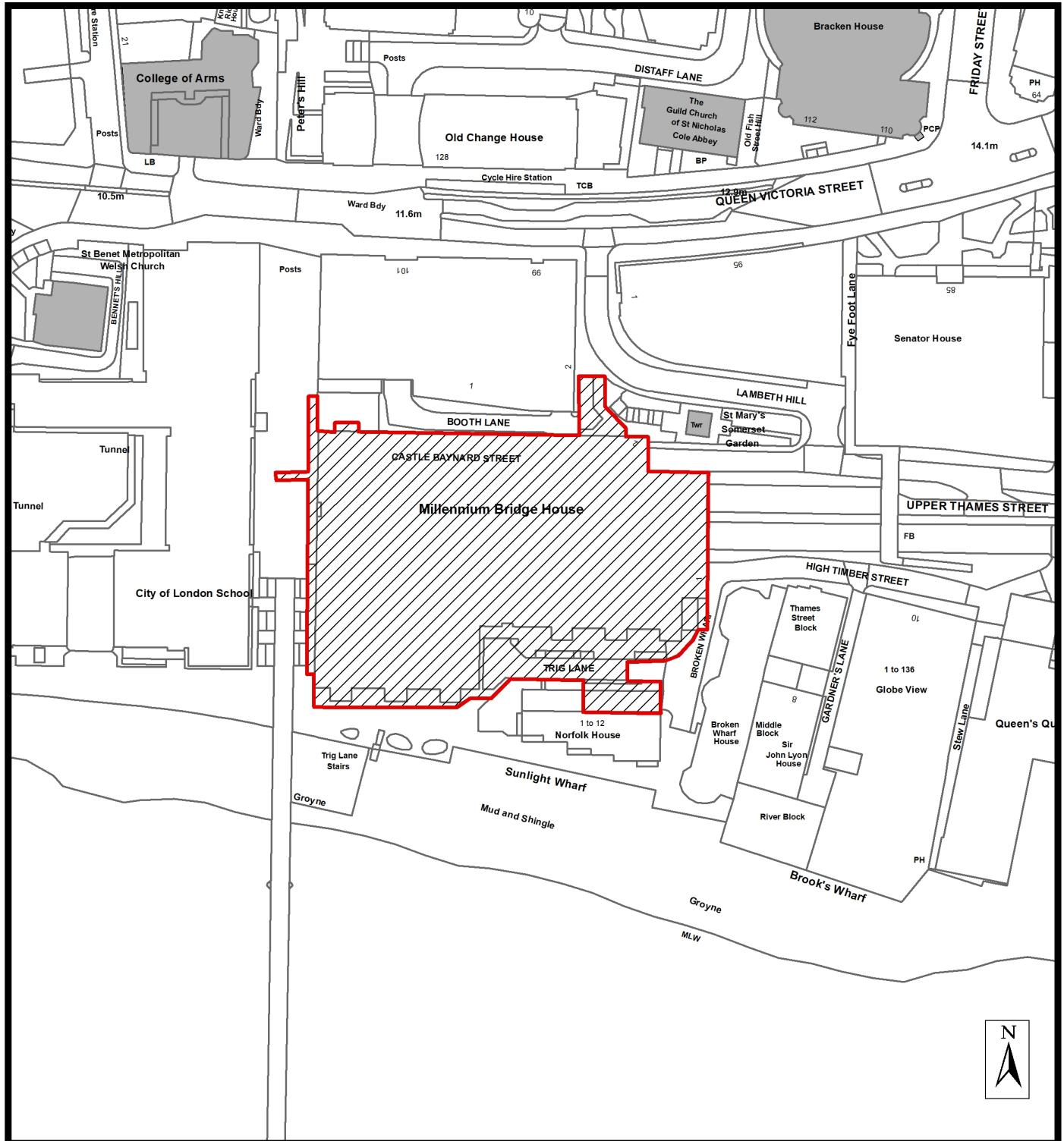
Recommendation

It is recommended that planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

Planning obligations and other agreements being entered into under section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highways Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.

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 Highways Act 1980.




Site Location Plan



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ADDRESS:
Millennium Bridge House

CASE No.
20/00214/FULMAJ

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



Existing view from Southbank



Proposed view from Southbank



Main Report

Introduction

1. This report deals with two related planning applications:
 - Application A: Millennium Bridge House (20/00214/FULLMAJ)
 - Application B: 1 Paul's Walk ((20/00235/FULL).

Sites and Surroundings

Application A: Millennium Bridge House

2. Millennium Bridge House is a six-storey office (Class B1) building located on the north bank of the River Thames. The building extends from the north side of Upper Thames Street southwards to the riverside walkway, with frontages to Lambeth Hill, Peter's Hill, Paul's Walk and Trig Lane. The building is located over tunnels running east to west containing Upper Thames Street, Castle Baynard Street and High Timber Street service road, from where the building and the neighbouring City of London School are serviced.
3. The existing building comprises six floors and a basement. The lower two floors are accessed from the riverside walkway and cover the southern part of the site only. Levels three to six occupy the whole footprint of the building. Level three has entrances from Lambeth Hill to the north and from Peter's Hill close to the start of the Millennium Bridge. The building is not within a conservation area but is within the area protected by the St. Paul's Heights Limitations.
4. The site is surrounded by the Salvation Army Headquarters, to the north, Castle Baynard Street and Upper Thames Street, to the east, the Norfolk House residential building, to the south, and the City of London Boy's School, to the west. Immediately to the north east of the building is the Grade I listed St. Mary's Tower and the St. Mary Somerset Garden. To the south east of the site is Broken Wharf House, which is currently being developed for use as an apart hotel (App ref: 17/00712/FULL), beyond which are the residential properties of Sir John Lyon House and Globe View. The St Paul's Cathedral Conservation Area lies to the north of the site.

Application B: 1 Paul's Walk

5. The application site comprises a raised restaurant terrace with louvred upstands, bounded by Paul's Walk and Trig Lane. The site adjoins the western end of Norfolk House and is not within a Conservation Area. The site is not within the setting of any non-designated heritage assets or designated heritage assets. The site is adjacent to the River Thames and the river walk.

Relevant Planning History

6. Planning permission was granted on 29 July 2009 (App ref: 08/01045/FULL) for the change of use of Millennium Bridge House from offices (Class B1) to a 348 bedroom hotel (Class C1), including

alterations to the elevations and a 1,726sq.m extension at roof level (comprising infilling atriums and recesses along the facade). An application to extend the time limit for the implementation of this permission was granted on 18 April 2013, subject to a section 106 agreement (App ref: 12/00525/FULL). A Lawful Certificate Development was issued on 07 December 2015 (app ref: 15/01076/CLEUD) to confirm that works undertaken to the building constituted the lawful implement of planning permission 12/00525/FULL. This planning permission therefore remains extant and could be built out.

7. Planning permission was granted on 09 October 2012 (App ref: 12/00370/FULL) for: (i) part-replacement of the existing building facades; (ii) creation of additional floor space through the development of the existing roof top plant housings and extension of fifth floor for office use (Class B1) (2058sq.m); and (iii) change of use from office (Class B1) to either Class A1 or A3 at part ground, first and second floor levels (2389sq.m). This planning permission has expired.

Proposals

Application A: Millennium Bridge House

8. Planning permission is sought for the refurbishment and extension of the existing building involving:
 - the partial demolition and partial infilling of the existing structure and the introduction of new facades to all elevations and extensions to the building at all levels.
 - the introduction of roof terraces at fifth and sixth floors, including a public viewing terrace and associated lobbies at second and sixth floors.
 - a part change of use at ground floor from office (Class B1) to Retail/Cafe/Restaurant (Class A1/A3).
 - a part change of use at first from Office (Class B1) to either office or Retail/Restaurant (Class A1/A3/B1).
 - a part change of use at second floor from office (Class B1) to either Office or Retail/Restaurant (Class A1/A3/B1) and a change of use from Office to Retail/Cafe/Restaurant (Class A1/A3);
 - a part change of use at sixth floor from office (Class B1) to either Office or Restaurant/Bar (Class B1/A3/A4); and
 - a part change of use at sixth floor level from office (Class B1) to restaurant/bar (Class A3/A4).
 - public realm works to Peter's Hill (including the removal and relocation of the northern and southern HSBC gates), Lambeth Hill, Trig Lane and Paul's Walk (part of the Thames Path); and associated works (this part of the proposal includes works to part of the City Walkway along Peter's Hill.)

Application B: 1 Paul's Walk

9. Planning permission is sought for the removal of the louvred upstands and the raised restaurant terrace at the western end of Norfolk House to be replaced with a lower terrace of natural stone paving at the same level as Paul's Walk and soft landscaping in three 600mm high, granite clad, raised planting beds.
10. The works are proposed in conjunction with the public realm works proposed as part of Application A but have been split into a separate application due to land ownership considerations.

Consultations

Pre-Application Consultation

11. The applicant has submitted a Statement of Community Involvement outlining the targeted programme of engagement prior to the submission of the application. It sets out the consultation undertaken with members of the public, neighbours and other key stakeholders including Historic England, the Surveyor to the Fabric of St. Pauls Cathedral, the Head of Facilities Management at the City of London, City of London Boys' School, the residents of Norfolk House, Ward Councillors and the City of London Police Architectural Liaison Officer.
12. Meetings were held with key stakeholders between December 2019 and February 2020. Queenhithe Ward Members (Councillor Mooney) in December 2019. Meetings with Norfolk House Residents were held in January 2020 and the City of London Boy's School in February 2020. The feedback was generally positive, particularly in relation to the proposed public realm enhancements.

Application Consultation

13. Following receipt of the applications by the City, the applications have been advertised by site and press notices and consulted upon. Copies of all letters and e-mails received making representations are attached to the report.
14. **Application A: Millennium Bridge House:** sixteen Letters of objection have been received. One from a resident of Norfolk House, one from a resident of Sir John Lyon House, twelve from residents of the Southbank in Southwark and two other objectors. The objections are summarised in the table below.

Topic	Objection
Setting of Listed Buildings	<ul style="list-style-type: none">General concern about the impact of the development on views of historic buildings in the locality and views of St. Paul's Cathedral.
Design	<ul style="list-style-type: none">The proposed extensions are out of scale and overbearing.
Need for Roof Terrace/ Noise	<ul style="list-style-type: none">Objectors cannot see any justification for public viewing terraces.

	<ul style="list-style-type: none"> Concerns are raised regarding noise from the proposed terraces in terms of music and entertainment and privacy.
Daylight Sunlight Overlooking	<ul style="list-style-type: none"> The proposed development would adversely impact on the daylight and sunlight received by neighboring residential properties. The development would result in greater overlooking and lead to a loss of privacy for neighboring residential occupiers.
Wind	<ul style="list-style-type: none"> There is a local wind effect along the roadway and Trig Lane experienced by Norfolk House residents.
Servicing	<ul style="list-style-type: none"> The proposed retail use would result in more deliveries.
Proposed Retail Uses	<ul style="list-style-type: none"> Anti-social behavior and noise disturbance locally and across the river.
Light Pollution	<ul style="list-style-type: none"> New restaurants, as planned by the developer, on the ground or higher floors will be a substantial source of light.

15. **Application B: 1 Paul's Walk:** One objection has been received from a local resident stating that The Podium, which includes a raised external terrace leased to the on-site restaurant, and related raised areas referred to in this Application is within NHRL's demise. This objection relates to a land ownership issue and is not a planning matter.
16. The Lead Local Flood Authority raised no objections subject to the imposition of conditions.
17. The London Borough of Southwark raises no objection to the proposal.
18. The Surveyor to the fabric of St. Paul's Cathedral has been consulted but no comments have been received.
19. Historic England has been consulted and raise no objections to the proposal.
20. The views of other City of London departments have been considered in the preparation of this development scheme and some detailed matters remain to be dealt with under conditions and in clauses in the Section 106 agreement.
21. The Environment Agency consider the proposed development to be acceptable subject to the inclusion of conditions relating to surface water drainage and the preservation of the integrity of tidal flood defences.

Policy Context

22. The development plan consists of the London Plan and the City of London Local Plan. The Mayor of London and the City of London have prepared draft plans which are material considerations to be taken into account in the determination of both applications.

23. The Draft London Plan is at an advanced stage. It takes forward many of the policy positions of the existing plan whilst strengthening and adding to others. On the 13th March 2020, the Secretary of State directed the Mayor not to adopt the Plan due to it not addressing a number of national policies in respect of housing ambition, small sites, industrial land and aviation, meaning it will be some time before the plan is adopted. It has passed through the Examination in Public so is to be afforded some weight with the matters addressed by the Secretary of State being less relevant to this site.
24. The draft City Plan 2036 was reported to the Court of Common Council in May 2020. They agreed the pre-submission draft for consultation, and it is anticipated that pre-submission consultation will commence in September. As such, the Plan is a material consideration in the determination of applications alongside the adopted Local Plan.
25. The London Plan and Local Plan policies and supplementary planning guidance documents that are most relevant to the consideration of this case are set out in Appendix A to this report.
26. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2019 and the Planning Practice Guidance (PPG) which is amended, as necessary.

Considerations

27. The Corporation, in determining the planning applications, has the following main statutory duties to perform: -
 - To have regard to the provisions of the development plan, so far as material to the application, any local finance considerations so far as material to the application, and other material considerations. (Section 70(2) Town & Country Planning Act 1990); and
 - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
28. In respect of sustainable development, the NPPF states at paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' For decision-making this means 'approving development proposals that accord with an up-to-date development plan without delay...'.
29. Paragraph 127 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.

30. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 190 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
31. In considering the planning applications before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.

Principal Issues to be Considered

32. The principal issues in considering this application are:
- The benefits of the proposed new uses throughout the building, including the provision of a publicly accessible terrace at roof level.
 - The appropriateness of the bulk, massing and design of the proposals.
 - The impact of the proposals on the London skyline including on views in the London Views Management Framework.
 - The impact on the St Paul's Heights policy area.
 - The impact on designated and non-designated heritage assets.
 - The proposed public realm improvement works including the replacement of the inclinator with a new, enclosed, vertical passenger lift.
 - The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight and light pollution.
 - Transport, Servicing, and the impact on public highways and pedestrian movement.
 - The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability; and
 - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.

Proposed Uses

Office Accommodation

33. Application A proposes the refurbishment and extension of an existing office building currently providing 25,944sq.m (GIA) of office (Class B1) floorspace to provide 27,275sq.m (GIA) of office (Class B1) floorspace. The additional 1,331sq.m of office floorspace is in accordance with Local Plan Policy CS1, which seeks to increase the City's office floorspace stock to meet long term economic and employment growth.

34. The proposed extension and modernisation will ensure the longer-term viability of the building for office use in accordance with Local Plan Policy DM1.1. The refurbishment and extension of the building encourages accommodation for small and medium sized businesses and therefore contributes to provision for a range of occupiers needs as per Policy DM 1.3.

Retail and Flexible Retail / Office Uses

35. A change of use and extension at ground, second and sixth floor levels for flexible retail (Class A1/A3) use is proposed, along with a change of use for flexible office or retail uses (Class B1/A1/A3) at part of the first, second and sixth floor levels. The Application proposes:
- A part change of use and extension at ground floor from office to retail - cafe/restaurant (Class A1/A3).
 - A part change of use at first floor from office to either office or retail - restaurant (Class A1/A3/B1).
 - A part change of use and extension at second floor from office to either office or retail/restaurant (Class A1/A3/B1) and a part change of use from office to retail/cafe/restaurant/bar (Class A1/A3/A4).
 - A part change of use and extension at sixth floor from office (Class B1) to either office or restaurant/bar (Class B1/A3/A4).
 - A part change of use at sixth floor level from office (Class B1) to restaurant/bar (Class A3/A4) at sixth floor.
36. The site is not located in a Principal Shopping Centre (PSC) or a Retail Link as set out in the adopted City of London Local Plan. There is no retail floorspace provided in the existing building. The application proposes 2,432 sq.m GIA of retail floorspace, with potential for an additional 1,776 sq.m of retail floorspace, which is proposed as flexible B1/A1/A3/A4 use.
37. The flexible retail floorspace (Class A1/A3/A4) would help activate frontages at ground floor on a site which currently has dead frontages and enhance vitality at street level on the north-south heavy footfall route between St. Paul's Cathedral and the Tate Modern and along the River. The proposed retail provision would be complementary to the City's business function and provide facilities which would enhance the environment surrounding the site.
38. The proposed retail is supported in accordance with Local Plan Policy DM19.3 as it would provide facilities to local workers and residents and Policy DM1.5 as it provides a complementary use to the office building and contributes to the City's economy and character.
39. The provision of additional retail in this location will contribute to increased vibrancy and activity on this part of the riverside, in accordance with Local Plan Policy CS9 and Draft Local Plan Policy S17. The proposal will support the development of a suitable evening economy enhancing the provision of facilities for visitors, City residents and workers, in line with the City Corporation's ambition to create a City

of commerce and culture and the requirements of Draft Local Plan Policy S6.

Roof Terraces

40. The proposals involve the creation of a public roof terrace with hard and soft landscaping and garden at sixth-floor level, which would provide an additional amenity for members of the public and visitors and provide panoramic views of the River Thames and St. Paul's Cathedral. Peter's Hill is a busy thoroughfare with many visitors dwelling to enjoy views or taking photographs. The public roof terrace will provide an amenity for the public to dwell and relax to appreciate the elevated views without impeding pedestrian movement. It will contribute significantly to the public and visitor experience to this popular part of London, 7 days a week, and in terms of the evening economy. Access would be provided from a prominent entrance on Peter's Hill via two dedicated public lifts serving the public terrace and the proposed restaurant (Class A3) at sixth-floor level. The lobby at sixth floor would be open to the elements on its western elevation to provide direct access to the new public terrace.
41. The public terrace would be located on the south western corner of the building furthest away from the residential units to the east, and forms part of a wider set of semi-public terraces associated with the restaurant proposed at sixth floor. There is also a private terrace proposed for use by the office occupiers. These spaces would be demarcated by the design of the landscaping, which seeks to introduce a meandering path that pays tribute to the River Thames with a series of hard and soft landscaping.
42. The total area which is publicly accessible is equal to 375sq.m (585sq.m with the western restaurant terrace space included) with an indicative capacity for up to 100 people at any given time. The semi-public terraces to the east and west of the atrium which are ancillary to the proposed restaurant/bar would total 570sq.m. A Draft Public Access and Operational Management Plan has been prepared and submitted as part of application A. It sets out the applicant's vision for how these spaces at sixth floor, along with the new A Class uses within the development, would be managed in terms of hours of operation, noise and capacity.
43. A private terrace is proposed at level 5 and the remainder of level 6 for use by office occupiers (1,064sq.m at level 6).

Design

44. Millennium Bridge House was built 1987-8 by Seifert and Partners in a Post-Modern Style and is clad in granite and glass with pediments at roof level. The existing building is not within a conservation area but does occupy a prominent site on the Thames riverside. It does not contribute positively to the setting or views of the listed St Paul's Cathedral and Church Tower of St Mary Somerset or non-designated heritage assets such as Millennium Bridge, the Thames riverfront and riverside walkway.

45. The building is not considered to be of significance for its architectural, artistic or historic interest. As such it does not merit recognition as a non-designated heritage asset under the guidance set out in NPPF and the Historic Environment Planning Practice Guide.
46. The existing roof features, pediments and atriums intrude into the view of St Paul's Cathedral from the south bank and breach the development plane for St Paul's Heights policy limitations. The intrusions were allowed in the 1980's on the basis that they did not contain any usable floor space and to mitigate 'the planes' resulting from the implementation of the St Paul's Heights Policy. The existing building does present a lively roof line, although the protrusions do block views of the Cathedral to some extent.
47. Despite the location on busy pedestrian walkways, the existing building lacks active frontages on Peter's Hill and Paul's Walk, apart from one office entrance which was designed to be secondary before the introduction of Millennium Bridge. The existing inclinator that provides a step free link between Peter's Hill and Paul's Walk, prevents openings being formed on the south west façade and has proved unreliable in providing continuous access.

Proposed Alterations and Extensions to the Building

48. The proposal involves the refurbishment, partial demolition, partial infilling of the existing structure, extensions at second to sixth floor levels and re-cladding of all the facades in limestone and reconstituted and textured stone. Much of the internal structure would be retained.

Mass, Bulk and Height

49. The existing structure undulates and steps back at all floors; it is proposed to partially demolish and rebuild these to create a more rational and efficient building line; at ground floor this would be infilled to the boundary with the City Walkway on Paul's Walk.
50. At second, third and fourth floors, the building would be extended by projecting outwards on the Paul's Walk and Trig Lane elevations and be supported by new columns below which sit outside of the City Walkway designation. The existing building structure has an irregular grid, and by cantilevering the façade outwards, this would enable the introduction of a unified and regular grid to the external façade providing a better sense of coherent frontage, definition and urban grain to both the Riverside walk and Trig Lane. The overhang will also create shelter to the public in inclement weather on an exposed stretch of river frontage. A terrace for the office use is proposed at fifth floor level above the projecting element of the roof of level four.
51. The fifth-floor office accommodation would be enlarged by infilling recesses to the north and the west and by an extension southward, to infill the existing recesses of the current footprint, creating a straight and unified rather than irregular, staggered façade.
52. On the western elevation, the building would be infilled to provide a rationalised and coherent facade with a unified treatment.

53. The existing City of London inclinator would be replaced with a new vertical, enclosed passenger lift on Peter's Hill providing public access to Paul's Walk. The massing of the lift enclosure has been located at a midpoint of the existing stair to aid in wayfinding and to align with the projecting elements of the Salvation Army Building in views looking north and therefore would not obscure or diminish views of St Paul's Cathedral from Paul's Walk. The new lift would improve step free access between Paul's Walk and Peter's Hill. The proposed lift would have a masonry base alongside the current staircase up to Peter's Hill, above which would be a glazed top to minimise visual intrusion into views towards St Paul's Cathedral.
54. The bulk and massing of the proposed development would consolidate a number of breaches to the St. Paul's Heights Grid by removing the existing architectural features which disrupt the view to St. Paul's Cathedral when viewed from the Southbank, most notably in LVMF River Prospect View 13B.1. The proposed extensions at sixth floor level have been carefully designed to ensure that any new massing which would impact on views of the Cathedral from the Southbank would be obscured by the fifth floor parapet line and balustrade, which has been previously established through previous approved developments (ref. 12/00370/FULL and 12/00525/FULL).
55. The sixth floor extension would provide a roof top pavilion space providing public lobbies, a restaurant/bar, office space and access to a free public viewing terrace and terraces for the restaurant/bar and office occupier. The pavilion would have a folded, articulated, roof form to provide visual interest and undulation on the northern edge of the roof. The proposed massing at the sixth floor is carefully shaped so that it would be concealed views from the Southbank, where it sits in front of the entablature and pediment of the Cathedral.
56. The proposals do create some new breaches into the St. Paul's Heights Grid at roof level, however the design has been shaped deliberately to follow a curve which can be interpolated from the pattern of the Grids. This would avoid a stepping of the new massing to create a more interesting and diverse roofscape which avoids the "table-top" effect. The sixth floor would be set back from the western façade to minimise the bulk visible from Peter's Hill. In addition, this facilitates the creation of a new public roof terrace and new views to St. Paul's Cathedral.
57. The additions at fifth and sixth floor levels would be set well back from the south facade and concealed behind the balustrades. An extension on the north west façade to form two public lifts would provide free public access to the proposed new public amenities at sixth floor level.
58. The existing sixth floor is used to house plant equipment and is accessible only via stairs. It is not possible to use the existing retained core for the proposed new access. The proposed lift over-run would breach St Paul's Heights; however, it would be located to the north of the existing structure to minimise its impact on the St. Paul's Heights Grid and views to St. Paul's Cathedral. These lifts would be glazed to

provide new public views of St Mary Somerset Church to the east. The location and orientation have been designed to minimise visual bulk and is visually unobtrusive. The lift over-run would be clad in stone to blend discreetly with St Paul's entablature. The visual impact of the lift over-run is not considered to detract from the setting and views of the Cathedral. The new lifts and over-runs would enable the sixth floor to be used as a free public roof terrace and therefore deliver public benefits to the scheme which justify the additional breaches to St Paul's Heights.

59. The rationalisation and extension of the existing floor plates would create a coherent building massing with new high quality, high performance facades that respond to surrounding conditions and provide a coherent and clear form. These small extensions are considered acceptable in terms of design, bulk and massing and do not adversely impact on views of St Paul's Cathedral, St Mary Somerset Church Tower or the Thames Riverside.

Design and Materials

60. The proposed façade design and materiality articulates the building with a base, middle and top, with a vertical emphasis. It is proposed to re-clad the existing building on all sides, with two different unitised façade types. The material palette of stone and steel has been derived from the industrial riverside heritage of the site. The masonry finish would complement the Portland stone of the Cathedral.
61. The glazed ground and 1st floor frontages would be dramatically framed in double height right angled red oxide steels supporting the extended, cantilevered upper floors. The new retail frontages and entrances along Paul's Walk and Peter's Hill would activate and enliven the street frontages and enhance the river side area and route to St Paul's Cathedral.
62. The proposed projecting southern elevations feature large openings, deep reveals featuring limestone columns and reconstituted stone panels, within regular bays with glazing framed by dark bronze metalwork behind.
63. The facades to the west, north, east and the diagonal crank element to the south would feature greater solidity, with a calmer, unified design of vertical limestone panels and reconstituted stone horizontal elements. This treatment helps to frame the primary elevations to the south to break up the horizontality of the building. The depth of modelling will be particularly apparent in oblique views of the building.
64. The office entrance to Peter's Hill and Lambeth Hill would be expressed with structural steel with the same materiality proposed for the columns on Paul's Walk to give all elevations a common vocabulary.
65. At second floor level, fronting Peter's Hill, a number of retail uses and a public access lobby are proposed in addition to an enhanced office reception. These are proposed as a series of shopfronts with glazing which curves towards the edges of the retail units and their entrances

provides a demarcation of the units through their design without requiring external signage.

66. The new roof at sixth floor level pavilion is faceted with masonry in the form of a series of undulating kites which peak and trough in response to the St. Paul's Heights Grid. The sixth-floor pavilion structure has been designed to be lightweight and of a finer grain so that it appears subordinate to the remainder of the building. The design of the pavilion is considered to present an interesting and attractive roof form while responding positively to the constraints of St Paul's Heights and not detracting from views of St Paul's Cathedral.
67. The roofscape of Millennium Bridge House would be transformed by the removal of the existing plant rooms, concrete paving, domed atria, parapets, pediments and finials. These negative elements would be replaced by an elegant pavilion with an articulated, visually interesting roof form and the provision of 2,527sq.m of attractive landscaped terrace areas at fifth and sixth floor. This would include soft landscaping and planting to promote biodiversity and wellbeing as well as a free public viewing terrace. The new sixth floor terrace would have non-reflective glass balustrades at 1.4m high which is lower than the existing granite parapets.
68. The development would provide a refined modernist aesthetic with stone framed elevations forming a calm back drop to the River edge and refined foreground in views of St Paul's Cathedral.
69. The proposed alterations and re-cladding would provide a building of very high architectural quality complementing its prominent riverside surroundings and enhances the townscape, views and setting of heritage assets.

Application B: 1 Paul's Walk

70. The proposal to remove the louvred upstands and the existing raised terrace structure and replace them with a lower terrace of natural stone paving highway to the same level as Paul's Walk and soft landscaping in three 600mm high, granite clad, raised planting beds would enhance the visual amenity of the building and the area, improve access and increase biodiversity.
71. The planting would be a mix of herbaceous perennials, shrubs and trees with a soil depth of between 600 and 900 to provide sufficient soil volume. The alterations would remove impediments to access to the restaurant terrace and visual barriers and would create a more permeable, accessible and legible space. The proposals are acceptable in design terms and would enhance this part of the City and River Walk.

London Views Management Framework (LVMF)

72. The LVMF is Supplementary Planning Guidance to the London Plan, which sets out the strategic context for protection of identified landmark buildings.

73. The whole of the site lies within the Wider Setting Consultation Area (background) of Alexandra Palace London Panorama 1A.2 and within the Wider Setting Consultation Area (background) of Kenwood London Panorama 3A.1 Kenwood. Consultation threshold is a constant plane of 52.1m AOD at this point as the site lies within the vista background. Development above this plane would be the subject of consultation with the Mayor and other consultees as set out in the Secretary of State's Directions. Development above this plane would normally be refused if it failed to preserve or enhance the ability to recognise and appreciate St. Paul's Cathedral in accordance with London Plan policies 7.11 and 7.12. The height of the proposed development is well below all the Protected Vista consultation threshold planes. The St Paul's Heights limitations, which cover the entire site, are significantly lower than the LVMF consultation threshold planes, and therefore take precedence.

River Prospect Views

74. The application site falls within LVMF Strategic View 13 Millennium Bridge and Thames side at the Tate Modern, an area of distinct character directly opposite the Cathedral. This view seeks to enhance the relationship between the townscape and the riverside and the forefront setting. The development proposal is of high design quality and reduces existing breaches of St Paul's Heights resulting in visual betterment and enhancement of River Prospect Views.

Townscape Views

75. The proposal has been assessed in terms of its impact on 17 views of the surrounding townscape as set out in the Townscape and Visual Impact Assessment prepared by Donald Insall Associates submitted as part of application A. Three of the views are LVMF River Prospect Views from Millennium Bridge, the South Bank (view 13A.1 and 13B.1) and Southwark Bridge (view 12A.1). Two of the views are night views meaning there are fifteen separate assessment points which show the exterior of the proposed building.
76. The views are from the following places: Blackfriars Bridge at river level, Millennium Bridge, Thames side at Tate Modern, Switch House at Tate Modern, Southwark Bridge, Upper Thames Street towards St Mary Somerset Church Tower, Queen Victoria Street towards Lambeth Hill entrance, Peter's Hill, St Paul's Stone Gallery, Trig Lane, Paul's Walk. In terms of the townscape, the TVIA concludes that the impact the development has on the townscape is positive overall with varying impacts ranging from minor beneficial, to major beneficial. Officers concur with this assessment and consider the impacts of the proposed development on townscape views is minor to major beneficial. The most important views, the LVMF River Prospects, which are all high sensitivity views have been assessed to be the most beneficial in terms of the proposed development's enhancement of the townscape, view and setting of designated heritage assets.

Setting and Views of St Paul's Cathedral

77. The development would impact upon the setting and views of St Paul's Cathedral, particularly in LVMF Viewpoint 13A.1 from Millennium Bridge and LVMF Viewpoint 13B.1 from Queen's Walk on the south side of the River Thames, as well as the view from the Tate Modern viewing gallery.
78. Objections have been raised to the proposed horizontal flat roof line and that it would dissect the view of St. Paul's from the river. However, London Borough of Southwark raise no objection and consider that the proposals make a 'positive contribution to this important river frontage'.
79. The proposed refinements of the silhouette of the building by removing the existing prominent pediment features that intrude into views of St Paul's Cathedral would reduce the level of existing breaches of St Paul's Heights and create a calmer roof line, enhancing views of St Paul's Cathedral from the river bridges and the south bank. The proposals are acceptable in design terms and improve the wider setting of the Cathedral.
80. The restrained design, use of limestone and textured stone in the new facades and roof level pavilion would create a more complimentary and harmonious foreground building, enhancing the townscape, views and setting of St Paul's Cathedral. The consolidated roof profile with its strong, simple parapet line would provide uninterrupted views of the Cathedral and an improved view of the upper section of the triangular pediment on the south elevation of the Cathedral.
81. The proposed alterations and additions at roof level in connection with the provision of a roof terrace would enable the public to enjoy new, dramatic, elevated views of St Paul's Cathedral, the River Thames and City skyline. The greening of the new roof would contribute to biodiversity and provide an attractive amenity space for well-being. The greening at roof level would improve the appearance of the building in views from the Cathedral Stone Gallery. The rooftop greening would provide a soft green buffer between the Cathedral and the proposed building in views from the south, across the river.
82. At night, the soft lighting within the development would be more subdued than the lighting to the dome of St Paul's Cathedral and the overall view would be improved.
83. The proposed alterations and extensions would not detract from, or result in any harm to, the setting of the Grade I listed St Paul's Cathedral and would be in accordance with paragraph 234 of the guidance for view 13A and 13B of the LVMF.

St Paul's Heights

84. The site lies within the St. Paul's Heights policy area. The existing building infringes the St. Paul's Heights limitations in 17 locations. There are several elements that significantly infringe the Heights, most noticeably the four large pediments at the front of the building, which

- infringe by up to 5.78m, and the front atrium roof, which infringes by up to 1.94m. These elements would be removed as part of the proposal.
85. Whilst elements of the proposed roof alterations would exceed the St. Paul's Heights limitations, most of the infringements would be below the existing. There would be noticeably fewer elements that would infringe the Heights and those that do infringe would be less significant than the existing.
 86. Overall, there would be a reduction in the breaches of St Paul's Heights and a betterment in terms of the impact on the views of St Paul's Cathedral. The minor incidences which result in slight diminishment of the views of St Paul's Cathedral would be hidden behind the balustrade at level six and the parapet of the fifth floor level and are significantly less visually intrusive than the existing infringements.
 87. The existing finials and other elements of the existing building at 6th floor breach the St Paul's Heights by up to 5.43m. The proposed sixth floor massing is deliberately designed to sit behind the parapet of the fifth floor which reduces the breach to 0.63m with non-reflective glass balustrade breaching by up to 1.6m. Any breaches of St Paul's Heights are not normally considered acceptable. However, given the improvement over the existing in terms of reduction in breaches and the significant public benefits offered, including a new publicly accessible roof terrace opening elevated public views of St. Paul's Cathedral with dedicated lifts, the proposals are justified and in accordance with St Paul's Heights policy.
 88. Overall, the proposed alterations at roof level would significantly contribute to the eventual restoration of the view of St. Paul's Cathedral, and ensure that several of the currently obstructed views of important architectural elements of the Cathedral would be unobstructed. This accords with of Local Plan Policy CS13 and the Protected Views Supplementary Planning Document.

Monument Views

89. Local Plan Policy CS13 provides for the protection and enhancement of significant local views of and from the Monument. These views are identified on the Policies Map and are described in more detail in the Protected Views Supplementary Planning Document (SPD). The SPD states that development should neither obstruct the identified Monument views due to its height or position, nor detract from the general prospect by inappropriate bulk or massing. It adds that height and massing should not visually intrude into the key features of the views, and that views of the River Thames should be maintained.
90. The southern portion of the application site lies within Monument View 4: West to Waterloo Bridge and Victoria Embankment. The River Thames and landmark buildings along the forefront are key features of the view, the upstream particularly important for a panoramic view. The forefront where the development proposal is sited is particularly vulnerable to changes however is protected by the LVMF and St Pauls

Heights. The development proposal is a visual betterment adding to this panoramic view.

Other Views

91. The new roof form and the use of the sixth floor for a variety of active uses with a coherent landscaping design would enhance views from the Tate Modern public roof terrace.

Public Realm

92. An extensive package of public realm improvements is proposed as part of the planning applications, most notably the replacement of the Corporation's existing inclinator lift with a new, enclosed vertical passenger lift. The new passenger lift is proposed at the midpoint of the existing inclinator to avoid a canyon effect at Paul's Walk when approaching the lift.
93. It is proposed to introduce steps and to remove the two sets of HSBC gates on Peter's Hill. Hard and soft landscaping is proposed to Trig Lane (application A) including the removal of existing louvred upstands and remedial works associated with the proposed change in the building line at ground floor to Paul's Walk and Trig Lane (Application B).
94. Along Peter's Hill, the existing paving is of poor quality and pedestrian movement is obstructed by the HSBC gates. As part of the works to the building in order to achieve level access, new steps and a slope at a gradient of 1:21 are proposed to provide level access over an existing structural beam which sits above the level of Peter's Hill by approximately 0.5 metres. This precludes the building from providing level access through internal alterations. Given the constraints of the building, and the costs (both financial and otherwise) that would occur, it is considered acceptable for this change to the City Walkway to occur.
95. In order to achieve level access to the retail uses, public access lobby and the office entrance at the second floor it is necessary to overcome the level change over the existing structural beam. This beam interfaces with the roadways beneath the second floor and a substantial package of works would be required to provide level access internally within the building. This would involve (as a minimum) additional demolition to the west of the building, removal of the ceiling and structure above Castle Baynard Street, High Timber Street and Upper Thames Street to install a crash deck above which would require road closures for a prolonged period and limit the usable height of the roadways. The consequential impact of these works would involve traffic diversions which would have a detrimental effect on the local road network within the City. The new steps and slope would remain public and part of the City Walkway.
96. In order to minimise the impact of this intervention to the public realm and pedestrian flow, it has been agreed that the HSBC gates adjacent to the Site and to Queen Victoria Street are removed and relocated at

the Applicant's expense as part of the Proposed Development. The northern HSBC gates are located on public highway so their removal would be secured through the Section 278 Agreement as part of the S.106 agreement together with the southern gates which sit within City Walkway. This will alleviate congestion and improve pedestrian flows and the intention is to create an enhanced piece of public realm which includes opportunities for seating and planting which have been explored through the design process. An indicative design has been included as part of the proposals; however, it is anticipated that the final design specification would be undertaken by the City of London Corporation.

97. Along Trig Lane, it is proposed to remove and replace the existing mix of paving materials with a new, high quality and consistent materials approach and make improvements to retain private and defensible space to the residential use at Norfolk House. New hard and soft landscaping is proposed to improve the outlook for residents and appearance of the wider townscape.
98. The proposed oversail/cantilever over the City Walkway on Paul's Walk adjacent to the river may make the area beneath feel somewhat enclosed. However, the oversail is at a height of 5.7m, (approximately two full storeys), which is considered high enough in this location. The oversail also provides shade and shelter to people walking on the City Walkway, therefore the proposed design is acceptable
99. Sheffield stands are also proposed within the public realm to provide short stay cycle parking along Trig Lane and Lambeth Hill.

Urban Greening and Biodiversity

100. An Urban Greening Factor (UGF) calculation has been submitted with the application based on the Mayor of London's draft London Plan.
101. The UGF for this application has been calculated as 0.17 based on the information provided, which fails to meet both the Mayor of London's draft London Plan and the City of London's draft Local Plan UGF target of 0.3 for commercial development. The UGF would receive a higher score of 0.25 if the hard surfaces required to deliver the public terrace and maintain vehicular access on Trig Lane were omitted from the site area in the UGF calculation were able to be provided as greening. Therefore, there may be opportunities to increase the UGF in the discharge of the landscaping conditions
102. Although the development would not meet the target score of 0.3 set out in the London Plan or draft Local Plan for urban greening, it would deliver an enhancement on the existing levels of greening on and around Millennium Bridge House and maximise the amount of feasible greening taking into account the constraints of working with the existing structural frame and the need to provide hard landscaping within the site boundary. The development would provide new publicly accessible terraces, with hard and soft landscaping affording unique views over the River Thames. The public benefits arising from the provision of these new terraces and the increase in greening above current

standards are enough to outweigh the inability of the site to deliver the target score of 0.3 for urban greening.

Residential Amenity

103. Millennium Bridge House is close to the edge of the Queenhithe Residential Area. Local Plan Policy DM21.3 Residential Environment states that the amenity of existing residents within identified residential areas will be protected by resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance and requiring new development near existing dwellings to demonstrate adequate mitigation measures to address any potential detrimental impact.

Impact of Proposed Roof Terraces

104. The proposed public viewing gallery would be situated on the western part of the rooftop furthest away from the residents to the east. The restaurant space would be towards the middle of the rooftop and the private space will be towards the eastern side, nearest to the four main residential blocks in the area.
105. There are residents living in the vicinity of the site, with Norfolk House directly to the south, Sir John Lyon House directly to the east and Globe View and Queens Quay also to the east, although partly sheltered by the apart-hotel development at Broken Wharf House. The City of London Boy's School is located to the west of the site.
106. The provision of new publicly accessible terraces overlooking the River Thames would deliver substantial public benefit and enhancement to this area of the City. The provision of new terraces is therefore supported in principle.
107. To mitigate the potential impact of noise from the terraces opening hours would be controlled within a Roof Terrace Management Plan, to form part of the S.106 agreement, and by condition. The restaurant terraces to the east and west of the atrium would have different hours of use with the eastern side closing earlier to protect the amenity of residents. The terrace to the east would be open between 10:00 to 22:00 Monday to Thursday, 09:00 to 22:00 Friday and Saturday and 10:00 – 18:00 on Sunday.
108. The terrace to the west would be open from 10:00 to 22:00 Monday to Thursday, 09:00 to 23:00 Friday and Saturday, and 10:00 to 18:00 on Sunday.
109. The proposed hours of use for the office element of the terrace are between 08:00 and 22:00 Monday to Friday and not at all on Sundays, or bank holidays other than in the case of any emergency.
110. Neither the acoustic report nor the management report specifies how many people are permitted to use the private office terrace as this is not known at this stage. The capacity of the office terrace and the hours of opening will be controlled through the Roof Terrace Management Plan for all uses of the sixth-floor terraces.

111. The public viewing terrace (expected to support 100 people) is proposed to be open to the public Monday to Sunday 10:00 to 19:00 (or nautical dusk, whichever is later). Details of operations would be secured via Section 106 Legal Agreement. These opening hours are considered appropriate in terms of not disturbing nearby residents.
112. A Draft Public Access and Operational Management Plan has been submitted by the applicants which explains how noise and amenity issues will be addressed. The management plan proposes the use of planting along the balustrade line to provide additional visual and acoustic screening. To ensure the protection of residential amenity a condition is proposed to ensure that the terraces are operated in accordance with a full Public Access and Operational Management Plan.

Overlooking

113. Objections have been received from residents in Norfolk House regarding increased overlooking as a result of the proposed extension to Millennium Bridge House.
114. Overlooking from the new terraces has been considered as part of the design. The application proposes several design measures to ensure that overlooking is minimised. To the east, the installation of a layer of thick planting (approximately 2 metres deep) is proposed behind the balustrade line which is also set back from the parapet by approximately 2 metres. This results in a 4 metres setback from the parapet line to avoid any overlooking to Norfolk House and any views are limited. The same approach is employed at level five along the southern terrace.
115. To the west, a line of planting is also proposed to minimise overlooking to the City of London Boy's School which is set behind the balustrade line.
116. The existing building is 12.9m away from Norfolk House at its closest point. The design of the new façade of the south elevation would result in the development being 4.6m closer to Norfolk House, with the closest windows on the south elevation of Millennium Bridge House being 9.15m away from the nearest windows on the north elevation of Norfolk House (taking account of the 0.85m depth of the window recess to the façade). Whilst there would be some reduction in separation between the buildings due to the existing density of development in the locality it is not considered that this would result in a significant adverse effect on the amenity of the adjoining residents.

Daylight and Sunlight

117. Local Plan Policy DM10.7 Daylight and Sunlight resists development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight

and sunlight conditions may not be practicable in densely developed city centre locations.

118. Policy DM21.3 requires development proposals to be designed to avoid overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation.
119. The BRE guidelines present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):
 - Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
 - Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.
 - Sunlight to windows: Annual Probable Sunlight Hours (APSH): sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and receives less than 0.8 times its former sunlight hours as result of a proposed development; and has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.
120. In addition to the use of the VSC, NSL and APSH methodology, the BRE provide guidelines on the use of the Average Daylight Factor (ADF) assessment. The ADF assessment is a measure of the daylight within a room, which is dependent on accurate knowledge of internal room layouts and finishes and is therefore mainly used to assess light

levels within new developments. The BRE guidance recommends an ADF of 5% or more, if there is to be no supplementary electric lighting, or 2% or more if supplementary electric lighting is provided. The guidance sets minimum recommendations for dwellings of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.

Daylight and Sunlight Assessment

121. Application A is supported by a daylight and sunlight report, which has assessed the impact of the proposed development on the daylight and sunlight received by the neighbouring residential properties within Norfolk House, Sir John Lyon House and St. Mary Somerset Tower. The apart hotel at Broken Wharf House and the City of London Boys' School have also been assessed.
122. The residential properties within Sir John Lyon House and St. Mary Somerset Tower would fully adhere to the BRE Guidelines for daylight (VSC and NSL) and sunlight (APSH) and the daylight and sunlight impact on these properties would therefore be negligible. The remaining properties are considered in greater detail below.

City of London Boys' School

123. The City of London Boys' School is located to the west of Millennium Bridge House on the opposite side of Peter's Hill. A total of 46 rooms served by a total of 138 windows have been assessed for daylight and sunlight. Of the 138 windows assessed all would achieve BRE compliance for both daylight (VSC) and sunlight (APSH). Five out of the 46 rooms assessed would experience percentage reductions in daylight distribution (NSL) that would technically breach the BRE guidelines; four rooms would experience percentage alterations that are within 5% of the BRE 20% noticeable threshold while the remaining room would experience a 28% reduction. Overall, the daylight and sunlight impact of the development on this property would be negligible.

Broken Wharf House

124. Broken Wharf House apart hotel is located to the south east of Millennium Bridge House, on the opposite side of Broken Wharf. A total of 80 rooms served by a total of 205 windows have been assessed for daylight, and where appropriate, for sunlight.
125. Of the 205 windows assessed for daylight 181 would achieve BRE compliance for VSC. The remaining 24 windows would experience reductions in VSC of between 21% and 40%. In all cases, the daylight values in the existing condition are low and the absolute alterations in daylight to windows (VSC) would generally be small and are minor. Of the 18 rooms assessed for sunlight, 17 would meet the BRE guidelines for APSH, with the remaining room falling fractionally below.
126. The management plan submitted as part of the planning application for the apart hotel (App ref: 17/00712/FULL) states that the average occupation is anticipated to be circa 21 days. Due to the transitory nature of this accommodation, it is considered unlikely that occupants

will notice a change in daylight between the existing and proposed condition. Overall, the daylight and sunlight impact of the development on this property is negligible to minor.

Norfolk House

127. This residential property is located immediately to the south of Millennium Bridge House. This property contains a total of 12 residential flats, nine of which contain windows that face towards Millennium Bridge House. A total of 53 windows serving 31 rooms within the nine flats have been assessed for daylight. The windows have not been assessed for sunlight as they do not face within 90° of due south.
128. Many of the rooms within the nine flats are either dual or triple aspect and receive light from numerous directions. All of the windows serving the flats facing Millennium Bridge House have been included in the daylight analysis (notwithstanding that some of them face away from Millennium Bridge House) to enable daylight distribution to be accurately plotted.
129. 42 of the 53 windows assessed for daylight would comply with the BRE guidelines for VSC. The remaining 11 windows would experience percentage reductions in daylight of between 22% and 59%. The largest percentage reductions in VSC would be experienced by windows on the ground and first floors. These windows have lower existing levels of VSC (11% and 14%) due their lower level within the building and their proximity to Millennium Bridge House. Any absolute reduction in daylight would consequently result in a greater percentage reduction in the level of daylight received.
130. Eight of the 11 affected windows serve seven dual or triple aspect rooms that are each served by additional windows that would continue to satisfy the VSC criteria. This additional source of light would allow these rooms to retain good levels of daylight distribution (NSL) and ensure that any reductions to daylight in these rooms would comply with the BRE guidelines.
131. The remaining three windows serve three north facing single aspect kitchens located at first, second and third floor levels. These windows would experience percentage reductions in VSC of 49%, 38% and 25% respectively. The kitchens that these windows serve would experience percentage reductions in daylight distribution (NSL) of 62%, 53% and 39% respectively. The higher percentage reductions in VSC to these windows can, in part, be attributed the low existing levels of daylight received by these windows. Similarly, the high percentage reduction in NSL can be attributed to the existing low levels of daylight distribution within the kitchens, which is a reflection of the depth of the rooms, the relatively small windows that they are served by and their close proximity to Millennium Bridge House. Overall, the daylight and sunlight impact of the development on this property is minor and the impact is considered to be acceptable in this instance.

Daylight and Sunlight Conclusions

132. The application site is in a dense urban environment and the existing daylight values enjoyed by the surrounding properties are indicative of what one would expect in an environment such as this. This is particularly relevant to Norfolk House, where the existing VSC levels are typically around half of the 27% target which is a consequence of the proximity of the building to Millennium Bridge House.
133. It is frequently the case that changes in massing within a dense urban environment will lead to percentage reductions in daylight and sunlight that exceed the national advice offered by the BRE Guidelines.
134. The results of the daylight and sunlight assessment demonstrate that 407 of the 442 (92%) windows assessed for VSC would adhere to the BRE Guidelines. 144 of the 170 (85%) rooms assessed for daylight distribution (NSL) would adhere to the BRE criteria. 69 of the 70 (99%) rooms assessed for sunlight would adhere to the BRE Guidelines for sunlight (APSH). These results demonstrate a good overall level of compliance for a development within the City of London.
135. The overall daylight and sunlight impact of the development on the nearby City of London Boys' School and Broken Wharf House would be negligible to minor.
136. Most of the daylight impacts on Norfolk House are within the BRE guidelines, with 42 out of 53 windows meeting the VSC Criteria. Most of the remaining windows serve dual or triple aspect rooms which benefit from daylight from additional windows, which would allow the rooms to retain good levels of daylight distribution (NSL). Whilst there are three single aspect kitchens that would experience reductions in both VSC and NSL the overall daylight impact of the development on Norfolk House is minor.
137. Overall, the daylight and sunlight impact of the extensions to Millennium Bridge House on the neighbouring properties are considered to be acceptable given the densely developed urban nature of the site and in accordance with the requirements of Local Plan Policy DM10.7 and DM21.3.

Light Pollution

138. Residents have raised concerns that the proposed new restaurant uses (Class A3) on the ground and/or higher floors would be a substantial source of artificial light.
139. Restaurants, by the nature of being a leisure destination, are generally lit at much lower lighting levels than an office building and most occupiers tend to dim lighting into the evening, as well as use much warmer, domestic lighting colour. The existing office building does not have a comprehensive building management system, and, for security purposes, all lights are on 24 hours a day, seven days a week. The proposed development would incorporate lighting curfew arrangements in accordance with the adopted City of London Lighting Strategy. The

submission of details of a lighting strategy for the building would be secured by condition.

140. The scheme and has also been designed to be subordinate to St Paul's Cathedral.

Archaeology

141. The site is in an area of high archaeological potential situated north of the River Thames in an area of land reclaimed from the 13th century onwards and there is potential for remains of timber and stone revetments to survive. An Archaeological Desk based Assessment has been submitted with the application.
142. Archaeological investigations have been carried out on parts of the site prior to construction of the existing building. Roman remains and a series of later medieval timber and stone revetment walls, road and building remains, and reclamation deposits were recorded. The line of the Roman riverside wall crosses the northern part of the site. It is considered that the lower sections of the revetments and associated archaeological deposits survive below the basement of the building. The waterfront structures are important evidence of the growth and expansion of the City at this period with evidence of domestic and industrial uses.
143. The proposed scheme would retain the existing basement and new piled foundations would be constructed on the southern part of the site. The new foundations would have an impact on surviving archaeological remains.
144. It is appropriate to carry out archaeological evaluation in the area of the proposed new foundations which would provide information on the date, nature and character of surviving archaeological remains. The results of the work would inform a mitigation strategy to record archaeological remains affected by the development.
145. Conditions are recommended to cover archaeological evaluation, a programme of archaeological work and foundation and piling design.

Inclusive Design and Access

146. The proposed development considerably improves accessibility of the existing building:
- The existing inclined traveller along the western façade would be replaced with a vertical platform lift for step-free access between Paul's Walk and the Millennium Bridge level of Peter's Hill.
 - The existing stepped entrance at Peter's Hill would be replaced with step-free entrance via a new slope and stepped arrangement on Peter's Hill. The slope would provide inclusive access into the office and retail uses and the public roof terrace lobby.
 - The proposals incorporate the provision of accessible cycle storage, WC and shower facilities.

Transport, Servicing, Parking and Impact on Public Highways

147. In terms of access, only one of the current office entrances provides level access, which is achieved at the ground floor from Paul's Walk. As part of the Proposed Development, level access will be facilitated at Peter's Hill to an enlarged office reception, the new public access lobby and the retail units. The entrance at Paul's Walk will be enlarged and improved with level access retained. There are no changes proposed to the Lambeth Hill entrance as part of this application, which is via a step which will be maintained, due to physical constraints associated with the existing ramp.
148. The 15 existing office car parking spaces located within the basement of the office building are proposed to be removed. The informal private office car parking opportunities along Trig Lane will also be removed. The residential car parking (for the adjacent Norfolk House) located within the shared basement is not within the scope of this application and there are no changes proposed to the access arrangements to the residential element within the basement.
149. The proposed development is car free and there is an existing on-street blue badge disabled bay that is located on-street on High Timber Street within the Site boundary. The development has been assessed to have capacity to meet potential demand for disabled users arising from the proposed development because there is limited change in the basement area is it considered reasonable that a blue badge cannot be provided on site.

Servicing Arrangements

150. Servicing and refuse collection will take place within the existing loading bay on High Timber Street. Provision for waste storage is contained at basement level with the appropriate mix of recyclable and general waste which has been agreed with the City of London's Waste Officer through pre application engagement. Tracking shows that the existing loading bay is appropriately sized and can accommodate all servicing vehicles necessary to service the development.
151. The consolidation of servicing is proposed and would form part of the S.106 agreement.
152. The Cleansing Team have confirmed that the waste storage and collection facilities comply with their requirements and are acceptable

Cycling

153. Cycle parking for the proposed development is provided within the existing basement in line with the Draft London Plan standards. The requirement has been assessed by making reasonable assumptions about the split of the flexible uses, on the basis that these are split into a third office, a third retail (Class A1) and a third restaurant/bar (Class A3/A4), the development will provide 413 long stay cycle parking spaces with commensurate provisions for showers (42), changing rooms and lockers (413). The 413 long stay cycle parking spaces

include 22 cycle parking spaces for non-standard cycles and 41 fold up bicycle lockers.

154. The cycle parking would be accessed via the existing ramp from Broken Wharf with access to all the building cores facilitated through corridors in the basement.
155. The cycle parking proposals include 54 short stay cycle parking spaces (on Trig Lane and Lambeth Hill). The short stay cycle parking is non-compliant with the London Plan, however it is considered acceptable due to the amount of City Walkway surrounding the site, where cycling is not permitted.

Public Transport

156. The Site is highly accessible with a Public Transport Accessibility Level of 6b (the highest possible) with Blackfriars Underground (Circle and District Line) and National Rail Stations located 500 m to the west and Mansion House Underground Station (Circle and District Line) located 400 m to the north east being the closest to the Site. St. Paul's Underground Station (Central Line) is also located 550 m to the north. Several local busses run along Queen Victoria Street and Ludgate Hill/Cannon Street.
157. The closest cycle hire dock is located immediately to the north on Queen Victoria Street and provides 32 spaces. Additional docking stations are located within walking distance on Godliman Street and Queen Street.

Section 278 Agreement

158. A Section 278 Highways Agreement would be secured for the removal of the northern HSBC gates, and remedial works to the footways and is included in the Section 106 legal agreement.

Wind Microclimate

159. Through pre-application discussions it was agreed that a Computational Fluid Dynamics Analysis would be appropriate for the development given its proximity to the River Thames.
160. The Wind and Microclimate Assessment prepared by RWDI has considered 36 different wind directions and the impact that mean winds speeds have on pedestrian comfort through CFD Analysis for the existing site and the proposed development and its surroundings.
161. The results conclude that the development would not result in any significant negative impacts to pedestrian comfort at ground or second floor level. Suggested mitigation measures have been included within the Assessment to inform the detailed design of the building in the future, particularly the roof terrace at level six to ensure that the comfort levels enjoyed by visitors are acceptable. The analysis does not assume that any of the balustrades or planting are in place and would be developed at the detailed design stage. Conditions at all entrance locations, thoroughfares and bus stops around the existing Site and surrounding area have acceptable wind conditions for their intended

use during the windiest season. The development would alter the wind conditions on Trig Lane but would not result in an unacceptable impact in terms of the use of this space for walking or standing. The Assessment does not suggest any mitigation for areas at ground or second floor level.

Sustainable Drainage Systems

162. The development would introduce 2,585sqm of blue/green roofs at fifth and sixth floors to provide attenuation and passive irrigation for the landscaping proposed within the building which allows for a reduction in peak discharge rates by 50% equating to a runoff rate of 8.9 litres per second. This strategy has been agreed with the Lead Local Flood Authority and Thames Water who have both recommended planning conditions.

Circular Economy

163. The proposed development will be designed and constructed to promote circular economy and resource efficiency, through the following measures:
- The proposed scheme utilises the existing structural frame (demolition accounts for only 31% of the existing floor plate area, to allow for normalisation of the building form) and as such avoids waste that would arise from demolition, in line with the principles of circular economy.
 - The design will aim to maximise the use of existing resources and materials and ensure that materials which are suitable for reuse or recycling are diverted from landfill. This will be informed by a pre-refurbishment audit which has been specified. The audit will identify suitable waste streams for diverting demolition waste from landfill and maximise the potential for reuse, in line with the principles of the circular economy.
 - The proposed facades consist of a unitised system that is manufactured off-site. Off-site manufacturing enables materials efficiency and contributes to minimisation of construction waste.
 - The materials proposed for the new facades are durable low maintenance or replacement requirement to reduce waste.
 - The proposed Development will promote resource efficiency via the effective management and reduction of construction waste. A site waste management plan (SWMP) will be developed and implemented by the principal contractor, according to best practice with the aim to reduce and manage the construction site waste effectively.
 - Construction waste will be sorted into separate key waste groups either on-site or through a licensed contractor for recovery. The construction process will implement the waste hierarchy (prevent, reuse, recycle, recover, dispose) to promote resource efficiency.
 - Construction waste will be reduced and diverted from landfill where technically and economically feasible.

Energy Consumption

164. The Energy and Sustainability Statement prepared by Norman, Disney and Young demonstrates that this development has been designed to achieve a 61.41% improvement over the baseline building in terms of carbon dioxide reductions.
165. This would be achieved through the installation of a building wide network of centralised plant, for all uses of the building which provides heating and cooling through highly efficient water-cooled chillers will be utilised to provide cooling across the building. The recovered waste heat from the chillers will be stored in large thermal storage water tanks contained in the basement to provide heating and hot water to all areas of the building. This maximises energy recover and reduces energy demand associated with producing heating and hot water as far as technically possible and can be considered as a renewable technology.
166. This exceeds the London Plan target of a 35% reduction and therefore a carbon offsetting contribution should not be required subject to the submission of an energy statement prior to the completion of the development demonstrating that the submitted energy statement has been implemented, or by submitting a revised energy statement to demonstrate any improvements. This would be secured through a S106 agreement.

BREEAM

167. The Sustainability and Energy Statement prepared by Norman Disney & Young shows that this development has been designed to achieve a BREEAM rating of 'Excellent' under the Refurbishment and Fit Out criteria 2014. This is in line with Local Plan policy CS15.
168. It is recommended that the City's standard condition requiring post construction certificate for the office element is applied demonstrating that the proposed BREEAM 'Excellent' rating has been achieved.

Air Quality

169. The submitted Air Quality Assessment, prepared by WYG, considers the air quality impacts from the construction and operational phase. For the construction phase, mitigation measures are recommended to ensure that the risk from the dust is reduced to a minimum. Implementation of these measures and good site practice mean that the residual effect of construction would not be significant.
170. During operation of the proposed development, the proposal would be air quality neutral and therefore additional mitigation would not be required. The proposal is therefore in accordance with London Plan policy 7.14, emerging London Plan policy SL1 and Local Plan Core Strategy policy CS15 and DM 15.6, as well as emerging draft City Plan policy HL2, which all seek to improve air quality.

Noise and Vibration

171. In City development schemes most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Construction Management Plan and Construction Logistics Plan required by condition.
172. During operation of the building, noise and vibration would be generated from mechanical plant. The mechanical plant equipment would be enclosed, within the basement and second floor except for the lift over runs and kitchen extracts. All these elements have been carefully sited to the north of the site, to preserve and enhance protected townscape views.
173. Noise levels from mechanical plant in the completed development would need to comply by condition with the City of London's standard requirement that noise output should be 10dB below background noise levels and conditions have been included relating to restricting hours of use of the office terraces. Hours of use of the public roof terrace would be controlled by condition.

Flood Risk

174. A site-specific flood risk assessment has been undertaken following a review of flood data published by the Environment Agency and City of London which found that the development is at risk from surface water, sewer, and tidal flooding (during the breach event). Mitigation measures are proposed, including using flood resilient design and outlining safe egress routes above the predicted flood level via Peter's Hill. The development does not seek to change the usage of the building to a more vulnerable flood risk classification and the site will remain as "Less Vulnerable". However, a more comprehensive Flood Emergency Plan is required showing safe routes within the building to enable evacuation in the event of rapid inundation from a breach of the flood defences, A Flood Emergency Plan will be secured by condition.

Community Infrastructure Levy (CIL) and Planning Obligations

175. The proposed development would require planning obligations to be secured through a Section 106 Agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
176. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
177. From 01 April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for

Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

178. CIL contributions and City of London Planning obligations are set out below:

Mayoral CIL2

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£976,075	£937,032	£39,043

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£415,425	£394,654	£20,771
City Planning Obligations			
Affordable Housing	£110,780	£109,672	£1,108
Local, Training, Skills and Job Brokerage	£16,617	£16,451	£166
Carbon Reduction Shortfall (<i>as designed</i>)	£0	£0	£0
Section 278 Design and Evaluation	£25,000	£100,000	£0
S106 Monitoring Charge	£3,250	£0	33,250
Total liability in accordance with the City of London's policies	£571,072	£545,777	£25,295

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations
- Local Procurement Strategy

- Local Training, Skills and Job Brokerage Strategy (Construction)
- Delivery and Servicing Management Plan (including Consolidation)
- No servicing of the building 0700-1000, 1200-1400, 1600-1900
- Travel Plan (including Cycling Promotion Plan)
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement
- City Walkway Agreement
- Roof Terrace Management Plan
- Public Lift (Replacement of Inclinator).
- The northern HSBC gates are located on public highway so their removal would be secured through the Section 278 Agreement as part of this S.106 agreement together with the Southern gates which sit within City Walkway.
- Public Access and Public Realm Improvement Works (Trig Lane, Paul's Walk and Peter's Hill)

180. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
181. The scope of the s278 agreement may include, but is not limited to, improvements to the surrounding footway/carriageway on Paul's Walk, Peter's Hill and Lambeth Hill.

Monitoring and Administrative Costs

182. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
183. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

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

Conclusion

185. The proposals have been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft London Plan and the draft Local Plan and considering all other material considerations.

Application A

186. The proposed development is regarded as a high-quality scheme with an appropriate mix of uses and an attractive design that would result in the optimisation of the building to enhance the office offering and to provide flexible retail uses that would activate the Thames Path and Millennium Bridge.
187. The proposed development is of high architectural quality and is of a composition, height, massing and detailing appropriate to the site. The development would be sustainable and contribute positively to the activation of the river frontage, enhancing natural surveillance of the river walk.
188. The setting and significance of St Paul's Cathedral and St Mary Somerset Church Tower as Grade I listed buildings would not be harmed by the proposals and views of them would be enhanced. The proposals are assessed as being beneficial to the townscape and LVMF River Prospect Views 13A and 13B.
189. The minor intrusions and breaches of St Paul's Heights would be less obtrusive when compared to the existing building and are justified by virtue of the public benefits delivered by the extensions proposed at sixth floor level. The new massing would result in a significant improvement to views of the Cathedral from the south bank by bringing more of its important architectural features into public view from the River.
190. The scheme offers significant public benefits in terms of improved access and public realm around the building and new amenities including a free publicly accessible roof terrace affording new and expansive elevated views along and across the River and towards St Paul's Cathedral. The scheme replaces the Corporation's Inclinator with a new vertical, enclosed public lift together with the removal and relocation of the HSBC gates to improve pedestrian flows.
191. The provision of greening at roof level offers important benefits contributing to improved visual amenity, well-being and biodiversity.

Application B

192. The removal of louvred upstands and raised terrace structure and the introduction of new hard and soft landscaping at 1 Paul's Walk would make a positive contribution to the locality and the development as a whole.
193. The proposals accord with the principles of the NPPF, the London Plan and Local Plan policies and the emerging London Plan and Local Plan policies.

Background Papers

Application A: Millennium Bridge House (20/00214/FULLMAJ)

Internal

Memo 23.03.20 Department of Markets and Consumer Protection

External

Letter 24.02.2020 Gerald Eve

Historic Environment Assessment June 2020 MOLA

Acoustic Report 14.02.2020 Gerald Eve

Pedestrian Level Wind Microclimate Assessment March 2020 RWDI

Daylight and Sunlight Assessment Feb 2020 Point 2

Design and Access Statement 21.02.2020 Piercy and Co

Planning Statement 21.02.2020 Gerald Eve

Transport Assessment and Outline Delivery Servicing Management Plan Feb 2020 WYG

Statement of Community Involvement February 2020

Email 20.04.20 Thames Water

Letter 21.04.20 London Borough of Southwark

Letter 12.06.20 Gerald Eve Consultation response

Letter 29.06.20 Historic England

Public Consultation Comments:

Letter 20.03.20 Alan Roach (Benbow House Residents Ltd.)

Email 21.03.20 Mr Rudi Schembri

Email 28.03.20 Michelle Lovric

Email 28.03.20 Lady S M Chantler

Email 30.03.20 Sir Cyril Chantler

Email 31.03.20 Gary List

Email 31.03.20 Kyriacos Kyriacou

Email 02.04.20 Guy Whittaker

Letter 02.04.20 Vali Mahlouji

Email 04.04.20 Dr Colin Brewer

Email 05.04.20 Pam and Roger Stubbs

Email 05.04.20 Maxine Darwin

Email 05.04.20 Thomas See

Email 06.04.20	Paul and Elisabeth Lee
Email 26.04.20	Mr Garfield Johns
Email 01.06.20	Michael Lowndes
Email 18.06.20	Thomas See (For and on behalf of Norfolk House Residents Limited)

Application B: 1 Paul's Walk (20/00235/FULL).

Internal

External

Letter 03.03.20	Gerald Eve
Design and Access Statement February 2020	Piercy and Co
Planning Statement 21.02.20	Gerald Eve

Public Consultation Comments:

Email 01.06.20	M A Lowndes
Email 01.04.20 and 18.06.20	Thomas See

Appendix A

Relevant London Plan Policies

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

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

Policy 3.19 Support development proposals that increase or enhance the provision of sports and recreation facilities.

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

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

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

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

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

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

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

Policy 4.8 Support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need

and the broader objectives of the spatial structure of this Plan, especially town centres.

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

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

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

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

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

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

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

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

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

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

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

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

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

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

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

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

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

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

Policy 7.6 Buildings and structures should:

a be of the highest architectural quality

b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm

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

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

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

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

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

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

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

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

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

Policy 7.21 Trees should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced.

Intend to publish London Plan policies – 20/00214/FULMAJ & 20/00235/FULL

- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- Policy S5 Sports and recreation facilities
- Policy E1 Offices
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SL13 Sustainable drainage

- Policy T1 Strategic approach to transport
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Parking
- Policy D1 London's form, character and capacity for growth
- Policy D3 Optimising site capacity through the design-led approach
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries

Relevant GLA Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).

Relevant Draft City Plan 2036 Policies

S1 Healthy and Inclusive City

HL1 Inclusive buildings and spaces

- HL2 Air quality
- HL3 Noise and light pollution
- HL7 Sports and recreation
- S3 Housing
 - HS3 Residential environment
- S4 Offices
 - OF1 Office development
 - OF2 Protection of existing office floorspace
- S5 Retailing
 - RE3 Ground floor retail provision elsewhere in the City
- S6 Culture, Visitors and the Night-Time economy
 - CV4 Evening and night-time economy
- S8 Design
 - DE1 Sustainability standards
 - DE2 New development
 - DE3 Public Realm
 - DE4 Pedestrian permeability
 - DE5 Terraces and Viewing Galleries
 - DE6 Shopfronts
 - DE8 Daylight and sunlight
 - DE9 Lighting
- S9 Vehicular Transport and Servicing
 - VT1 The impacts of development on transport
 - VT2 Freight and Servicing
 - VT3 Vehicle parking
- S10 Active travel and healthy streets
 - AT1 Pedestrian movement
 - AT2 Active travel including cycling
 - AT3 Cycle parking
- S11 Historic Environment

HE2 Ancient monuments and archaeology

S13 Protected Views

S14 Open spaces and green infrastructure

OS2 City greening

OS3 Biodiversity

OS4 Trees

S15 Climate Resilience and Flood Risk

CR1 Overheating and Urban Heat Island Effect

CR2 Flood Risk

CR3 Sustainable drainage systems

CR4 Flood protection and flood defences

S16 Circular economy and waste

CE1 Zero waste city

CE2 Sustainable waste transport

S17 Thames Policy Area

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Air Quality SPD (July 2017);
- Archaeology and Development Guidance SPD (July 2017);
- City Lighting Strategy (October 2018);
- City Transport Strategy (May 2019);
- City Waste Strategy 2013-2020 (January 2014);
- Protected Views SPD (January 2012);
- City of London's Wind Microclimate Guidelines (2019);
- Planning Obligations SPD (July 2014);
- Open Space Strategy (2016);
- Office Use (2015);
- City Public Realm (2016);
- Culture Mile Strategy (2018);
- Cultural Strategy 2018 – 2022 (2018).

Relevant Local Plan Policies

CS10 Promote high quality environment

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

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

CS3 Ensure security from crime/terrorism

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

CS4 Seek planning contributions

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

CS10 Promote high quality environment

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

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;

- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;

- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

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

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;

- c) demonstration of climate change resilience measures.
- 3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
- 4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
- 5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

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

DM15.6 Air quality

- 1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
- 2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
- 3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

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

DM15.7 Noise and light pollution

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

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

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

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

CS17 Minimising and managing waste

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

CS18 Minimise flood risk

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

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
 - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
 - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

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

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS20 Improve retail facilities

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

SCHEDULE

APPLICATION: 20/00214/FULMAJ

Millennium Bridge House 2 Lambeth Hill London

Refurbishment and extension of the existing building involving the partial demolition and partial infilling of the existing structure and the introduction of a new facade to all elevations and extension to the building at all floors, introduction of roof terraces at fifth and sixth floors, including a public viewing terrace and associated lobbies at second and sixth floors, alongside a part change of use at ground floor from Office to Retail/Cafe/Restaurant (Class A1/A3); a part change of use at first from Office to either Office or Retail/Restaurant (Class A1/A3/B1); second floor from Office to either Office or Retail/Restaurant (Class A1/A3/B1) and a change of use from Office to Retail/Cafe/Restaurant (Class A1/A3); a part change of use at sixth floor from Office (Class B1) to either Office or Restaurant/Bar (Class B1/A3/A4) and a change of use from office to restaurant/bar (Class A3/A4) use together with public realm works to Peter's Hill (including the removal and relocation of the southern HSBC gates), Lambeth Hill, Trig Lane and Paul's Walk (part of the Thames Path) and associated works, this part of the proposal include the rescission of part of the City Walkway.

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 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 be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. 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 and emerging policies HL2 and VT1 of the Draft City

Plan 2036 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.

- 3 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the 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 (including payment of any agreed monitoring contribution)

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 and emerging policies HL2 and HL3 of the Draft City Plan 2036. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 4 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, providing final details on how the building would adhere to circular economy principles: build in layers, design out waste, design for longevity, design for flexibility and adaptability, design for disassembly and using systems, elements or materials that can be re-used and recycled, and the development shall be carried out in accordance with the approved details.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: Draft London Plan ; GG5, GG6, D3,

- 5 There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the 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 (including payment of any agreed monitoring contribution)

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.

- 6 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 be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. 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 and emerging policies HL2 and VT1 of the Draft City Plan 2036. 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.

- 7 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.

REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4 and emerging policy HE2 of the Draft City Plan 2036

- 8 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the

analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4 and emerging policy HE2 of the Draft City Plan 2036.

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

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4 and emerging policy HE2 of the Draft City Plan 2036

- 10 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) samples and particulars of facing materials, details of Windows, entrances,
- (b) typical bay of new facades,
- (c) balustrades, handrails, soffits,
- (d) Pavilion at 6th floor level
- (e) plant and other excrescences at roof level including AOD spot heights,
- (f) garaging of window cleaning gantry and equipment including AOD spot heights.
- (g)Details of new public lifts
- (h)Details including levels and materials and design of the new ramp access from Peter's Hill
- (i)Details including levels and materials and design of the Public realm

- (j)Details including levels and materials and design of the new public lift which replaces the inclinor

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 and emerging policies SE1, DE2, DE6 and HE1 of the Draft City Plan 2036.

- 11 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood

Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: blue roof, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 8.9 l/s from the area of blue roof which shall have a catchment no less than 0.35 hectares, provision should be made for an attenuation volume capacity capable of achieving this;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

- 12 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;
 - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

- 13 A post construction BREEAM (2018) assessment demonstrating that a target rating of 'Excellent' has been achieved for the office and "Very good" for the retail (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' and "Very good" rating) shall be submitted as soon as practicable after practical completion. The post construction assessment should include the credits achieved to demonstrate sustainability across the range of categories.

REASON: To demonstrate that carbon emissions have been minimised and that the

development is sustainable in accordance with the following policy of the Local Plan:

CS15, DM15.1, DM15.2, and emerging policy DE1 of the Draft City Plan 2036.

- 14 No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.
Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.
- 15 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 413 long stay spaces and 54 short stay cycle parking spaces . All doors on the access to the parking area shall be automated, push button or pressure pad operated. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3, and emerging policy AT3 of the Draft City Plan 2036.
- 16 Changing facilities and 42 showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 17 The proposed roof terraces at level 5 and 6 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.

- 18 The roof terraces on level's 5&6 hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 08:00 on the following day, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3 and the emerging policy HL3 of the Draft City Plan 2036.
- 19 No amplified or other music shall be played on the roof terraces.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3, and the emerging policy HL3 of the Draft City Plan 2036.
- 20 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1, and emerging policy DE2 of the Draft City Plan 2036.
- 21 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7 and emerging policy HL3 of the Draft City Plan 2036.
- 22 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, and emerging policy HL3 of the Draft City Plan 2036.

- 23 (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 and emerging policies HL3 and HS3 of the Draft City Plan 2036.
- 24 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
- REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 25 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.
- REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and

DM 21.3 and emerging policies HL3 and HS3 of the Draft City Plan 2036.

- 26 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A use. 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. The details approved must be implemented before the Class A use takes place.
REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3 and emerging policies HL3 and HS3 of the Draft City Plan 2036.
- 27 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.
- 28 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and any associated measures to reduce the potential for glare. All works pursuant to this consent shall be carried out in accordance with the approved details.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, and emerging policy DE2 of the Draft City Plan 2036.
- 29 The development shall provide:
- 27,275 sq.m of office floorspace (Class B1);
- 1,776 sq.m of flexible office/retail floorspace (Class B1/A1/A3/A4);
- 2,432 sq.m of retail floorspace (Class A1/A3/A4);
- 375sqm of publicly accessible roof terrace
- 30 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: Proposed Basement Plan
13585-A-B00-03-099-A
Proposed Ground Floor Plan 13585-A-L00-03-100-B
Proposed First Floor Plan 13585-A-L01-03-101-B
Proposed Second Floor Plan 13585-A-L02-03-102-B
Proposed Third Floor Plan 13585-A-L03-03-103-A

Proposed Fourth Floor Plan 13585-A-L04-03-104-A
 Proposed Fifth Floor Plan 13585-A-L05-03-105-A
 Proposed Sixth Floor Plan 13585-A-L06-03-106-A
 Proposed Roof Plan 13585-A-RF-03-107-A
 Proposed Section A 13585-A-ZZ-04-200-A
 Proposed Section B 13585-A-ZZ-04-201-A
 Proposed Section C 13585-A-ZZ-04-202-A
 Proposed North Elevation 13585-E-ZZ-05-300-A
 Proposed East Elevation 13585-E-ZZ-05-301-A
 Proposed South Elevation 13585-E-ZZ-05-302-A
 Proposed West Elevation 13585-E-ZZ-05-303-A
 Existing St Paul's Heights Grid Plan 13585-A-XX-00-150
 Proposed St Paul's Heights Grid Plan 13585-A-XX-00-151-C

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

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

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
- 2 This listed building consent is granted having regard to listed building considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.
- 3 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.

- 4 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
- (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
 - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.
 - (c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).
You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.
 - (d) Bridges over highways
 - (e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.
 - (f) Declaration, alteration and discontinuance of City and Riverside Walkways.
 - (g) The provision of City Walkway drainage facilities and maintenance arrangements thereof.
 - (h) Connections to the local sewerage and surface water system.
 - (i) Carriageway crossovers.

(j) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".

5 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

(a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site 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) Use of the premises for public entertainment.

(h) Approvals relating to the storage and collection of wastes.

(i) The detailed layout of public conveniences.

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

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

(l) Methods of odour control.

Background Papers

Application A: Millennium Bridge House (20/00214/FULMAJ)

Internal

Memo 23.03.20 Department of Markets and Consumer Protection

External

Letter 24.02.2020 Gerald Eve

Statement of Community involvement 24.02.2020

Historic Environment Assessment June 2020 MOLA

Acoustic Report 14.02.2020 Gerald Eve

Pedestrian Level Wind Microclimate Assessment March 2020 RWDI

Daylight and Sunlight Assessment Feb 2020 Point 2

Design and Access Statement 21.02.2020 Piercy and Co

Planning Statement 21.02.2020 Gerald Eve

Transport Assessment and Outline Delivery Servicing Management Plan Feb 2020 WYG

Email 20.04.20 Thames Water

Letter 21.04.20 London Borough of Southwark

Letter 12.06.20 Gerald Eve Consultation response

Letter 29.06.20 Historic England

Public Consultation Comments:

Letter 20.03.20 Alan Roach (Benbow House Residents Ltd.)

Email 21.03.20 Mr Rudi Schembri

Email 28.03.20 Michelle Lovric

Email 28.03.20 Lady S M Chantler

Email 30.03.20 Sir Cyril Chantler

Email 31.03.20 Gary List

Email 31.03.20 Kyriacos Kyriacou

Email 02.04.20 Guy Whittaker

Letter 02.04.20 Vali Mahlouji

Email 04.04.20 Dr Colin Brewer

Email 05.04.20 Roger Stubbs

Email 05.04.20 Maxine Darwin

Email 05.04.20 Thomas See
Email 06.04.20 Paul and Elisabeth Lee
Email 26.04.20 Mr Garfield Johns
Email 01.06.20 Michael Lowndes
Email 18.06.20 and 30.06.2020 Thomas See (For and on behalf of Norfolk House Residents Limited)

From: PLN - Comments
Subject: FW: Attn. Rob Chipperfield, Case Officer re 20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

From: [REDACTED]
Sent: 30 March 2020 08:26
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Attn. Rob Chipperfield, Case Officer re 20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

29.3.20

Dear Mr Chipperfield,

RE :20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

Thank you for advising me of the above planning application. I live on the south bank of the river Thames opposite Millennium House.

I note that the application includes proposals for extensive roof terraces on the fifth and sixth floors and a public viewing platform facing southwards towards the River Thames. I have several concerns and **object** to aspects of the application, without restrictions, for the reasons outlined below:

1. Noise and disturbance:

a) **The roof terraces** The application is for either office or restaurant /bar use and includes the creation of extensive roof terraces on the 5th and 6th floors. There are several residential buildings in the immediate neighbourhood and opposite on the south bank. Any use of these venues for entertainment and music will generate considerable noise, amplified across the river and disturbance to residents. Whilst we note that the Acoustic report concludes that 'noise due to occupants on the terrace are not expected to produce a significant change in existing ambient noise levels, we consider this conclusion is flawed as i) Measurements were done at a period and times unlikely to be optimal for outdoor terrace activity (27 November to 3 December until 7 pm). **We would request stringent restrictions/ conditions imposed on the use of terraces or any open space for entertainment and music in any approval without severe conditions/ restrictions on the nature and hours of use.**

b) **The public viewing lobbies and terraces.** We cannot see any justification in the application for **public viewing** terraces nor do we understand the need for same. Allowing this use would incur an undesirable intrusion on the privacy of residents nearby and opposite. **We request that public viewing lobbies (or use of terraces for this purpose) are not permitted.**

c) **Mixed use** .The building is mainly an office and the area around currently serves as a quiet place for residents and families but the application requests for total flexibility to provide office and/or retail, restaurant, bar use on all floors. The extended use for retail/restaurant/ bars would result in considerable congestion in the vicinity and the real possibility of anti-social behaviour and noise disturbance locally and across the river. This has implications for traffic control and police activity. **We request that the majority of the building is restricted to office use.**

2. **Impact on views of listed buildings.** We understand from the Historical buildings report that considerable attention will be placed on the proposed height of the building to ensure that there is no negative impact on the historic environment.

Alan Roach, Chairman, Benbow House Residents Ltd./Chairman, Benbow House Freehold Ltd.
Apt 16 Benbow House,
24 New Globe Walk,
London SE1 9DS

Comments for Planning Application 20/00214/FULMAJ

Application Summary

Application Number: 20/00214/FULMAJ

Address: Millennium Bridge House 2 Lambeth Hill London EC4V 4AG

Proposal: Refurbishment and extension of the existing building involving the partial demolition and partial infilling of the existing structure and the introduction of a new facade to all elevations and extension to the building at all floors, introduction of roof terraces at fifth and sixth floors, including a public viewing terrace and associated lobbies at second and sixth floors, alongside a part change of use at ground floor from Office to Retail/Cafe/Restaurant/Bar (Class A1/A3/A4); a part change of use at first from Office to either Office or Retail/Restaurant/Bar (Class A1/A3/A4/B1); second floor from Office to either Office or Retail/Restaurant (Class A1/A3/B1) and a change of use from Office to Retail/Cafe/Restaurant (Class A1/A3); a part change of use at sixth floor from Office (Class B1) to either Office or Restaurant/Bar (Class B1/A3/A4) and a change of use from office to restaurant/bar (Class A3/A4) use together with public realm works to Peter's Hill (including the removal and relocation of the southern HSBC gates), Lambeth Hill, Trig Lane and Paul's Walk (part of the Thames Path) and associated works.

Case Officer: Rob Chipperfield

Customer Details

Name: Mr Rudi Schembri

Address: Flat 66, Sir John Lyon House, 8 High Timber Street, London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Couple of comments:

1) Inclinator lift: this lift is essential to residents in the area e.g. with young children to connect to the St. Paul's area. Disabling the lift for several weeks will be most unhelpful as it would require a very long detour for step free access. I note your new lift in the design - if during the works you had to provide alternative step free access to St. Paul's walkway next to the Millenium Bridge that would mitigate this point

2. Riverside area outside of Millenium Bridge: presently this serves as a quiet area for residents e.g. with young families. I note the presence of restaurants in your proposal - encroachment of the public area by restaurants with al fresco dining will be most unwelcome

3. Noise: The area has a number of residential buildings close by - any entertainment venues must be constrained from playing loud music that can disturb neighbours. This should also apply to the

public viewing areas on the 2nd and 6th floor

4. Mixed use: Presently the building is primarily an office. The application provides the applicant full flexibility to either maintain an office or provide retail/bar/restaurant. As a neighbour I would prefer the application to limit the amount of retail/bar/restaurant, for example, to the ground floor only, if at all - especially bar/restaurant, as this gives rise to high volumes of people during weekends and is likely to congest High Timber Street (e.g. uber drivers) and create many instances of anti-social behaviour/intoxicated individuals in the area. This would represent a significant shift from the quiet currently enjoyed in weekends.

5. Traffic: Currently High Timber Street has several parking bays, which help residents e.g. with children during weekends. This development is only likely to congest those parking bays so the City of London and the developer should give priority to residents in those bays.

Thanks

Sent by email to PLNComments@cityoflondon.gov.uk and marked for the attention of Rob Chipperfield – Case Officer on 28 March 2020

Dear Mr Chipperfield

RE :20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

I live on the south bank of the river Thames diagonally opposite Millennium House.

I wish to object to this application on the following grounds:

1. Noise and disruption of residential and office amenity, as well as disruption to the Globe Theatre from the roof terraces.

The application includes the creation of extensive roof terraces on the 5th and 6th floors. Any use of these venues for entertainment and music will generate considerable noise, amplified across the river, and therefore significant disturbance to residents both sides of the river. We in Southwark already had to call the City Licensing Officer in to stop amplified entertainments on the roof above Cannon Street station, because, as the explanation below shows, water actually magnifies noise in transmission.

Scientist Sedeer el-Showk explains on his Inspiring Science website: *‘When you make noise, sound waves travel away from you in every direction, making an expanding sphere. Since the air just above an open body of water is cooler than the air slightly higher up, the speed of sound is slightly lower above the water’s surface ... The difference in speed causes the expanding sphere of sound to change shape, flattening into a wall or even focusing the sound downwards. That’s why sound travels further over water: less is lost up into the air, meaning more of it ends up in your ears – or your neighbours’.*

So music played at the regular 85 decibels would be louder on the balconies and homes of residents on the south side of the Thames. This would include the Globe Theatre and I hope that they are on your list of consultees, as well as the offices nearby, including Nomura, where the nature of the business means that employees are working 24/7.

This will raise problems of enforcement. Southwark Environmental Health Officers absolutely will not enforce on a noise nuisance stemming from the City. The City officers will be left in a position where they have to deal with noise complaints not just from the City but from Southwark: a development of this kind would be a considerable drain on City resources, both in terms of licensing and environmental health.

I do not believe that the noise measurements provided are completely disingenuous, being done at a period and times unlikely to be optimal for outdoor terrace activity (27 November to 3 December until 7 pm, not at night when noise from the terraces would be most disruptive).

If the A3 use of the terraces is consented, I would request the following conditions:

If Planning is minded to grant the variation, then the only way to keep the residents safe from damage to their amenity is to impose strict conditions. This scheme requires the application of the principle of 'Agent of Change': where a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts. To ensure this, the following conditions must be built into the consent for each terrace:

- a. That the new terrace will not be used after 21.00. The doors and windows will be closed and locked at 21.00. (Of course, even better 19.00 hours, as the noise survey suggested!) There will be no staff allowed on the terrace after this time for their own recreation with no noisy scraping/rearranging of furniture, or emptying of bottles or bins, or non-silent cleaning after this time.
- b. That the terrace will be closed and silent on Sundays
- c. That the terrace will have no bar area, temporary or fixed
- d. That the terrace will have no barbecue or outside cooking facilities, temporary or fixed, such as pizza ovens
- e. That no one will be allowed to stand drinking on the terrace.
- f. No stools or raised bar/posing tables will be provided for drinkers.
- g. That customers will be allowed to order alcohol on the terrace only when seated at a table, and when the alcohol is accompanied by substantial food.
- h. That no music, live or recorded, will be played on the terrace.
- i. That no screens (i.e. for sporting events) will be allowed on the terrace.
- j. That when the terrace is closed, no music or conversation from inside should 'leak' into the terrace area through open windows.
- k. That there will be no smoking allowed on the terrace.
- l. That no Audio Visual equipment, i.e. PA systems, will be allowed on the terrace
- m. That the doors to the terrace will be fitted with an airlock system to prevent slamming
- n. That smells from the kitchen will not exit onto the terrace.
- o. That the number of patrons allowed on the terrace at any one time is restricted to the number that can be seated.
- p. That patrons on the terrace will not be allowed to chant, sing, shout or dance.
- q. That no awnings or outsize parasols will be erected on the terrace (which would effectively convert the terrace into another room)
- r. That no heating is installed or used on the terrace
- s. That all above conditions are conditioned into any lease granted for this terrace.

It is important to have these conditions embodied in both the Planning and the Licensing of these premises, but one must start with Planning and have them attached to the physical fabric of the building and its leases in perpetuity. There will inevitably be succession in the leasing and licensing of the unit and we need to

discourage ‘mission creep’ with repeated new licensing applications (with no consultation with the residents) that could change the whole nature of the use of this terrace over time. It would be storing up trouble not just to fail to acknowledge, anticipate and tackle this well-worn scenario.

2. Impact on views of listed buildings.

Modelling needs to be done to show how the development would impact on both historic buildings and the protected views on this stretch of the Thames

Thanking you in anticipation

Michelle Lovric, 5 Winchester Wharf, 4 Clink Street, London SE1 9DL

Sent by email to PLNComments@cityoflondon.gov.uk and marked for the attention of Rob Chipperfield – Case Officer on 28 March 2020

Dear Mr Chipperfield

RE :20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

Thank you for advising me of the above planning application. I live on the south bank of the river Thames opposite Millennium House.

I note that the application includes proposals for extensive roof terraces on the fifth and sixth floors and a public viewing platform facing southwards towards the River Thames. I have several concerns and **object** to aspects of the applications , without restrictions, for the reasons outlined below:

1. Noise and disturbance:

- a) **The roof terraces** The application is for either office or restaurant /bar use and includes the creation of extensive roof terraces on the 5 th and 6 th floors. There are several residential buildings in the immediate neighbourhood and opposite on the south bank. Any use of these venues for entertainment and music will generate considerable noise, amplified across the river and disturbance to residents. Whilst we note that the Acoustic report concludes that ‘noise due to occupants on the terrace are not expected to produce a significant change in existing ambient noise levels, we consider this conclusion is flawed as i) Measurements were done at a period and times unlikely to be optimal for outdoor terrace activity (27 November to 3 December until 7 pm). **We would request stringent restrictions/ conditions imposed on the use of terraces or any open space for entertainment and music in any approval without severe conditions/ restrictions on the nature and hours of use.**
- b) **The public viewing lobbies and terraces.** We cannot see any justification in the application for **public viewing** terraces nor do we understand the need for same. Allowing this use would incur an undesirable intrusion on the privacy of residents nearby and opposite. **We request that public viewing lobbies (or use of terraces for this purpose) are not permitted.**
- c) **Mixed use .**The building is mainly an office and the area around currently serves as a quiet place for residents and families but the application requests for total flexibility to provide office and/or retail, restaurant, bar use on all floors. The extended use for retail / restaurant/ bars would result in considerable congestion in the vicinity and the real possibility of anti- social behaviour and noise disturbance locally and across the river. This has implications for traffic control and police activity. **We request that the majority of the building is restricted to office use.**

2. Impact on views of listed buildings. We understand from the Historical buildings report that considerable attention will be placed on the proposed height of the building to ensure there is no negative impact on the historic environment.

[REDACTED]

[REDACTED]

From: PLN - Comments
Subject: FW: for attention Mr Rob Chipperfield

From: [REDACTED]
Sent: 30 March 2020 11:48
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: for attention Mr Rob Chipperfield

Dear Mr Chipperfield

RE :20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

Please will you register my objections to this proposal. I live on the opposite side of the river therefore am directly affected.

First: The creation of two roof terraces suggests that these areas will be available for hire for parties. The developers would be unlikely to create two unless they foresaw a large demand. There will need to be strict controls on noise with no music or loudspeakers. We have already had to complain about noise from roof parties in the summer on that side of the river. Perhaps if it was made clear that no music or loudspeakers would be allowed the developers might reconsider their need for two areas?

Second: I do not understand the need for public viewing platforms. The river can be observed from the riverside paths and there are already many roof terraces much higher from which the city can be viewed. Public viewing platforms opposite our windows are neither necessary or desirable.

Yours sincerely

Sir Cyril Chantler 32 Benbow House, 24 New Globe Walk, London SE1 9DS

From: PLN - Comments
Subject: FW: 20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

From: Gary List
Sent: 31 March 2020 16:13
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

Sent by email to PLNComments@cityoflondon.gov.uk and marked for the attention of Rob Chipperfield – Case Officer on 28 March 2020

Dear Mr Chipperfield

RE :20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

Thank you for advising us of the above planning application. I own a property on the south bank of the river Thames opposite Millennium House.

I note that the application includes proposals for extensive roof terraces on the fifth and sixth floors and a public viewing platform facing southwards towards the River Thames. I have several concerns and **object** to aspects of the applications, without restrictions, for the reasons outlined below:

1. Noise and disturbance:
 - a. **The roof terraces** The application is for either office or restaurant /bar use and includes the creation of extensive roof terraces on the 5 th and 6 th floors. There are several residential buildings in the immediate neighbourhood and opposite on the south bank. Any use of these venues for entertainment and music will generate considerable noise, amplified across the river and disturbance to residents. Whilst we note that the Acoustic report concludes that 'noise due to occupants on the terrace are not expected to produce a significant change in existing ambient noise levels, we consider this conclusion is flawed as i) Measurements were done at a period and times unlikely to be optimal for outdoor terrace activity (27 November to 3 December until 7 pm). **We would request stringent restrictions/ conditions imposed on the use of terraces or any open space for entertainment and music in any approval without severe conditions/ restrictions on the nature and hours of use.**
 - b. **The public viewing lobbies and terraces.** We cannot see any justification in the application for **public viewing** terraces nor do we understand the need for same. Allowing this use would incur an undesirable intrusion on the privacy of residents nearby and opposite. **We request that public viewing lobbies (or use of terraces for this purpose) are not permitted.**
 - c. **Mixed use** .The building is mainly an office and the area around currently serves as a quiet place for residents and families but the application requests for total flexibility to provide office and/or retail, restaurant, bar use on all floors. The extended use for retail / restaurant/ bars would result in considerable congestion in the vicinity and the real possibility of anti- social behaviour and noise disturbance locally and across the river. This has implications for traffic control and police activity. **We request that the majority of the building is restricted to office use.**
2. Impact on views of listed buildings. We understand from the Historical buildings report that considerable attention will be placed on the proposed height of the building to ensure there is no negative impact on the historic environment.

From: PLN - Comments
Subject: FW: Ref:20/00214/FULMAJ; Application for refurbishment and extension of Millennium Bridge House

From: Kyriacos Kyriacou
Sent: 31 March 2020 16:31
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Ref:20/00214/FULMAJ; Application for refurbishment and extension of Millennium Bridge House

FOR THE ATTENTION OF MR. ROB CHIPPERFIELD, CASE OFFICER
By email to PLNComments@cityoflondon.gov.uk

Dear Sir

Re: Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG; Ref:20/00214/FULMAJ

I write in respect of the above planning application. I live in Benbow House on Bankside which looks across the river towards Millennium House.

I write to express my concerns regarding the application for proposed new roof terraces and, in particular, to the proposed public viewing platform facing southwards across the Thames. Benbow House is a residential building comprising of a number of residential flats each with large French-style windows and doors opening onto balcony terraces. It is inevitable that the proposed viewing gallery will allow the public to look directly into the residents' homes and will seriously impact our right to privacy and the enjoyment of our homes and terraces. I would therefore like to register my strong objection to the application for the creation of public viewing galleries or platforms.

Additionally if restaurants are to be allowed to operate from the terraces, I would request that adequate measures be taken to control noise from music and parties, particularly after 10pm. There are already more than two buildings on the north side of the Thames opposite Benbow House, in the area of St Paul's, with restaurant/bars on the roof. When music is played, it resonates across the Thames into our flats; even though these buildings are actually set back quite a way from the Thames and behind other buildings. It is clear that any music played from the terraces of Millennium Bridge House, which actually fronts the river itself, will carry across the Thames even more so.

Another concern I would ask you to consider, is the height of the new terraces and the impact this may have on views of historical buildings across the Thames.

I thank you for taking the time to consider the above points.

Kind regards.

Yours faithfully,

Kyriacos Kyriacou
Flat 56, Benbow House,
24 New Globe Walk, London, SE1 9DS

From:

Guy Whittaker

Apt 68 Benbow House, 24 New Globe Walk, London SE1 9D

To: PLNComments@cityoflondon.gov.uk .

02 April 2020

For the attention of Rob Chipperfield. Case Officer

Reference: 20/00214/FULMAJ - application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

Dear Mr Chipperfield,

Thank you for notification of the abovementioned planning application. I live in Benbow House on the South bank of the river opposite Millennium House and wish to register my objection to the proposal as submitted. In particular I object to the large roof terraces and public viewing gallery on the upper floors which look out directly over the river and will create a number of issues for local residents.

Firstly, the application is for both office, restaurant and bar use and includes the creation of large roof terraces on the 5th and 6th floors. There are several residential buildings in the neighbourhood and also across the river. Any use of these terraces for entertainment and music will generate noise, which we know gets amplified across the river and will cause disturbance to local residents. Whilst the Acoustic report concludes that 'noise due to occupants on the terrace are not expected to produce a significant change in existing ambient noise levels', this conclusion is incorrect since the measurements were taken at a period of time that is not representative for outdoor terrace use, namely 27 November to 3 December until 7 pm. I ask that you impose stringent conditions on any use of terraces or any open space for entertainment and music in any potential approval and restrict severely the nature and hours of use to preserve the environment for residents.

Secondly, I see no justification in the application for public viewing terraces nor understand the need for them. Allowing this would intrude on the privacy of residents nearby and opposite and accordingly I ask that these not be permitted.

Thirdly, the building to-day is primarily an office and the area around serves as a quiet place for residents and families. I request it remains that way. The application requests for total flexibility to provide office and/or retail, restaurant, bar use on all floors; such extended use for retail / restaurant/ bars would result in considerable additional congestion in the vicinity with the real possibility of anti- social behaviour and noise locally and across the river. This has further implications for traffic flow and policing.

Finally, please ensure the view from the South bank to St. Paul's, seen by the millions of visitors to the Tate Modern and the Globe Theatre is not adversely impacted by this development.

Kind regards,
Guy Whittaker.

*Flat 15, Benbow House
24 New Globe Walk
London SE1 9DS*

2 April 2020

Dear Mr Chipperfield

RE :20/00214/FULMAJ

Application for refurbishment and extension of Millennium Bridge House, 2
Lambeth Hill London EC4V 4AG

Thank you for notifying us about the planning application regarding Millennium Bridge House. I live directly opposite the property on the river at 15 Benbow House.

I would like to object to the planning application as I am keen for the level of noise disturbance to be kept under control in our area. The additions of viewing spaces and roof terraces would obviously have a detrimental and negative effect on maintaining control of noise and disturbance.

Furthermore, these additions would also impact the privacy that our building enjoys.

I thank you in advance.

With kind regards,

A black rectangular box redacting the signature of Vali Mahlouji.

Vali Mahlouji

From: PLN - Comments
Subject: FW: Attn: Rob Chipperfield. Millennium House planning application.

From: Colin Brewer
Sent: 04 April 2020 10:33
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Attn: Rob Chipperfield. Millennium House planning application.

RE :20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill London EC4V 4AG

Dear Mr Chipperfield. I live at 49 Bankside, which is literally and directly opposite Millennium House. In the section of Bankside between Blackfriars and Southwark bridges, we are already troubled on a daily basis by anti-social buskers whose amplified (and not always tuneful) performances are much louder than necessary and disturb residents living more than 100 m from the main busking site. This has led to hundreds of complaints from Bankside residents but also from a few residents on the north bank of the river because the noise reaches them as well. The the high walls of Tate Modern act as a bowl that amplifies the sound and the river acts as a sound reflector and transmitter.

The proposed open terraces on the upper floors and their use for 'entertainment' will surely include live and/or recorded music as well as the noise made by large numbers of mildly or not-so-mildly intoxicated people trying to talk against high levels of ambient noise from other people and from loud music. This is already a problem with party boats, even though most of the passengers and musicians are inside the boats. A terrace that is not completely enclosed is likely to be even more intrusive to riverine residents and, like the boats, may intrude well into the small hours.

Many residents and visitors also complain about the architecture of Millennium House. I am not among them because although they are not exactly beautiful, I think that the architects may have been trying to re-create the appearance of the Hanseatic commercial buildings that once lined many ports and rivers in Northern Europe and can still be seen. However, the inhabitants of Hanseatic towns never had to put up with heavily amplified music and I urge you very strongly not to let another source of this modern curse add to our existing discomfort and interrupted sleep.

Sincerely, Dr Colin Brewer.

[REDACTED]

From: [REDACTED]
Sent: 05 April 2020 11:10
To: PLN - Comments
Subject: Ref 20/00214/FULMAJ

Dear Rob Chipperfield -

I write in relation to the **application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill, London EC4V 4AG.**

I live in apartment 40 of Benbow House, directly across the river from this site.

I wish to object to the proposals for 'extensive roof terraces on the fifth and sixth floors' and a public viewing platform facing across the River Thames.

The grounds for my objection are the inevitable **noise and disturbance** this development will create. The proposed restaurant and bar, together with the roof terraces are bound to create considerable noise impacting on the residential buildings in the immediate neighbourhood, including Benbow House. I believe stringent conditions and restrictions should be imposed on such use of the terraces. Indeed, I cannot see the need for any public viewing areas. This use would constitute an **intrusion on the privacy** of residents adjacent and opposite (i.e. Benbow House).

I believe that the most sensible use of the building in this location is for **office space.**

Yours sincerely

Roger Stubbs

[REDACTED]

From: [REDACTED]
Sent: 05 April 2020 14:39
To: PLN - Comments
Cc: Maxine Darwin
Subject: RE:Application 20/00214/FULMAJ; FTAO MR Chipperfield

For the attention of Case Officer Rob Chipperfield

Dear Mr Chipperfield

RE :20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House,
2 Lambeth Hill London EC4V 4AG

Thank you for informing me about the above planning application. I live on the south bank of the River Thames, opposite Millennium House.

I note that the application includes proposals for extensive roof terraces on the fifth and sixth floors and a public viewing platform facing southwards towards the River Thames. I have several concerns and **object** to aspects of the application, without restrictions, for the reasons outlined below:

1. Noise and disturbance:

a) **The roof terraces**

The application is for either office or restaurant /bar use and includes the creation of extensive roof terraces on the fifth and sixth floors. There are several residential buildings in the immediate neighbourhood and opposite on the south bank. Any use of these venues for entertainment and music will generate considerable noise, amplified across the river and cause disturbance to residents. Whilst we note that the Acoustic report concludes that 'noise due to occupants on the terrace is not expected to produce a significant change in existing ambient noise levels', we challenge this conclusion as the measurements were done at a period and times unlikely to be optimal for outdoor terrace activity (27 November to 3 December until 7 pm). **We would request stringent restrictions/ conditions be imposed on the use of terraces or any open space for entertainment and music in any approval to protect the interests of local residents.**

b) **The public viewing lobbies and terraces.**

We cannot see any justification in the application for **public viewing** terraces nor do we understand the need for same. Allowing this use would incur an undesirable intrusion on the privacy of residents nearby and opposite. **We request that public viewing lobbies (or use of terraces for this purpose) are not permitted.**

c) **Mixed use.**

The building is mainly an office and the area around currently serves as a quiet place for residents and families but the application requests for total flexibility to provide office and/or retail, restaurant,

bar use on all floors. The extended use for retail / restaurant/ bars would result in considerable congestion in the vicinity and the real possibility of anti- social behaviour and noise disturbance locally and across the river. This has implications for traffic control and police activity. **We request that the majority of the building is restricted to office use.**

2. Impact on views of listed buildings.

We understand from the Historical Buildings report that considerable attention will be paid to the proposed height of the building to ensure there is no negative impact on the historic environment. Given the proximity of the proposed development to St Paul's, it is absolutely critical that any approval protects the integrity of existing sight lines.

Many thanks for your kind attention.

Yours sincerely,

**Maxine Darwin
Apartment 65
Benbow House
24 New Globe Walk
Southwark
LONDON
SE1 9DS**

[REDACTED]

From: Thomas See
Sent: 05 April 2020 21:27
To: Devlia, Neel; Chipperfield, Rob; PLN - Comments
Subject: RE: 20/00214/FULMAJ and 20/00235/FULL
Attachments: Letter of objection 5Apr20.docx; Anstey Horne report on daylight and sunlight 2Apr20.pdf

Dear Mr Devlia and Mr Chipperfield

I am submitting the attached objection letter to 20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill, London, EC4V 4AG.

The submission is longer than usual because I am also writing on behalf of my neighbours at Norfolk House. The attached letter, "Letter of Objection 5Apr20", is 12 pages long and contains input from professional consultants, diagrams and photographs. I attach a second document, also for inclusion, being a consultant's report from Anstey Horne who we have retained to advise us on daylight and sunlight.

Please could I ask you kindly to acknowledge receipt, since the last day for submission is Monday 6 April 2020. Please can you tell me also if you are able to upload onto your Planning web-site the entire contents of my "Letter of Objection 5Apr20" - thank you.

Regards
Thomas See

Mobile:

Dr Thomas See, Flat 3, Norfolk House, Trig Lane, London EC4V 3QQ (Objects)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1. Introduction.

1a. Norfolk House was designed and built at the same time as Millennium Bridge House and shares a basement and common services but are under separate ownership. This physical link means that redevelopment of one affects the other, in a way that does not apply to separate independent buildings.

1b. Norfolk House Residents Limited ("NHRL") owns the Headlease to Norfolk House. NHRL in turn is owned by the leaseholders of the 12 flats within Norfolk House, who have a long-term interest in Norfolk House and its surrounding area as owner occupiers. We are writing as NHRL and as a block of 12 individually named residents of Norfolk House.

2. Design.

2a. The character of Trig Lane is of a quiet yard or mews with its access off Broken Wharf and an alleyway to the Thames Path. The street pattern has evolved through hundreds of years of trade along the River Thames which can be evidenced by a review of historic maps of the area illustrating yards and warehouses which are generally rectangular in form, perpendicular to the River. The introduction of the proposed 45 degree splay as an extension to MBH at the end of Trig Lane is wholly out of character and introduces an unnecessarily complicated and alien form to this historic area. It will adversely impact the historic "yard" character of Trig Lane.

2b. The proposed extensions to MBH along Trig Lane and the Thames Path are in the form of extensive cantilevered elements projecting from the upper floors. These projections are out of scale and unsympathetic to the building forms which otherwise maintain an aesthetic characterised by load bearing structural walls.

2c. The proposed extensions to MBH adjacent to the West and North West elevations of Norfolk House are in particular intrusive and overbearing. The issues of loss of privacy from overlooking and loss of daylight and sunlight from overshadowing are noted elsewhere in this letter however in our view the scale of the building and orientation of its windows are oppressive and lack sympathy or respect for its neighbour. The current organisation of space has been orchestrated by the original Architect (R. Seifert and Partners) who designed both Norfolk House and MBH as a carefully considered ensemble and this design integrity needs to be recognised.

2d. The proposed A3 use in this location will add further noise and disturbance and extend the hours of intrusive overlooking beyond normal office hours currently experienced.

2e. It would seem that The City is potentially conflicted by being both Freeholder and Local Planning Authority. We therefore request that an independent design review should be sought from Design Council CABE, or similar, and ask that NHRL be given the opportunity to

make representations about the proposals at such a review. This is an important and prominent site which will impact directly on the view of St Pauls from Millennium Bridge and we are concerned that the designs have progressed with such little consultation with key local stakeholders and such little engagement with the residents of Norfolk House who are directly affected by this inappropriate and highly offensive proposal.

3. Legal rights. Norfolk House Residents Limited (“NHRL”) owns the Norfolk House Head-lease in which Norfolk House enjoys legal rights including but not limited to, “(5) The right to pass with or without vehicles over the roadway and adjacent areas coloured pink stippled black on plan A1 for the purpose of access to and egress from the Blue Land and to park on the said roadway but only for the purpose of short term loading unloading delivery and collecting of goods and items to or from the Blue Land and to pass and repass on foot only over the area coloured pink hatched green on plan 1A.”

4. Equally convenient rights of way and road safety.

4a. No acceptable provision has been made by the Applicant to give equally convenient vehicular access to Norfolk House residents to load and unload directly in front of Norfolk House’s main entrance and to turn vehicles around within this roadway so vehicles can re-join Trig Lane in forward gear. We prepared a plan (Figure 1 below) and photographs (Figures 2 to 5) based on the Applicant’s proposal. This shows how the Applicant proposes to build over the turning area in the existing Roadway (which adjoins Trig Lane) in a way that will make it impossible for Norfolk House to continue to have equally convenient access and egress, even were the Applicant to propose including roadway access to the entrance to Norfolk House, which the Applicant has not done.

(Please note that Figures 1 – 5 were prepared informally by residents, to help visualise the Applicant’s plans, as contained in the Applicant’s presentation. We have tried to locate key points in these figures as closely as possible to the Applicant’s drawings although some dimensions were not given and which we estimated to locate key points. Any slight error in positioning should not detract from the observations we are making.)

4b. Section 12.4 of the City of London (CoL) highway and servicing requirements for developments requires that a vehicle must enter and leave this roadway to the entrance of Norfolk House in forward gear and reversing on to the public highway is unacceptable on road safety grounds. The Roadway adjoining Trig Lane is being amended and is not public highway.

4c. Disabled residents at Norfolk House are entitled to continuing access to the entrance of Norfolk House and not have to rely on the single shared blue badge parking on High Timber Street 50 metres away, which the Applicant proposes we use. Note additionally that the entire boundary of Trig Lane is marked with double yellow lines.

5. London Fire Brigade concerns. The London Fire Brigade has written to Norfolk House residents in the past to express their concerns related to access. We have the following concerns:

5a. The Applicant does not allow the Fire Brigade road access to the fire point and water supply located at the main entrance of Norfolk House.

5b. By building over the current turning area and reducing the space for any potential roadway the Applicant does not allow the Fire Brigade a turning point, sufficient deployment space and the ability to leave any roadway in forward gear.

5c. By increasing the size of their building, the Applicant significantly reduces the already limited distance between the raised Podium of Norfolk House and their planned development. This expansion stops the Fire Brigade from not only efficiently accessing Norfolk House and the new development on the Thames side, but also the lower area of the Millennium Bridge and the adjacent school.

5d. Norfolk House residents would like assurance from the Fire Brigade that all fire safety aspects of this Application have been reviewed and deemed safe on fire safety grounds which are a concern for all high-rise residential buildings. This is not a frivolous demand. In the immediate area there are already three restaurants operating and several more are planned in the new development. Kitchens are one of the main sources of fires.

6. Underground parking ventilation. The Applicant states that underground parking for Norfolk House and the basement roadway to and from basement parking spaces are not a part of this Application. But the safety of this space is affected by the Applicant's removal of vents that run along the full length of the north edge of the Roadway adjoining Trig Lane. This represents 70% of the total open ventilation by area to the basement that will be built over, affecting air flow and ventilation for cars running within the basement area. Although the Applicant proposes to remove 18 (62% of total) out of a total of 29 basement parking spaces, the remaining 11 (38% of total) Norfolk House parking spaces will have only 2% (70cm x 60cm) of direct ventilation in the cul-de-sac in which all 11 remaining spaces are located. This cul-de-sac depends disproportionately on generous air flow and air circulation within the adjacent basement roadway, 70% of whose ventilation is proposed to be built over. It is not sufficient to simply observe that the removal of 70% of ventilation can be justified by the removal of 62% of the parking spaces if the Applicant is challenged, when this will disproportionately compromise the already restricted air flow into the remaining Norfolk House parking area, raising safety concerns.

7. Pinch point. We consider the "pinch point" where the new building approaches the west end of Norfolk House to be unattractive for pedestrians at ground level who will feel hemmed in by the new building with its overhanging cantilevered floors on one side and Norfolk House on the other, creating an overbearing feeling and of walking within a narrow canyon. We note that the Applicant has omitted presenting perspective views that highlight this shortcoming and its negative impact on the public realm.

8. Daylight and sunlight. We instructed leading daylight and sunlight specialists, Anstey Horne, to consider the impact of this Application upon Norfolk House, with particular reference to the detailed report prepared by Point 2 Surveyors on behalf of the Applicant. We are grateful to the Applicant for providing Anstey Horne with access to all the relevant technical data, which Anstey Horne has relied upon. We attach the Anstey Horne

report dated 2nd April 2020, which sets out the details of concerns and questions. Drawing on the summary section of their report, the key points are as follows:

8a. Anstey Horne generally accepts and agrees with the technical methodology adopted by Point 2, except for reservations relating to the use of additional test (outside of the usual BRE testing methodology) that looks at ADF using Radiance software. The report explains reservations both in terms of the usefulness of that test and Point 2's interpretation and application of the results.

8b. A key component of Point 2's defence of the daylight transgressions relative to the BRE guidelines, is that the inter-relationship between Millennium Bridge House and Norfolk House is already very tight, leading to what they conclude to be compromised existing daylight conditions that make Norfolk House sensitive to further change. Anstey Horne's response is effectively two-fold. Firstly, given the moderate existing light conditions, sensitivity must surely be applied in terms of further material reductions in light that are currently proposed. Secondly, that the two buildings were designed and built at the same time as a composition, with what was deemed an acceptable amount of light to the north facing windows given the urban context. The current proposal is to close off the gap between the buildings, increasing the sense of enclosure and producing an unacceptable inter-relationship that is not in keeping with the original design intentions. Of course, these two points tie together.

8c. Point 2 go a stage further and suggest that the existing light levels are so poor that even small changes manifest themselves as disproportionately large percentage reductions that constitute transgressions of the guidance. Anstey Horne points out that in general the existing light levels are meaningful, warrant proper protection and do not in any way distort the position or unfairly burden the Applicant.

8d. Anstey Horne suggest that while some transgressions of the BRE guidance might be justifiable, perhaps even exceeding the 20% guideline in part if it were to a very limited number of windows/rooms, this Application takes us significantly beyond that with reductions in light up 50%-60% in part.

8e. Anstey Horne's overall conclusion is that the proposed changes to the original design concept and relationship between the buildings as currently proposed, would lead to material further reductions in light to rooms that can ill afford material detrimental changes. In essence, the proposals go too far in terms of applying flexibility to the BRE daylight and sunlight guidance.

9. Unacceptable local wind effect. There is a local wind effect along the Roadway and Trig Lane experienced by Norfolk House residents that has not been recognised in this Application.

9a. The large riverside face of Millennium Bridge House blocks and collects moving air that meets it from an approximate South Westerly direction that then finds its way at speed and whips around along the Roadway and Trig Lane between the two buildings. This arises from the alignment of Millennium Bridge House relative to the wind direction and the

juxtaposition of Millennium Bridge House relative to Norfolk House. This effect is similar to that of a funnel where fluid is collected in a large cup (comprising Millennium Bride House and Norfolk House) and makes its way down a narrow spout (Roadway and Trig Lane).

9b. This site fronts onto the River Thames where higher wind speeds are common, including from the prevailing South Westerly direction. This is also the approximate direction the river runs along at this bend and wind gusts are common across the uninterrupted expanse of the Thames. The very large supporting structure for the restaurant umbrella was once damaged by wind. There is no record or recognition in the Applicant's wind study that on windy days already fast wind speeds along the Roadway and Trig Lane can easily double at ground level. This estimate is based simply on Bernoulli's equation – if you squeeze the same volume of air flow through a passage that is half as wide (the new building halves the distance between the two buildings) the wind speed will double.

9c. This effect will be amplified at ground level where the cantilevered upper floors will focus more of the airflow along the ground level walkway. The smooth façade of the new building will further accentuate this effect compared to the existing building whose façade is indented. The 45 degree splay will further streamline airflow and increase windspeed. None of these factors are mentioned in the microclimate report nor has a wind tunnel test been done, focussing on the important interaction between the new Millennium Bridge House and Norfolk House. The computer modelling should also be focussed on the specific interaction between the two buildings to show how wind or gusts coming across the Thames is collected by the larger building and funnelled down the narrow passage between the two.

10. The flats along the river Thames in this area are residential. The current high level of tourism has seen to it there are sufficient restaurants to cater to these needs. Additional restaurants and the additional foot and taxi traffic, will be an unreasonable burden for residents to bear. In particular:

10a. Noise pollution. Increased visitor numbers and outside terraces will increase an already high noise level. Noise is particularly noticeable in the confined streets of the City of London and would be particularly noticeable on Trig Lane and the Roadway.

10b. Increased delivery chaos. More restaurants and bars imply more deliveries. These vehicles cannot park in the area. Trig Lane is a small area of roadway which is marked by double yellow lines throughout. They will park on the proposed pedestrian zone or double park on the road, leaving their engines turning and refrigeration units on. At current levels there is some hindrance. An increase would be an unreasonable burden.

10c. Light pollution. The City of London has fully illuminated the river boardwalk as well as authorized the illuminated river project. These sources of light are significant and illuminate the front of Norfolk House. This is acceptable to Norfolk House residents, given that bedrooms are often at the other side of the building. New restaurants, as planned by the developer, on the ground or higher floors will be a substantial source of light. The Applicant plans to locate these restaurants at a distance of only 8.3 metres from Norfolk House. More detail is required to explain lighting arrangements for the redevelopment. We are

concerned about glare that will negatively impact on the amenity for NHRL residents and also impact on the Illuminated River project which offers attractive and subtle lighting of Millennium Bridge.

10d. Privacy concerns. The proximity of the restaurants to Norfolk House raises considerable concerns to residents, who have their bathrooms and bedrooms opposite. The gap between Norfolk House and the proposed new building and restaurants is only 8.3m across the Roadway/Trig Lane.

11. Norfolk House Podium.

11a. The Podium is located at the West side of Norfolk House and forms part of Norfolk House demise. It is owned by NHRL and any works require our consent. It is not attached to Millennium Bridge House and is subject of an inappropriate land grabbing exercise by the Applicant under 20/00235/FULL. Removal of the Podium (which NHRL does not give consent to in any case) is ill-considered for the reasons below.

11b. More detailed analysis of surface water drainage is needed. The area of paving adjacent to the Podium often floods and by increasing the surface area at pavement level the situation is likely to be made worse, because the Podium currently has separate drainage arrangements.

11c. The Podium currently provides a separation and marshalled area for customers of the restaurant. By removing this and opening up the terrace for a wider group it has the potential to increase noise and disturbance associated with the proposed increased A3 use. This will impact negatively on the amenity for existing residents and encroach into the River Path.

12. Uncovering issues and good neighbourliness. We are all dependent on good neighbourliness and would appeal to the Applicant to respect this. The Applicant has chosen to give us limited time to engage professional consultants and to uncover issues which we believe the Applicant has been aware of and chose to conceal. It is breath taking to see how the Applicant has sought to extend its development aggressively towards Norfolk House by requiring Norfolk House to retract its own building in 20/00235/FULL. This is done under the guise of improving the public realm, when it is the public realm itself that is being compromised by the Applicant's proposal.

13. Statement of Community Involvement. The Applicant's Statement of Community Involvement misrepresents consultation of NHRL. NHRL were only recently informed of the Applicant's plans at a first meeting on 14 January 2020. At this meeting NHRL (represented by 3 NHRL Directors) said that it would consider its position and would not comment on the Applicant's proposal at the meeting. This Statement implies NHRL consent to matters presented at this first meeting and does not record the material objection I made to the loss of Norfolk House access via Trig Lane and the adjoining Roadway. Instead the Statement notes agreement that Trig Lane is a "dead space", a comment I do not recall. No representation has been made by the Board of NHRL to the Applicant in the short space of time since that January meeting, during which time NHRL has been obtaining professional advice.

Yours faithfully,
T See

For and on behalf of Norfolk House Residents Limited and named Norfolk House residents below:

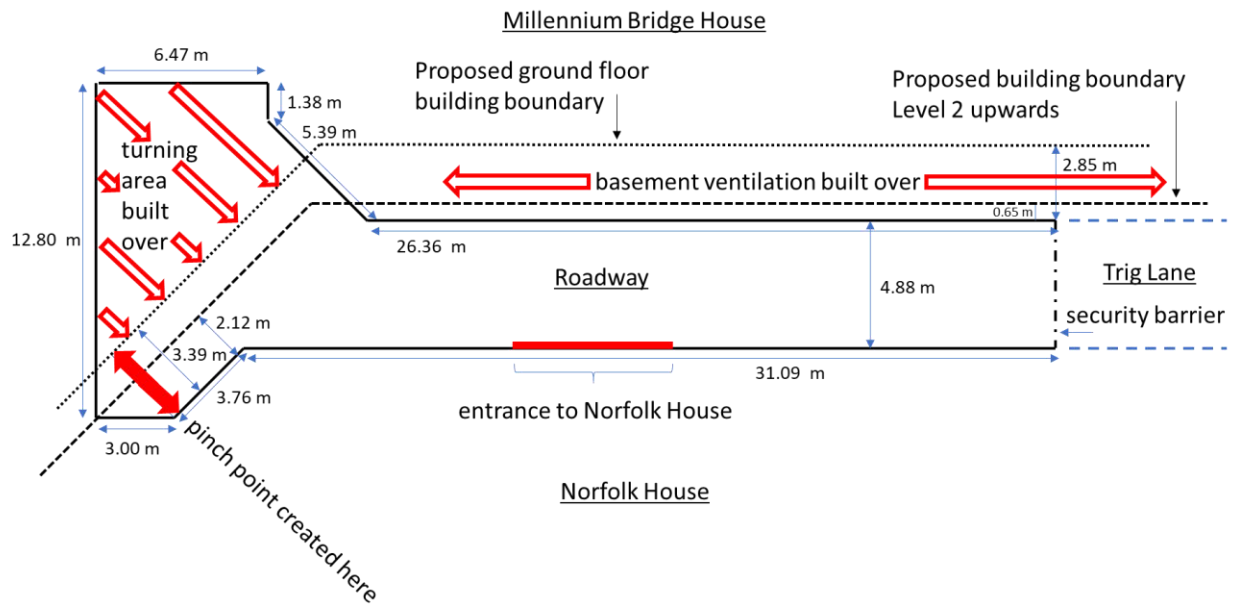
W J J Warmoes, Flat 1;
R Ellison, Flat 2;
C M See and T See, Flat 3;
D M Kearns and R A Hawkins, Flat 4;
A M Crowley and K B Mulhern, Flat 5;
A J P Gilchrist and R A M Gilchrist, Flat 6;
P Atkinson and N Farrow, Flat 7;
A Roste, Flat 8;
J M Read and P G Read, Flat 9;
V Smith and P Brewer, Flat 10;
S M G Braddell, Flat 11;
S N Tanoto, Flat 12.

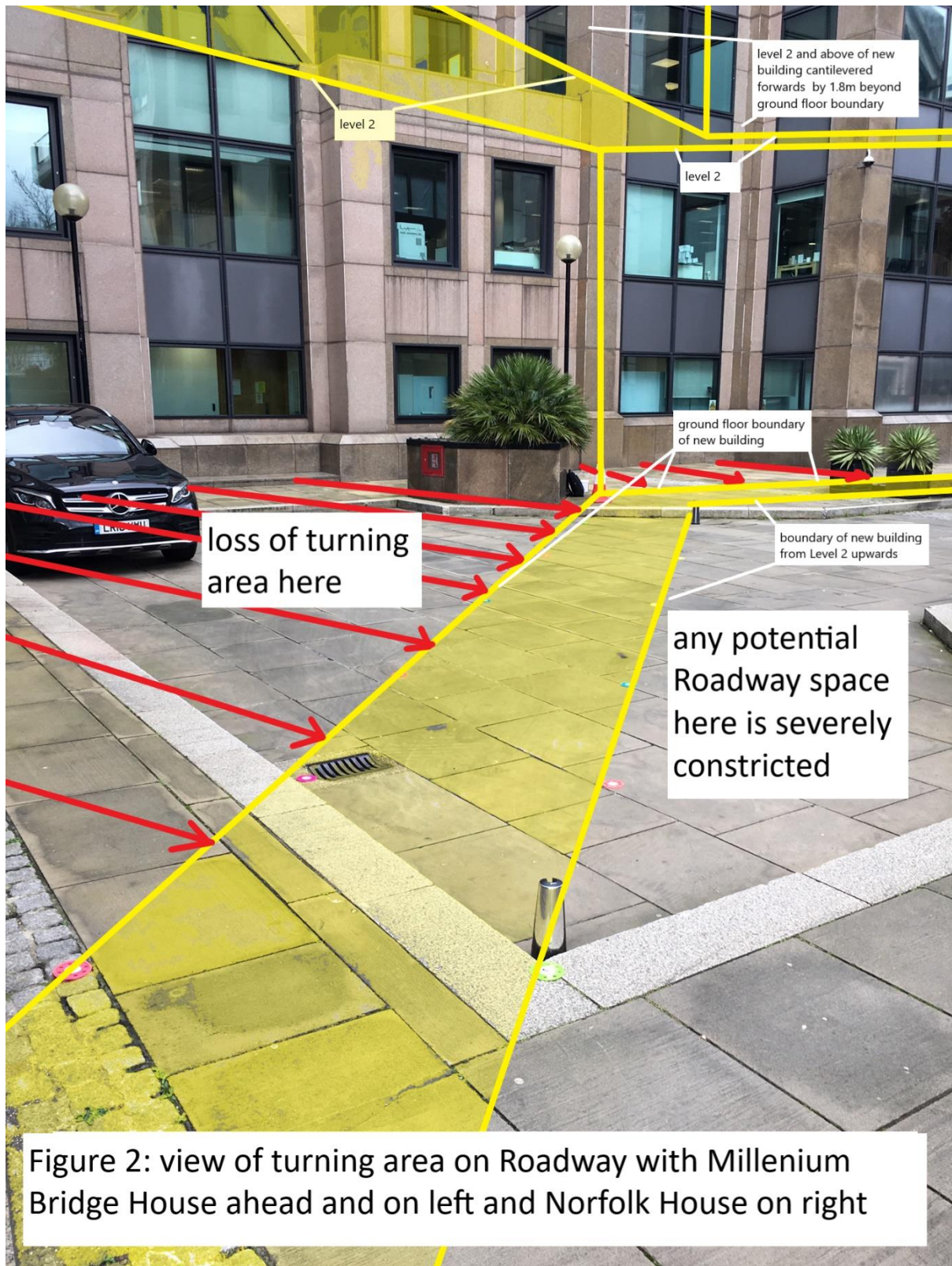
Postal address:
Norfolk House
Trig Lane
London
EC4V 3QQ

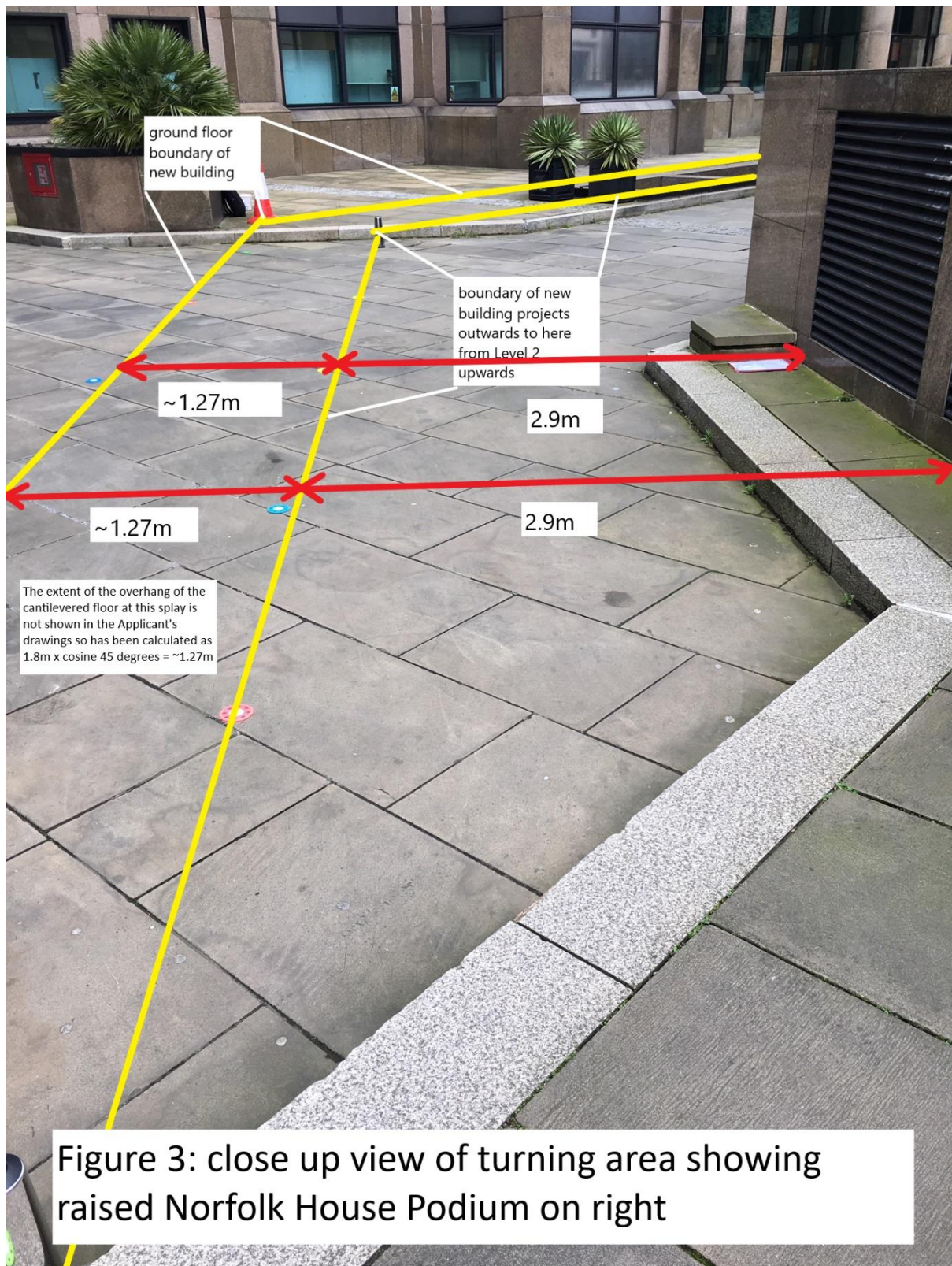
Attachments:

1. Figure 1: sketch of Roadway showing proposed building on and around the Roadway;
2. Figure 2: view of turning area on Roadway with Millennium Bridge House ahead and on left and Norfolk House on right;
3. Figure 3: close up view of turning area showing raised Norfolk House Podium on right
4. Figure 4: view of turning area from further back showing raised Norfolk House Podium on right
5. Figure 5: view down the length of the Roadway with Trig Lane at the end showing basement ventilation that will be built over
6. Anstey Horne report on daylight and sunlight dated 2Apr20 (attached as separate PDF document)

Figure1: sketch of Roadway showing proposed building on and around the Roadway









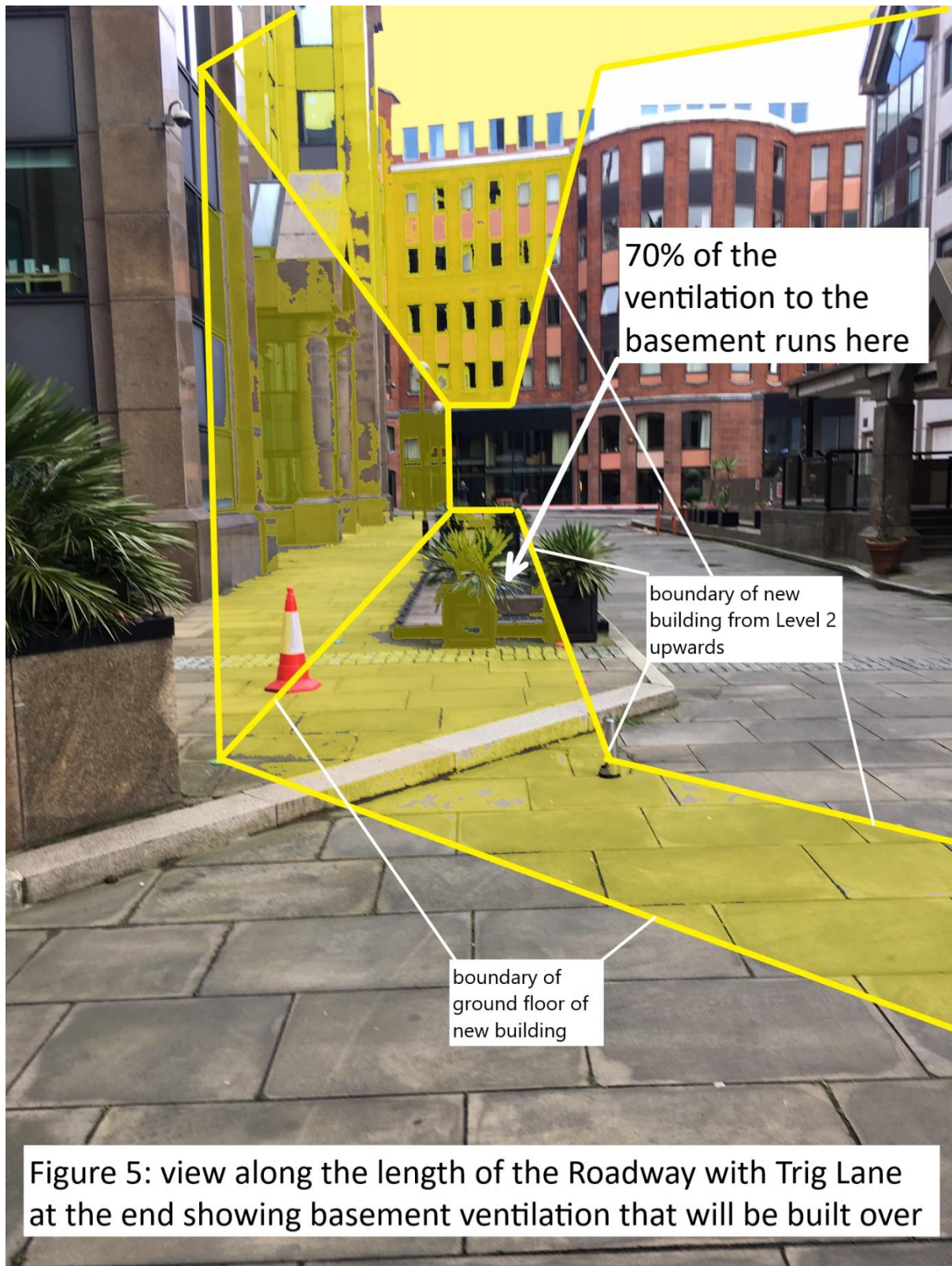


Figure 5: view along the length of the Roadway with Trig Lane at the end showing basement ventilation that will be built over

Roger Hawkins and Thomas See

2nd April 2020

By email

Dear Mr Hawkins and Mr See

Re: (ROL00379) Millennium Bridge House and Norfolk House

You recently instructed me on behalf of the Norfolk House residents to consider the proposed works of extension to Millennium Bridge House with reference to the impact upon the light to Norfolk House. In particular, you asked me to review and comment on the report dated February 2020 produced by Point 2 Surveyors on behalf of the applicants, AG Beltane MBH B.V.

It is my understanding that Mr Hawkins owns and occupies Flat 4 and Mr See owns and occupies Flat 3, but my instructions are to advise all of the residents on a joint basis.

I have not carried out any form of technical assessment myself, so at this stage I am trusting the computer modelling and technical output provided by Point 2. When I visited site recently I inspected your own flats, but in respect of the others I am relying upon the available drawing information.

I imagine you intend to forward a copy of this letter to the City of London planning department alongside a general letter of objection, which is fine by me. I would be more than happy to discuss the matter with the planning officer if that would assist.

Accuracy of technical information

As indicated above, I am relying upon the information provided by Point 2 at this stage. I note that the layouts of the flats were taken from estate agents' details in the main. Based upon the information you subsequently provided I think there are variations from the reality of the layouts in part, but probably not such that would significantly affect the technical results and therefore any conclusions arising therefrom.

4 Chiswell Street, London EC1Y 4UP T: 020 7065 2770

Also at 3 Temple Row West, Birmingham B2 5NY T: 0121 667 9902

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Point 2's approach to the BRE guidance and the appropriate technical tests to adopt

I take no issue with the fact that Point 2 lead with an assessment of vertical sky component (VSC), no-skyline (NSL, but otherwise known as daylight distribution) and annual probable sunlight (APSH) for sunlight.

I note that Point 2 additionally include an average daylight factor (ADF) assessment using Radiance software and make the following general observations in that respect:-

- The BRE guide specifically excludes ADF for the assessment of impacts upon neighbouring properties, because it is not intended as a comparative test, instead it is how one assesses light conditions within new developments in order to determine whether they will be sufficiently well daylight.
- Radiance offers up increased sophistication in the sense that it can take account of internal and external reflectance, but external reflectance can change through time if changes are made to relevant surrounding buildings and internal reflectance will change much more regularly depending upon the tastes of the occupants of a particular room.
- I am therefore interested to know what internal light reflectance Point 2 assumed for the various surfaces, because it may not accord with the current position or potential future uses. I would also appreciate confirmation as to whether Point 2 took full account of external reflected light with a detailed model of the finishes of Millennium Bridge House.

More detailed analysis of Point 2 report

For the sake of brevity I have not endeavoured to comment on each and every paragraph or comment appearing in the report, instead summarising the key points, starting with the preliminary assessment (following the BRE guidance) utilising the VSC, NSL and APSH test methodologies.

General points

1. Point 2 argue that where one is dealing with a double or triple aspect room, extending from the north elevation through to the south elevation overlooking the River Thames, the windows in the north elevation facing Millennium Bridge House should not be considered the main source of light. I do not believe that to be strictly correct, nor a reasonable approach for the following reasons:-

- For a room to extend from the north elevation to the south elevation within Norfolk House, it will be of a significant size and therefore it cannot be reasonable to assert that the south facing glazing overlooking the River Thames is the main source of light to the northern element, i.e. the kitchen/dining element in the northern portion of the building.
 - Apart from anything else, to do so would assume that the space must always remain open plan, whereas that may not be the position in the future as it will depend upon the choice and taste of the occupants. In my opinion it would be more reasonable to assume the space divided roughly down the centre, with the northern element served only by the north facing windows overlooking Millennium Bridge House. That has not been done and therefore could serve to camouflage the full impact upon the northern spaces. My suggestion would be that an updated analysis is run for these open plan spaces with VSC and NSL results for the rear parts assuming a single aspect arrangement. I should add that it is probably how the units were originally designed.
 - This is an important point, because Point 2 make their initial assumption about the open plan arrangement and therefore effectively dismiss certain spaces as being BRE adherent when that may not in fact be the case. An example may be Flat 1 at first floor level.
2. Point 2 point out the fact that in the BRE guide kitchens and bedrooms are deemed to be less important than main living rooms, which I quite accept. However, they clearly must not be disregarded and as there are a number facing north towards Millennium Bridge House, some with already compromised light conditions, they warrant careful consideration and sensitive treatment.
 3. Point 2 indicate that some of the existing VSC levels are quite low due to the urban setting, tight relationship with Millennium Bridge House etc, and say that they are therefore particularly sensitive to further reductions in daylight. That is true, but emphasises at least partly why they need to be treated sensitively.

As an extension of this, Point 2 say that Norfolk House was designed to mainly leave kitchens and bedrooms facing north towards Millennium Bridge House and, where possible, main living spaces overlooking the River Thames, in order to obtain the best light and views. That is also true, but I believe it is the case that Norfolk House and Millennium Bridge House were designed and developed together, with the designers clearly spacing the buildings apart to maintain perhaps not ideal daylight conditions to the rear of Norfolk House, but sufficient to leave the rooms fit for purpose. Point 2 clearly think the existing spacing is limited and seem to see that as justification for further compromising light conditions, but surely that is all the more reason to maintain the limited building-to-building separation by not building further south towards Norfolk House in such a clearly oppressive way. Indeed, even a moderate extension to the south elevation of Millennium Bridge House that ensured no reductions beyond 20% of the existing light would be challenging for the Norfolk House residents, but here Point 2 seek to defend transgressions materially beyond that in part.

Comments on individual paragraphs

1. Paragraph 3.6 says “.....main source of light to the primary living accommodation in Norfolk House will therefore be unaffected by the development”.

Where there is an open plan living space extending from the north to south elevations of Norfolk House, I have explained earlier why I do not think it is fair and reasonable to argue that the southern elevation glazing is the main source of light to the whole space. That is to ignore the impact upon the northern windows to these open plan spaces and I do not believe be correct.

This also cannot be correct with regard to the ground floor studio Unit 12 in the north-west corner, which enjoys a dual aspect, where both aspects are affected by the works of extension, with only a glancing view towards the Thames.

2. Paragraph 3.8 suggests that because we are dealing with a dense location and the majority of affected rooms are bedrooms and kitchens, the impacts are not that significant or important. I think we have to be careful not to be too dismissive of the importance of kitchens and bedrooms, but even if it is accepted that they are less important than key living rooms, we are not talking about marginal transgressions of the BRE guidelines because the report confirms that of 11 VSC transgressions, 2 record reductions between 20% and 30%, 3 record reductions between 30% and 40%, 3 record reductions between 40% and 50% and a final 3 record reductions between 50% and 60%.

3. Paragraph 3.9. Point 2 explain that where existing light values are very low, even a small absolute change might manifest itself as a disproportionately large percentage change. That is true and is a point I have taken myself on many occasions, but one has to remember that the guide allows 20% leeway anyway. More importantly, taking this case specifically, in general we are not dealing with extremely low VSC values and so the percentage reductions referred to above are not fractional absolute changes in VSC values. By way of a couple of examples:

- Ground floor Flat 12 – 2 windows serving the studio unit are reduced from 11.1% and 10.6% VSC to 4.5% and 4.6% respectively. We are therefore talking about reasonably material VSC reductions and percentage reductions of 59% and 56% respectively.
- First floor Flat 3 – a kitchen window is reduced from 14.1% to 7.3% VSC, equal to a percentage reduction from the current value of 49% and an absolute change of 6.8% VSC.

Point 2 also refer to and quote the section of the guide that indicates one might not be able to achieve BRE adherence if proposed buildings are to match the height of others in the vicinity. That too is a valid point in principle, but in this instance it is not a question of matching heights, it is a proposal to close off the gap between two buildings that are already close to one another, such that ideal daylight conditions do not exist now and they are sensitive to any meaningful further change.

4. Paragraph 3.10 quotes from the City of London plan (paragraph 3.10.41) and says that the City of London accepts that *“ideal sunlight and daylight conditions may not be practicable in densely developed city-centre locations”*.

That is a sensible approach, but there is still a need to protect amenity to residential accommodation within the City and the BRE guide already allows 20% leeway for change in that respect. I would reemphasize the fact here that we are not talking about marginal transgressions beyond that 20% leeway.

5. Paragraph 4.23 deals with the NSL test and Point 2 seek to defend what seem to be meaningful transgressions of the guidance. Here it is important to note that this paragraph seems to deal with affected neighbours in total, rather than Norfolk House in isolation, so I have attempted to pick out the parts relevant to Norfolk House below.

What Point 2 seem to be saying is that the existing daylit areas are so limited that even small changes manifest themselves as disproportionately large percentage reductions that then do not adhere to the BRE guidance. However, I do not think that is a reasonable argument in respect of Norfolk House, as explained in the paragraph below.

8 rooms transgress using the DD test, 3 of which currently receive visible sky to less than 50% of the working plane and are kitchens. The 3 kitchens lose 39%, 53% and 62% of the values in the existing conditions (area losses of around 25 sq ft) - the other 5 rooms are 2 kitchens and 3 bedrooms that lose from 23% to 32% of the existing values (4 rooms experience area losses of 23-28 sq ft and 1 kitchen loses 58 sq ft).

6. Paragraphs 4.32 to 4.36. This section includes a useful diagram and some tabulated information, but I would pick out the following points of interest.
 - Point 2 refer to only 11 of 53 windows tested not satisfying the VSC test, but that is a bit misleading as to the severity of the change because the 11 windows they refer to are focused in the north-west corner of the block, not a well lit area and one that is affected by two different areas of the proposed extension.
 - In paragraph 4.3.3. Point 2 refer to what they seem to consider to be exceptionally low VSC value ranging between 11% and 14% for these windows. That is certainly not unheard of in urban locations, albeit I accept the VSCs are quite low. I am afraid though I must come back to the fact that they still represent a meaningful amount of light that has to be respected, indeed specifically requires protection from the City of London because those values are already compromised.

- Paragraph 4.3.4 mentions that of the 11 windows falling below the guidelines using the VSC test, 8 serve 7 rooms that are multi-aspect and each retains BRE adherence to at least one mitigating window. Although this is strictly true, I would argue that in some cases the mitigating window is a marginal technical 'pass' and does not in my view automatically discount the significant losses to the window/s that transgress. A few examples of this are:-
 - The ground floor studio, Flat 12, is served by 3 windows. The 2 north facing windows transgress the guidelines significantly and the VSC of the 3rd west facing window is reduced from 21.3% to 17.1%, representing a 20% loss to the existing value. Although technically a 'pass', in my view this does not mitigate the losses to the other two windows which are reduced from 11.1% and 10.6% to 4.5% and 4.6% respectively (equivalent to over 50% loss from that received in the current conditions).
 - A first floor bedroom within Flat 3 is served by 2 windows. The VSC of the north facing window is reduced from 13.8% to 6.5%, an absolute reduction of 7.3% (53% loss of the value received in the current conditions). The VSC of the west facing window is reduced from 23.1% to 18.5% (absolute VSC loss of 4.6% and an equivalent 20% loss from the existing value).
 - It is often argued that according to the BRE guide, bedrooms have less of a requirement for daylight than living areas. However, in the case of the second floor bedroom assessed within Flat 6, there is evidence of the intention for its use to be as a study too. The VSC of the north facing window serving this room is reduced from 17.3% to 9.7% and the west facing window from 25.6% to 20.9%. The north facing window is beyond the guidelines as the loss from the existing value equates to 44% (absolute change of 7.6%). The west facing window passes marginally by losing the equivalent of 18% of the current value (absolute change of 4.7%).
- Paragraph 4.35 tries to whittle things down to 3 kitchens as if they are of limited consequence, but I think they are single aspect so they only take their light from over Millennium Bridge House and paragraph 4.36 seems to confirm significant percentage reductions. The daylight reductions to the 3 kitchens are significant and can be summarised as follows:

- The VSC test results show that the 3 windows serving the 3 kitchens lose 49%, 38% and 25% of the existing values.
- The NSL test results show that the 3 kitchens lose 62%, 53% and 39% of the existing values.

7. The report attempts to justify the transgressions arising out of the key recommended BRE tests by reference to use of Radiance software and average daylight factor. As mentioned earlier it is important to note that the BRE guide specifically says that the correct tests for daylight when testing the impact upon an existing neighbour are those of VSC and NSL. Furthermore, it confirms that ADF is not the recommended test because instead it is meant to be a tool for assessing adequate daylight conditions in new developments.

One might justify use of the ADF test if one could show that good ADF levels would prevail in an affected building after the proposed development had been built. However, it is generally the case that Point 2 are not able to do that here and, in any event, their subsequent comparisons all relate to the minimum target in the guidance. Surely it cannot be the case that Point 2 are suggesting that the Radiance study indicates that good daylight conditions will be retained, because earlier in the report they are at pains to point out that the existing levels are rather low?

8. When one reads through the floor by floor analysis of the Radiance results, it is evident that Point 2 are not consistent in their approach. They appear to run a different argument in defence of the results on virtually every floor, effectively running a different argument to suit each different transgression. It is also the case that they confirm clear examples of material impacts even if one thought that an ADF assessment was the correct approach. For example;
 - On the third floor they cite the example of a kitchen having an ADF reduced from 1.3% to 0.9%, which we must consider in the context of the BRE of 2.0%. It is quite a low value that is reduced by nearly a third.
 - They cite the example of room R4/11, a kitchen, with the ADF cut from 0.8% to 0.4%. It is a low existing value that would be halved.

9. Some focus is applied to the studio unit 12 at ground floor level in the north-west corner, including an introduction of testing which attempts to take account of the external foliage. I am not convinced it is correct to say that they are in leaf for two thirds of the year, not least because there is always a transitional period when leaves are falling. However, they confirm in paragraph 4.56 that when the trees are “*out of leaf*” the ADF value will fall from 1.5% to 1%, a reduction of a third to an already compromised unit.
10. In the conclusion section paragraph 5.2 refers again to the current VSC values for the north facing windows as being circa half of the 27% target in the BRE guide. I think that is true, but of course the 27% target is not viable in an urban location and while the existing values are low, I come back again to the point that it means those values need to be properly protected. They are not so low that the proposed reductions would be unnoticeable or of no significance to the occupiers of the rooms in question.

Paragraph 5.3 says that in an urban setting some transgressions of the BRE guidance may be unavoidable. I accept that proposition but come back to the fact that one should seek to avoid material transgressions beyond the 20% in-built leeway the BRE guide provides. If only dealing with an odd window here and there one might also take a more relaxed view, but the impacts are spread across the northern elevation and quite a number of rooms will be compromised as a consequence.

Summing up

Please excuse the fact that I have repeated certain points throughout this report, I have done so simply because they are repeated in the Point 2 report and I felt the need to respond to key paragraphs as I worked through the report. I take the view that in an urban setting one should not necessarily apply the BRE guidelines rigidly, so I do not assess the Point 2 report on that rather prescriptive basis. Instead I have tried to come at it from the point of view of what is reasonable in all the circumstances, in order to be fair to both the developing party and you as the residents of Norfolk House. Having done so I would summarise my thoughts as follows:-

1. Point 2 effectively criticise the design of Norfolk House and its relationship with Millennium Bridge House, leading to their argument that the north facing rooms have compromised light conditions in the main and, in a sense, therefore overly-burden their clients in terms of what they can now do to Millennium Bridge House. I think it is relevant to point out that they were effectively developed together and as a composition, so although it is true to say the north facing windows and rooms do not enjoy the best of light conditions and some of the existing values are quite low in part, they were deemed acceptable at the time that

composition was put together and were not designed to further close off the space between the blocks in the manner that is now proposed. Quite apart from the factual position with regard to the BRE daylight tests, I think it is fair to say that the proposal would be rather overbearing, arguably oppressive, when viewed from the windows in question.

2. When one argues that the BRE guidance should not be applied too rigidly in urban settings, one still has to be cognisant of the aim of the BRE guide, which is to try to avoid reducing existing daylight levels by more than 20%. One might reasonably argue that some leeway should be applied beyond that, particularly if not many windows and rooms are affected, but in this instance some of the transgressions are significantly beyond the 20% benchmark, and would be keenly felt by residents.
3. Point 2 make the valid point that where existing light levels are exceptionally low, for example if one had a VSC value of 6%, even an absolute reduction from 6% to 4% would manifest itself as a 33% change and therefore arguably be disproportionate. However, what we mainly have here is lowish values, but not to the level of a 6% VSC, instead in the low to mid-teens. They are meaningful levels of light and what we see here is meaningful absolute reductions in part and meaningful percentage reductions in quite a lot of cases.
4. One additional point of justification used by Point 2 with regard to open plan spaces, particularly those spanning from north to south across the block, is that by hampering and reducing the light to the rear, north facing windows they are not affecting the primary source of light. I do not believe that is correct when what they refer to as the primary source of light – the south facing windows overlooking the River Thames – is so distant from the rear parts of the building. It is also the case that these northern spaces would have been partitioned off in the past and could be so in the future as well. For that reason I have advocated that Point 2 be asked to produce a revised study for these areas that assumes a notional division between the northern and southern spaces to see how the single aspect north facing elements would then be affected by reference to VSC and NSL.
5. I do not see that the introduction of the additional Radiance study in relation to ADF is of material assistance to the City of London, nor do I see that it serves, as intended, to justify the transgressions of the recommended tests. ADF is clearly explained in the BRE guide as not being the appropriate test for existing neighbouring properties. In addition, if one looks at the ADF results presented by Point 2, I do not think it fairly leads to the conclusion that there is not a material problem. Finally, I think it is evident that Point 2 do not show consistency in their ADF lines of defence, switching arguments and justification on a floor by floor basis to suit the particular results arising.



6. My overall conclusion is that while it may indeed be acceptable to extend Millennium Bridge House in part, pushing out to close the gap between the buildings is rather oppressive and even if one accepts the reasonableness of flexibility in interpretation of the BRE guide in urban locations, the degree of change here is quite material to rooms that already have compromised light conditions.

I hope all of the above is clear, but if you have any queries to let me know.

Yours sincerely

Lance J Harris

cc: Justin Cullen

Yours sincerely

[Insert author's name]

From: [REDACTED]
To: [PLN - Comments](#)
Subject: 20/00214/FULMAJ application for refurbishment and extension Millennium Bridge House 2 Lambeth Hill EC4V 4AG
Date: 06 April 2020 18:21:11

Dear Sir

We are the owners of Flat 67 Benbow House , New Globe Walk SE1 9DS . Our flat faces north towards the Thames and accordingly we could be directly and adversely affected if the proposals for extensive roof terraces (5th and 6th floors) and public viewing platform facing south are allowed without restrictions.

Our particular concerns are as follows :

1) Noise and disturbance

Use of the roof terraces...noise from entertainment generally and in particular any music will be amplified across the river and cause significant disturbance to neighbours and residents. (we note that the measurements done for the Acoustic report were taken at the end of November/ early December a period which is hardly likely to be a fair reflection of the impact this will have on existing ambient noise levels).

We would accordingly request that stringent restrictions/conditions are imposed on the use of the terraces (and indeed of any open space) for entertainment and/ or music in relation to both the nature and the hours of public use

2) We fail to understand the relevance and/or need for any public viewing being allowed from lobbies and terraces. This can only amount to an unreasonable intrusion into the privacy and quiet enjoyment of their premises for residents both nearby and opposite the site and we would accordingly object in the strongest terms to this use being permitted at all.

3) Mixed use,....the building is currently mainly an office and the surrounding area is a quiet space for residents and families. Any extended use for retail/ restaurant/ bars would result in congestion, incidences of anti social behaviour and noise disturbance both during daylight and darkness with the inevitable impact on traffic control and policing.

We would therefore object strongly to any permissions that did not ensure that the majority of the building remains restricted to office use.

4) Finally We would want any permissions to ensure that in accordance with the Historical Buildings report close attention will be placed on the proposed height of the building to ensure that there is no detrimental impact on the historic environment.

We trust that the above issues will receive due consideration.

Paul and Elisabeth Lee. Flat 67 Benbow House New Globe Walk.

Sent from my iPad

Comments for Planning Application 20/00214/FULMAJ

Application Summary

Application Number: 20/00214/FULMAJ

Address: Millennium Bridge House 2 Lambeth Hill London EC4V 4AG

Proposal: Refurbishment and extension of the existing building involving the partial demolition and partial infilling of the existing structure and the introduction of a new facade to all elevations and extension to the building at all floors, introduction of roof terraces at fifth and sixth floors, including a public viewing terrace and associated lobbies at second and sixth floors, alongside a part change of use at ground floor from Office to Retail/Cafe/Restaurant/Bar (Class A1/A3/A4); a part change of use at first from Office to either Office or Retail/Restaurant/Bar (Class A1/A3/A4/B1); second floor from Office to either Office or Retail/Restaurant (Class A1/A3/B1) and a change of use from Office to Retail/Cafe/Restaurant (Class A1/A3); a part change of use at sixth floor from Office (Class B1) to either Office or Restaurant/Bar (Class B1/A3/A4) and a change of use from office to restaurant/bar (Class A3/A4) use together with public realm works to Peter's Hill (including the removal and relocation of the southern HSBC gates), Lambeth Hill, Trig Lane and Paul's Walk (part of the Thames Path) and associated works.

Case Officer: Rob Chipperfield

Customer Details

Name: Mr Garfield Johns

Address: Flat 10 Ash House Burnt Ash Hill London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I strongly object to this development. Seen from the river and/or the South Bank, this addition to the north shore, will sadly add to the already disastrous collection of recent/modern buildings which sit between Tower Bridge and Blackfriars (book-ended by the truly hideous Guoman Hotel in the east and the ghastly Puddle Dock in the west). Ugh. Ghastly. The proposal for Millennium Bridge House is the wrong building to put here. The horizontal flat roof line will abruptly dissect the view of St. Paul's from the river. As is often the case with much of development in London, this proposal is being seen as a single plot, when in fact the whole north shore and the skyline/riverscape should be planned/seen together. This means having a plan for the whole riverside, which is harmonious and can be developed over time. If The City authorities really want visitors and businesses to enjoy and return to these spaces, and build a lasting legacy where roofscapes and beauty matter, then there needs to be a not so radical shift in thinking. I often ask myself why London's riverside can't be just as thrilling, exciting, architecturally appealing as most European riversides. Go to Tate Modern and gaze across from the bar to see how poor

the riverside built environment is - it's truly disappointing. It's not from want of investment. It's about a vision. The current proposal, while functional, interesting, is not a building to sit on the river. TBH, it would be best suited in a business park off the M4. The starting point in my view, is to search the archives, and look at drawings from the past to see how architects built in harmony with the river. We need to develop the north shore as one parcel of land; there should be guiding principles to ensuring architectural styles are harmonised rather than competing. We should be seeking to create a 21st century Canaletto-style view of the north shore and The City, a lasting legacy which befits the great city. The proposal comes up short.

From: [Chipperfield, Rob](#)
To: [DBE - PLN Support](#)
Subject: FW: Millennium Bridge House 20/00214/FULMAJ
Date: 01 June 2020 09:15:29

From: M A Lowndes
Sent: 29 May 2020 12:36
To: Chipperfield, Rob <Rob.Chipperfield@cityoflondon.gov.uk>
Cc: Thomas See
Subject: Millennium Bridge House 20/00214/FULMAJ

Dear Rob

Thank you for your email of 4th May. We are pleased to hear that you are carefully considering the impacts of the proposed development on the residential amenities of Norfolk House. We are particularly keen that you should take into account the cumulative impacts of the development upon those sensitive amenities.

In addition to the further loss of daylight to already poorly served residential windows on the north side of Norfolk House we identify that the scheme, by reason of the significant encroachment of additional built form into Trig Lane, will lead to a substantially increased sense of enclosure, loss of outlook and loss of privacy through overlooking.

Together, these impacts will fail to meet the terms of Policy DM 21.3 which seeks to protect residential amenities of existing homes.

Further we have concerns that the increase in ground level active frontages (and roof level gardens) to Trig Lane could cause noise nuisance which is likely to be exacerbated by the canyon-like form of the street now being proposed.

The proposed south elevation is an unrelieved cantilevered wall, substantially in advance of the line formed by the forward-most part of the currently castellated building line. This existing plan form was carefully articulated in the original design so as to provide interest in outlook, to manage the experience of enclosure and to moderate overlooking of the residential units.

In this way the original development created a carefully balanced physical and spatial relationship between the twinned office and residential buildings which would be fundamentally compromised by the current proposals.

The detrimental impacts so arising could be largely overcome by a simple revision which would set the new elevation back to the substantive position of the existing main elevation.

At the western end of the Roadway/Trig Lane the proposals also involve encroachment into the existing space between the two buildings in the form of the angled extension. This component relies upon the significant reworking of the podium element attached to the residential building (the subject of the second application) in order to allow continued convenient and safe access for pedestrians and emergency services. However this proposed adjustment will compromise existing, protected, arrangements of residential access to Norfolk House itself.

In this respect it is important to point out that the podium is not in the legal control of the developer. The legal control of the podium is in the hands of Norfolk House Residents Ltd (NHRL) and there are covenants which restrict any alterations being made to the structure of the podium by any lessee. The lessee of the Norfolk House restaurant (which uses the podium for outdoor dining) has a demise which excludes the borders of the podium, and the terms of their occupation of the inner area of the podium does not allow them to overcome NHRL's control of the elevated structure.

Without being able to modify the podium the angled extension to MBH cannot be delivered and so should not form part of the main proposals.

We would be very keen to discuss these concerns with you in advance of submitting our further formal objection.

Kind regards

Michael Lowndes | Urban Planning

From: PLN - Comments
Subject: FW: 20/00214/FULMAJ and 20/00235/FULL

From: Thomas See <
Sent: 18 June 2020 07:38
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>; Chipperfield, Rob
<Rob.Chipperfield@cityoflondon.gov.uk>
Subject: 20/00214/FULMAJ and 20/00235/FULL

NHRL Planning Objection Letter 18 June 2020 ref: 20/00214/FULMAJ and 20/00235/FULL

Dear Mr Chipperfield

Gerald Eve's letter dated 12 June 2020 argues on behalf of Beltane, the Applicant, that permission should be granted to the redevelopment plans without amendment, since NHRL were properly consulted prior to Beltane's application being submitted. As we set out below, no such proper consultation of NHRL has, in fact, taken place.

Beltane claims to have had four consultation meetings with NHRL although it significantly omitted to mention them in its original Statement of Community Involvement. Why was this not previously mentioned if the Applicant considers these discussions to be legitimate and to convey an endorsement by NHRL of its Application?

The Applicant has not informed NHRL of the dates and attendees at these four consultation meetings. However, NHRL has since become aware that two individual residents have been approached by the Applicant and its financial backer. The Board and residents of NHRL take a dim view of such informal approaches and, if so claimed, do not consider these discussions to form part of any consultation.

In our letter dated 5 April we wrote, "The Applicant's Statement of Community Involvement misrepresents consultation of NHRL. NHRL was only recently informed of the Applicant's plans at a first meeting on 14 January 2020. At this meeting NHRL (represented by 3 NHRL Directors) said that it would consider its position and would not comment on the Applicant's proposal at the meeting." We added that, "No representation has been made by the Board of NHRL to the Applicant in the short space of time since that January meeting, during which time NHRL has been obtaining professional advice."

NHRL's Board has four Directors and a majority is required for Board decisions. There was no Board decision taken to approach and make any representation to the Applicant in the period between 14 January 2020 and when our Planning Objection letters were submitted on 1 and 5 April 2020.

We reiterate that the NHRL Board and residents of Norfolk House were not made aware of any meeting that individual residents in Norfolk House might have had with the Applicant at the time our two Objection letters were submitted on 1 and 5 April. Any views that might have been expressed by individuals, acting for their individual benefit, cannot be conflated with the views the Board of NHRL has carefully collated from and agreed with residents and recorded in its two Objection letters.

We will write again shortly to respond to other important points in the Applicant's letter.

Yours faithfully

T See

For and on behalf of Norfolk House Residents Limited and named Norfolk House residents below:

W J J Warmoes, Flat 1;

R Ellison, Flat 2;

C M See and T See, Flat 3;

D M Kearns and R A Hawkins, Flat 4;

A M Crowley and K B Mulhern, Flat 5;

A J P Gilchrist and R A M Gilchrist, Flat 6;

P Atkinson and N Farrow, Flat 7;

A Roste, Flat 8;

J M Read and P G Read, Flat 9;

V Smith and P Brewer, Flat 10;

S M G Braddell, Flat 11;

S N Tanoto, Flat 12.

Postal address:

Norfolk House

Trig Lane

London

EC4V 3QQ

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From: [Chipperfield, Rob](#)
To: [Devlia, Neel](#)
Subject: Fwd: 20/00235/FULL
Date: 30 June 2020 13:18:26
Attachments: [Title Plan View - NGL801549\[103644\].PDF](#)
[Title Plan View - NGL731070\[103642\].PDF](#)

From: Thomas See [REDACTED]
Sent: Tuesday, June 30, 2020 12:26:18 PM
To: Chipperfield, Rob <Rob.Chipperfield@cityoflondon.gov.uk>; PLN - Comments
<PLNComments@cityoflondon.gov.uk>
Subject: 20/00235/FULL

Dear Mr Chipperfield,

We wrote on 1 April 2020 to object to 20/00235/FULL which relates to the lowering of the Norfolk House Podium. This Podium is entirely within the legal control of Norfolk House Residents Limited ("NHRL"), which is in turn controlled by the residents of Norfolk House, who appear as signatories to this letter below. We will not give permission for this Podium, which forms an integral part of Norfolk House, to be lowered in any circumstances.

Despite claims to the contrary in the Applicant's letter dated 12 June 2020, there is no legal ambiguity over the control exercised by NHRL over the Podium. The attached Land Registry plan for NGL731070 shows the extent of NHRL's demise of the Podium area at ground floor level. It shows that NHRL's demise extends over the whole area of the raised Podium, which wraps around Norfolk House and extends to one side of the Roadway adjoining Trig Lane. NHRL is granted rights of support for the Norfolk House premises, which include the raised Podium area. A smaller section within the surface area of the Podium is demised to the Norfolk House Restaurant but this area does not extend to the outer edges of the podium (so that there is an area around the outer edges of the surface of the Podium which remains in NHRL's control). This is shown in the Land Registry plan for title number NGL801549. Further, and significantly, the walls, rails and surrounds of the Podium are specifically excluded from the Restaurant lease. NHRL's legal control over the Podium cannot be overcome as the (a) the structure of the Podium is outside of the restaurant's demise and (b) even if it were within the restaurant's demise, the lease prohibits any alteration to the structure of the Premises. The rights of support enjoyed by NHRL means that the Podium cannot be lowered.

We understand that it is possible to grant Planning permission for a Planning Application that later cannot be implemented for legal reasons. It is imperative that this is not done for this particular Application because knowledge that the Podium will remain in its current form and has to be physically accommodated affects what is possible to be permitted in the linked Application 20/00214/FULMAJ.

We are writing to ask for this Application 20/00235/FULL to lower the Podium to be determined ahead of the linked Application 20/00214/FULMAJ. This is in order that subsequent linked Planning decisions on 20/00214/FULMAJ can be taken in the clear understanding of how they affect the public realm and the further legal rights of NHRL with the Podium structure remaining in place.

It is not the case, as the Applicant claims in its letter dated 12 June 2020, that “this is a private law matter and is not a material planning consideration”.

Yours faithfully,
T See

For and on behalf of Norfolk House Residents Limited and named Norfolk House residents below:

W J J Warmoes, Flat 1;
R Ellison, Flat 2;
C M See and T See, Flat 3;
D M Kearns and R A Hawkins, Flat 4;
A M Crowley and K B Mulhern, Flat 5;
A J P Gilchrist and R A M Gilchrist, Flat 6;
P Atkinson and N Farrow, Flat 7;
A Roste, Flat 8;
J M Read and P G Read, Flat 9;
V Smith and P Brewer, Flat 10;
S M G Braddell, Flat 11;
S N Tanoto, Flat 12.

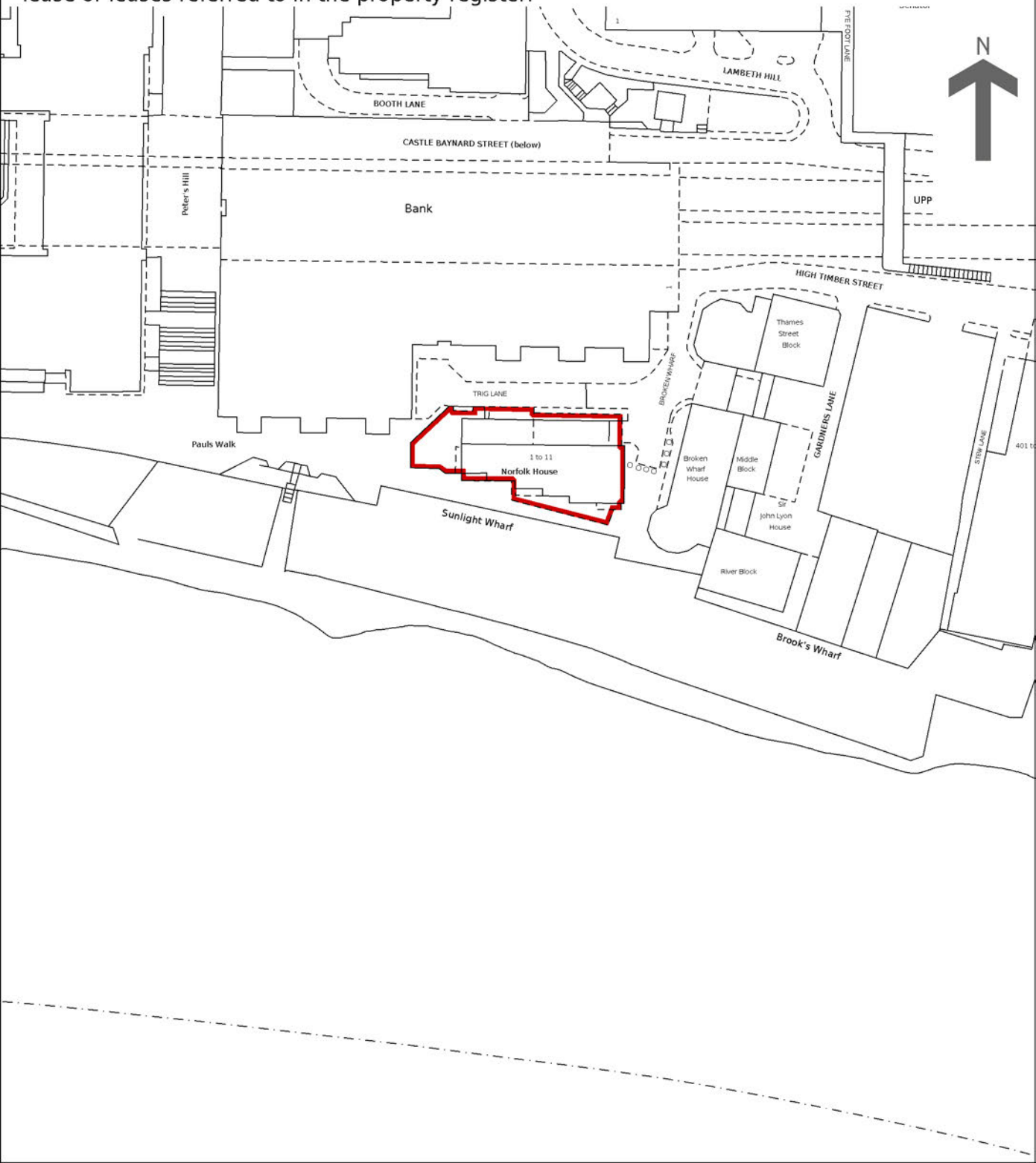
Postal address:
Norfolk House
Trig Lane
London
EC4V 3QQ

Attachments:

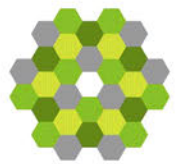
NGL 731070
NGL 801549



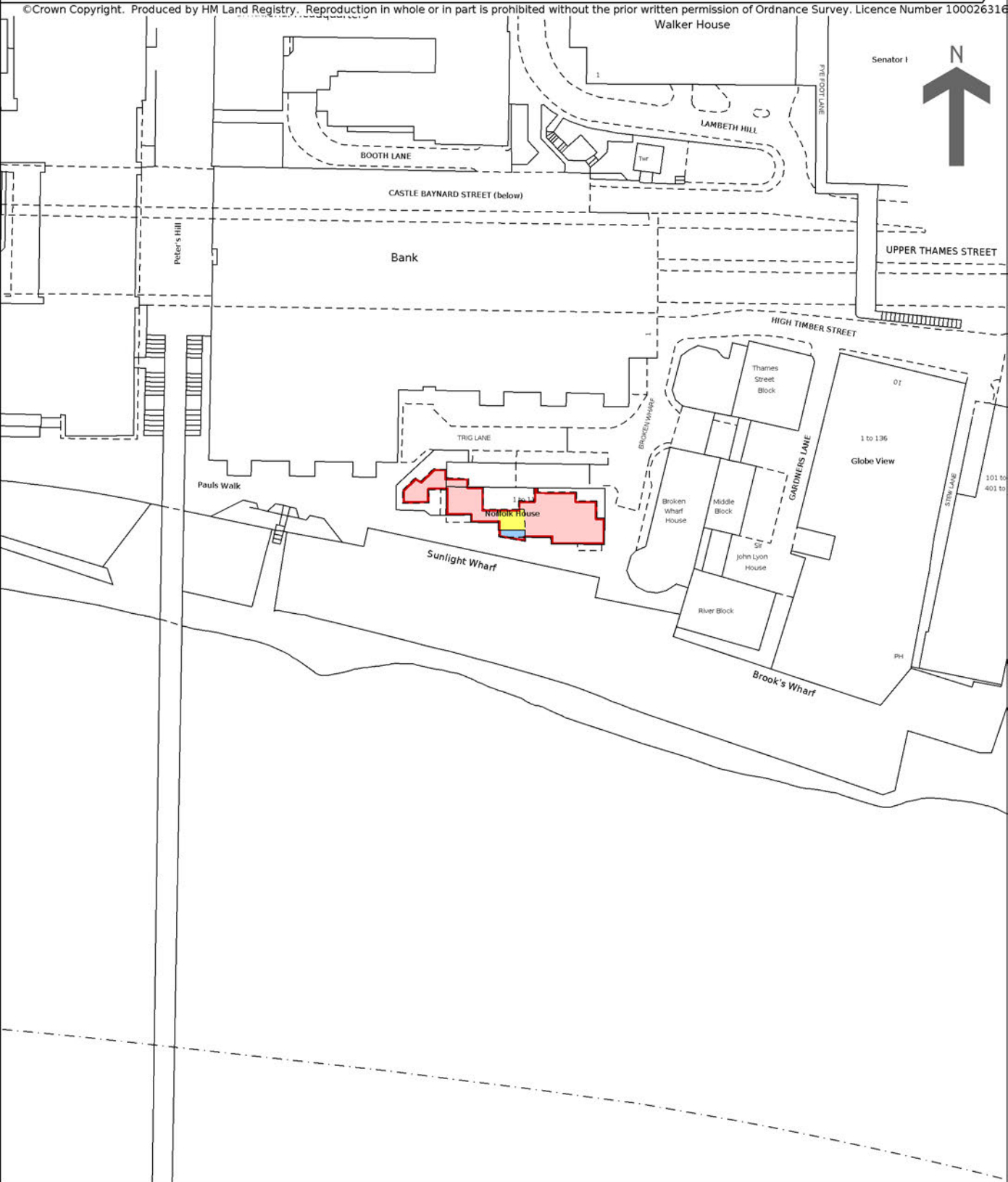
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The land in this title lies within the area edged red hereon and is more particularly described in the lease or leases referred to in the property register.



This is a print of the view of the title plan obtained from HM Land Registry showing the state of the title plan on 25 February 2020 at 16:14:33. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.



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This is a print of the view of the title plan obtained from HM Land Registry showing the state of the title plan on 25 February 2020 at 15:49:11. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.



GERALDEVE

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FAO: Rob Chipperfield

12 June 2020

Our ref: JNR/LLJ/U0009872

Your ref: 20/00214/FULMAJ & 20/00235/FULL

By email: rob.chipperfield@cityoflondon.gov.uk
liam.hart@cityoflondon.gov.uk
peter.shadbolt@cityoflondon.gov.uk

Dear Rob

Millennium Bridge House – Consultation Responses

We write in response to the comments received in respect of our the applications for full planning permission (refs. A: 20/00214/FULMAJ & B: 20/00235/FULL) at Millennium Bridge House submitted by Gerald Eve LLP on behalf of our Client, AG Beltane MBH B.V (the “Applicant”).

This letter sets out a response to each of the points raised by Norfolk House Residents Limited (NHRL) in their letter dated 04 April 2020, and includes supporting material prepared by Piercy & Company and input from the design team including Norman, Disney & Young, Heyne Tillett Steele, EQ2 Lighting Consultants and Point 2 Surveyors. We also address other consultation responses from Southwark residents at the end of this letter.

Norfolk House Residents Limited

Engagement with NHRL

In advance of submitting the applications, the Applicant carried out a programme of consultation with key stakeholders and neighbours, including NHRL. The Applicant met with representatives of NHRL for the first time on site on 14 January 2020 with the project team, to present and discuss the proposals. Councillor Brian Mooney was also present at this meeting.

Following this initial meeting, the Applicant has met with representatives of NHRL on four further separate occasions. An informal meeting was held on site with a representative of NHRL and a member of the project team on 03 June 2020 to discuss their concerns.

This dialogue demonstrates that the Applicant has discussed the proposals at length with NHRL, including the potential upgrades to the services infrastructure and facilities which are shared between the two buildings for the benefit of Norfolk House.

We have set out our responses to each of the points raised by NHRL below.

Design Matters

(2a.) Historic maps appear to show that the present orientation of Trig Lane is actually as a result of the development of the existing development by R. Seifert and Partners in 1987-8. Historically Trig Lane was located further to the west from Broken Wharf, separated by warehouse developments, and they did not connect. Their original locations are shown on historic maps from John Rocque's Map of 1746 through to the LCC Bomb Damage Map of 1939-45. Trig Lane historically connected directly to Upper Thames Street to the north, running north south directly to the river, where it met with Trig Stairs on the waterfront.

The site has evolved considerably over the centuries and the immediate street pattern around the site is not historic. Furthermore, the current proposals retain Trig Lane as it exists, continuing to provide a passage way to the riverside with a sense of enclosure, elements that would have characterised the alleyways historically, whilst demonstrating a building with a much improved architectural design that would enhance the setting of Norfolk House, and the riverside, in addition, to key heritage assets such as St Paul's Cathedral.

(2b.) The design approach to the south of the building has been developed to respond to the City of London's Riverside Walk Enhancement Strategy which encourages *"new developments to provide a spacious, accessible and better connected Riverside Walk with appropriate active frontages."* The proposed cantilevered elements facilitate this with the creation of a new south facing covered area to the Thames Walkway, activated by a series of A-class units along Paul's Walk.

The double height covered walkway has been developed to form a generous new civic backdrop to the river, the height of which has been designed to comply with City of London transport policy. The loadbearing steel elements are integral to the character of design and reference the river's industrial heritage, specifically the Sunlight Wharf building previously occupying the site.

(2c.) Millennium Bridge House is a poor example of Postmodernism and is not a heritage asset or worthy of listing, neither for its architectural quality which is low, nor its historical association with the architectural practice of Seifert & Partners. The building's relationship with the riverside and the local townscape to the north, west and east is not successful. The proposals would improve Millennium Bridge House to provide an architecturally appropriate landmark building that responds to its historic riverside location and the character and appearance of the warehouse architecture that once defined the City's riverside. The proposals would enhance the setting of nearby heritage assets, notable St Paul's Cathedral (Grade I) and the Tower of St Mary Somerset (Grade I).

(2d.) The ground floor restaurant (Class A3) uses have been designed to keep the entrances far enough away from Norfolk House to minimise any negative impacts associated with the use. A detailed Operational Management Plan has been submitted with the principal application to set parameters which any future tenant would need to comply with. Any potential adverse impacts associated with the introduction of a restaurant use can be appropriately controlled via planning conditions. Active retail uses are supported in policy terms as part of the Corporation's strategic aspirations to improve the Northbank as the City moves towards a seven day a week economy.

(2e.) The City is both Freeholder and Local Planning Authority for substantial portions of the City of London. The suggestion that the City's separate landowning role would interfere with its statutory obligation as Local Planning Authority is unsubstantiated.

The Application has put forward a thorough and reasoned justification for the design and massing of the building and has been the subject of extensive pre-application discussions with Officers. To suggest a design review panel on this basis is not justified and is not common practice in the City of London. The City Corporation has an established reputation for delivering buildings of a high quality of design and layout, producing buildings that have been critically acclaimed and recognised through international design awards, and has good working relationships with the numerous leading British and international architecture practices often engaged by developers to work in the City.

The City Corporation's design input is delivered by a strong team of experienced and highly regarded officers, with experience in design, historic buildings, archaeology as well as development management. Regular liaison with the City's developers has revealed no external perception that there is a design quality issue arising from the City's advice that needs to be addressed through the proposed external process.

NHRL have provided their feedback and had been previously complimentary about the proposed design. The Applicant has engaged with key stakeholders including Historic England, the Surveyor to Fabric of St Paul's Cathedral, the City of London School and NHRL, to say that the design has evolved with little consultation is untrue.

(3) There are no changes proposed which would impact the ability for residents of Norfolk House to access the front door on foot or for deliveries. The existing arrangement is maintained despite the change in the ground floor building line of Millennium Bridge House.

Trig Lane

(4a.) It is understood that vehicles are currently unable to both enter and exit Trig Lane in forward gear. The "hammerhead" at the end of the private part of Trig Lane is too small for vehicles to practically use for manoeuvring, and particularly larger ones which cannot use this space. The "turning area" which is mentioned is often used for informal parking for occupiers of Millennium Bridge House and NHRL do not have any access rights for parking in this location, or its use for manoeuvring. The omission of this informal parking area is considered a substantial benefit of the scheme in highways and sustainability terms.

In terms of deliveries, it is understood that vehicles typically drive forwards into Broken Wharf and then reverse into Trig Lane through the bollard. Further, it is understood that the legal rights given to Norfolk House do not provide for vehicles entering or exiting in forward gear and only provide access to the front door by foot or vehicle for loading and unloading only.

The proposals would not preclude access for residents on foot or by vehicle for deliveries and the width of the shared surface would be a minimum clear width of 4.9 m at its narrowest point. The design of the shared surface area along Trig Lane is a matter for detailed design and there could be scope to widen the roadway. The clear width from the existing planter to the proposed ground floor line along Trig Lane is 7.5m.

(4b.) Trig Lane is not public highway beyond the bollard. The deliveries and servicing of Norfolk House are not the subject of this application and the existing informal arrangement which is not controlled by any planning conditions would be maintained. Existing vehicle deliveries to Norfolk House are not undertaken in a forward in forward out arrangement as vehicles are not able to turn around in the existing condition, vehicles are required to reverse in or out.

(4c.) The existing blue badge space on High Timber Street is not changing. It has been identified through surveys that there is space capacity to accommodate members of the public and any disabled users associated with the development. Further, Norfolk House has 11 car parking spaces in the basement for the 12 flats meaning there is a provision of nearly one car parking space per unit. Level access from the basement to all floors is provided which would be able to serve the needs of disabled residents.

Trig Lane is not public highway beyond the bollard and the T shaped junction in front of the bollard is designated as public highway with a double yellow line. This area designated as public highway is shown at figure 1.

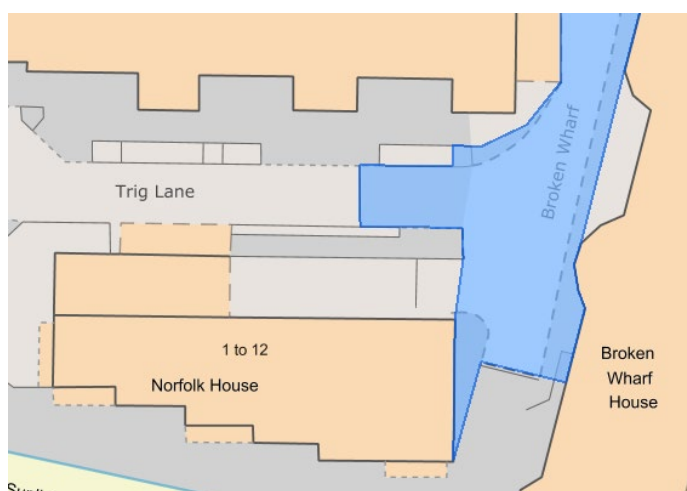


Figure 1 – Public Highway Boundary to Trig Lane

Fire Access

(5a.& b.) Fire service access will be available to within 18m of the dry riser inlet serving Norfolk House. Turning is available using the hammer head provided by Trig Lane and Broken Wharf shown at figure 2.

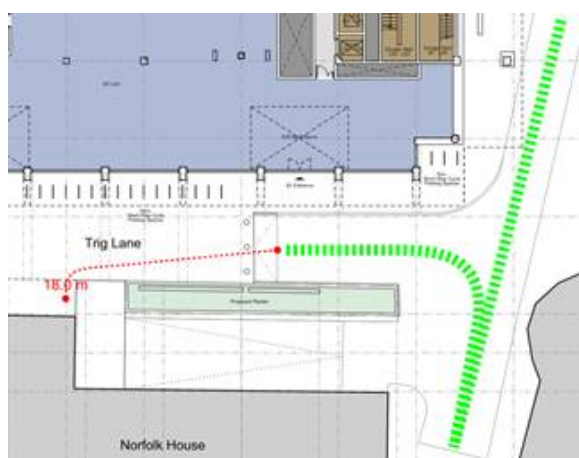


Figure 2 – Fire Access Arrangement to Norfolk House

This arrangement is compliant with Building Regulations Approved Document B (Fire Safety) guidance.

(5c.) The existing access between Norfolk House and Millennium Bridge House is not adequate for Fire Service vehicle access. Pedestrian access will be maintained and therefore this condition is not materially altered by the proposals.

(5d.) All fire risks associated with the proposed development will be assessed as required by Building Regulations and statutory consultation with the London Fire Brigade which will be completed as part of the application process.

Ventilation of the Basement

(6) Norman, Disney & Young have confirmed that the design will maintain adequate ventilation (via natural and/or mechanical means as required) to the communal basement area, including the Norfolk House car parking area (which is outside of the application boundary) and any solution will be compliant with Building Regulations. The basement space is proposed to be extensively refurbished with new plant and ventilation equipment.

The Applicant is in discussions with NHRL in respect of any mutually beneficial improvements that can be made to the basement.

Alterations to Building Line of Millennium Bridge House

(7) The rationalising of the building line by infilling this part of Trig Lane would make the best of use of land, particularly on this constrained site where upwards extensions are not feasible given its prominent location in the foreground of the St Paul's Cathedral.

Notwithstanding the change in building line, the repaving and enhancements to Trig Lane and Paul's Walk are considered to be acceptable and beneficial alterations. A minimum footway width of 4.4 m is maintained along the angled element, an improvement of approximately 1m on the current clear width.

In addition, by design, pedestrians are encouraged to use the Thames Path rather than Trig Lane and Broken Wharf. It is considered that the proposals provide sufficient width to maintain pedestrian comfort along Trig Lane in any case.

Piercy & Company have prepared a brief response document which is appended to this letter and explains the detail in more detail.

Daylight/Sunlight

Point 2 Surveyors have responded in detail to the Anstey Horne Analysis which is appended to this letter. They have provided responses directly to the points raised by NHRL below.

(8a.) The radiance analysis provided was used to supplement the BRE tests undertaken and to furnish decision makers with greater detail on the effects and importantly, the areas of the rooms where the light loss is likely to be experienced. Whether the effects are acceptable is a wider planning judgement to be taken by Officers and the Planning Committee.

Point 2 have used Radiance analysis on multiple projects in the City and across London and so it hasn't been specifically deployed for the current application; it is a more sophisticated technology and one generally welcomed by planning officials. During our pre-application meetings, Officers found the Radiance study a useful tool to assess the effect to Norfolk House.

(8b. and c.) Within the daylight and sunlight assessment, Point 2 acknowledge that the existing levels of daylight are low however, they are indicative of what one would expect in a very dense urban environment such as this. They are typically half of the 27% target which is a consequence of the close proximity of Norfolk House to the development site. Norfolk House has clearly been designed with this in mind as the secondary uses such as bedrooms and kitchens have intentionally been located to the rear of the building, where there are lower levels of daylight by comparison to the main accommodation.

It is frequently the case that changes in massing within such a dense environment will lead to reductions in daylight and sunlight that exceed the national advice offered by the BRE Guidelines. A rigid application of the BRE Guidelines would in our opinion be at odds with the intention of the guidelines, which repeatedly encourage the user to apply the technical specification in a manner that is appropriate for the development context. Furthermore, it would be at odds with the City of London Local Plan and their conventional approach to considering daylight and sunlight impacts.

(8d.) Where windows have low existing values, small absolute changes in VSC are somewhat disproportionately represented as a percentage alteration. Subsequently, small reductions in VSC exceed the 0.8 reduction factor test. In our experience, it is fairly common to see this component of the VSC test exceeded when developing sites in very dense locations and therefore the same can be expected here. This point is expressly recognised in the introduction to the BRE Guidelines at paragraph 1.6.

This is in part why we have undertaken the additional Radiance analysis in order to more accurately understand the changes in light to the north facing rooms.

(8e.) This conclusion differs from Point 2's. There are a number of inaccuracies within Anstey Horne's commentary which have been pointed out in Point 2's response letter which may be the reason why they have drawn this conclusion.

Point 2's report sets out in detail the analysis undertaken and the changes in light to Norfolk House. The conclusions within the report are based on this.

Wind and Microclimate

(9) In the absence of any technical data or relevant modelling to underpin the comments made by NHRL, it is considered that conclusions of the Wind and Microclimate Assessment, prepared by RWDI and submitted as part of the application are valid and the points raised in the objection should not be given any weight.

Extensive Computational Fluid Dynamic (CFD) modelling was undertaken and concludes that there would be no expected instances of strong winds exceeding the safety threshold at any area around the Proposed Development or immediate surrounding area (in accessible areas). It is noted that the Applicant specifically chose RWDI to undertake the wind modelling on this project. RWDI assisted the City of London in their preparation of industry leading guidelines in 2019 and are recognised by the City Corporation as highly competent wind advisors.

Noise

(10a.) The Acoustic Report, prepared by Sandy Brown concludes that the proposed uses including any plant equipment will not be perceptible above the existing background noise levels. The predicted noise level from the rooftop activities is below the representative background noise levels measured during the survey and will not lead to a significant increase in the ambient noise levels at the Norfolk House.

Deliveries and Servicing

(10b.) All deliveries and servicing for the development will be undertaken via the existing loading bay on High Timber Street and be controlled by a delivery and servicing management plan which will include consolidation measures and a booking system, any breaches to this could be enforced against. Vehicles cannot access Trig Lane due to the bollard.

Light Pollution, Privacy and Overlooking

(10c.) Restaurants, by the nature of being a leisure destination, are generally lit at much lower lighting levels than an office building and most occupiers tend to dim lighting into the evening, as well as use much warmer, domestic lighting colour. The existing office building does not have a comprehensive building management system and for security purposes, all lights are on 24/7. The proposed development will incorporate lighting curfew arrangements, will work within the City of London lighting guidance documentation, will take cognisance of the Illuminated River Project and will provide a reduction to local light pollution. The scheme and has also been designed to be subordinate to St Paul's Cathedral.

(10d.) The Proposed Development seeks to introduce restaurant uses at ground level, with a flexible office/restaurant use proposed at first floor which is of most relevance to Norfolk House. In terms of proximity, it is considered that through detailed design and careful management that this would not lead to any detrimental impacts to residential amenity for residents in the ground and first floor. In the existing condition, planting obscures some views between the two buildings. Norfolk House additionally has an existing restaurant at ground floor with a raised outdoor terrace.

It is considered that the proximity of Norfolk House to the new uses within the proposed development can be overcome through detailed design and controlled by planning condition. Detailed design of the new landscaping along Trig Lane in addition to the fit of the internal spaces once the split of uses is confirmed and an operator has been identified can be sufficiently controlled by the Corporation to ensure that residential amenity is preserved.

Restaurant Podium and Terrace

(11a.) Whether the Applicant owns the podium or has the necessary rights to carry out the works is a private law matter and is not a material planning consideration. Nonetheless we have set out some information regarding the position below.

(11b.) The Applicant's Structural Engineers, Heyne Tillett Steele, have confirmed that this section of Paul's Walk is drained into the basement of Millennium Bridge House and Norfolk House. This system will be upgraded as part of the proposed works and therefore if any changes are needed to ensure surface water does not pond in the future this will be factored in.

The area of external paving on Trig Lane is being reduced as part of proposals, which will reduce the volume of rainwater onto Pauls Walk, the works present an opportunity to address levels and drainage, therefore the proposed works are considered to improve drainage. The Applicant would also expect these details to be controlled via detailed design condition in relation to drainage and SuDS, should the Corporation be minded to grant permission.

(11c.) The Applicant is proposing to lower the height of the existing restaurant terrace to the same level as Paul's Walk and replace the louvred upstands with planting. This is proposed as a public realm benefit and would also create greater distance between the restaurant terrace and the nearest residential windows.

The extent of the restaurant outdoor seating area is not changing, it is only being lowered with new planting to surround it. In lowering the height of the podium the external seating will be located further away from the residential windows which would provide a benefit and improve the wider public realm.

The land ownership is complex, however this is not a material consideration and the neighbourly matters discussions required to carry out the works could be resolved should the Corporation grant planning permission for both applications.

(12 and 13) The Applicant has engaged proactively with NHRL and sought to resolve as many issues as possible. NHRL did not seek to resolve any of the points within their objection in advance of submitting their formal response. The Applicant met with representatives of NHRL a total of five times prior to the submission of the application and NHRL did not raise any of these issues with the Applicant in advance of objecting to the applications. The Applicant also met with a representative of NHRL to discuss their concerns during the determination period.

The Applicant is disappointed that these comments could not be resolved as part of our extensive discussions with NHRL, however remains open to working with NHRL on neighbourly matters in the future and maintaining a good relationship.

Benbow House

This section responds to the ten objections which have been received from Benbow House, on the southern side of the River Thames in the London Borough of Southwark in relation to noise, land use and light pollution.

Millennium Bridge House is located approximate 350 meters to the north west of Benbow House with Bankside, the River Thames, the Tate Modern and Millennium Bridge located in the vicinity. Given the distance between the two buildings and the very busy surroundings, it is considered that there will be no material impact in terms of these residents' amenity.

In terms of the land use, a mixed-use office led development at the site will provide additional amenities for residents, workers and visitors not only within the City of London, but also to those further afield. These uses will all be properly managed (and can be controlled through operational management conditions) to ensure that there is no impact on nearby residents.

The Acoustic Report submitted with the application concludes that the likelihood of noise arising from the use of the terraces are not likely to be heard by the nearest sensitive receptors on the northern side of the River, given the distance to Benbow House and the surrounding context, it is highly unlikely that this will be perceived by residents in Southwark.

Concluding Remarks

It is considered that the proposed development would provide substantial benefits for the City of London as a whole. The Applicant has committed to providing the replacement of the Corporation's existing inclinator lift, introduction of a free public roof terrace, in addition to active retail uses in an area which is identified to be lacking in such provision.

In order to be able to provide these, commercial uplift in value needs to be commensurate with the level of benefits secured. This site is incredibly constrained in terms of intensifying the use of the building. The proposed design has been the subject of extensive pre-application engagement with the City of London and discussions with stakeholders.

We consider that appropriate steps have been taken by the Applicant and the design team to sufficiently safeguard the amenity of neighbouring residents and has committed to careful management of the office and retail elements of the building. The proposed development accords with the development plan and there are no issues raised by Objectors which are considered to be material considerations which should be taken into account in the determination of both applications.

A copy of this letter and enclosures has also been sent to representatives of NHRL.

Please feel free to contact Jeremy Randall of Liam Lawson Jones of this office should you wish to discuss further.

Yours faithfully,



Gerald Eve LLP

LLawsonJones@geraldeve.com

Direct tel. +44 (0)20 7333 3605

Mobile +44 (0)7557202231

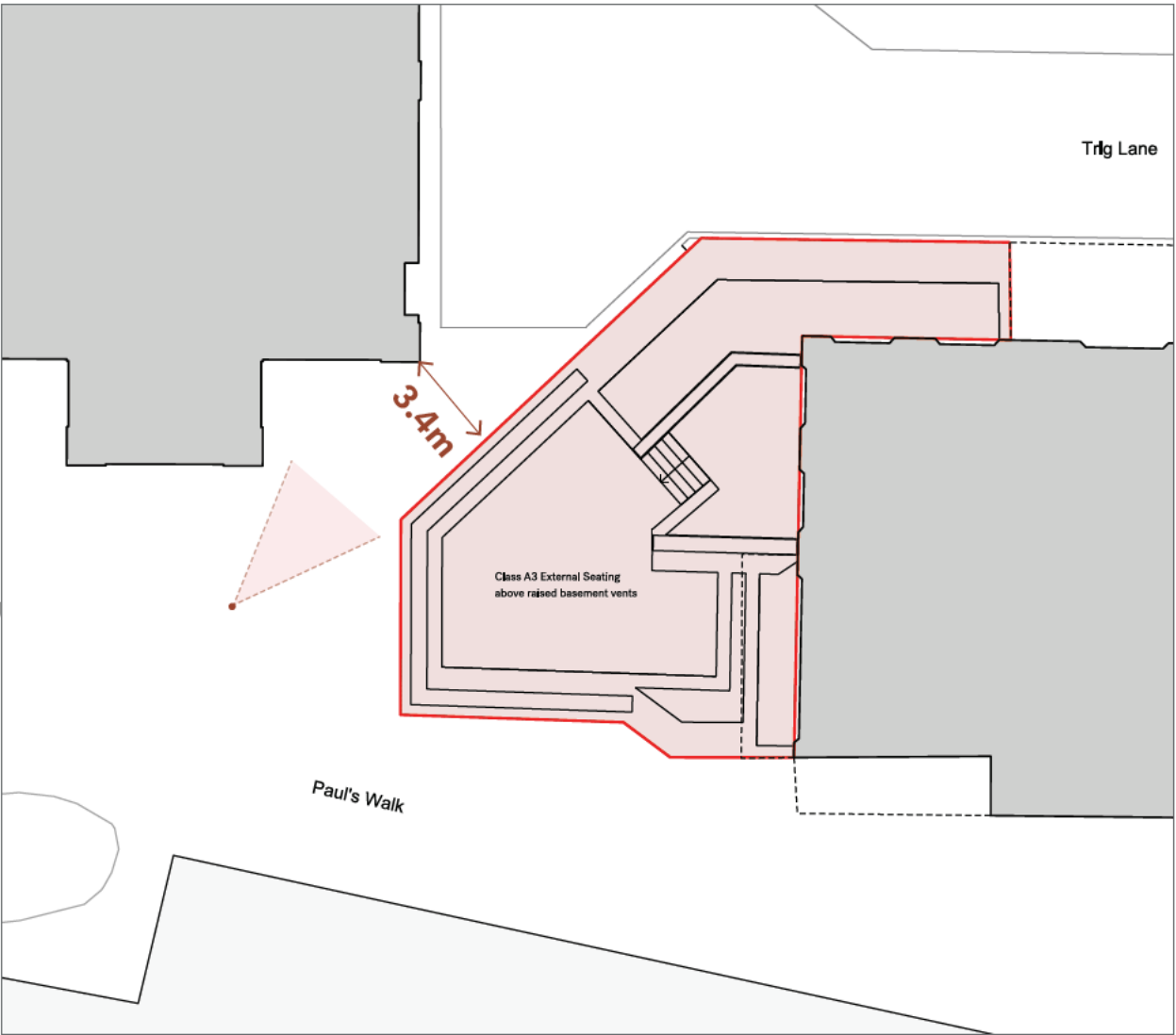
Encl.

Piercy & Company Design Response

Point 2 Surveyors Response to Anstey Horne

MILLENNIUM BRIDGE HOUSE:

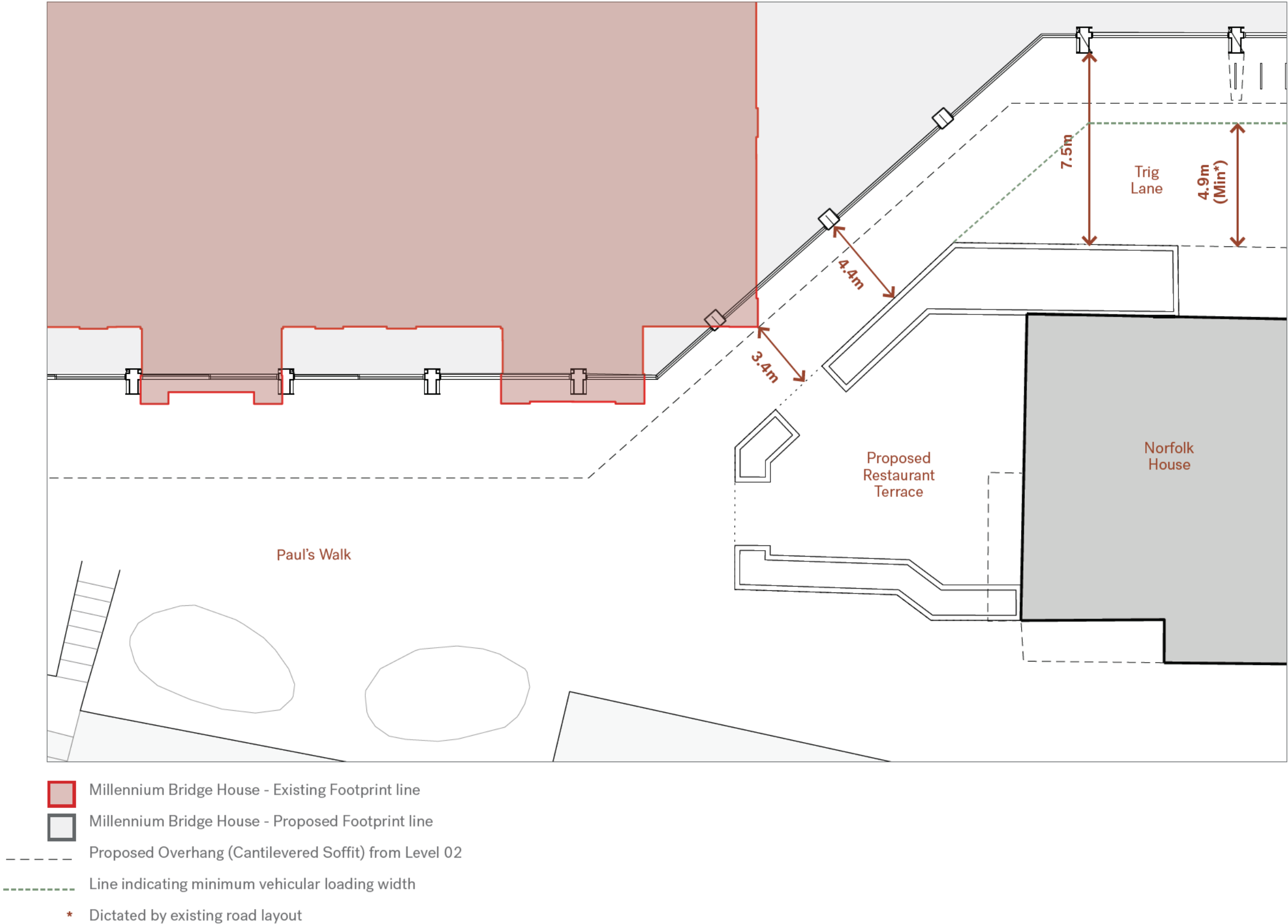
NORFOLK HOUSE OBJECTION
SUPPLEMENTARY INFORMATION



Existing plan



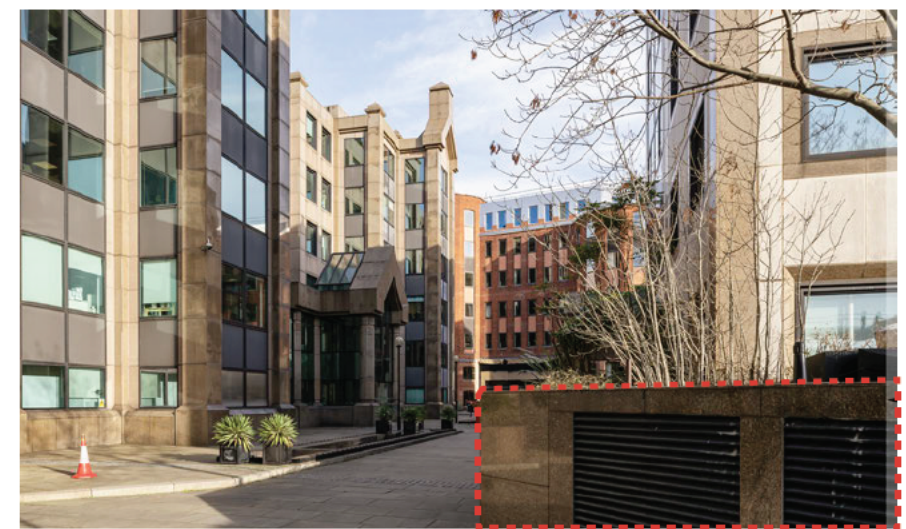
Existing view from Paul's Walk to Trig Lane





Proposed view to Trig Lane

1.2
PROPOSED CONDITION



Existing street condition on Trig Lane

..... Location of louvres



17 SLINGSBY PLACE
LONDON | WC2E 9AB

Rob Chipperfield
City of London Corporation
Department of the Built Environment – Planning
PO Box 270
Guildhall
London
EC2P 2EJ

27th April 2020

Dear Rob,

RE: MILLENNIUM BRIDGE HOUSE AND NORFOLK HOUSE – RESPONSE TO PLANNING OBJECTION FROM NHRL/ ANSTEY HORNE

We have reviewed a copy of the planning objection that has been received from Norfolk House Residents Limited (“NHRL”). Appended to their objection is a letter from Anstey Horne (“AH”) which is essentially a critique of the Daylight & Sunlight report produced by Point 2.

We find the commentary prepared by AH misguided and inaccurate. AH repeatedly make erroneous assertions with the objective of creating some false impression that Point 2 have either sought to downplay or worse, dismiss the effects to Norfolk House.

We will deal with the more substantial points in greater detail later in this letter, but I initially highlight so of the inaccurate reporting in AH’s report. AH repeatedly refer to us *‘disregarding rooms such as bedrooms and kitchens’*. No such attempts have been made at any stage within our report. We have openly reported on the effect to every single room and window and indeed report at great length on the effects to the kitchens and so it is factually incorrect to say have disregarded such spaces. These rooms actually receive more discussion than the living rooms.

Further, we note on page 4, paragraph 2 of the AH letter it is stated *‘Paragraph 3.8 (of the Point 2 report) suggests that because we dealing with a dense location and the majority of affected rooms are bedrooms and kitchens, the impacts are not that significant or important.’*

No such claim exists anywhere within the report. What paragraph 3.8 of our report actually says is;

‘As you would expect, the existing VSC values to the windows in the rear of the building are indicative of what one would expect in a very dense urban environment such as this. They are typically half of the 27% target which is a consequence of the close proximity of Norfolk House to the development site. Norfolk House has clearly been designed with this in mind as the secondary uses such as bedrooms and kitchens have intentionally been located to the rear of the building, where there are lower levels of daylight by comparison to the main accommodation, where the primary aspect is south facing’.

On page 5 of the AH letter, paragraph 3 which provides a commentary on the Point 2 report paragraph 3.9, AH have stated that “Point 2 explain that where existing light values are very low”. Paragraph 3 goes on to refer to Point 2 describing the existing VSC values as “extremely low VSC values”.

We have never described the existing VSC values as either ‘very low’ or ‘extremely low’. Given the repetitive use of this language throughout the letter, we consider AH are unreasonably seeking to undermine our analysis and discredit our thorough assessment of the situation.

What we actually say at paragraph 3.9;

‘Where windows have low existing values, small absolute changes in VSC are somewhat disproportionately represented as a percentage alteration. Subsequently, small reductions in VSC exceed the 0.8 reduction factor test. In our experience, it is fairly common to see this component of the VSC test exceeded when developing sites in very dense locations and therefore the same can be expected here. This point is expressly recognised in the introduction to the BRE Guidelines at paragraph 1.6 which states A simple review of our report demonstrates no such language or suggestion has been made’.

Page 6, paragraph 6, AH claim that our presentation of the VSC results for Norfolk House is misleading. They state ‘Point 2 refer to only 11 out of 53 windows tested not satisfy the VSC test, but that is a bit misleading as to the severity of the change....”.

Again, this is factually incorrect. We expressly state the effects to the windows at paragraph 4.33;

*‘42 of the 53 windows included within our analysis will adhere to the BRE Guidelines for VSC. **The remaining 11 windows experience percentage alterations between 22% and 60% and are highlighted dark blue in Figure 4 below’.***

They go on to say, “Point 2 refer to what they seem to consider to be exceptionally low VSC values ranging from 11 to 14%”.

What we actually say at paragraph 4.33 is;

“The windows that experience the largest alterations in VSC are located on the ground and 1st floors. These windows have lower levels of VSC in the existing condition (11% and 14%) due to their proximity to the existing site buildings’.

The above are just a few of the many examples we could cite of the misguided and incorrect nature of their critique. It is an attempt to distort our presentation of the results which are both factual and informed by our extensive professional experience of advising on sites within the City and across central London. I stand completely behind all of the conclusions within our report.

As I mentioned above, our report comprehensively addresses the majority of the points within the AH letter. Our submitted report thoroughly and accurately assesses the impacts on Norfolk House, so we do not seek to repeat our results in this letter. But in response to the AH critique I would however take this opportunity to provide more substantive responses on the following topics.

Accuracy of analysis

I note that AH have inspected Norfolk House and have concluded that any variations in room layouts by comparison to the floorplan information we have obtained is *'probably not such that would significantly affect the technical results and therefore any conclusions arising from it'*.

Double/Triple aspect Living rooms (Page 2, point 1 of AH letter)

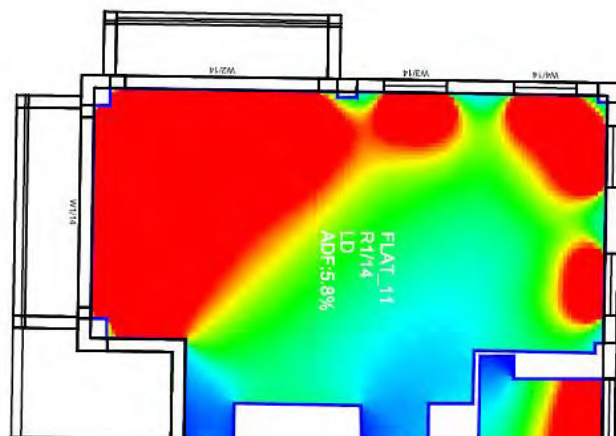
The point of objection appears to relate to paragraphs 3.6 and 3.7 of our report. AH state that it is incorrect to suggest that the north facing windows serving dual/triple aspect LKD's are not the main source of light to rooms.

There are two rooms that fall within this category; R1/14 which relates to Flat 11 and R9/11 which relates to Flat 1.

I disagree with AH criticism of our conclusion for the following reasons.

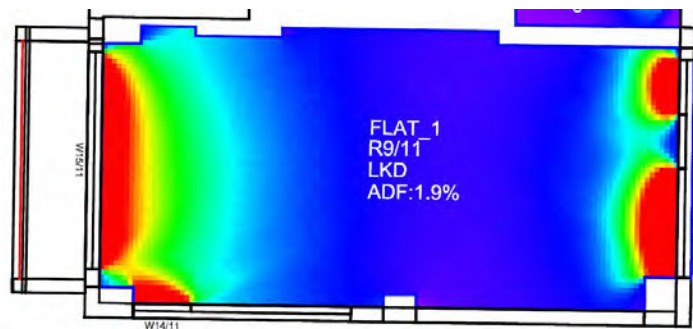
Flat 11

1. There are six windows serving the LKD. The south facing window overlooking the River Thames is a full height, full width window measuring 4.5m x 3m. There is a second, equally sized windows that faces west. The north facing windows are 1.45m x 1.41m.
2. The existing VSC value for the south and west facing windows are significantly higher than the north facing windows. This fact, coupled with the larger window dimensions clearly dictates that the south facing window provides more daylight than the north facing windows.
3. The radiance plot below clearly demonstrates that much higher daylight factors are received through the river facing windows by comparison to the north facing windows. This is demonstrated by the brighter colours. The south facing windows are on the left of the image whereas the north facing windows are on the right.



Flat 1

1. The south facing window overlooking the River Thames is a full height, full width window measuring 4.5m x 2.275m. The north facing windows are 1.1m x 1.41m and 2.2m x 1.4m.
2. The existing VSC value for the south facing window is higher than the north facing windows.
3. The radiance plot below clearly demonstrates that daylight penetrates much further into the room through the river facing windows by comparison to the north facing windows.



It therefore seems clear to me that the south facing windows are the primary source of light and so I do not accept AH's suggestion otherwise.

AH also suggest that it would be appropriate to undertake more analysis which assumes an entirely hypothetical situation whereby an occupant may or may not at some point in the future erect partitioning within the flat, thereby creating two smaller, less desirable spaces. I consider this suggestion wholly inappropriate for the following reasons;

1. Almost all modern urban residential apartments are designed to be open plan and so converting this large multi-aspect room into two inferior quality single aspect rooms is counterintuitive.
2. It would limit the area of the flat that can take benefit of the enviable views over the Thames towards the Tate Modern, The Shard and beyond.
3. The approach isn't in line with the BRE Guideline
4. I have never undertaken multiple assessments of multi-aspect rooms such as and there is no reasons to do so here, particularly given 1-3 above.
5. We could provide extensive evidence to demonstrate that AH do not produce planning reports on this basis and so it is unreasonable to suggest the Applicant should deviate from standard practice.

Daylight to bedrooms and kitchens (multiple references but in particular page 3, (2) and page 4, (1))

On page 3, AH '*quite accept*' that daylight to bedrooms and kitchen are less important than main living rooms but state that they must not be disregarded. We quite agree which is why we have reported on the effect to every single room that has a window facing towards the application site. At no stage does the language within the report suggest they should be disregarded; we have simply stated the general view of practitioners and planning officials is that daylight to living rooms is more useful and therefore important, which AH expressly acknowledge themselves.

They go on to say that the bedroom and kitchen windows already have '*compromised daylight*' and '*warrant careful consideration*'. Again, we quite agree which is why the Applicant has gone to the lengths of instructing more sophisticated and costly Radiance analysis to provide Officers with a more detailed and holistic understanding of the effect to these rooms than can be gleaned from BRE measures alone.

Notwithstanding the above, it remains the case that with the exception of one ground floor studio, the main living accommodation is predominantly south facing to take benefit of the views of the Thames and the uninterrupted access of daylight and sunlight the windows provide. The main source of light to the primary living accommodation in Norfolk House will therefore be unaffected by the development. There are effects to bedrooms and kitchens which have been reported on in detail in our report. Like any development in the City or central London, those localised effects are a matter of planning balance that must be weighed up with the significant benefits this development will bring.

Page 6, Paragraph 5

This AH are commenting on the results for Broken Wharf as opposed to Norfolk House and therefore this section of their letter should be ignored.

Use of Radiance

AH correctly point out that our assessment leads with the VSC and NSL tests described in the BRE Guidelines. They then assert that we '*have attempted to justify the transgression arising out of the key recommended BRE tests by reference to use of Radiance software and average daylight factors.*'

That is simply not correct. We expressly state at paragraph 3.12

'To supplement the BRE tests, we have undertaken detailed radiance based assessments to provide a more holistic understanding of both the reduction in light to each room facing the Site but also, and in our opinion more importantly, the quantum of retained daylight that the rooms will be left with.'

Radiance is not an attempt to justify the effects. Whether the effects are acceptable is a wider planning judgement to be taken by Officers and the Planning Committee. The analysis has been undertaken to furnish decision makers with greater detail on the effects and importantly, the areas of the rooms where the light loss is likely to be experienced.

We have used Radiance analysis on multiple projects in the City and across London and so it hasn't been specifically deployed for the current application; it is a more sophisticated technology and one generally welcomed by planning officials. Indeed, during our Pre-App meetings, Officers found the Radiance study a useful tool to assess the effect to Norfolk House and so it is completely inappropriate for AH to simply dismiss it because it suits their client to do so.

Furthermore, it seems somewhat paradoxical for AH to state in the 'General Observations' section of their letter that '*there are a number (of windows) facing north towards Millennium Bridge House, some with already compromised light conditions, that (sic) warrant careful consideration*' but then seek to dismiss us doing exactly as they request - *warrant careful consideration*. Radiance analysis is a significantly more sophisticated means for Officers to assess the effect to the building and so surely this additional analysis is providing the careful consideration they demand?

The paradoxical nature of AH commentary on Radiance is not limited to the above. They state;

‘One might justify use of the ADF test if one could show that good ADF levels would prevail in affected buildings after the proposed development had been built.’

We are not seeking to use Radiance to *‘justify that good ADF levels would prevail’* in the way that AH suggest would be appropriate, notwithstanding that the analysis actually demonstrates this to be the case for all of the rooms that meet their respective ADF requirement in the existing condition. AH repeatedly and incorrectly suggest that we are making *‘arguments’* to defend the effects.

Quite the opposite.

Our report clearly acknowledges that there is a reduction in daylight to three kitchens that currently achieve values below the 2% recommendation and the studio. The report is open and transparent on this point. However, the benefit Radiance offers over conventional BRE analysis is that it facilitates a more informed judgment to be made around whether that reduction is a) within an important part of the room(s) (which we do not believe to be the case) and b) whether that change will materially worsen the amenity of the rooms.

We have been able to source photos for three of the four rooms mentioned above and so we have an understanding of how these spaces are configured and most likely used. It is our professional judgement that whilst there is some light loss to these rooms, that loss would not fundamentally alter how the space is used albeit there would be some reduction in amenity. That change must therefore be judged against the benefits the application scheme brings.

Design of Norfolk House and MBH (page 5 (3) and 9 (1))

AH state that our report *‘criticises’* the design of Norfolk House and its relationship with MBH and that it *‘overly-burdens our client in terms of what they can do to MBH’*.

We do not make this suggestion. The Gerald Eve response deals with this point in greater detail, but for clarity, what our report says at paragraph 3.8 is;

As you would expect, the existing VSC values to the windows in the rear of the building are indicative of what one would expect in a very dense urban environment such as this. They are typically half of the 27% target which is a consequence of the close proximity of Norfolk House to the development site. Norfolk House has clearly been designed with this in mind as the secondary uses such as bedrooms and kitchens have intentionally been located to the rear of the building, where there are lower levels of daylight by comparison to the main accommodation, where the primary aspect is south facing’.

And in conclusion, we state at paragraph 5.3;

‘It is frequently the case that changes in massing within such a dense environment will lead to reductions in daylight and sunlight that exceed the national advice offered by the BRE Guidelines. A rigid application of the BRE Guidelines would in our opinion be at odds with the intention of the guidelines, which repeatedly encourage the user to apply the technical specification in a manner that is appropriate for the development context. Furthermore, it would be at odds with the City of London Plan and their conventional approach to daylight and sunlight.’

I trust this letter addresses the points raised within the AH letter. If Officers would like to discuss this with me, then I am only too happy to arrange a time to speak with them.

Yours Sincerely

A large black rectangular redaction box covering the signature area.

Nick Lane
Senior Director

For and on behalf of Point 2

**BELTANE- MILLENIUM BRIDGE HOUSE
STATEMENT OF COMMUNITY INVOLVEMENT
19 FEBRUARY**

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1. SECTION 1: INTRODUCTION

1.1 This Statement of Community Involvement (SCI) has been prepared by London Communications Agency (LCA) on behalf of AG Beltane MBH B.V., which will hence forth be known as ‘the Applicant’. It accompanies a full planning application that has been submitted to the City of London Corporation for the refurbishment of Millennium Bridge House (‘the Site’).

1.2 The Application is for the following proposed development:

“Refurbishment and extension of the existing building involving the partial demolition and partial infilling of the existing structure and the introduction of a new façade to all elevations and extension to the building at all floors, introduction of roof terraces at fifth and sixth floors, including a public viewing terrace and associated lobbies at second and sixth floors, alongside a part change of use at ground floor from Office to Retail/Café/Restaurant/Bar (Class A1/A3/A4); a part change of use at first from Office to either Office or Retail/Restaurant/Bar (Class A1/A3/A4/B1); second floor from Office to either Office or Retail/Restaurant (Class A1/A3/B1) and a change of use from Office to Retail/Café/Restaurant (Class A1/A3); a part change of use at sixth floor from Office (Class B1) to either Office or Restaurant/Bar (Class B1/A3/A4) and a change of use from office to restaurant/bar (Class A3/A4) use together with public realm works to Peter’s Hill (including the removal and relocation of the southern HSBC gates), Lambeth Hill, Trig Lane and Paul’s Walk (part of the Thames Path) and associated works.”

1.3 This SCI demonstrates that a thorough approach has been taken to consultation with local stakeholders and political stakeholders, alongside on-going engagement with planning officers. This approach focused on targeted consultation with key site neighbours and ward councillors, to ensure that those within close proximity to the site have had a chance to communicate directly with the Applicant and project team and give feedback.

1.4 This document outlines the context for the site, as well as the consultation strategy, the activities and engagement that has taken place with stakeholders and analyses the feedback received.

1.5 The Applicant has been supported by a core team, including planning consultants, Gerald Eve; architects, Piercy & Co; historic buildings consultants, Donald Insall Associates; and landscape architects, Andy Sturgeon Garden Design (the “Project Team”).

1.6 The consultation activities that have taken place are in accordance with the City of London’s own Statement of Community Involvement (2016) and also reflect the principles for consultation in the Localism Act (2011) and in the National Planning Policy Framework (2019).



2. SECTION 2: EXECUTIVE SUMMARY

2.1 Millennium Bridge House is to undergo significant refurbishment, to extend and modernise the building adjacent to the Millennium Bridge on the north side of the River Thames.

2.2 A programme of engagement with the local community and key stakeholders took place throughout 2019 and into 2020, which has helped shape the planning application that will be submitted.

2.3 This programme focused on targeted consultation with key site neighbours and ward councillors, to ensure that those within close proximity of the site have had a chance to communicate directly with the Applicant and project team and give feedback.

2.4 Letters were distributed to 672 residential and businesses addresses within the immediate vicinity of the site, offering meetings with the project team. This includes letters to:

- Key City of London elected representatives and officers;
- Heritage bodies concerned with local assets such as the Sir Christopher Wren-designed St Mary's Somerset Church and St Paul's;
- Local tenant and residents' associations and amenity societies; and,
- Key site neighbours and businesses.

2.5 A number of meetings were held as a result, including with:

- Cllr Mooney, Queenshithe ward (17 December 2019)
- Norfolk House Residents Limited (14 January 2020)
- City of London School (23 January 2020)

2.6 In addition, the project team has committed to providing an update to be included as part of the Queenshithe ward newsletter, which will be issued in March. The update will include a brief summary of the proposals, as well as details of the validation number for people to view the plans in full online via the City of London Corporation's planning portal.



3. SECTION 3: CONSULTATION OBJECTIVES

3.1 The objectives of this consultation are set out below:

- To carry out a targeted programme of engagement with neighbouring residents, businesses and local amenity groups, offering one-to-one meetings with the project team to discuss the plans and provide feedback;
- To ensure the Applicant and senior consultants have engaged directly with key stakeholders and neighbours, reflecting the team's commitment to consultation and understanding people's views;
- To explain clearly the aims behind the proposals and how the development would benefit those living and working within the immediate vicinity of the site;
- To understand the issues of importance to neighbouring residents and businesses before submission of the application;
- To work closely with the City of London Corporation to ensure key officers and councillors are aware of the proposed development, key consultation activities and outcomes.



4. **SECTION 4: CONSULTATION ACTIVITIES AND FEEDBACK**

4.1 The pre-application consultation programme has seen engagement with neighbouring residents, businesses and local amenity groups in order to inform them about the proposals and provide them with a chance to give their feedback.

4.2 This engagement ran alongside an ongoing programme of meetings with City of London planning officers, led by Gerald Eve.

4.3 The consultation was promoted via letters posted to 672 local addresses within a 400m radius of the proposed site. This area and approach was agreed with CoL officers.

4.4 In addition, the project team emailed the following organisations directly to offer meetings:

- Queenhithe Ward Club
- Queen's Quay Residents' Association
- St Paul's Cathedral
- The City Property Association
- The Twentieth Century Society

4.5 This activity resulted in the following meetings taking place and outlined below is a summary of these sessions and the feedback received:

Meeting and attendees	Date	Summary of feedback
Norfolk House Residents Limited <ul style="list-style-type: none">• Cllr Brian Mooney – City of London• Robin Ellison – Norfolk House Residents Limited (“NHRL”)• Roger Hawkins – NHRL• Thomas See – NHRL• Jonathan Chenery – Beltane• Claire Brinson – Beltane• Stuart Piercy – P&Co• Henry Humphreys – P&Co• Conor Maguire – P&Co• Jeremy Randall – GE• Liam Lawson Jones – GE	14 Jan 2020	<ul style="list-style-type: none">• Residents were generally supportive of the scheme in terms of what is being proposed, noting that there would be a much cleaner finish to the façade and that Trig Lane is unsightly and is dead space.• There was concern over the daylight/sunlight impact to the properties.• It was also queried whether the replacement inclinor could be located within the building due to its impact on St Paul's.• There were queries as to whether the replacement inclinor could be located within the building due to its impact on St Paul's.
City of London Boys School <ul style="list-style-type: none">• Charles Griffiths, City of London School (CLS)• Richard Brooks, CLBS• John Hawson, CLBS• Duncan Roe – Beltane• Conor Maguire, P&CO• Liam Lawson Jones, GE	23 Jan 2020	<ul style="list-style-type: none">• Overall, it was felt that proposals would be beneficial to the area.• In relation to the steps and removal of the HSBC gates, it was felt that this would limit lingering on the approach to the bridge and create a better pedestrian environment.• Some concern was expressed about the potential loss of views from the library as a result of the cantilever.• It was noted that the School would prefer for the public terrace to be “less public” and would prefer a more “semi public/private” offer.



		<ul style="list-style-type: none">• There was concern that the use of the roof terrace could cause disturbance to students.
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- 4.5** The project team also met with St Paul's Restaurant Limited on 13 February to discuss the proposed works to the terrace at Norfolk House.
- 4.6** In addition, emails were also exchanged with Oliver Caroe, Surveyor of the Fabric to St Paul's. Although a meeting could not be arranged, the project team issued a copy of the materials that had been presented to local groups in December 2019 and remains open to setting up separate meetings as necessary.



5. SECTION 5: RESPONSE TO FEEDBACK

5.1 Provided below is the Applicant's response to the main issues and concerns that were raised during the programme of meetings set out in Section 4.

Query	Response
<p><i>Comment from meeting with Norfolk House Residents Limited:</i></p> <p>It was queried whether the replacement inclinator could be located within the building due to its impact on St Paul's.</p>	<p>The team noted that the location and positioning of the inclinator has been subject to substantial discussions with Planning and Design officers at the City of London Corporation. It was concluded that this was the most appropriate location for the inclinator.</p>
<p><i>Comment from meeting with Norfolk House Residents Limited:</i></p> <p>It was suggested that the height of the paving adjacent to the River Thames on Paul's Walk could be raised in order to improve views.</p>	<p>The applicant has looked at this, however it would require significant change well beyond what is within its ownership and is therefore considered unfeasible.</p>



6. SECTION 6: CONCLUSION

- 6.1** This SCI sets out how the Applicant has engaged with neighbouring residents and business, as well as local amenity groups, to seek their views on the proposals for Millennium Bridge House.
- 6.2** Through its engagement, the Applicant has provided these key stakeholders with a chance to comment on the plans ahead of the submission of a planning application.
- 6.3** Key meetings have taken place with adjacent site neighbours, including residents of Norfolk House and the City of London school, as well as with key elected representatives.
- 6.4** By participating in the consultation process the local community has been able to communicate directly with the Applicant and project team, and contribute their views and feedback into the design process.
- 6.5** The Applicant is committed to continuing a positive and regular dialogue with local communities throughout the planning process.



7. SECTION 7: APPENDICES

- **Appendix A: Stakeholder letters**



BELTANE
ASSET MANAGEMENT

4 December 2019

Dear Neighbour,

I wanted to write to let you know that Beltane Asset Management are planning to undertake a major refurbishment of Millennium Bridge House, the office building adjacent to the Millennium Bridge on the north side of the river Thames. We are currently working to develop proposals in order to substantially refurbish, extend and modernise the building and improve the surrounding public areas.

As one of our neighbours, we wanted to offer you the opportunity to meet us and learn more about our proposed designs, led by renowned architects Piercy & Company. You will have the opportunity to ask questions and provide us with feedback before we submit a planning application to the City of London Corporation early next year.

If you would like to take us up on this offer please contact my colleague, Declan Bennett of London Communications Agency, on db@londoncommunications.co.uk or 020 7291 1504, ideally by Friday 20 December.

With best wishes,

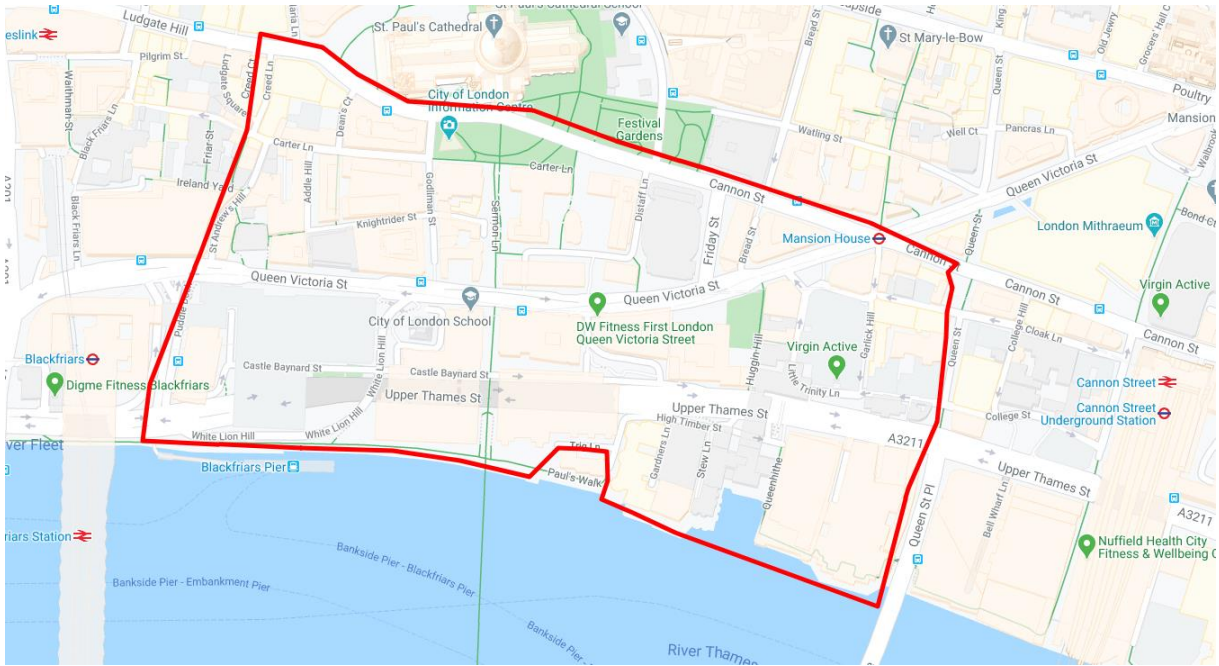
Claire Brinson
Beltane Asset Management LLP

Beltane Asset Management LLP

Telephone +44 (0)203 146 7773

Registered in England: 3rd Floor, 33 Queen Street, London EC4R 1BB, Company Number 7162404 www.beltaneglobal.com

- **Appendix B: Mailing area**



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Committee:	Date:
Planning and Transportation	14 July 2020
Subject: 1 Paul's Walk London EC4V 3QH Removal of louvred upstands and introduction of new hard and soft landscaping alongside remedial public realm and associated works	Public
Ward: Queenhithe	For Decision
Registered No: 20/00235/FULL	Registered on: 3 March 2020
Conservation Area:	Listed Building: No

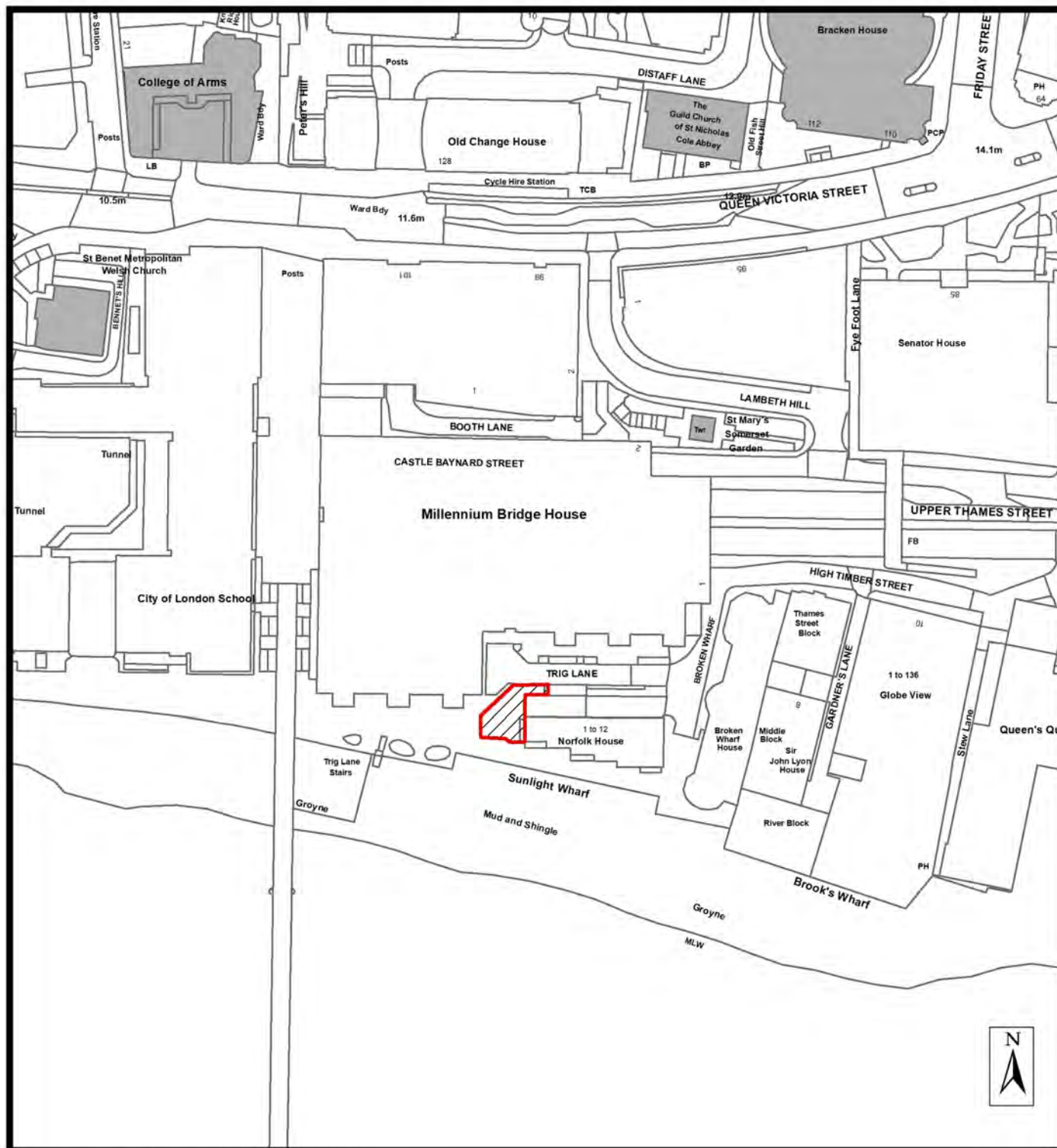
Summary

For full report see 20/00214/FULMAJ.

Recommendation

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

Site Location Plan



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ADDRESS:
1 Paul's Walk

CASE No.
20/00235/FULL

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT

Existing view from Paul's Walk/Trig Lane



Proposed view from Peter's Hill/Trig Lane



Main Report

For full report see 20/00214/FULMAJ.

Relevant Intend to Publish London Plan Policies

- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- Policy S5 Sports and recreation facilities
- Policy E1 Offices
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Parking
- Policy D1 London's form, character and capacity for growth
- Policy D3 Optimising site capacity through the design-led approach
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D11 Safety, security and resilience to emergency

- Policy D14 Noise
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries

Relevant Draft City Plan 2036 Policies

S1 Healthy and Inclusive City

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL7 Sports and recreation

S3 Housing

HS3 Residential environment

S4 Offices

OF1 Office development

OF2 Protection of existing office floorspace

S5 Retailing

RE3 Ground floor retail provision elsewhere in the City

S6 Culture, Visitors and the Night-Time economy

CV4 Evening and night-time economy

S8 Design

DE1 Sustainability standards

DE2 New development

DE3 Public Realm

DE4 Pedestrian permeability

DE5 Terraces and Viewing Galleries

DE6 Shopfronts

DE8 Daylight and sunlight

DE9 Lighting

S9 Vehicular Transport and Servicing

- VT1 The impacts of development on transport
- VT2 Freight and Servicing
- VT3 Vehicle parking
- S10 Active travel and healthy streets
 - AT1 Pedestrian movement
 - AT2 Active travel including cycling
 - AT3 Cycle parking
- S11 Historic Environment
 - HE2 Ancient monuments and archaeology
- S13 Protected Views
- S14 Open spaces and green infrastructure
 - OS2 City greening
 - OS3 Biodiversity
 - OS4 Trees
- S15 Climate Resilience and Flood Risk
 - CR1 Overheating and Urban Heat Island Effect
 - CR2 Flood Risk
 - CR3 Sustainable drainage systems
 - CR4 Flood protection and flood defences
- S16 Circular economy and waste
 - CE1 Zero waste city
 - CE2 Sustainable waste transport
- S17 Thames Policy Area

Relevant Local Plan Policies

CS10 Promote high quality environment

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

DM10.1 New development

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

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

SCHEDULE

APPLICATION: **20/00235/FULL**

1 Paul's Walk London EC4V 3QH

Removal of louvred upstands and introduction of new hard and soft landscaping alongside remedial public realm and associated works

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) particulars and samples of the materials to be used.
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 and emerging policies SE1, DE2, DE6 and HE1 of the Draft City Plan 2036.
- 3 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.
- 4 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: 13585-A-XX-91-004, 13585-A-XX-91-005

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

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

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

a full pre application advice service has been offered;

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

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Background Papers

Application B: 1 Paul's Walk (20/00235/FULL).

Internal

External

Letter 03.03.20 Gerald Eve

Design and Access Statement February 2020 Piercy and Co

Planning Statement 21.02.20 Gerald Eve

Public Consultation Comments:

Email 01.06.20 M A Lowndes

Email 05.04.20, 18.06.20 and
30/06/2020

Thomas See (For and on behalf of
Norfolk House Residents Limited)

[REDACTED]

From: Thomas See
Sent: 05 April 2020 21:27
To: Devlia, Neel; Chipperfield, Rob; PLN - Comments
Subject: RE: 20/00214/FULMAJ and 20/00235/FULL
Attachments: Letter of objection 5Apr20.docx; Anstey Horne report on daylight and sunlight 2Apr20.pdf

Dear Mr Devlia and Mr Chipperfield

I am submitting the attached objection letter to 20/00214/FULMAJ Application for refurbishment and extension of Millennium Bridge House, 2 Lambeth Hill, London, EC4V 4AG.

The submission is longer than usual because I am also writing on behalf of my neighbours at Norfolk House. The attached letter, "Letter of Objection 5Apr20", is 12 pages long and contains input from professional consultants, diagrams and photographs. I attach a second document, also for inclusion, being a consultant's report from Anstey Horne who we have retained to advise us on daylight and sunlight.

Please could I ask you kindly to acknowledge receipt, since the last day for submission is Monday 6 April 2020. Please can you tell me also if you are able to upload onto your Planning web-site the entire contents of my "Letter of Objection 5Apr20" - thank you.

Regards
Thomas See

Mobile:

Dr Thomas See, Flat 3, Norfolk House, Trig Lane, London EC4V 3QQ (Objects)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1. Introduction.

1a. Norfolk House was designed and built at the same time as Millennium Bridge House and shares a basement and common services but are under separate ownership. This physical link means that redevelopment of one affects the other, in a way that does not apply to separate independent buildings.

1b. Norfolk House Residents Limited ("NHRL") owns the Headlease to Norfolk House. NHRL in turn is owned by the leaseholders of the 12 flats within Norfolk House, who have a long-term interest in Norfolk House and its surrounding area as owner occupiers. We are writing as NHRL and as a block of 12 individually named residents of Norfolk House.

2. Design.

2a. The character of Trig Lane is of a quiet yard or mews with its access off Broken Wharf and an alleyway to the Thames Path. The street pattern has evolved through hundreds of years of trade along the River Thames which can be evidenced by a review of historic maps of the area illustrating yards and warehouses which are generally rectangular in form, perpendicular to the River. The introduction of the proposed 45 degree splay as an extension to MBH at the end of Trig Lane is wholly out of character and introduces an unnecessarily complicated and alien form to this historic area. It will adversely impact the historic "yard" character of Trig Lane.

2b. The proposed extensions to MBH along Trig Lane and the Thames Path are in the form of extensive cantilevered elements projecting from the upper floors. These projections are out of scale and unsympathetic to the building forms which otherwise maintain an aesthetic characterised by load bearing structural walls.

2c. The proposed extensions to MBH adjacent to the West and North West elevations of Norfolk House are in particular intrusive and overbearing. The issues of loss of privacy from overlooking and loss of daylight and sunlight from overshadowing are noted elsewhere in this letter however in our view the scale of the building and orientation of its windows are oppressive and lack sympathy or respect for its neighbour. The current organisation of space has been orchestrated by the original Architect (R. Seifert and Partners) who designed both Norfolk House and MBH as a carefully considered ensemble and this design integrity needs to be recognised.

2d. The proposed A3 use in this location will add further noise and disturbance and extend the hours of intrusive overlooking beyond normal office hours currently experienced.

2e. It would seem that The City is potentially conflicted by being both Freeholder and Local Planning Authority. We therefore request that an independent design review should be sought from Design Council CABE, or similar, and ask that NHRL be given the opportunity to

make representations about the proposals at such a review. This is an important and prominent site which will impact directly on the view of St Pauls from Millennium Bridge and we are concerned that the designs have progressed with such little consultation with key local stakeholders and such little engagement with the residents of Norfolk House who are directly affected by this inappropriate and highly offensive proposal.

3. Legal rights. Norfolk House Residents Limited (“NHRL”) owns the Norfolk House Head-lease in which Norfolk House enjoys legal rights including but not limited to, “(5) The right to pass with or without vehicles over the roadway and adjacent areas coloured pink stippled black on plan A1 for the purpose of access to and egress from the Blue Land and to park on the said roadway but only for the purpose of short term loading unloading delivery and collecting of goods and items to or from the Blue Land and to pass and repass on foot only over the area coloured pink hatched green on plan 1A.”

4. Equally convenient rights of way and road safety.

4a. No acceptable provision has been made by the Applicant to give equally convenient vehicular access to Norfolk House residents to load and unload directly in front of Norfolk House’s main entrance and to turn vehicles around within this roadway so vehicles can re-join Trig Lane in forward gear. We prepared a plan (Figure 1 below) and photographs (Figures 2 to 5) based on the Applicant’s proposal. This shows how the Applicant proposes to build over the turning area in the existing Roadway (which adjoins Trig Lane) in a way that will make it impossible for Norfolk House to continue to have equally convenient access and egress, even were the Applicant to propose including roadway access to the entrance to Norfolk House, which the Applicant has not done.

(Please note that Figures 1 – 5 were prepared informally by residents, to help visualise the Applicant’s plans, as contained in the Applicant’s presentation. We have tried to locate key points in these figures as closely as possible to the Applicant’s drawings although some dimensions were not given and which we estimated to locate key points. Any slight error in positioning should not detract from the observations we are making.)

4b. Section 12.4 of the City of London (CoL) highway and servicing requirements for developments requires that a vehicle must enter and leave this roadway to the entrance of Norfolk House in forward gear and reversing on to the public highway is unacceptable on road safety grounds. The Roadway adjoining Trig Lane is being amended and is not public highway.

4c. Disabled residents at Norfolk House are entitled to continuing access to the entrance of Norfolk House and not have to rely on the single shared blue badge parking on High Timber Street 50 metres away, which the Applicant proposes we use. Note additionally that the entire boundary of Trig Lane is marked with double yellow lines.

5. London Fire Brigade concerns. The London Fire Brigade has written to Norfolk House residents in the past to express their concerns related to access. We have the following concerns:

5a. The Applicant does not allow the Fire Brigade road access to the fire point and water supply located at the main entrance of Norfolk House.

5b. By building over the current turning area and reducing the space for any potential roadway the Applicant does not allow the Fire Brigade a turning point, sufficient deployment space and the ability to leave any roadway in forward gear.

5c. By increasing the size of their building, the Applicant significantly reduces the already limited distance between the raised Podium of Norfolk House and their planned development. This expansion stops the Fire Brigade from not only efficiently accessing Norfolk House and the new development on the Thames side, but also the lower area of the Millennium Bridge and the adjacent school.

5d. Norfolk House residents would like assurance from the Fire Brigade that all fire safety aspects of this Application have been reviewed and deemed safe on fire safety grounds which are a concern for all high-rise residential buildings. This is not a frivolous demand. In the immediate area there are already three restaurants operating and several more are planned in the new development. Kitchens are one of the main sources of fires.

6. Underground parking ventilation. The Applicant states that underground parking for Norfolk House and the basement roadway to and from basement parking spaces are not a part of this Application. But the safety of this space is affected by the Applicant's removal of vents that run along the full length of the north edge of the Roadway adjoining Trig Lane. This represents 70% of the total open ventilation by area to the basement that will be built over, affecting air flow and ventilation for cars running within the basement area. Although the Applicant proposes to remove 18 (62% of total) out of a total of 29 basement parking spaces, the remaining 11 (38% of total) Norfolk House parking spaces will have only 2% (70cm x 60cm) of direct ventilation in the cul-de-sac in which all 11 remaining spaces are located. This cul-de-sac depends disproportionately on generous air flow and air circulation within the adjacent basement roadway, 70% of whose ventilation is proposed to be built over. It is not sufficient to simply observe that the removal of 70% of ventilation can be justified by the removal of 62% of the parking spaces if the Applicant is challenged, when this will disproportionately compromise the already restricted air flow into the remaining Norfolk House parking area, raising safety concerns.

7. Pinch point. We consider the "pinch point" where the new building approaches the west end of Norfolk House to be unattractive for pedestrians at ground level who will feel hemmed in by the new building with its overhanging cantilevered floors on one side and Norfolk House on the other, creating an overbearing feeling and of walking within a narrow canyon. We note that the Applicant has omitted presenting perspective views that highlight this shortcoming and its negative impact on the public realm.

8. Daylight and sunlight. We instructed leading daylight and sunlight specialists, Anstey Horne, to consider the impact of this Application upon Norfolk House, with particular reference to the detailed report prepared by Point 2 Surveyors on behalf of the Applicant. We are grateful to the Applicant for providing Anstey Horne with access to all the relevant technical data, which Anstey Horne has relied upon. We attach the Anstey Horne

report dated 2nd April 2020, which sets out the details of concerns and questions. Drawing on the summary section of their report, the key points are as follows:

8a. Anstey Horne generally accepts and agrees with the technical methodology adopted by Point 2, except for reservations relating to the use of additional test (outside of the usual BRE testing methodology) that looks at ADF using Radiance software. The report explains reservations both in terms of the usefulness of that test and Point 2's interpretation and application of the results.

8b. A key component of Point 2's defence of the daylight transgressions relative to the BRE guidelines, is that the inter-relationship between Millennium Bridge House and Norfolk House is already very tight, leading to what they conclude to be compromised existing daylight conditions that make Norfolk House sensitive to further change. Anstey Horne's response is effectively two-fold. Firstly, given the moderate existing light conditions, sensitivity must surely be applied in terms of further material reductions in light that are currently proposed. Secondly, that the two buildings were designed and built at the same time as a composition, with what was deemed an acceptable amount of light to the north facing windows given the urban context. The current proposal is to close off the gap between the buildings, increasing the sense of enclosure and producing an unacceptable inter-relationship that is not in keeping with the original design intentions. Of course, these two points tie together.

8c. Point 2 go a stage further and suggest that the existing light levels are so poor that even small changes manifest themselves as disproportionately large percentage reductions that constitute transgressions of the guidance. Anstey Horne points out that in general the existing light levels are meaningful, warrant proper protection and do not in any way distort the position or unfairly burden the Applicant.

8d. Anstey Horne suggest that while some transgressions of the BRE guidance might be justifiable, perhaps even exceeding the 20% guideline in part if it were to a very limited number of windows/rooms, this Application takes us significantly beyond that with reductions in light up 50%-60% in part.

8e. Anstey Horne's overall conclusion is that the proposed changes to the original design concept and relationship between the buildings as currently proposed, would lead to material further reductions in light to rooms that can ill afford material detrimental changes. In essence, the proposals go too far in terms of applying flexibility to the BRE daylight and sunlight guidance.

9. Unacceptable local wind effect. There is a local wind effect along the Roadway and Trig Lane experienced by Norfolk House residents that has not been recognised in this Application.

9a. The large riverside face of Millennium Bridge House blocks and collects moving air that meets it from an approximate South Westerly direction that then finds its way at speed and whips around along the Roadway and Trig Lane between the two buildings. This arises from the alignment of Millennium Bridge House relative to the wind direction and the

juxtaposition of Millennium Bridge House relative to Norfolk House. This effect is similar to that of a funnel where fluid is collected in a large cup (comprising Millennium Bride House and Norfolk House) and makes its way down a narrow spout (Roadway and Trig Lane).

9b. This site fronts onto the River Thames where higher wind speeds are common, including from the prevailing South Westerly direction. This is also the approximate direction the river runs along at this bend and wind gusts are common across the uninterrupted expanse of the Thames. The very large supporting structure for the restaurant umbrella was once damaged by wind. There is no record or recognition in the Applicant's wind study that on windy days already fast wind speeds along the Roadway and Trig Lane can easily double at ground level. This estimate is based simply on Bernoulli's equation – if you squeeze the same volume of air flow through a passage that is half as wide (the new building halves the distance between the two buildings) the wind speed will double.

9c. This effect will be amplified at ground level where the cantilevered upper floors will focus more of the airflow along the ground level walkway. The smooth façade of the new building will further accentuate this effect compared to the existing building whose façade is indented. The 45 degree splay will further streamline airflow and increase windspeed. None of these factors are mentioned in the microclimate report nor has a wind tunnel test been done, focussing on the important interaction between the new Millennium Bridge House and Norfolk House. The computer modelling should also be focussed on the specific interaction between the two buildings to show how wind or gusts coming across the Thames is collected by the larger building and funnelled down the narrow passage between the two.

10. The flats along the river Thames in this area are residential. The current high level of tourism has seen to it there are sufficient restaurants to cater to these needs. Additional restaurants and the additional foot and taxi traffic, will be an unreasonable burden for residents to bear. In particular:

10a. Noise pollution. Increased visitor numbers and outside terraces will increase an already high noise level. Noise is particularly noticeable in the confined streets of the City of London and would be particularly noticeable on Trig Lane and the Roadway.

10b. Increased delivery chaos. More restaurants and bars imply more deliveries. These vehicles cannot park in the area. Trig Lane is a small area of roadway which is marked by double yellow lines throughout. They will park on the proposed pedestrian zone or double park on the road, leaving their engines turning and refrigeration units on. At current levels there is some hindrance. An increase would be an unreasonable burden.

10c. Light pollution. The City of London has fully illuminated the river boardwalk as well as authorized the illuminated river project. These sources of light are significant and illuminate the front of Norfolk House. This is acceptable to Norfolk House residents, given that bedrooms are often at the other side of the building. New restaurants, as planned by the developer, on the ground or higher floors will be a substantial source of light. The Applicant plans to locate these restaurants at a distance of only 8.3 metres from Norfolk House. More detail is required to explain lighting arrangements for the redevelopment. We are

concerned about glare that will negatively impact on the amenity for NHRL residents and also impact on the Illuminated River project which offers attractive and subtle lighting of Millennium Bridge.

10d. Privacy concerns. The proximity of the restaurants to Norfolk House raises considerable concerns to residents, who have their bathrooms and bedrooms opposite. The gap between Norfolk House and the proposed new building and restaurants is only 8.3m across the Roadway/Trig Lane.

11. Norfolk House Podium.

11a. The Podium is located at the West side of Norfolk House and forms part of Norfolk House demise. It is owned by NHRL and any works require our consent. It is not attached to Millennium Bridge House and is subject of an inappropriate land grabbing exercise by the Applicant under 20/00235/FULL. Removal of the Podium (which NHRL does not give consent to in any case) is ill-considered for the reasons below.

11b. More detailed analysis of surface water drainage is needed. The area of paving adjacent to the Podium often floods and by increasing the surface area at pavement level the situation is likely to be made worse, because the Podium currently has separate drainage arrangements.

11c. The Podium currently provides a separation and marshalled area for customers of the restaurant. By removing this and opening up the terrace for a wider group it has the potential to increase noise and disturbance associated with the proposed increased A3 use. This will impact negatively on the amenity for existing residents and encroach into the River Path.

12. Uncovering issues and good neighbourliness. We are all dependent on good neighbourliness and would appeal to the Applicant to respect this. The Applicant has chosen to give us limited time to engage professional consultants and to uncover issues which we believe the Applicant has been aware of and chose to conceal. It is breath taking to see how the Applicant has sought to extend its development aggressively towards Norfolk House by requiring Norfolk House to retract its own building in 20/00235/FULL. This is done under the guise of improving the public realm, when it is the public realm itself that is being compromised by the Applicant's proposal.

13. Statement of Community Involvement. The Applicant's Statement of Community Involvement misrepresents consultation of NHRL. NHRL were only recently informed of the Applicant's plans at a first meeting on 14 January 2020. At this meeting NHRL (represented by 3 NHRL Directors) said that it would consider its position and would not comment on the Applicant's proposal at the meeting. This Statement implies NHRL consent to matters presented at this first meeting and does not record the material objection I made to the loss of Norfolk House access via Trig Lane and the adjoining Roadway. Instead the Statement notes agreement that Trig Lane is a "dead space", a comment I do not recall. No representation has been made by the Board of NHRL to the Applicant in the short space of time since that January meeting, during which time NHRL has been obtaining professional advice.

Yours faithfully,
T See

For and on behalf of Norfolk House Residents Limited and named Norfolk House residents below:

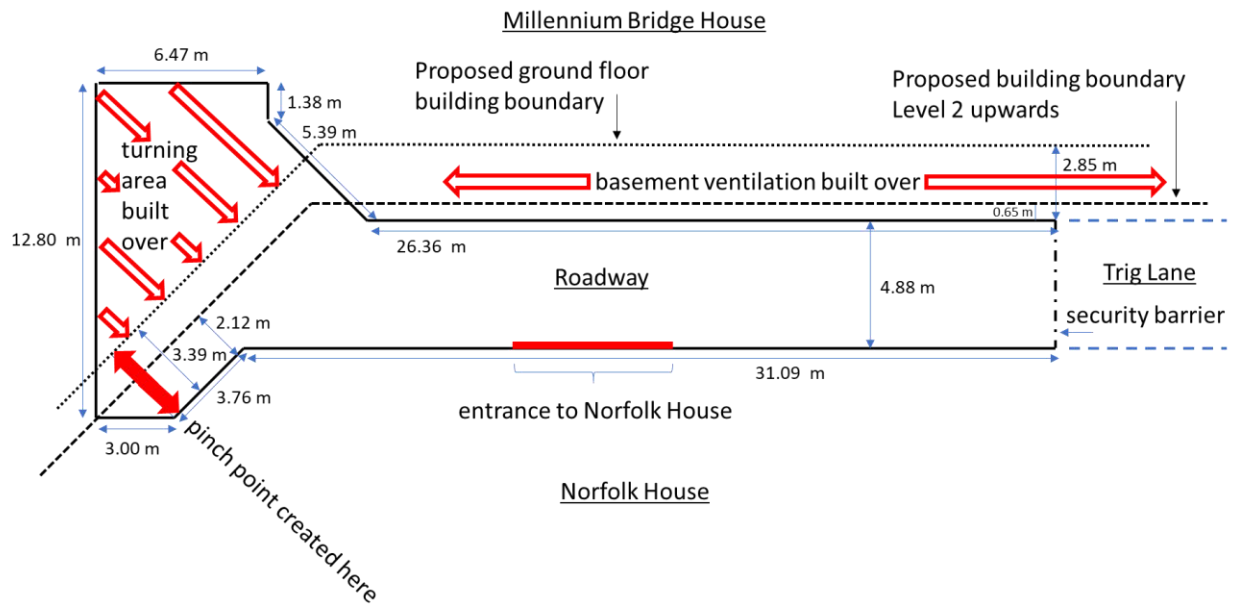
W J J Warmoes, Flat 1;
R Ellison, Flat 2;
C M See and T See, Flat 3;
D M Kearns and R A Hawkins, Flat 4;
A M Crowley and K B Mulhern, Flat 5;
A J P Gilchrist and R A M Gilchrist, Flat 6;
P Atkinson and N Farrow, Flat 7;
A Roste, Flat 8;
J M Read and P G Read, Flat 9;
V Smith and P Brewer, Flat 10;
S M G Braddell, Flat 11;
S N Tanoto, Flat 12.

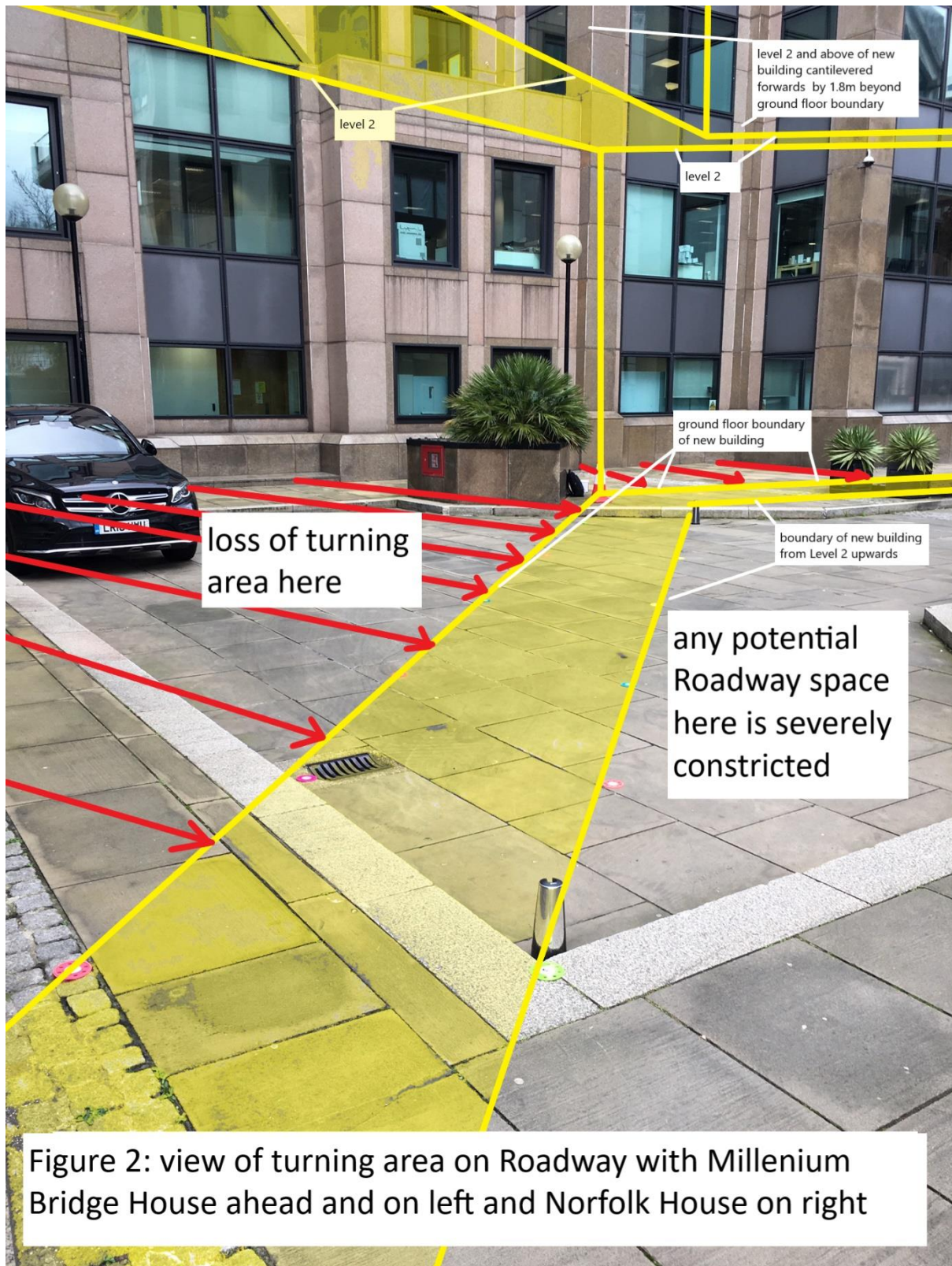
Postal address:
Norfolk House
Trig Lane
London
EC4V 3QQ

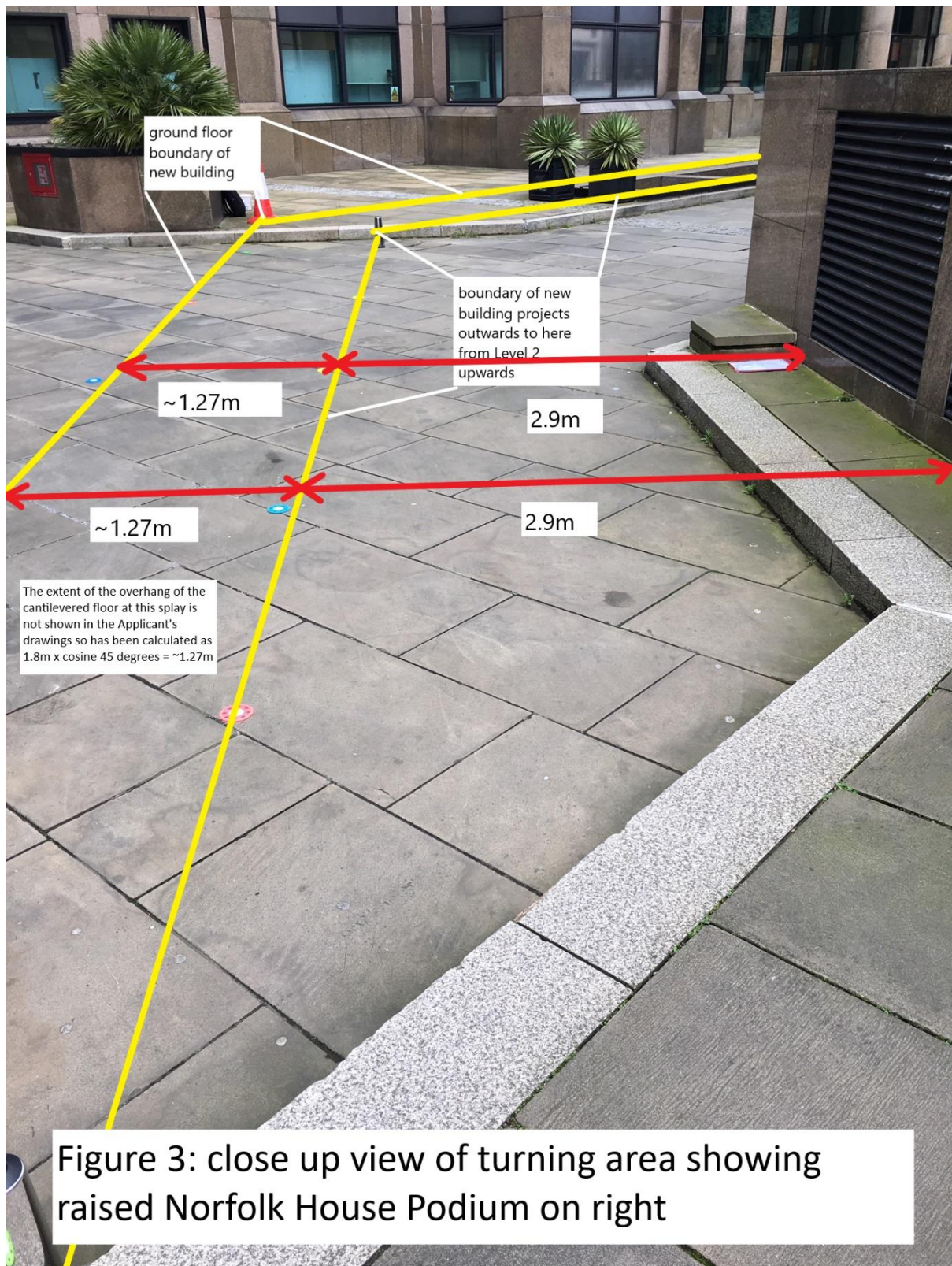
Attachments:

1. Figure 1: sketch of Roadway showing proposed building on and around the Roadway;
2. Figure 2: view of turning area on Roadway with Millennium Bridge House ahead and on left and Norfolk House on right;
3. Figure 3: close up view of turning area showing raised Norfolk House Podium on right
4. Figure 4: view of turning area from further back showing raised Norfolk House Podium on right
5. Figure 5: view down the length of the Roadway with Trig Lane at the end showing basement ventilation that will be built over
6. Anstey Horne report on daylight and sunlight dated 2Apr20 (attached as separate PDF document)

Figure1: sketch of Roadway showing proposed building on and around the Roadway









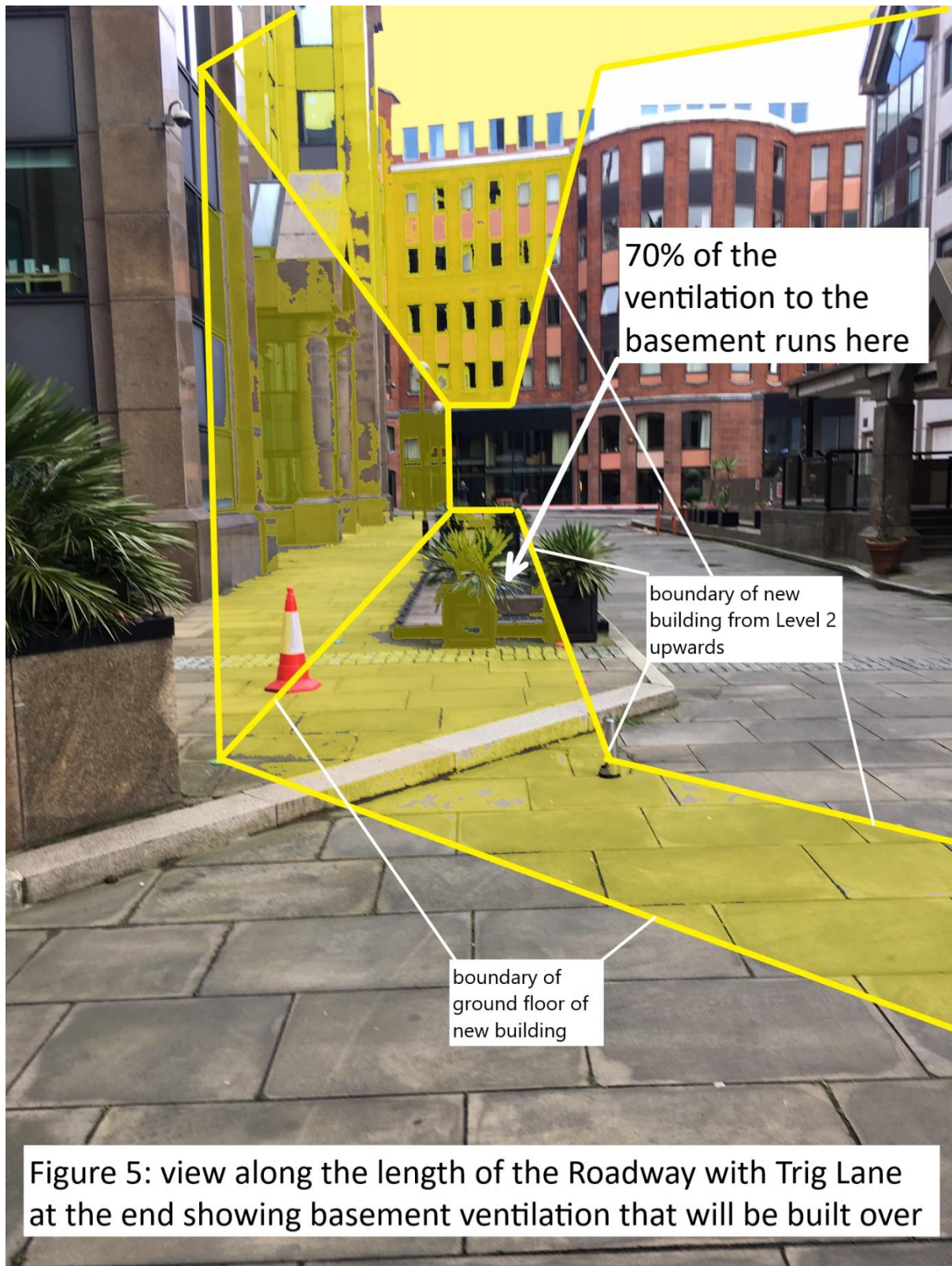


Figure 5: view along the length of the Roadway with Trig Lane at the end showing basement ventilation that will be built over

Roger Hawkins and Thomas See

2nd April 2020

By email

Dear Mr Hawkins and Mr See

Re: (ROL00379) Millennium Bridge House and Norfolk House

You recently instructed me on behalf of the Norfolk House residents to consider the proposed works of extension to Millennium Bridge House with reference to the impact upon the light to Norfolk House. In particular, you asked me to review and comment on the report dated February 2020 produced by Point 2 Surveyors on behalf of the applicants, AG Beltane MBH B.V.

It is my understanding that Mr Hawkins owns and occupies Flat 4 and Mr See owns and occupies Flat 3, but my instructions are to advise all of the residents on a joint basis.

I have not carried out any form of technical assessment myself, so at this stage I am trusting the computer modelling and technical output provided by Point 2. When I visited site recently I inspected your own flats, but in respect of the others I am relying upon the available drawing information.

I imagine you intend to forward a copy of this letter to the City of London planning department alongside a general letter of objection, which is fine by me. I would be more than happy to discuss the matter with the planning officer if that would assist.

Accuracy of technical information

As indicated above, I am relying upon the information provided by Point 2 at this stage. I note that the layouts of the flats were taken from estate agents' details in the main. Based upon the information you subsequently provided I think there are variations from the reality of the layouts in part, but probably not such that would significantly affect the technical results and therefore any conclusions arising therefrom.

4 Chiswell Street, London EC1Y 4UP T: 020 7065 2770

Also at 3 Temple Row West, Birmingham B2 5NY T: 0121 667 9902

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expertise
applied

Point 2's approach to the BRE guidance and the appropriate technical tests to adopt

I take no issue with the fact that Point 2 lead with an assessment of vertical sky component (VSC), no-skyline (NSL, but otherwise known as daylight distribution) and annual probable sunlight (APSH) for sunlight.

I note that Point 2 additionally include an average daylight factor (ADF) assessment using Radiance software and make the following general observations in that respect:-

- The BRE guide specifically excludes ADF for the assessment of impacts upon neighbouring properties, because it is not intended as a comparative test, instead it is how one assesses light conditions within new developments in order to determine whether they will be sufficiently well daylit.
- Radiance offers up increased sophistication in the sense that it can take account of internal and external reflectance, but external reflectance can change through time if changes are made to relevant surrounding buildings and internal reflectance will change much more regularly depending upon the tastes of the occupants of a particular room.
- I am therefore interested to know what internal light reflectance Point 2 assumed for the various surfaces, because it may not accord with the current position or potential future uses. I would also appreciate confirmation as to whether Point 2 took full account of external reflected light with a detailed model of the finishes of Millennium Bridge House.

More detailed analysis of Point 2 report

For the sake of brevity I have not endeavoured to comment on each and every paragraph or comment appearing in the report, instead summarising the key points, starting with the preliminary assessment (following the BRE guidance) utilising the VSC, NSL and APSH test methodologies.

General points

1. Point 2 argue that where one is dealing with a double or triple aspect room, extending from the north elevation through to the south elevation overlooking the River Thames, the windows in the north elevation facing Millennium Bridge House should not be considered the main source of light. I do not believe that to be strictly correct, nor a reasonable approach for the following reasons:-

- For a room to extend from the north elevation to the south elevation within Norfolk House, it will be of a significant size and therefore it cannot be reasonable to assert that the south facing glazing overlooking the River Thames is the main source of light to the northern element, i.e. the kitchen/dining element in the northern portion of the building.
 - Apart from anything else, to do so would assume that the space must always remain open plan, whereas that may not be the position in the future as it will depend upon the choice and taste of the occupants. In my opinion it would be more reasonable to assume the space divided roughly down the centre, with the northern element served only by the north facing windows overlooking Millennium Bridge House. That has not been done and therefore could serve to camouflage the full impact upon the northern spaces. My suggestion would be that an updated analysis is run for these open plan spaces with VSC and NSL results for the rear parts assuming a single aspect arrangement. I should add that it is probably how the units were originally designed.
 - This is an important point, because Point 2 make their initial assumption about the open plan arrangement and therefore effectively dismiss certain spaces as being BRE adherent when that may not in fact be the case. An example may be Flat 1 at first floor level.
2. Point 2 point out the fact that in the BRE guide kitchens and bedrooms are deemed to be less important than main living rooms, which I quite accept. However, they clearly must not be disregarded and as there are a number facing north towards Millennium Bridge House, some with already compromised light conditions, they warrant careful consideration and sensitive treatment.
 3. Point 2 indicate that some of the existing VSC levels are quite low due to the urban setting, tight relationship with Millennium Bridge House etc, and say that they are therefore particularly sensitive to further reductions in daylight. That is true, but emphasises at least partly why they need to be treated sensitively.

As an extension of this, Point 2 say that Norfolk House was designed to mainly leave kitchens and bedrooms facing north towards Millennium Bridge House and, where possible, main living spaces overlooking the River Thames, in order to obtain the best light and views. That is also true, but I believe it is the case that Norfolk House and Millennium Bridge House were designed and developed together, with the designers clearly spacing the buildings apart to maintain perhaps not ideal daylight conditions to the rear of Norfolk House, but sufficient to leave the rooms fit for purpose. Point 2 clearly think the existing spacing is limited and seem to see that as justification for further compromising light conditions, but surely that is all the more reason to maintain the limited building-to-building separation by not building further south towards Norfolk House in such a clearly oppressive way. Indeed, even a moderate extension to the south elevation of Millennium Bridge House that ensured no reductions beyond 20% of the existing light would be challenging for the Norfolk House residents, but here Point 2 seek to defend transgressions materially beyond that in part.

Comments on individual paragraphs

1. Paragraph 3.6 says “.....main source of light to the primary living accommodation in Norfolk House will therefore be unaffected by the development”.

Where there is an open plan living space extending from the north to south elevations of Norfolk House, I have explained earlier why I do not think it is fair and reasonable to argue that the southern elevation glazing is the main source of light to the whole space. That is to ignore the impact upon the northern windows to these open plan spaces and I do not believe be correct.

This also cannot be correct with regard to the ground floor studio Unit 12 in the north-west corner, which enjoys a dual aspect, where both aspects are affected by the works of extension, with only a glancing view towards the Thames.

2. Paragraph 3.8 suggests that because we are dealing with a dense location and the majority of affected rooms are bedrooms and kitchens, the impacts are not that significant or important. I think we have to be careful not to be too dismissive of the importance of kitchens and bedrooms, but even if it is accepted that they are less important than key living rooms, we are not talking about marginal transgressions of the BRE guidelines because the report confirms that of 11 VSC transgressions, 2 record reductions between 20% and 30%, 3 record reductions between 30% and 40%, 3 record reductions between 40% and 50% and a final 3 record reductions between 50% and 60%.

3. Paragraph 3.9. Point 2 explain that where existing light values are very low, even a small absolute change might manifest itself as a disproportionately large percentage change. That is true and is a point I have taken myself on many occasions, but one has to remember that the guide allows 20% leeway anyway. More importantly, taking this case specifically, in general we are not dealing with extremely low VSC values and so the percentage reductions referred to above are not fractional absolute changes in VSC values. By way of a couple of examples:

- Ground floor Flat 12 – 2 windows serving the studio unit are reduced from 11.1% and 10.6% VSC to 4.5% and 4.6% respectively. We are therefore talking about reasonably material VSC reductions and percentage reductions of 59% and 56% respectively.
- First floor Flat 3 – a kitchen window is reduced from 14.1% to 7.3% VSC, equal to a percentage reduction from the current value of 49% and an absolute change of 6.8% VSC.

Point 2 also refer to and quote the section of the guide that indicates one might not be able to achieve BRE adherence if proposed buildings are to match the height of others in the vicinity. That too is a valid point in principle, but in this instance it is not a question of matching heights, it is a proposal to close off the gap between two buildings that are already close to one another, such that ideal daylight conditions do not exist now and they are sensitive to any meaningful further change.

4. Paragraph 3.10 quotes from the City of London plan (paragraph 3.10.41) and says that the City of London accepts that *“ideal sunlight and daylight conditions may not be practicable in densely developed city-centre locations”*.

That is a sensible approach, but there is still a need to protect amenity to residential accommodation within the City and the BRE guide already allows 20% leeway for change in that respect. I would reemphasize the fact here that we are not talking about marginal transgressions beyond that 20% leeway.

5. Paragraph 4.23 deals with the NSL test and Point 2 seek to defend what seem to be meaningful transgressions of the guidance. Here it is important to note that this paragraph seems to deal with affected neighbours in total, rather than Norfolk House in isolation, so I have attempted to pick out the parts relevant to Norfolk House below.

What Point 2 seem to be saying is that the existing daylit areas are so limited that even small changes manifest themselves as disproportionately large percentage reductions that then do not adhere to the BRE guidance. However, I do not think that is a reasonable argument in respect of Norfolk House, as explained in the paragraph below.

8 rooms transgress using the DD test, 3 of which currently receive visible sky to less than 50% of the working plane and are kitchens. The 3 kitchens lose 39%, 53% and 62% of the values in the existing conditions (area losses of around 25 sq ft) - the other 5 rooms are 2 kitchens and 3 bedrooms that lose from 23% to 32% of the existing values (4 rooms experience area losses of 23-28 sq ft and 1 kitchen loses 58 sq ft).

6. Paragraphs 4.32 to 4.36. This section includes a useful diagram and some tabulated information, but I would pick out the following points of interest.
 - Point 2 refer to only 11 of 53 windows tested not satisfying the VSC test, but that is a bit misleading as to the severity of the change because the 11 windows they refer to are focused in the north-west corner of the block, not a well lit area and one that is affected by two different areas of the proposed extension.
 - In paragraph 4.3.3. Point 2 refer to what they seem to consider to be exceptionally low VSC value ranging between 11% and 14% for these windows. That is certainly not unheard of in urban locations, albeit I accept the VSCs are quite low. I am afraid though I must come back to the fact that they still represent a meaningful amount of light that has to be respected, indeed specifically requires protection from the City of London because those values are already compromised.

- Paragraph 4.3.4 mentions that of the 11 windows falling below the guidelines using the VSC test, 8 serve 7 rooms that are multi-aspect and each retains BRE adherence to at least one mitigating window. Although this is strictly true, I would argue that in some cases the mitigating window is a marginal technical 'pass' and does not in my view automatically discount the significant losses to the window/s that transgress. A few examples of this are:-
 - The ground floor studio, Flat 12, is served by 3 windows. The 2 north facing windows transgress the guidelines significantly and the VSC of the 3rd west facing window is reduced from 21.3% to 17.1%, representing a 20% loss to the existing value. Although technically a 'pass', in my view this does not mitigate the losses to the other two windows which are reduced from 11.1% and 10.6% to 4.5% and 4.6% respectively (equivalent to over 50% loss from that received in the current conditions).
 - A first floor bedroom within Flat 3 is served by 2 windows. The VSC of the north facing window is reduced from 13.8% to 6.5%, an absolute reduction of 7.3% (53% loss of the value received in the current conditions). The VSC of the west facing window is reduced from 23.1% to 18.5% (absolute VSC loss of 4.6% and an equivalent 20% loss from the existing value).
 - It is often argued that according to the BRE guide, bedrooms have less of a requirement for daylight than living areas. However, in the case of the second floor bedroom assessed within Flat 6, there is evidence of the intention for its use to be as a study too. The VSC of the north facing window serving this room is reduced from 17.3% to 9.7% and the west facing window from 25.6% to 20.9%. The north facing window is beyond the guidelines as the loss from the existing value equates to 44% (absolute change of 7.6%). The west facing window passes marginally by losing the equivalent of 18% of the current value (absolute change of 4.7%).
- Paragraph 4.35 tries to whittle things down to 3 kitchens as if they are of limited consequence, but I think they are single aspect so they only take their light from over Millennium Bridge House and paragraph 4.36 seems to confirm significant percentage reductions. The daylight reductions to the 3 kitchens are significant and can be summarised as follows:

- The VSC test results show that the 3 windows serving the 3 kitchens lose 49%, 38% and 25% of the existing values.
- The NSL test results show that the 3 kitchens lose 62%, 53% and 39% of the existing values.

7. The report attempts to justify the transgressions arising out of the key recommended BRE tests by reference to use of Radiance software and average daylight factor. As mentioned earlier it is important to note that the BRE guide specifically says that the correct tests for daylight when testing the impact upon an existing neighbour are those of VSC and NSL. Furthermore, it confirms that ADF is not the recommended test because instead it is meant to be a tool for assessing adequate daylight conditions in new developments.

One might justify use of the ADF test if one could show that good ADF levels would prevail in an affected building after the proposed development had been built. However, it is generally the case that Point 2 are not able to do that here and, in any event, their subsequent comparisons all relate to the minimum target in the guidance. Surely it cannot be the case that Point 2 are suggesting that the Radiance study indicates that good daylight conditions will be retained, because earlier in the report they are at pains to point out that the existing levels are rather low?

8. When one reads through the floor by floor analysis of the Radiance results, it is evident that Point 2 are not consistent in their approach. They appear to run a different argument in defence of the results on virtually every floor, effectively running a different argument to suit each different transgression. It is also the case that they confirm clear examples of material impacts even if one thought that an ADF assessment was the correct approach. For example;
 - On the third floor they cite the example of a kitchen having an ADF reduced from 1.3% to 0.9%, which we must consider in the context of the BRE of 2.0%. It is quite a low value that is reduced by nearly a third.
 - They cite the example of room R4/11, a kitchen, with the ADF cut from 0.8% to 0.4%. It is a low existing value that would be halved.

9. Some focus is applied to the studio unit 12 at ground floor level in the north-west corner, including an introduction of testing which attempts to take account of the external foliage. I am not convinced it is correct to say that they are in leaf for two thirds of the year, not least because there is always a transitional period when leaves are falling. However, they confirm in paragraph 4.56 that when the trees are “*out of leaf*” the ADF value will fall from 1.5% to 1%, a reduction of a third to an already compromised unit.
10. In the conclusion section paragraph 5.2 refers again to the current VSC values for the north facing windows as being circa half of the 27% target in the BRE guide. I think that is true, but of course the 27% target is not viable in an urban location and while the existing values are low, I come back again to the point that it means those values need to be properly protected. They are not so low that the proposed reductions would be unnoticeable or of no significance to the occupiers of the rooms in question.

Paragraph 5.3 says that in an urban setting some transgressions of the BRE guidance may be unavoidable. I accept that proposition but come back to the fact that one should seek to avoid material transgressions beyond the 20% in-built leeway the BRE guide provides. If only dealing with an odd window here and there one might also take a more relaxed view, but the impacts are spread across the northern elevation and quite a number of rooms will be compromised as a consequence.

Summing up

Please excuse the fact that I have repeated certain points throughout this report, I have done so simply because they are repeated in the Point 2 report and I felt the need to respond to key paragraphs as I worked through the report. I take the view that in an urban setting one should not necessarily apply the BRE guidelines rigidly, so I do not assess the Point 2 report on that rather prescriptive basis. Instead I have tried to come at it from the point of view of what is reasonable in all the circumstances, in order to be fair to both the developing party and you as the residents of Norfolk House. Having done so I would summarise my thoughts as follows:-

1. Point 2 effectively criticise the design of Norfolk House and its relationship with Millennium Bridge House, leading to their argument that the north facing rooms have compromised light conditions in the main and, in a sense, therefore overly-burden their clients in terms of what they can now do to Millennium Bridge House. I think it is relevant to point out that they were effectively developed together and as a composition, so although it is true to say the north facing windows and rooms do not enjoy the best of light conditions and some of the existing values are quite low in part, they were deemed acceptable at the time that

composition was put together and were not designed to further close off the space between the blocks in the manner that is now proposed. Quite apart from the factual position with regard to the BRE daylight tests, I think it is fair to say that the proposal would be rather overbearing, arguably oppressive, when viewed from the windows in question.

2. When one argues that the BRE guidance should not be applied too rigidly in urban settings, one still has to be cognisant of the aim of the BRE guide, which is to try to avoid reducing existing daylight levels by more than 20%. One might reasonably argue that some leeway should be applied beyond that, particularly if not many windows and rooms are affected, but in this instance some of the transgressions are significantly beyond the 20% benchmark, and would be keenly felt by residents.
3. Point 2 make the valid point that where existing light levels are exceptionally low, for example if one had a VSC value of 6%, even an absolute reduction from 6% to 4% would manifest itself as a 33% change and therefore arguably be disproportionate. However, what we mainly have here is lowish values, but not to the level of a 6% VSC, instead in the low to mid-teens. They are meaningful levels of light and what we see here is meaningful absolute reductions in part and meaningful percentage reductions in quite a lot of cases.
4. One additional point of justification used by Point 2 with regard to open plan spaces, particularly those spanning from north to south across the block, is that by hampering and reducing the light to the rear, north facing windows they are not affecting the primary source of light. I do not believe that is correct when what they refer to as the primary source of light – the south facing windows overlooking the River Thames – is so distant from the rear parts of the building. It is also the case that these northern spaces would have been partitioned off in the past and could be so in the future as well. For that reason I have advocated that Point 2 be asked to produce a revised study for these areas that assumes a notional division between the northern and southern spaces to see how the single aspect north facing elements would then be affected by reference to VSC and NSL.
5. I do not see that the introduction of the additional Radiance study in relation to ADF is of material assistance to the City of London, nor do I see that it serves, as intended, to justify the transgressions of the recommended tests. ADF is clearly explained in the BRE guide as not being the appropriate test for existing neighbouring properties. In addition, if one looks at the ADF results presented by Point 2, I do not think it fairly leads to the conclusion that there is not a material problem. Finally, I think it is evident that Point 2 do not show consistency in their ADF lines of defence, switching arguments and justification on a floor by floor basis to suit the particular results arising.



6. My overall conclusion is that while it may indeed be acceptable to extend Millennium Bridge House in part, pushing out to close the gap between the buildings is rather oppressive and even if one accepts the reasonableness of flexibility in interpretation of the BRE guide in urban locations, the degree of change here is quite material to rooms that already have compromised light conditions.

I hope all of the above is clear, but if you have any queries to let me know.

Yours sincerely

Lance J Harris

cc: Justin Cullen

Yours sincerely

[Insert author's name]

From: [Chipperfield, Rob](#)
To: [DBE - PLN Support](#)
Subject: FW: Millennium Bridge House 20/00214/FULMAJ
Date: 01 June 2020 09:15:29

From: M A Lowndes
Sent: 29 May 2020 12:36
To: Chipperfield, Rob <Rob.Chipperfield@cityoflondon.gov.uk>
Cc: Thomas See
Subject: Millennium Bridge House 20/00214/FULMAJ

Dear Rob

Thank you for your email of 4th May. We are pleased to hear that you are carefully considering the impacts of the proposed development on the residential amenities of Norfolk House. We are particularly keen that you should take into account the cumulative impacts of the development upon those sensitive amenities.

In addition to the further loss of daylight to already poorly served residential windows on the north side of Norfolk House we identify that the scheme, by reason of the significant encroachment of additional built form into Trig Lane, will lead to a substantially increased sense of enclosure, loss of outlook and loss of privacy through overlooking.

Together, these impacts will fail to meet the terms of Policy DM 21.3 which seeks to protect residential amenities of existing homes.

Further we have concerns that the increase in ground level active frontages (and roof level gardens) to Trig Lane could cause noise nuisance which is likely to be exacerbated by the canyon-like form of the street now being proposed.

The proposed south elevation is an unrelieved cantilevered wall, substantially in advance of the line formed by the forward-most part of the currently castellated building line. This existing plan form was carefully articulated in the original design so as to provide interest in outlook, to manage the experience of enclosure and to moderate overlooking of the residential units.

In this way the original development created a carefully balanced physical and spatial relationship between the twinned office and residential buildings which would be fundamentally compromised by the current proposals.

The detrimental impacts so arising could be largely overcome by a simple revision which would set the new elevation back to the substantive position of the existing main elevation.

At the western end of the Roadway/Trig Lane the proposals also involve encroachment into the existing space between the two buildings in the form of the angled extension. This component relies upon the significant reworking of the podium element attached to the residential building (the subject of the second application) in order to allow continued convenient and safe access for pedestrians and emergency services. However this proposed adjustment will compromise existing, protected, arrangements of residential access to Norfolk House itself.

In this respect it is important to point out that the podium is not in the legal control of the developer. The legal control of the podium is in the hands of Norfolk House Residents Ltd (NHRL) and there are covenants which restrict any alterations being made to the structure of the podium by any lessee. The lessee of the Norfolk House restaurant (which uses the podium for outdoor dining) has a demise which excludes the borders of the podium, and the terms of their occupation of the inner area of the podium does not allow them to overcome NHRL's control of the elevated structure.

Without being able to modify the podium the angled extension to MBH cannot be delivered and so should not form part of the main proposals.

We would be very keen to discuss these concerns with you in advance of submitting our further formal objection.

Kind regards

Michael Lowndes | Urban Planning

From: PLN - Comments
Subject: FW: 20/00214/FULMAJ and 20/00235/FULL

From: Thomas See <
Sent: 18 June 2020 07:38
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>; Chipperfield, Rob
<Rob.Chipperfield@cityoflondon.gov.uk>
Subject: 20/00214/FULMAJ and 20/00235/FULL

NHRL Planning Objection Letter 18 June 2020 ref: 20/00214/FULMAJ and 20/00235/FULL

Dear Mr Chipperfield

Gerald Eve's letter dated 12 June 2020 argues on behalf of Beltane, the Applicant, that permission should be granted to the redevelopment plans without amendment, since NHRL were properly consulted prior to Beltane's application being submitted. As we set out below, no such proper consultation of NHRL has, in fact, taken place.

Beltane claims to have had four consultation meetings with NHRL although it significantly omitted to mention them in its original Statement of Community Involvement. Why was this not previously mentioned if the Applicant considers these discussions to be legitimate and to convey an endorsement by NHRL of its Application?

The Applicant has not informed NHRL of the dates and attendees at these four consultation meetings. However, NHRL has since become aware that two individual residents have been approached by the Applicant and its financial backer. The Board and residents of NHRL take a dim view of such informal approaches and, if so claimed, do not consider these discussions to form part of any consultation.

In our letter dated 5 April we wrote, "The Applicant's Statement of Community Involvement misrepresents consultation of NHRL. NHRL was only recently informed of the Applicant's plans at a first meeting on 14 January 2020. At this meeting NHRL (represented by 3 NHRL Directors) said that it would consider its position and would not comment on the Applicant's proposal at the meeting." We added that, "No representation has been made by the Board of NHRL to the Applicant in the short space of time since that January meeting, during which time NHRL has been obtaining professional advice."

NHRL's Board has four Directors and a majority is required for Board decisions. There was no Board decision taken to approach and make any representation to the Applicant in the period between 14 January 2020 and when our Planning Objection letters were submitted on 1 and 5 April 2020.

We reiterate that the NHRL Board and residents of Norfolk House were not made aware of any meeting that individual residents in Norfolk House might have had with the Applicant at the time our two Objection letters were submitted on 1 and 5 April. Any views that might have been expressed by individuals, acting for their individual benefit, cannot be conflated with the views the Board of NHRL has carefully collated from and agreed with residents and recorded in its two Objection letters.

We will write again shortly to respond to other important points in the Applicant's letter.

Yours faithfully

T See

For and on behalf of Norfolk House Residents Limited and named Norfolk House residents below:

W J J Warmoes, Flat 1;

R Ellison, Flat 2;

C M See and T See, Flat 3;

D M Kearns and R A Hawkins, Flat 4;

A M Crowley and K B Mulhern, Flat 5;

A J P Gilchrist and R A M Gilchrist, Flat 6;

P Atkinson and N Farrow, Flat 7;

A Roste, Flat 8;

J M Read and P G Read, Flat 9;

V Smith and P Brewer, Flat 10;

S M G Braddell, Flat 11;

S N Tanoto, Flat 12.

Postal address:

Norfolk House

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EC4V 3QQ

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From: [Chipperfield, Rob](#)
To: [Devlia, Neel](#)
Subject: Fwd: 20/00235/FULL
Date: 30 June 2020 13:18:26
Attachments: [Title Plan View - NGL801549\[103644\].PDF](#)
[Title Plan View - NGL731070\[103642\].PDF](#)

From: Thomas See [REDACTED]
Sent: Tuesday, June 30, 2020 12:26:18 PM
To: Chipperfield, Rob <Rob.Chipperfield@cityoflondon.gov.uk>; PLN - Comments
<PLNComments@cityoflondon.gov.uk>
Subject: 20/00235/FULL

Dear Mr Chipperfield,

We wrote on 1 April 2020 to object to 20/00235/FULL which relates to the lowering of the Norfolk House Podium. This Podium is entirely within the legal control of Norfolk House Residents Limited ("NHRL"), which is in turn controlled by the residents of Norfolk House, who appear as signatories to this letter below. We will not give permission for this Podium, which forms an integral part of Norfolk House, to be lowered in any circumstances.

Despite claims to the contrary in the Applicant's letter dated 12 June 2020, there is no legal ambiguity over the control exercised by NHRL over the Podium. The attached Land Registry plan for NGL731070 shows the extent of NHRL's demise of the Podium area at ground floor level. It shows that NHRL's demise extends over the whole area of the raised Podium, which wraps around Norfolk House and extends to one side of the Roadway adjoining Trig Lane. NHRL is granted rights of support for the Norfolk House premises, which include the raised Podium area. A smaller section within the surface area of the Podium is demised to the Norfolk House Restaurant but this area does not extend to the outer edges of the podium (so that there is an area around the outer edges of the surface of the Podium which remains in NHRL's control). This is shown in the Land Registry plan for title number NGL801549. Further, and significantly, the walls, rails and surrounds of the Podium are specifically excluded from the Restaurant lease. NHRL's legal control over the Podium cannot be overcome as the (a) the structure of the Podium is outside of the restaurant's demise and (b) even if it were within the restaurant's demise, the lease prohibits any alteration to the structure of the Premises. The rights of support enjoyed by NHRL means that the Podium cannot be lowered.

We understand that it is possible to grant Planning permission for a Planning Application that later cannot be implemented for legal reasons. It is imperative that this is not done for this particular Application because knowledge that the Podium will remain in its current form and has to be physically accommodated affects what is possible to be permitted in the linked Application 20/00214/FULMAJ.

We are writing to ask for this Application 20/00235/FULL to lower the Podium to be determined ahead of the linked Application 20/00214/FULMAJ. This is in order that subsequent linked Planning decisions on 20/00214/FULMAJ can be taken in the clear understanding of how they affect the public realm and the further legal rights of NHRL with the Podium structure remaining in place.

It is not the case, as the Applicant claims in its letter dated 12 June 2020, that “this is a private law matter and is not a material planning consideration”.

Yours faithfully,
T See

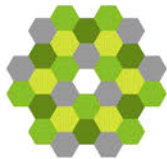
For and on behalf of Norfolk House Residents Limited and named Norfolk House residents below:

W J J Warmoes, Flat 1;
R Ellison, Flat 2;
C M See and T See, Flat 3;
D M Kearns and R A Hawkins, Flat 4;
A M Crowley and K B Mulhern, Flat 5;
A J P Gilchrist and R A M Gilchrist, Flat 6;
P Atkinson and N Farrow, Flat 7;
A Roste, Flat 8;
J M Read and P G Read, Flat 9;
V Smith and P Brewer, Flat 10;
S M G Braddell, Flat 11;
S N Tanoto, Flat 12.

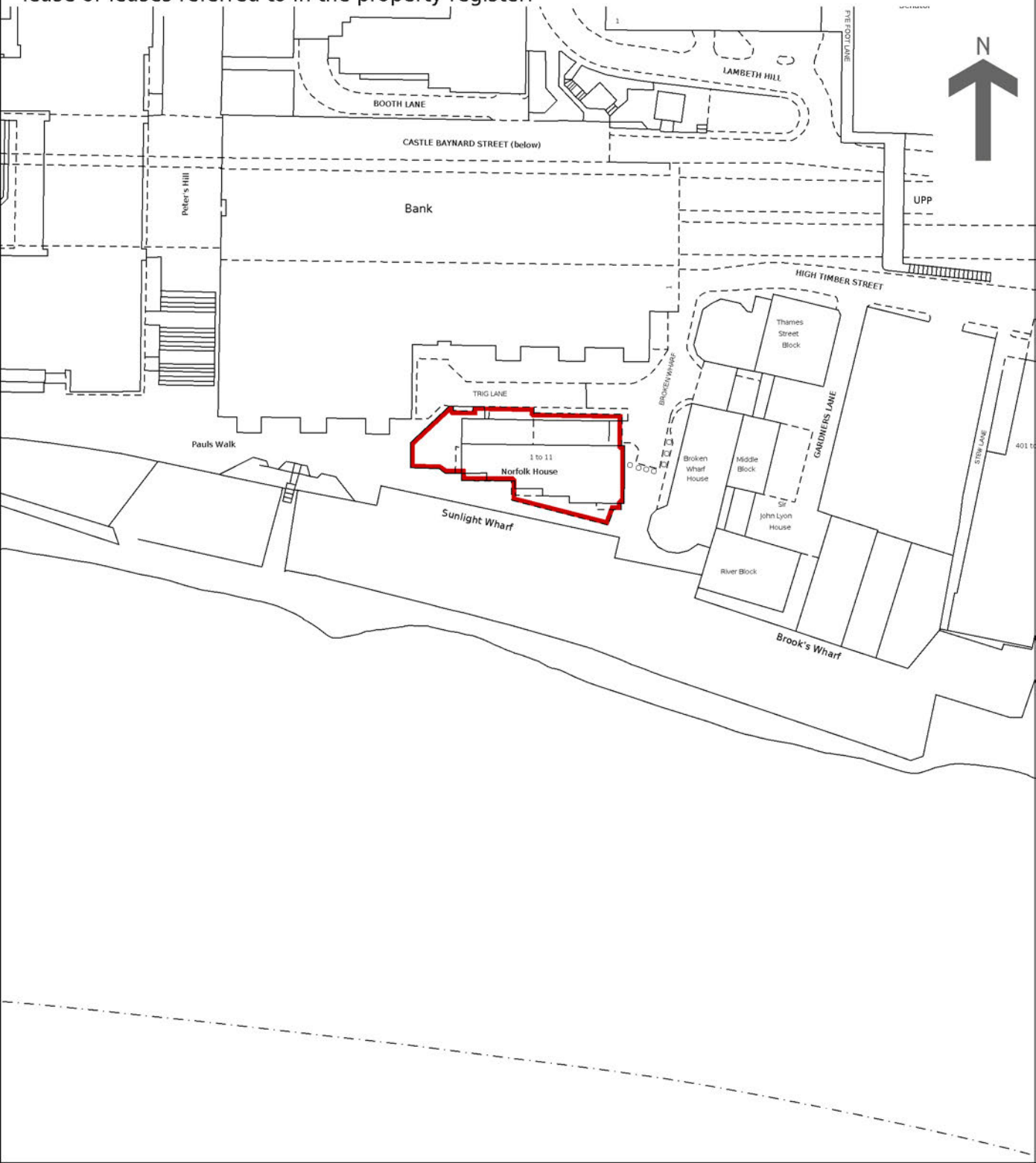
Postal address:
Norfolk House
Trig Lane
London
EC4V 3QQ

Attachments:

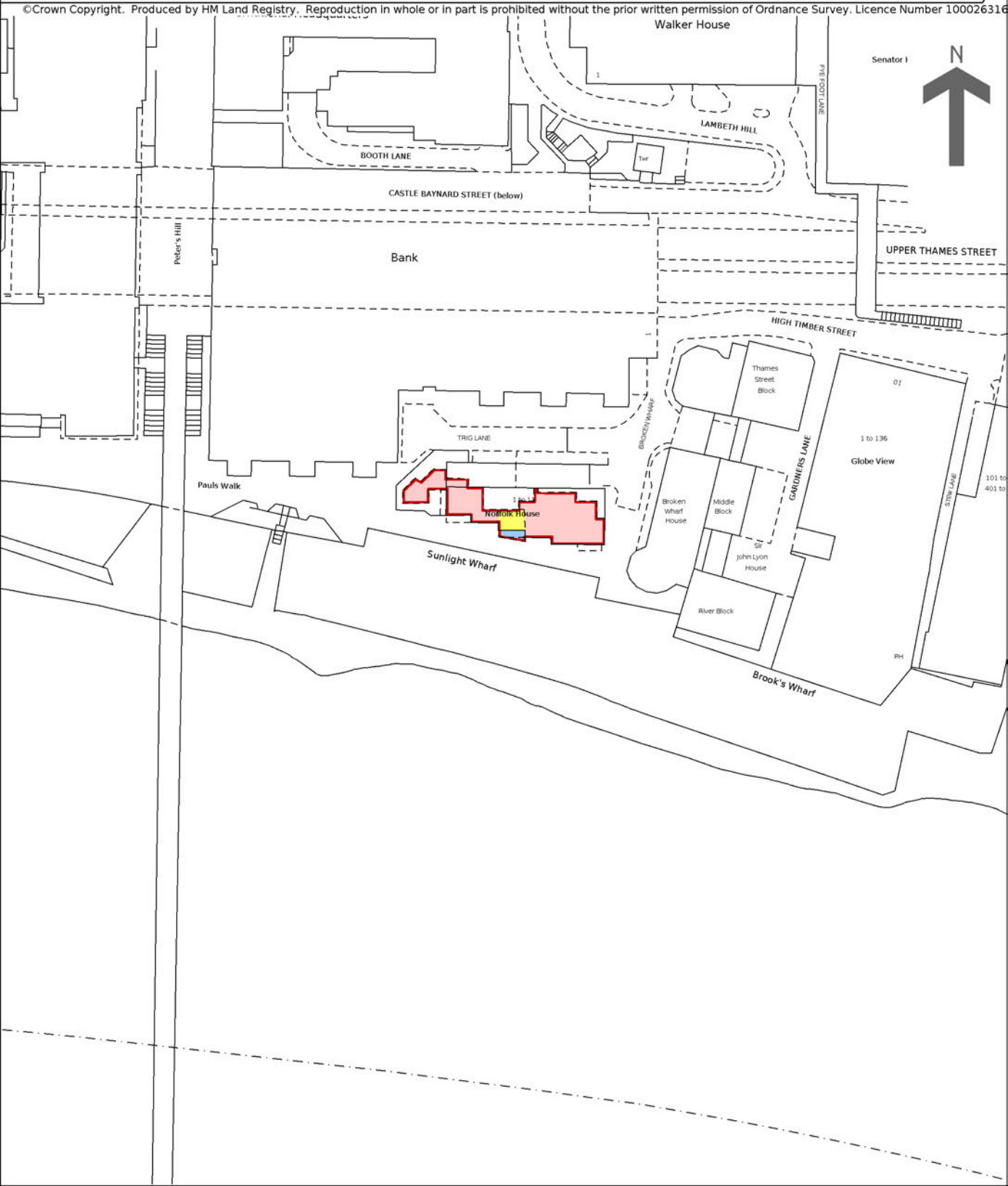
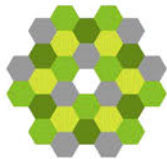
NGL 731070
NGL 801549



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The land in this title lies within the area edged red hereon and is more particularly described in the lease or leases referred to in the property register.



This is a print of the view of the title plan obtained from HM Land Registry showing the state of the title plan on 25 February 2020 at 16:14:33. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.



This is a print of the view of the title plan obtained from HM Land Registry showing the state of the title plan on 25 February 2020 at 15:49:11. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.



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FAO: Rob Chipperfield

12 June 2020

Our ref: JNR/LLJ/U0009872

Your ref: 20/00214/FULMAJ & 20/00235/FULL

By email: rob.chipperfield@cityoflondon.gov.uk
liam.hart@cityoflondon.gov.uk
peter.shadbolt@cityoflondon.gov.uk

Dear Rob

Millennium Bridge House – Consultation Responses

We write in response to the comments received in respect of our the applications for full planning permission (refs. A: 20/00214/FULMAJ & B: 20/00235/FULL) at Millennium Bridge House submitted by Gerald Eve LLP on behalf of our Client, AG Beltane MBH B.V (the “Applicant”).

This letter sets out a response to each of the points raised by Norfolk House Residents Limited (NHRL) in their letter dated 04 April 2020, and includes supporting material prepared by Piercy & Company and input from the design team including Norman, Disney & Young, Heyne Tillett Steele, EQ2 Lighting Consultants and Point 2 Surveyors. We also address other consultation responses from Southwark residents at the end of this letter.

Norfolk House Residents Limited

Engagement with NHRL

In advance of submitting the applications, the Applicant carried out a programme of consultation with key stakeholders and neighbours, including NHRL. The Applicant met with representatives of NHRL for the first time on site on 14 January 2020 with the project team, to present and discuss the proposals. Councillor Brian Mooney was also present at this meeting.

Following this initial meeting, the Applicant has met with representatives of NHRL on four further separate occasions. An informal meeting was held on site with a representative of NHRL and a member of the project team on 03 June 2020 to discuss their concerns.

This dialogue demonstrates that the Applicant has discussed the proposals at length with NHRL, including the potential upgrades to the services infrastructure and facilities which are shared between the two buildings for the benefit of Norfolk House.

We have set out our responses to each of the points raised by NHRL below.

Design Matters

(2a.) Historic maps appear to show that the present orientation of Trig Lane is actually as a result of the development of the existing development by R. Seifert and Partners in 1987-8. Historically Trig Lane was located further to the west from Broken Wharf, separated by warehouse developments, and they did not connect. Their original locations are shown on historic maps from John Rocque's Map of 1746 through to the LCC Bomb Damage Map of 1939-45. Trig Lane historically connected directly to Upper Thames Street to the north, running north south directly to the river, where it met with Trig Stairs on the waterfront.

The site has evolved considerably over the centuries and the immediate street pattern around the site is not historic. Furthermore, the current proposals retain Trig Lane as it exists, continuing to provide a passage way to the riverside with a sense of enclosure, elements that would have characterised the alleyways historically, whilst demonstrating a building with a much improved architectural design that would enhance the setting of Norfolk House, and the riverside, in addition, to key heritage assets such as St Paul's Cathedral.

(2b.) The design approach to the south of the building has been developed to respond to the City of London's Riverside Walk Enhancement Strategy which encourages *"new developments to provide a spacious, accessible and better connected Riverside Walk with appropriate active frontages."* The proposed cantilevered elements facilitate this with the creation of a new south facing covered area to the Thames Walkway, activated by a series of A-class units along Paul's Walk.

The double height covered walkway has been developed to form a generous new civic backdrop to the river, the height of which has been designed to comply with City of London transport policy. The loadbearing steel elements are integral to the character of design and reference the river's industrial heritage, specifically the Sunlight Wharf building previously occupying the site.

(2c.) Millennium Bridge House is a poor example of Postmodernism and is not a heritage asset or worthy of listing, neither for its architectural quality which is low, nor its historical association with the architectural practice of Seifert & Partners. The building's relationship with the riverside and the local townscape to the north, west and east is not successful. The proposals would improve Millennium Bridge House to provide an architecturally appropriate landmark building that responds to its historic riverside location and the character and appearance of the warehouse architecture that once defined the City's riverside. The proposals would enhance the setting of nearby heritage assets, notable St Paul's Cathedral (Grade I) and the Tower of St Mary Somerset (Grade I).

(2d.) The ground floor restaurant (Class A3) uses have been designed to keep the entrances far enough away from Norfolk House to minimise any negative impacts associated with the use. A detailed Operational Management Plan has been submitted with the principal application to set parameters which any future tenant would need to comply with. Any potential adverse impacts associated with the introduction of a restaurant use can be appropriately controlled via planning conditions. Active retail uses are supported in policy terms as part of the Corporation's strategic aspirations to improve the Northbank as the City moves towards a seven day a week economy.

(2e.) The City is both Freeholder and Local Planning Authority for substantial portions of the City of London. The suggestion that the City's separate landowning role would interfere with its statutory obligation as Local Planning Authority is unsubstantiated.

The Application has put forward a thorough and reasoned justification for the design and massing of the building and has been the subject of extensive pre-application discussions with Officers. To suggest a design review panel on this basis is not justified and is not common practice in the City of London. The City Corporation has an established reputation for delivering buildings of a high quality of design and layout, producing buildings that have been critically acclaimed and recognised through international design awards, and has good working relationships with the numerous leading British and international architecture practices often engaged by developers to work in the City.

The City Corporation's design input is delivered by a strong team of experienced and highly regarded officers, with experience in design, historic buildings, archaeology as well as development management. Regular liaison with the City's developers has revealed no external perception that there is a design quality issue arising from the City's advice that needs to be addressed through the proposed external process.

NHRL have provided their feedback and had been previously complimentary about the proposed design. The Applicant has engaged with key stakeholders including Historic England, the Surveyor to Fabric of St Paul's Cathedral, the City of London School and NHRL, to say that the design has evolved with little consultation is untrue.

(3) There are no changes proposed which would impact the ability for residents of Norfolk House to access the front door on foot or for deliveries. The existing arrangement is maintained despite the change in the ground floor building line of Millennium Bridge House.

Trig Lane

(4a.) It is understood that vehicles are currently unable to both enter and exit Trig Lane in forward gear. The "hammerhead" at the end of the private part of Trig Lane is too small for vehicles to practically use for manoeuvring, and particularly larger ones which cannot use this space. The "turning area" which is mentioned is often used for informal parking for occupiers of Millennium Bridge House and NHRL do not have any access rights for parking in this location, or its use for manoeuvring. The omission of this informal parking area is considered a substantial benefit of the scheme in highways and sustainability terms.

In terms of deliveries, it is understood that vehicles typically drive forwards into Broken Wharf and then reverse into Trig Lane through the bollard. Further, it is understood that the legal rights given to Norfolk House do not provide for vehicles entering or exiting in forward gear and only provide access to the front door by foot or vehicle for loading and unloading only.

The proposals would not preclude access for residents on foot or by vehicle for deliveries and the width of the shared surface would be a minimum clear width of 4.9 m at its narrowest point. The design of the shared surface area along Trig Lane is a matter for detailed design and there could be scope to widen the roadway. The clear width from the existing planter to the proposed ground floor line along Trig Lane is 7.5m.

(4b.) Trig Lane is not public highway beyond the bollard. The deliveries and servicing of Norfolk House are not the subject of this application and the existing informal arrangement which is not controlled by any planning conditions would be maintained. Existing vehicle deliveries to Norfolk House are not undertaken in a forward in forward out arrangement as vehicles are not able to turn around in the existing condition, vehicles are required to reverse in or out.

(4c.) The existing blue badge space on High Timber Street is not changing. It has been identified through surveys that there is space capacity to accommodate members of the public and any disabled users associated with the development. Further, Norfolk House has 11 car parking spaces in the basement for the 12 flats meaning there is a provision of nearly one car parking space per unit. Level access from the basement to all floors is provided which would be able to serve the needs of disabled residents.

Trig Lane is not public highway beyond the bollard and the T shaped junction in front of the bollard is designated as public highway with a double yellow line. This area designated as public highway is shown at figure 1.

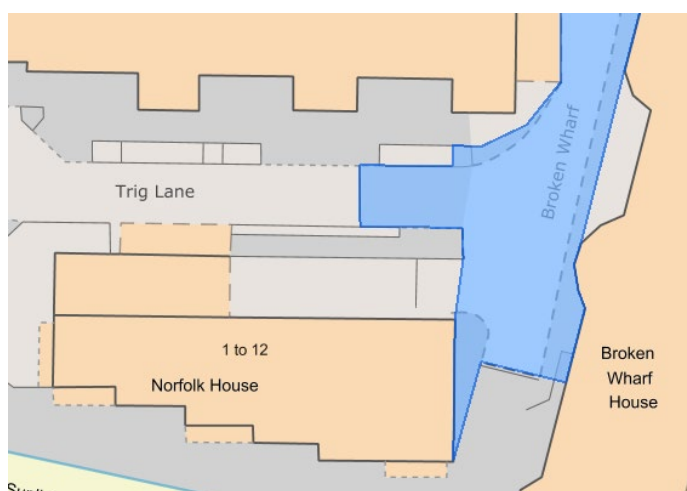


Figure 1 – Public Highway Boundary to Trig Lane

Fire Access

(5a.& b.) Fire service access will be available to within 18m of the dry riser inlet serving Norfolk House. Turning is available using the hammer head provided by Trig Lane and Broken Wharf shown at figure 2.

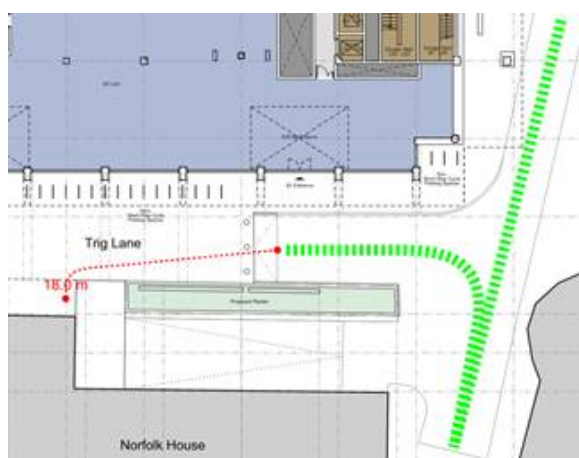


Figure 2 – Fire Access Arrangement to Norfolk House

This arrangement is compliant with Building Regulations Approved Document B (Fire Safety) guidance.

(5c.) The existing access between Norfolk House and Millennium Bridge House is not adequate for Fire Service vehicle access. Pedestrian access will be maintained and therefore this condition is not materially altered by the proposals.

(5d.) All fire risks associated with the proposed development will be assessed as required by Building Regulations and statutory consultation with the London Fire Brigade which will be completed as part of the application process.

Ventilation of the Basement

(6) Norman, Disney & Young have confirmed that the design will maintain adequate ventilation (via natural and/or mechanical means as required) to the communal basement area, including the Norfolk House car parking area (which is outside of the application boundary) and any solution will be compliant with Building Regulations. The basement space is proposed to be extensively refurbished with new plant and ventilation equipment.

The Applicant is in discussions with NHRL in respect of any mutually beneficial improvements that can be made to the basement.

Alterations to Building Line of Millennium Bridge House

(7) The rationalising of the building line by infilling this part of Trig Lane would make the best of use of land, particularly on this constrained site where upwards extensions are not feasible given its prominent location in the foreground of the St Paul's Cathedral.

Notwithstanding the change in building line, the repaving and enhancements to Trig Lane and Paul's Walk are considered to be acceptable and beneficial alterations. A minimum footway width of 4.4 m is maintained along the angled element, an improvement of approximately 1m on the current clear width.

In addition, by design, pedestrians are encouraged to use the Thames Path rather than Trig Lane and Broken Wharf. It is considered that the proposals provide sufficient width to maintain pedestrian comfort along Trig Lane in any case.

Piercy & Company have prepared a brief response document which is appended to this letter and explains the detail in more detail.

Daylight/Sunlight

Point 2 Surveyors have responded in detail to the Anstey Horne Analysis which is appended to this letter. They have provided responses directly to the points raised by NHRL below.

(8a.) The radiance analysis provided was used to supplement the BRE tests undertaken and to furnish decision makers with greater detail on the effects and importantly, the areas of the rooms where the light loss is likely to be experienced. Whether the effects are acceptable is a wider planning judgement to be taken by Officers and the Planning Committee.

Point 2 have used Radiance analysis on multiple projects in the City and across London and so it hasn't been specifically deployed for the current application; it is a more sophisticated technology and one generally welcomed by planning officials. During our pre-application meetings, Officers found the Radiance study a useful tool to assess the effect to Norfolk House.

(8b. and c.) Within the daylight and sunlight assessment, Point 2 acknowledge that the existing levels of daylight are low however, they are indicative of what one would expect in a very dense urban environment such as this. They are typically half of the 27% target which is a consequence of the close proximity of Norfolk House to the development site. Norfolk House has clearly been designed with this in mind as the secondary uses such as bedrooms and kitchens have intentionally been located to the rear of the building, where there are lower levels of daylight by comparison to the main accommodation.

It is frequently the case that changes in massing within such a dense environment will lead to reductions in daylight and sunlight that exceed the national advice offered by the BRE Guidelines. A rigid application of the BRE Guidelines would in our opinion be at odds with the intention of the guidelines, which repeatedly encourage the user to apply the technical specification in a manner that is appropriate for the development context. Furthermore, it would be at odds with the City of London Local Plan and their conventional approach to considering daylight and sunlight impacts.

(8d.) Where windows have low existing values, small absolute changes in VSC are somewhat disproportionately represented as a percentage alteration. Subsequently, small reductions in VSC exceed the 0.8 reduction factor test. In our experience, it is fairly common to see this component of the VSC test exceeded when developing sites in very dense locations and therefore the same can be expected here. This point is expressly recognised in the introduction to the BRE Guidelines at paragraph 1.6.

This is in part why we have undertaken the additional Radiance analysis in order to more accurately understand the changes in light to the north facing rooms.

(8e.) This conclusion differs from Point 2's. There are a number of inaccuracies within Anstey Horne's commentary which have been pointed out in Point 2's response letter which may be the reason why they have drawn this conclusion.

Point 2's report sets out in detail the analysis undertaken and the changes in light to Norfolk House. The conclusions within the report are based on this.

Wind and Microclimate

(9) In the absence of any technical data or relevant modelling to underpin the comments made by NHRL, it is considered that conclusions of the Wind and Microclimate Assessment, prepared by RWDI and submitted as part of the application are valid and the points raised in the objection should not be given any weight.

Extensive Computational Fluid Dynamic (CFD) modelling was undertaken and concludes that there would be no expected instances of strong winds exceeding the safety threshold at any area around the Proposed Development or immediate surrounding area (in accessible areas). It is noted that the Applicant specifically chose RWDI to undertake the wind modelling on this project. RWDI assisted the City of London in their preparation of industry leading guidelines in 2019 and are recognised by the City Corporation as highly competent wind advisors.

Noise

(10a.) The Acoustic Report, prepared by Sandy Brown concludes that the proposed uses including any plant equipment will not be perceptible above the existing background noise levels. The predicted noise level from the rooftop activities is below the representative background noise levels measured during the survey and will not lead to a significant increase in the ambient noise levels at the Norfolk House.

Deliveries and Servicing

(10b.) All deliveries and servicing for the development will be undertaken via the existing loading bay on High Timber Street and be controlled by a delivery and servicing management plan which will include consolidation measures and a booking system, any breaches to this could be enforced against. Vehicles cannot access Trig Lane due to the bollard.

Light Pollution, Privacy and Overlooking

(10c.) Restaurants, by the nature of being a leisure destination, are generally lit at much lower lighting levels than an office building and most occupiers tend to dim lighting into the evening, as well as use much warmer, domestic lighting colour. The existing office building does not have a comprehensive building management system and for security purposes, all lights are on 24/7. The proposed development will incorporate lighting curfew arrangements, will work within the City of London lighting guidance documentation, will take cognisance of the Illuminated River Project and will provide a reduction to local light pollution. The scheme and has also been designed to be subordinate to St Paul's Cathedral.

(10d.) The Proposed Development seeks to introduce restaurant uses at ground level, with a flexible office/restaurant use proposed at first floor which is of most relevance to Norfolk House. In terms of proximity, it is considered that through detailed design and careful management that this would not lead to any detrimental impacts to residential amenity for residents in the ground and first floor. In the existing condition, planting obscures some views between the two buildings. Norfolk House additionally has an existing restaurant at ground floor with a raised outdoor terrace.

It is considered that the proximity of Norfolk House to the new uses within the proposed development can be overcome through detailed design and controlled by planning condition. Detailed design of the new landscaping along Trig Lane in addition to the fit of the internal spaces once the split of uses is confirmed and an operator has been identified can be sufficiently controlled by the Corporation to ensure that residential amenity is preserved.

Restaurant Podium and Terrace

(11a.) Whether the Applicant owns the podium or has the necessary rights to carry out the works is a private law matter and is not a material planning consideration. Nonetheless we have set out some information regarding the position below.

(11b.) The Applicant's Structural Engineers, Heyne Tillett Steele, have confirmed that this section of Paul's Walk is drained into the basement of Millennium Bridge House and Norfolk House. This system will be upgraded as part of the proposed works and therefore if any changes are needed to ensure surface water does not pond in the future this will be factored in.

The area of external paving on Trig Lane is being reduced as part of proposals, which will reduce the volume of rainwater onto Pauls Walk, the works present an opportunity to address levels and drainage, therefore the proposed works are considered to improve drainage. The Applicant would also expect these details to be controlled via detailed design condition in relation to drainage and SuDS, should the Corporation be minded to grant permission.

(11c.) The Applicant is proposing to lower the height of the existing restaurant terrace to the same level as Paul's Walk and replace the louvred upstands with planting. This is proposed as a public realm benefit and would also create greater distance between the restaurant terrace and the nearest residential windows.

The extent of the restaurant outdoor seating area is not changing, it is only being lowered with new planting to surround it. In lowering the height of the podium the external seating will be located further away from the residential windows which would provide a benefit and improve the wider public realm.

The land ownership is complex, however this is not a material consideration and the neighbourly matters discussions required to carry out the works could be resolved should the Corporation grant planning permission for both applications.

(12 and 13) The Applicant has engaged proactively with NHRL and sought to resolve as many issues as possible. NHRL did not seek to resolve any of the points within their objection in advance of submitting their formal response. The Applicant met with representatives of NHRL a total of five times prior to the submission of the application and NHRL did not raise any of these issues with the Applicant in advance of objecting to the applications. The Applicant also met with a representative of NHRL to discuss their concerns during the determination period.

The Applicant is disappointed that these comments could not be resolved as part of our extensive discussions with NHRL, however remains open to working with NHRL on neighbourly matters in the future and maintaining a good relationship.

Benbow House

This section responds to the ten objections which have been received from Benbow House, on the southern side of the River Thames in the London Borough of Southwark in relation to noise, land use and light pollution.

Millennium Bridge House is located approximate 350 meters to the north west of Benbow House with Bankside, the River Thames, the Tate Modern and Millennium Bridge located in the vicinity. Given the distance between the two buildings and the very busy surroundings, it is considered that there will be no material impact in terms of these residents' amenity.

In terms of the land use, a mixed-use office led development at the site will provide additional amenities for residents, workers and visitors not only within the City of London, but also to those further afield. These uses will all be properly managed (and can be controlled through operational management conditions) to ensure that there is no impact on nearby residents.

The Acoustic Report submitted with the application concludes that the likelihood of noise arising from the use of the terraces are not likely to be heard by the nearest sensitive receptors on the northern side of the River, given the distance to Benbow House and the surrounding context, it is highly unlikely that this will be perceived by residents in Southwark.

Concluding Remarks

It is considered that the proposed development would provide substantial benefits for the City of London as a whole. The Applicant has committed to providing the replacement of the Corporation's existing inclinator lift, introduction of a free public roof terrace, in addition to active retail uses in an area which is identified to be lacking in such provision.

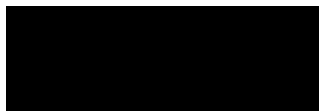
In order to be able to provide these, commercial uplift in value needs to be commensurate with the level of benefits secured. This site is incredibly constrained in terms of intensifying the use of the building. The proposed design has been the subject of extensive pre-application engagement with the City of London and discussions with stakeholders.

We consider that appropriate steps have been taken by the Applicant and the design team to sufficiently safeguard the amenity of neighbouring residents and has committed to careful management of the office and retail elements of the building. The proposed development accords with the development plan and there are no issues raised by Objectors which are considered to be material considerations which should be taken into account in the determination of both applications.

A copy of this letter and enclosures has also been sent to representatives of NHRL.

Please feel free to contact Jeremy Randall of Liam Lawson Jones of this office should you wish to discuss further.

Yours faithfully,



Gerald Eve LLP

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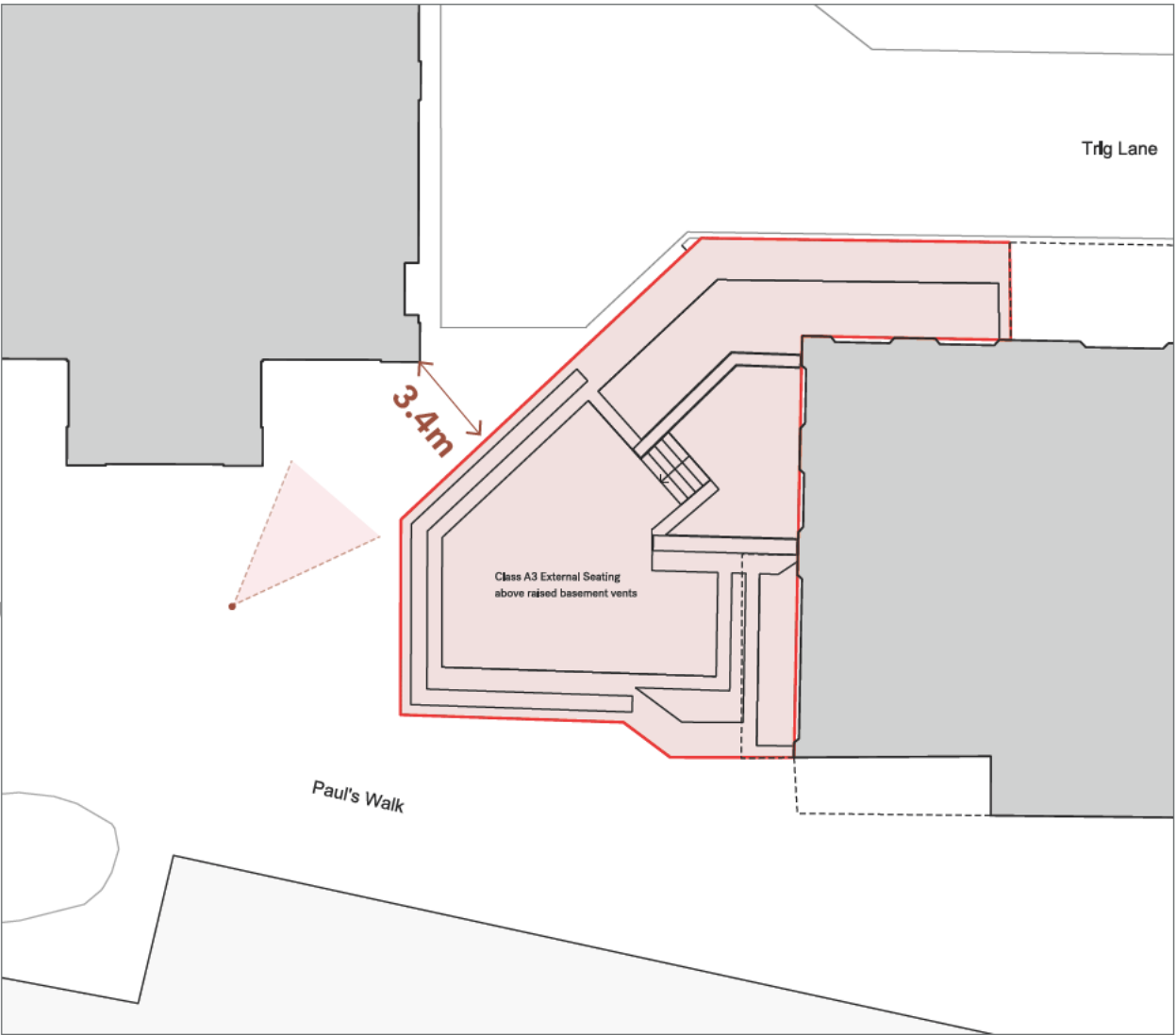
Encl.

Piercy & Company Design Response

Point 2 Surveyors Response to Anstey Horne

MILLENNIUM BRIDGE HOUSE:

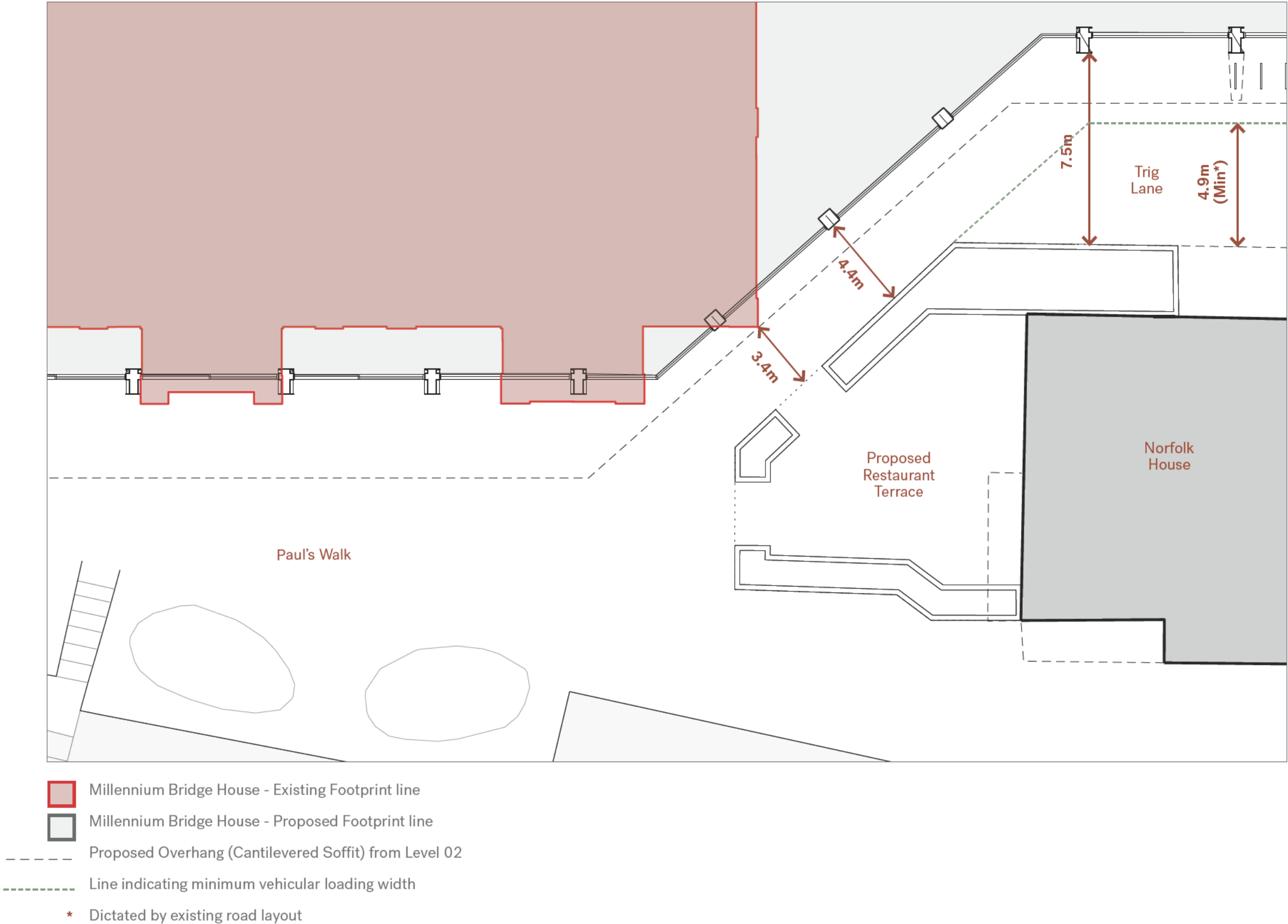
NORFOLK HOUSE OBJECTION
SUPPLEMENTARY INFORMATION



Existing plan



Existing view from Paul's Walk to Trig Lane





Proposed view to Trig Lane



Existing street condition on Trig Lane

..... Location of louvers



17 SLINGSBY PLACE
LONDON | WC2E 9AB

Rob Chipperfield
City of London Corporation
Department of the Built Environment – Planning
PO Box 270
Guildhall
London
EC2P 2EJ

27th April 2020

Dear Rob,

RE: MILLENNIUM BRIDGE HOUSE AND NORFOLK HOUSE – RESPONSE TO PLANNING OBJECTION FROM NHRL/ ANSTEY HORNE

We have reviewed a copy of the planning objection that has been received from Norfolk House Residents Limited (“NHRL”). Appended to their objection is a letter from Anstey Horne (“AH”) which is essentially a critique of the Daylight & Sunlight report produced by Point 2.

We find the commentary prepared by AH misguided and inaccurate. AH repeatedly make erroneous assertions with the objective of creating some false impression that Point 2 have either sought to downplay or worse, dismiss the effects to Norfolk House.

We will deal with the more substantial points in greater detail later in this letter, but I initially highlight so of the inaccurate reporting in AH’s report. AH repeatedly refer to us *‘disregarding rooms such as bedrooms and kitchens’*. No such attempts have been made at any stage within our report. We have openly reported on the effect to every single room and window and indeed report at great length on the effects to the kitchens and so it is factually incorrect to say have disregarded such spaces. These rooms actually receive more discussion than the living rooms.

Further, we note on page 4, paragraph 2 of the AH letter it is stated *‘Paragraph 3.8 (of the Point 2 report) suggests that because we dealing with a dense location and the majority of affected rooms are bedrooms and kitchens, the impacts are not that significant or important.’*

No such claim exists anywhere within the report. What paragraph 3.8 of our report actually says is;

‘As you would expect, the existing VSC values to the windows in the rear of the building are indicative of what one would expect in a very dense urban environment such as this. They are typically half of the 27% target which is a consequence of the close proximity of Norfolk House to the development site. Norfolk House has clearly been designed with this in mind as the secondary uses such as bedrooms and kitchens have intentionally been located to the rear of the building, where there are lower levels of daylight by comparison to the main accommodation, where the primary aspect is south facing’.

On page 5 of the AH letter, paragraph 3 which provides a commentary on the Point 2 report paragraph 3.9, AH have stated that “Point 2 explain that where existing light values are very low”. Paragraph 3 goes on to refer to Point 2 describing the existing VSC values as “extremely low VSC values”.

We have never described the existing VSC values as either ‘very low’ or ‘extremely low’. Given the repetitive use of this language throughout the letter, we consider AH are unreasonably seeking to undermine our analysis and discredit our thorough assessment of the situation.

What we actually say at paragraph 3.9;

‘Where windows have low existing values, small absolute changes in VSC are somewhat disproportionately represented as a percentage alteration. Subsequently, small reductions in VSC exceed the 0.8 reduction factor test. In our experience, it is fairly common to see this component of the VSC test exceeded when developing sites in very dense locations and therefore the same can be expected here. This point is expressly recognised in the introduction to the BRE Guidelines at paragraph 1.6 which states A simple review of our report demonstrates no such language or suggestion has been made’.

Page 6, paragraph 6, AH claim that our presentation of the VSC results for Norfolk House is misleading. They state ‘Point 2 refer to only 11 out of 53 windows tested not satisfy the VSC test, but that is a bit misleading as to the severity of the change....”.

Again, this is factually incorrect. We expressly state the effects to the windows at paragraph 4.33;

*‘42 of the 53 windows included within our analysis will adhere to the BRE Guidelines for VSC. **The remaining 11 windows experience percentage alterations between 22% and 60% and are highlighted dark blue in Figure 4 below’.***

They go on to say, “Point 2 refer to what they seem to consider to be exceptionally low VSC values ranging from 11 to 14%”.

What we actually say at paragraph 4.33 is;

“The windows that experience the largest alterations in VSC are located on the ground and 1st floors. These windows have lower levels of VSC in the existing condition (11% and 14%) due to their proximity to the existing site buildings’.

The above are just a few of the many examples we could cite of the misguided and incorrect nature of their critique. It is an attempt to distort our presentation of the results which are both factual and informed by our extensive professional experience of advising on sites within the City and across central London. I stand completely behind all of the conclusions within our report.

As I mentioned above, our report comprehensively addresses the majority of the points within the AH letter. Our submitted report thoroughly and accurately assesses the impacts on Norfolk House, so we do not seek to repeat our results in this letter. But in response to the AH critique I would however take this opportunity to provide more substantive responses on the following topics.

Accuracy of analysis

I note that AH have inspected Norfolk House and have concluded that any variations in room layouts by comparison to the floorplan information we have obtained is *'probably not such that would significantly affect the technical results and therefore any conclusions arising from it'*.

Double/Triple aspect Living rooms (Page 2, point 1 of AH letter)

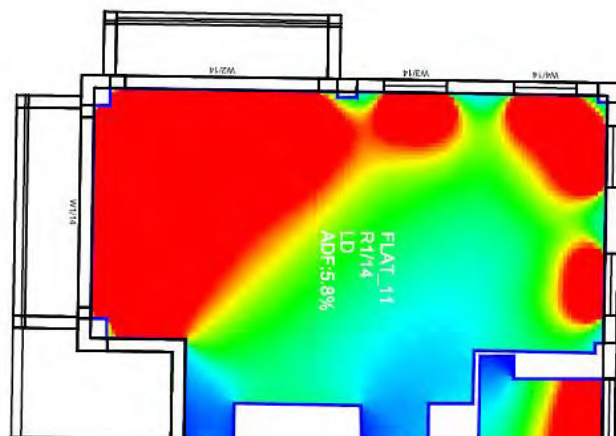
The point of objection appears to relate to paragraphs 3.6 and 3.7 of our report. AH state that it is incorrect to suggest that the north facing windows serving dual/triple aspect LKD's are not the main source of light to rooms.

There are two rooms that fall within this category; R1/14 which relates to Flat 11 and R9/11 which relates to Flat 1.

I disagree with AH criticism of our conclusion for the following reasons.

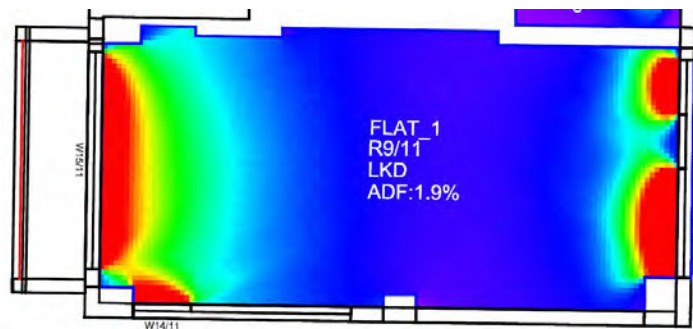
Flat 11

1. There are six windows serving the LKD. The south facing window overlooking the River Thames is a full height, full width window measuring 4.5m x 3m. There is a second, equally sized windows that faces west. The north facing windows are 1.45m x 1.41m.
2. The existing VSC value for the south and west facing windows are significantly higher than the north facing windows. This fact, coupled with the larger window dimensions clearly dictates that the south facing window provides more daylight than the north facing windows.
3. The radiance plot below clearly demonstrates that much higher daylight factors are received through the river facing windows by comparison to the north facing windows. This is demonstrated by the brighter colours. The south facing windows are on the left of the image whereas the north facing windows are on the right.



Flat 1

1. The south facing window overlooking the River Thames is a full height, full width window measuring 4.5m x 2.275m. The north facing windows are 1.1m x 1.41m and 2.2m x 1.4m.
2. The existing VSC value for the south facing window is higher than the north facing windows.
3. The radiance plot below clearly demonstrates that daylight penetrates much further into the room through the river facing windows by comparison to the north facing windows.



It therefore seems clear to me that the south facing windows are the primary source of light and so I do not accept AH's suggestion otherwise.

AH also suggest that it would be appropriate to undertake more analysis which assumes an entirely hypothetical situation whereby an occupant may or may not at some point in the future erect partitioning within the flat, thereby creating two smaller, less desirable spaces. I consider this suggestion wholly inappropriate for the following reasons;

1. Almost all modern urban residential apartments are designed to be open plan and so converting this large multi-aspect room into two inferior quality single aspect rooms is counterintuitive.
2. It would limit the area of the flat that can take benefit of the enviable views over the Thames towards the Tate Modern, The Shard and beyond.
3. The approach isn't in line with the BRE Guideline
4. I have never undertaken multiple assessments of multi-aspect rooms such as and there is no reasons to do so here, particularly given 1-3 above.
5. We could provide extensive evidence to demonstrate that AH do not produce planning reports on this basis and so it is unreasonable to suggest the Applicant should deviate from standard practice.

Daylight to bedrooms and kitchens (multiple references but in particular page 3, (2) and page 4, (1))

On page 3, AH '*quite accept*' that daylight to bedrooms and kitchen are less important than main living rooms but state that they must not be disregarded. We quite agree which is why we have reported on the effect to every single room that has a window facing towards the application site. At no stage does the language within the report suggest they should be disregarded; we have simply stated the general view of practitioners and planning officials is that daylight to living rooms is more useful and therefore important, which AH expressly acknowledge themselves.

They go on to say that the bedroom and kitchen windows already have '*compromised daylight*' and '*warrant careful consideration*'. Again, we quite agree which is why the Applicant has gone to the lengths of instructing more sophisticated and costly Radiance analysis to provide Officers with a more detailed and holistic understanding of the effect to these rooms than can be gleaned from BRE measures alone.

Notwithstanding the above, it remains the case that with the exception of one ground floor studio, the main living accommodation is predominantly south facing to take benefit of the views of the Thames and the uninterrupted access of daylight and sunlight the windows provide. The main source of light to the primary living accommodation in Norfolk House will therefore be unaffected by the development. There are effects to bedrooms and kitchens which have been reported on in detail in our report. Like any development in the City or central London, those localised effects are a matter of planning balance that must be weighed up with the significant benefits this development will bring.

Page 6, Paragraph 5

This AH are commenting on the results for Broken Wharf as opposed to Norfolk House and therefore this section of their letter should be ignored.

Use of Radiance

AH correctly point out that our assessment leads with the VSC and NSL tests described in the BRE Guidelines. They then assert that we '*have attempted to justify the transgression arising out of the key recommended BRE tests by reference to use of Radiance software and average daylight factors.*'

That is simply not correct. We expressly state at paragraph 3.12

'To supplement the BRE tests, we have undertaken detailed radiance based assessments to provide a more holistic understanding of both the reduction in light to each room facing the Site but also, and in our opinion more importantly, the quantum of retained daylight that the rooms will be left with.'

Radiance is not an attempt to justify the effects. Whether the effects are acceptable is a wider planning judgement to be taken by Officers and the Planning Committee. The analysis has been undertaken to furnish decision makers with greater detail on the effects and importantly, the areas of the rooms where the light loss is likely to be experienced.

We have used Radiance analysis on multiple projects in the City and across London and so it hasn't been specifically deployed for the current application; it is a more sophisticated technology and one generally welcomed by planning officials. Indeed, during our Pre-App meetings, Officers found the Radiance study a useful tool to assess the effect to Norfolk House and so it is completely inappropriate for AH to simply dismiss it because it suits their client to do so.

Furthermore, it seems somewhat paradoxical for AH to state in the 'General Observations' section of their letter that '*there are a number (of windows) facing north towards Millennium Bridge House, some with already compromised light conditions, that (sic) warrant careful consideration*' but then seek to dismiss us doing exactly as they request - *warrant careful consideration*. Radiance analysis is a significantly more sophisticated means for Officers to assess the effect to the building and so surely this additional analysis is providing the careful consideration they demand?

The paradoxical nature of AH commentary on Radiance is not limited to the above. They state;

‘One might justify use of the ADF test if one could show that good ADF levels would prevail in affected buildings after the proposed development had been built.’

We are not seeking to use Radiance to *‘justify that good ADF levels would prevail’* in the way that AH suggest would be appropriate, notwithstanding that the analysis actually demonstrates this to be the case for all of the rooms that meet their respective ADF requirement in the existing condition. AH repeatedly and incorrectly suggest that we are making *‘arguments’* to defend the effects.

Quite the opposite.

Our report clearly acknowledges that there is a reduction in daylight to three kitchens that currently achieve values below the 2% recommendation and the studio. The report is open and transparent on this point. However, the benefit Radiance offers over conventional BRE analysis is that it facilitates a more informed judgment to be made around whether that reduction is a) within an important part of the room(s) (which we do not believe to be the case) and b) whether that change will materially worsen the amenity of the rooms.

We have been able to source photos for three of the four rooms mentioned above and so we have an understanding of how these spaces are configured and most likely used. It is our professional judgement that whilst there is some light loss to these rooms, that loss would not fundamentally alter how the space is used albeit there would be some reduction in amenity. That change must therefore be judged against the benefits the application scheme brings.

Design of Norfolk House and MBH (page 5 (3) and 9 (1))

AH state that our report *‘criticises’* the design of Norfolk House and its relationship with MBH and that it *‘overly-burdens our client in terms of what they can do to MBH’*.

We do not make this suggestion. The Gerald Eve response deals with this point in greater detail, but for clarity, what our report says at paragraph 3.8 is;

As you would expect, the existing VSC values to the windows in the rear of the building are indicative of what one would expect in a very dense urban environment such as this. They are typically half of the 27% target which is a consequence of the close proximity of Norfolk House to the development site. Norfolk House has clearly been designed with this in mind as the secondary uses such as bedrooms and kitchens have intentionally been located to the rear of the building, where there are lower levels of daylight by comparison to the main accommodation, where the primary aspect is south facing’.

And in conclusion, we state at paragraph 5.3;

‘It is frequently the case that changes in massing within such a dense environment will lead to reductions in daylight and sunlight that exceed the national advice offered by the BRE Guidelines. A rigid application of the BRE Guidelines would in our opinion be at odds with the intention of the guidelines, which repeatedly encourage the user to apply the technical specification in a manner that is appropriate for the development context. Furthermore, it would be at odds with the City of London Plan and their conventional approach to daylight and sunlight.’

I trust this letter addresses the points raised within the AH letter. If Officers would like to discuss this with me, then I am only too happy to arrange a time to speak with them.

Yours Sincerely

A large black rectangular redaction box covering the signature area.

Nick Lane
Senior Director

For and on behalf of Point 2

**BELTANE- MILLENIUM BRIDGE HOUSE
STATEMENT OF COMMUNITY INVOLVEMENT
19 FEBRUARY**

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1. **SECTION 1: INTRODUCTION**

1.1 This Statement of Community Involvement (SCI) has been prepared by London Communications Agency (LCA) on behalf of AG Beltane MBH B.V., which will hence forth be known as ‘the Applicant’. It accompanies a full planning application that has been submitted to the City of London Corporation for the refurbishment of Millennium Bridge House (‘the Site’).

1.2 The Application is for the following proposed development:

“Refurbishment and extension of the existing building involving the partial demolition and partial infilling of the existing structure and the introduction of a new façade to all elevations and extension to the building at all floors, introduction of roof terraces at fifth and sixth floors, including a public viewing terrace and associated lobbies at second and sixth floors, alongside a part change of use at ground floor from Office to Retail/Café/Restaurant/Bar (Class A1/A3/A4); a part change of use at first from Office to either Office or Retail/Restaurant/Bar (Class A1/A3/A4/B1); second floor from Office to either Office or Retail/Restaurant (Class A1/A3/B1) and a change of use from Office to Retail/Café/Restaurant (Class A1/A3); a part change of use at sixth floor from Office (Class B1) to either Office or Restaurant/Bar (Class B1/A3/A4) and a change of use from office to restaurant/bar (Class A3/A4) use together with public realm works to Peter’s Hill (including the removal and relocation of the southern HSBC gates), Lambeth Hill, Trig Lane and Paul’s Walk (part of the Thames Path) and associated works.”

1.3 This SCI demonstrates that a thorough approach has been taken to consultation with local stakeholders and political stakeholders, alongside on-going engagement with planning officers. This approach focused on targeted consultation with key site neighbours and ward councillors, to ensure that those within close proximity to the site have had a chance to communicate directly with the Applicant and project team and give feedback.

1.4 This document outlines the context for the site, as well as the consultation strategy, the activities and engagement that has taken place with stakeholders and analyses the feedback received.

1.5 The Applicant has been supported by a core team, including planning consultants, Gerald Eve; architects, Piercy & Co; historic buildings consultants, Donald Insall Associates; and landscape architects, Andy Sturgeon Garden Design (the “Project Team”).

1.6 The consultation activities that have taken place are in accordance with the City of London’s own Statement of Community Involvement (2016) and also reflect the principles for consultation in the Localism Act (2011) and in the National Planning Policy Framework (2019).



2. SECTION 2: EXECUTIVE SUMMARY

2.1 Millennium Bridge House is to undergo significant refurbishment, to extend and modernise the building adjacent to the Millennium Bridge on the north side of the River Thames.

2.2 A programme of engagement with the local community and key stakeholders took place throughout 2019 and into 2020, which has helped shape the planning application that will be submitted.

2.3 This programme focused on targeted consultation with key site neighbours and ward councillors, to ensure that those within close proximity of the site have had a chance to communicate directly with the Applicant and project team and give feedback.

2.4 Letters were distributed to 672 residential and businesses addresses within the immediate vicinity of the site, offering meetings with the project team. This includes letters to:

- Key City of London elected representatives and officers;
- Heritage bodies concerned with local assets such as the Sir Christopher Wren-designed St Mary's Somerset Church and St Paul's;
- Local tenant and residents' associations and amenity societies; and,
- Key site neighbours and businesses.

2.5 A number of meetings were held as a result, including with:

- Cllr Mooney, Queenshithe ward (17 December 2019)
- Norfolk House Residents Limited (14 January 2020)
- City of London School (23 January 2020)

2.6 In addition, the project team has committed to providing an update to be included as part of the Queenshithe ward newsletter, which will be issued in March. The update will include a brief summary of the proposals, as well as details of the validation number for people to view the plans in full online via the City of London Corporation's planning portal.



3. SECTION 3: CONSULTATION OBJECTIVES

3.1 The objectives of this consultation are set out below:

- To carry out a targeted programme of engagement with neighbouring residents, businesses and local amenity groups, offering one-to-one meetings with the project team to discuss the plans and provide feedback;
- To ensure the Applicant and senior consultants have engaged directly with key stakeholders and neighbours, reflecting the team's commitment to consultation and understanding people's views;
- To explain clearly the aims behind the proposals and how the development would benefit those living and working within the immediate vicinity of the site;
- To understand the issues of importance to neighbouring residents and businesses before submission of the application;
- To work closely with the City of London Corporation to ensure key officers and councillors are aware of the proposed development, key consultation activities and outcomes.



4. **SECTION 4: CONSULTATION ACTIVITIES AND FEEDBACK**

4.1 The pre-application consultation programme has seen engagement with neighbouring residents, businesses and local amenity groups in order to inform them about the proposals and provide them with a chance to give their feedback.

4.2 This engagement ran alongside an ongoing programme of meetings with City of London planning officers, led by Gerald Eve.

4.3 The consultation was promoted via letters posted to 672 local addresses within a 400m radius of the proposed site. This area and approach was agreed with CoL officers.

4.4 In addition, the project team emailed the following organisations directly to offer meetings:

- Queenhithe Ward Club
- Queen's Quay Residents' Association
- St Paul's Cathedral
- The City Property Association
- The Twentieth Century Society

4.5 This activity resulted in the following meetings taking place and outlined below is a summary of these sessions and the feedback received:

Meeting and attendees	Date	Summary of feedback
Norfolk House Residents Limited <ul style="list-style-type: none">• Cllr Brian Mooney – City of London• Robin Ellison – Norfolk House Residents Limited (“NHRL”)• Roger Hawkins – NHRL• Thomas See – NHRL• Jonathan Chenery – Beltane• Claire Brinson – Beltane• Stuart Piercy – P&Co• Henry Humphreys – P&Co• Conor Maguire – P&Co• Jeremy Randall – GE• Liam Lawson Jones – GE	14 Jan 2020	<ul style="list-style-type: none">• Residents were generally supportive of the scheme in terms of what is being proposed, noting that there would be a much cleaner finish to the façade and that Trig Lane is unsightly and is dead space.• There was concern over the daylight/sunlight impact to the properties.• It was also queried whether the replacement inclinor could be located within the building due to its impact on St Paul's.• There were queries as to whether the replacement inclinor could be located within the building due to its impact on St Paul's.
City of London Boys School <ul style="list-style-type: none">• Charles Griffiths, City of London School (CLS)• Richard Brooks, CLBS• John Hawson, CLBS• Duncan Roe – Beltane• Conor Maguire, P&CO• Liam Lawson Jones, GE	23 Jan 2020	<ul style="list-style-type: none">• Overall, it was felt that proposals would be beneficial to the area.• In relation to the steps and removal of the HSBC gates, it was felt that this would limit lingering on the approach to the bridge and create a better pedestrian environment.• Some concern was expressed about the potential loss of views from the library as a result of the cantilever.• It was noted that the School would prefer for the public terrace to be “less public” and would prefer a more “semi public/private” offer.



		<ul style="list-style-type: none">• There was concern that the use of the roof terrace could cause disturbance to students.
--	--	---

- 4.5** The project team also met with St Paul's Restaurant Limited on 13 February to discuss the proposed works to the terrace at Norfolk House.
- 4.6** In addition, emails were also exchanged with Oliver Caroe, Surveyor of the Fabric to St Paul's. Although a meeting could not be arranged, the project team issued a copy of the materials that had been presented to local groups in December 2019 and remains open to setting up separate meetings as necessary.



5. SECTION 5: RESPONSE TO FEEDBACK

5.1 Provided below is the Applicant's response to the main issues and concerns that were raised during the programme of meetings set out in Section 4.

Query	Response
<p><i>Comment from meeting with Norfolk House Residents Limited:</i></p> <p>It was queried whether the replacement inclinator could be located within the building due to its impact on St Paul's.</p>	<p>The team noted that the location and positioning of the inclinator has been subject to substantial discussions with Planning and Design officers at the City of London Corporation. It was concluded that this was the most appropriate location for the inclinator.</p>
<p><i>Comment from meeting with Norfolk House Residents Limited:</i></p> <p>It was suggested that the height of the paving adjacent to the River Thames on Paul's Walk could be raised in order to improve views.</p>	<p>The applicant has looked at this, however it would require significant change well beyond what is within its ownership and is therefore considered unfeasible.</p>



6. SECTION 6: CONCLUSION

- 6.1** This SCI sets out how the Applicant has engaged with neighbouring residents and business, as well as local amenity groups, to seek their views on the proposals for Millennium Bridge House.
- 6.2** Through its engagement, the Applicant has provided these key stakeholders with a chance to comment on the plans ahead of the submission of a planning application.
- 6.3** Key meetings have taken place with adjacent site neighbours, including residents of Norfolk House and the City of London school, as well as with key elected representatives.
- 6.4** By participating in the consultation process the local community has been able to communicate directly with the Applicant and project team, and contribute their views and feedback into the design process.
- 6.5** The Applicant is committed to continuing a positive and regular dialogue with local communities throughout the planning process.



7. SECTION 7: APPENDICES

- **Appendix A: Stakeholder letters**



BELTANE
ASSET MANAGEMENT

4 December 2019

Dear Neighbour,

I wanted to write to let you know that Beltane Asset Management are planning to undertake a major refurbishment of Millennium Bridge House, the office building adjacent to the Millennium Bridge on the north side of the river Thames. We are currently working to develop proposals in order to substantially refurbish, extend and modernise the building and improve the surrounding public areas.

As one of our neighbours, we wanted to offer you the opportunity to meet us and learn more about our proposed designs, led by renowned architects Piercy & Company. You will have the opportunity to ask questions and provide us with feedback before we submit a planning application to the City of London Corporation early next year.

If you would like to take us up on this offer please contact my colleague, Declan Bennett of London Communications Agency, on db@londoncommunications.co.uk or 020 7291 1504, ideally by Friday 20 December.

With best wishes,

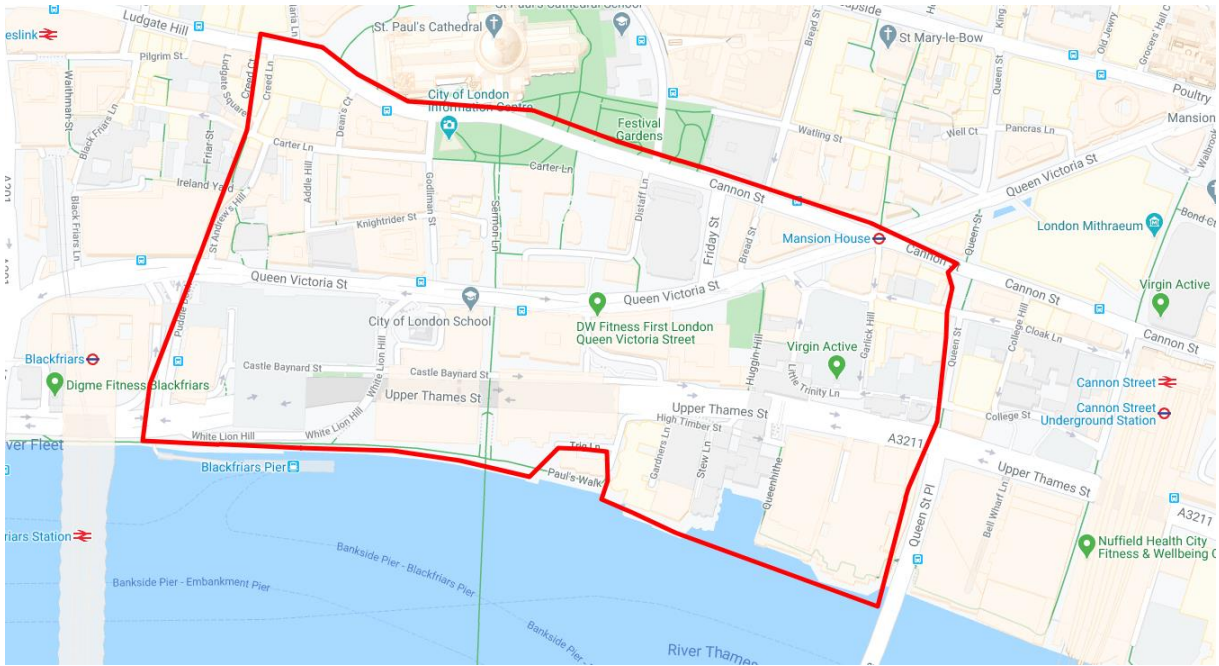
Claire Brinson
Beltane Asset Management LLP

Beltane Asset Management LLP

Telephone +44 (0)203 146 7773

Registered in England: 3rd Floor, 33 Queen Street, London EC4R 1BB, Company Number 7162404 www.beltaneglobal.com

- **Appendix B: Mailing area**



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Committee	Dated:
Planning & Transportation	14 July 2020
Subject: City Fund & City Estate Highway Declaration Surplus Delegated Authority Request – 80 Fenchurch Street, EC2	Public
Report of: City Surveyor CS.199/20.	For Decision
Report author: Mark Eyre	

Summary

The 80 Fenchurch Street development owned by Partners Group Fenchurch Limited (Partners Group) received planning consent on 11 November 2014 under application number: 08/00824/FULMAJ and includes architectural projections along the elevation fronting Fenchurch Street and a Building Maintenance Unit oversail at Carlisle Avenue and Fenchurch Street which will project into City Corporation airspace above the highway stratum. This occupation of Corporation owned airspace requires regularising through an appropriate airspace lease.

Before third party interests can be granted in City Fund highway airspace the affected area/s first need to be declared surplus to highway requirements. The area of highway airspace to be included in a lease to Partners Group was agreed in January 2020 as shown in Appendix I and with areas shown by fund in the table below. These will be subject to minor variations pending agreed review of the proposed lease plans.

	City Estate	City Fund	Total
Airspace - leasehold	125 m2 (1,347 ft2)	75 m2 (807 ft2)	200 m2 2,154 ft2

Partners Group have now made a request to remove elements of the airspace from the proposed lease plan following a further review by their appointed architect. Further investigation by the City Surveyor's Cartographic team will be required to determine if the removal of the areas is required and to ensure it reflects Partners Group's occupation of the site. This review will take time to be considered properly and as the request to vary the lease plan has been made so late it is not possible to agree the final areas required to be declared surplus by the date of your July 2020 committee.

As the anticipated development completion date is before the next sitting of your committee in September 2020 it is requested that authority is delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman of your Committee to approve the declaration surplus of the of City Fund airspace surplus to highway requirements and between datum levels to be determined by the City Surveyor to be included in a lease to Partners Group, ensuring that the occupation of Corporation airspace is regularised on time.

Power of disposal

The transaction involves the disposal of City Fund and City's Estate airspace, both being subject to the highway interest. No statutory power is required to dispose of airspace held by City's Estate. The City Fund parcels are held by the City of London for highway purposes. Disposal of airspace held for highway purposes is authorised by Section 9 of the City of London (Various Powers) Act 1958 on such terms and conditions as the City thinks fit.

Recommendation

Members are asked to delegate authority to the Town Clerk in consultation with the Chairman and Deputy Chairman of the Planning and Transportation Committee to declare surplus to highway requirements the City Fund airspace required for the development at 80 Fenchurch Street and between datum levels determined by the City Surveyor to enable its inclusion in the lease to be granted to Partners Group upon terms to be approved by the Corporate Asset Sub Committee and subject to the City Corporation retaining ownership of the highway and the continuing highway functions.

Appendices

- Appendix 1 – Airspace and Areas Required By Fund Committee Plan

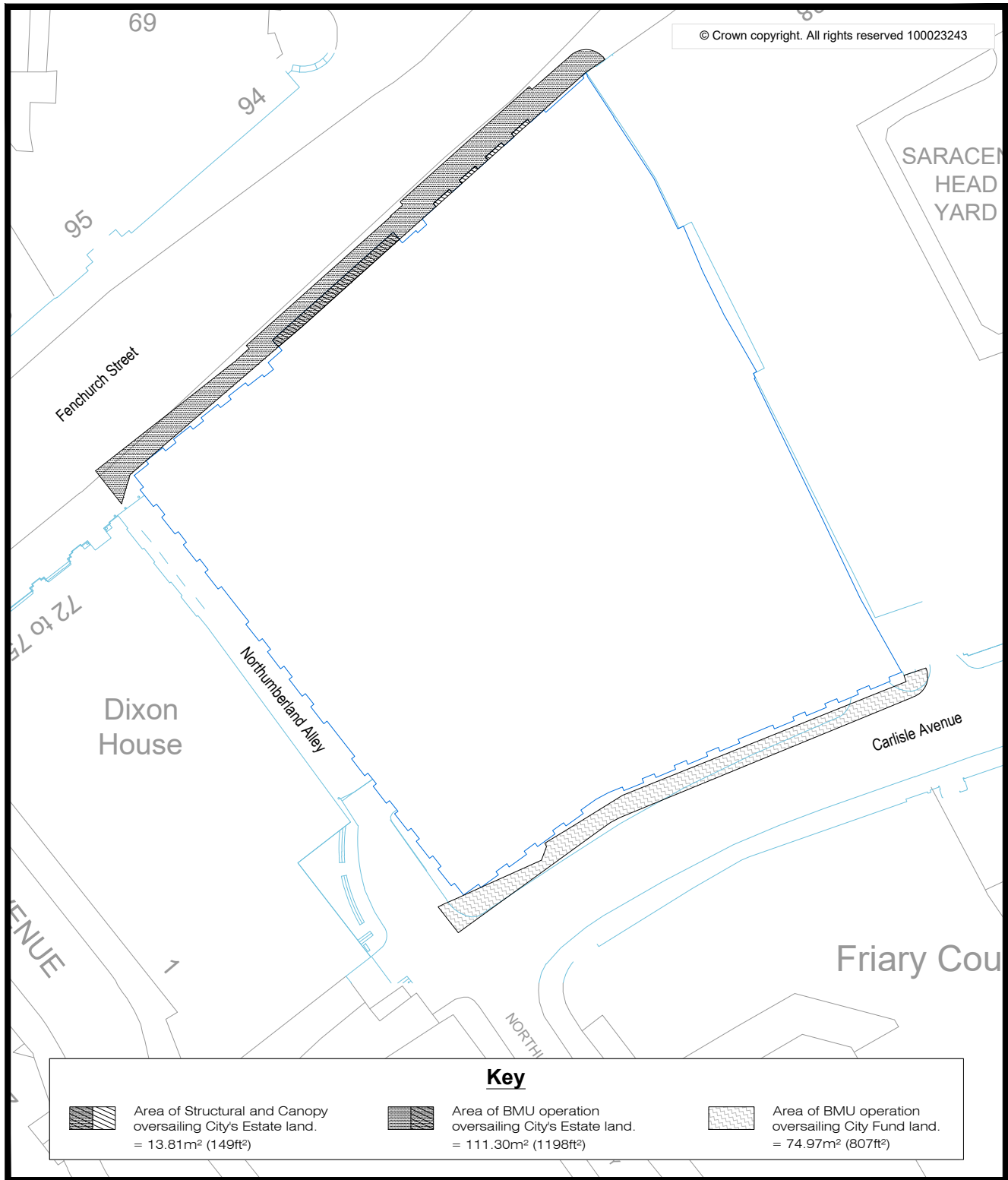
Background Papers:

- Planning Consent number 08/00824/FULMAJ

Mark Eyre
City Surveyor's Department
T: 07712235583
E: mark.eyre@cityoflondon.gov.uk

Appendix 1

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Address :

80 Fenchurch Street
London EC3

Title :

Airspace and BMU areas by Fund
Committee Plan

Pro code

UPRN



P.G.Wilkinson BSc MSc MRICS
City Surveyor

CITY SURVEYOR'S DEPARTMENT

Corporate Property Group :

Plans & Records Section

Page 277

Print Scale :

1:500 @ A4

Date :

05/2020

Drawn by :

SJC

Drawing No :

4-C-42095 -06



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Agenda Item 8

Committee(s): Planning and Transportation Committee – For decision Streets and Walkways Sub – For decision Projects Sub – For decision Open Spaces Committee - For information	Date(s): 14 July 2020 07 July 2020 30 July 2020 14 July 2020
Subject: City Cluster Area– Updated Delivery Plan Unique Project Identifier: City Cluster and Fenchurch Healthy Streets Plan - 12071 City Cluster Vision Phase One - 12072	Public
Report of: Director of the Built Environment	For Decision
Report author: Maria Herrera – City Public Realm	

Summary

This report seeks approval for an updated City Cluster area delivery plan 2020-2023, centred around three programmes that will enable the initial set of high priority projects to be developed and implemented. The proposed programmes will also support the City's Covid-19 transport response strategy which will deliver a reduction in vehicular traffic to provide more space for people walking and cycling and support local businesses and workers by providing additional space for safe social distancing.

Recently consented office developments have demonstrated that the City remains an attractive place for business and it is estimated that over the next ten years, as many as 100,000 additional people will be using the streets and spaces in the Cluster. Therefore, there is a need to carry out functional changes to provide a safe and comfortable pedestrian environment. Furthermore, the lack of green infrastructure and public spaces needs to be addressed, in order to deliver attractive spaces where City life can continue in a safe and pleasant environment. The need for change is particularly pertinent in view of the current Covid-19 pandemic and the City's response strategy.

The intention in 2019 was to deliver the projects within the City Cluster area in three phases, as outlined in the Vision document (adopted in May 2019), which was proposed to be coordinated with the on-going developments in the area and in line with the Transport Strategy's objectives and timeframes. Phase One of the City Cluster area delivery plan was approved in July 2019, comprising a range of S278 funded projects, greening and activation projects and the production of the City Cluster and Fenchurch Area Healthy Streets Plan. A bid for capital funding for Phase Two was submitted in December 2019 and was deferred by the Resource Allocation Sub Committee.

As a result of this deferral, officers have reviewed the content of Phase One to reflect the pressing need to deliver change and to also meet the terms of the Transport for London (TfL) Liveable Neighbourhoods Grant for the area, which requires match-funding from the City.

The output of this review is an updated Delivery Plan which sets out three new programmes:

Programme 1	Pedestrian Priority and Traffic Reduction: Ensure streets can safely accommodate the projected increases in pedestrians and cyclists by rebalancing the street capacity.
Programme 2	Well-being and Climate Change Resilience: The improvement of public spaces and introduction of greenery to deliver an enhanced environment, in line with objectives of the City's Climate Action Strategy
Programme 3	Activation and Engagement: Deliver public places that are welcoming and inclusive, encouraging public participation and social engagement.

These programmes have an estimated cost between £2.4 - £2.9m for the delivery of the initial three years of work (2020-2023). This is to be funded from existing Section 106 contributions and the TfL Liveable Neighbourhood grant, which are both specific in geography and purpose to be used for improvements in the City Cluster. At the time of writing (June 2020), the TfL grant for 2020-2021 has been put on hold as a result of the impacts of Covid-19. However further guidance is expected from TfL in the coming months.

Further transformational change is planned to be delivered in future years (2024-2029), when additional funding becomes available. This will include additional S106 and S278 contributions, potential further TfL grant funding, and CIL funding with funding bids to be submitted as required (see Appendix 4).

The initiation and development of individual projects within the three programmes will be subject to separate Gateway reports. A Gateway 3 report on the Well-being & Climate Change Resilience programme is attached in Appendix 5 for decision.

Recommendations

Members are asked to:

1. Agree the updated City Cluster area delivery plan 2020-2023 as set out in this report.
2. Note the estimated cost of £2.4m - £2.9 to deliver the three programmes for 2020-2023, to be fully funded by site specific Section 106 contributions and the Transport for London Liveable Neighbourhoods grant, however this cost estimate does not preclude the opportunity to secure additional funding to deliver further change where there is a demonstrable need from TfL, from restricted funds linked to local development sites or from third party sponsorship, subject to Member approval (refer to Appendix 4 for detailed information on funding structure).
3. Note that gateway reports will be submitted for each individual project and area programme reports are to be submitted annually.
4. Approve the allocation of £37k staff costs from the Pinnacle S106 towards the development and management of the City Cluster Area programme.
5. Approve the appended report: "Gateway 3: Well-being and Climate change resilience Programme", see Appendix 5.

Main report

Background and Public consultation outcomes

1. The City Cluster Vision (adopted in May 2019) provides a framework for the transformation of the streets and public spaces in order to manage the projected growth within the City Cluster and mitigate the impact of new developments. The public consultation on the City Cluster Vision identified 4 main themes which were strongly supported by stakeholders, these are:
 - Delivery of an improved walking environment
 - Radical change implemented within shorter timeframes
 - Rebalancing streets to reflect user needs
 - Streets and spaces that are vibrant, attractive and green

The proposals in the Vision respond to the feedback provided during the public consultation and aim to deliver additional on-street capacity for pedestrians, public realm enhancements, measures to reduce the impact of climate change, delivering healthy and active streets and improving well-being.

2. The Transport Strategy (adopted in June 2019) identifies that in areas where there is significant change and development proposed, an area-based approach to traffic management will allow for significant improvements for people walking, cycling and using public transport. This will be through the development of Healthy Street Plans and is set out in Proposal 12 of the Transport Strategy. In addition, a Zero Emission Zone was approved for this area under proposal 29 of the Transport Strategy.
3. The proposals in the City Cluster Vision and the Transport Strategy reflect the interests of a diverse local user group and aim to ensure that the Cluster remains a vibrant, dynamic and well-functioning area of the City. The proposals received widespread support, with an average of 83% of respondents supporting specific schemes and proposals, including options for more radical approaches to street management, including timed street closures, place activation and increased greenery.
4. The adopted City Cluster Vision included a delivery plan set out in three Phases to be implemented over a period of approximately 10 years. Delivery was proposed to be coordinated with development in the area, to ensure changes are targeted at those areas in greatest need and in line with the objectives of the Transport Strategy. The Vision acknowledged that the delivery phases were indicative and a change in project priorities would need to be accommodated to reflect Corporate objectives and development progress.

Progress to date

5. In July 2019, a City Cluster and Fenchurch Street Area programme report was approved by Committees. This report outlined the delivery of change in the Cluster in three phases, as set out in the adopted City Cluster Vision document. The report also included details for the development of the “City Cluster and Fenchurch Street Healthy Streets Plan”, in line with TfL Liveable Neighbourhoods funding requirements.
6. Since the last programme report, the following projects have been progressed:
 - City Cluster and Fenchurch Street Area Healthy Streets Plan (in progress): This plan will evaluate the feasibility of the Vision proposals in terms of traffic impact and traffic management measures that are required in order to deliver transformational change. This Plan will collectively test the proposals to assess the overall traffic impact and set out a delivery plan for changes to the highway network. The plan will also identify where temporary and interim changes to the function of the streets can be implemented in the City Cluster ahead of transformational change.
 - Zero emission zone for the City Cluster (in progress)

7. A Gateway 2 report was approved in July 2019 which initiated the development the “City Cluster Vision Phase one - Activation, greening and experiments”. The report outlined a group of projects to improve the pedestrian environment, along with a series of greening interventions, street activation and a community engagement programme. Specific elements included:
 - Footway widening in temporary materials
 - Experimental timed closures
 - Improvements to existing green spaces
 - Greening, sustainable urban drainage (SuDs) and pollution mitigation projects
 - Events and activities (including art and culture)
 - Trials of smart technology, including sensors

8. Projects that have been progressed to date within Phase One include:
 - An experimental timed closure of St Mary Axe to motor vehicles during peak times. A Gateway 3/4 committee report was approved in February 2020 to progress with the experimental traffic closure. However, as a result of the Covid-19 transport recovery strategy, the timed closure will be implemented, and will include the following:
 - 7am – 7pm closure except for access to off-street premises and for cycles
 - Signed informal pedestrian priority on St Mary Axe
 - Reallocate carriageway and motorcycle parking to space for walking as required
 - Retain and improve cycle contraflow

 - Greening and Sustainable Urban Drainage: Officers have commenced the evaluation and design of a sustainable urban drainage project in the area; the improvement of existing public spaces; and increased greenery throughout the area (trees, planters and parklets) in line with the emerging City Climate Action Strategy. Please refer to the Gateway 3 report (for decision) attached in Appendix 5.

 - An activation programme (currently on hold due to Covid-19): This is in response to the feedback from the public consultation on the City Cluster Vision during which stakeholders were highly supportive of a cultural programme that was tailored to the specific characteristics of the area. The City is collaborating with the London Festival of Architecture, Sculpture in the City and the EC business partnership, to deliver a series of on-site interventions to support wayfinding and activation.

 - Other live public realm projects (S106 and S278 funded):
 - 22 Bishopsgate public realm scheme – Construction commenced May 2020
 - 150 Bishopsgate public realm scheme - Detailed design stage
 - Lunchtime Streets Summer 2020 – Tender to select consultant has been undertaken and dates for implementation are yet to be confirmed due to the impacts of Covid-19.
 - 80 Fenchurch St - Public realm scheme, project initiated.

Current Position

9. On 12 December 2019 a capital funding bid was submitted to the Resource Allocation Sub-committee to fund the delivery of Phase 2 of the City Cluster area programme. The funding bid was included within the “advisable” category and was deferred to the next process in late 2020. Therefore, the delivery plan outlined initially has been re-evaluated in response to the urgency to deliver improvements in the area, and in line with the Covid-19 transport response strategy.

10. The updated delivery plan will be the organising framework within which projects will be progressed through the development of three workstreams: 1) Pedestrian priority and traffic reduction, 2) Well-being and Climate Change Resilience, and 3) Engagement and Activation.

11. The first series of projects for 2020-2023 will be focussed on the top priorities for the area and developed under the three workstreams as outlined below. Current “live” projects have been grouped under each programme in order to manage project dependencies in an efficient way. It is proposed that the longer-term transformational change will be delivered as funding becomes available and coordinated with the projected development pipeline.

12. The City’s Covid-19 transport response strategy includes two key objectives:

- Residents, workers and visitors are safe and feel comfortable travelling into and within the Square Mile, particularly when travelling on foot, by bike and on public transport.
- City businesses are supported in their Covid-19 recovery and the City remains an attractive location for business.

13. Covid-19 transport response - streets and interventions:

The Covid-19 recovery measures planned for the City Cluster will deliver a reduction in vehicular traffic to provide more space for people walking and cycling, and will support local business and workers by providing additional space for safe social interaction. The initial set of interventions are currently being delivered as part of the Phase 1 and 2 measures which will provide a safer walking environment in Leadenhall Street, St Mary Axe and Fenchurch Street, followed by other measures currently being discussed for Bishopsgate and secondary pedestrian routes (Phase 3). The Covid-19 transport response strategy aligns with the City Cluster and Transport strategy delivery programme and officers will evaluate the feasibility of extending some traffic reduction measures to deliver long-term change in the area.

14. **City Cluster updated Delivery Plan 2020-23** (See Appendix 1 - 3):

The delivery plan is divided into three programmes of work, as follows:

1. **Pedestrian priority and traffic reduction:**

Officers have assessed priorities for the area based on the projected increase in pedestrian numbers. In order to maintain safe pedestrian movement and accommodate the impact of new development, radical change to traffic movement will be needed. Therefore, a key priority is to achieve traffic reduction at peak pedestrian times to provide more space for people walking and a safer environment.

Projects within this programme include the following:

- City Cluster Healthy Streets Plan: This will test the collective changes proposed to the street network in the City Cluster Vision and set out a delivery plan for these traffic proposals. The plan will identify where temporary and interim changes to the function of the streets can be implemented before the full implementation of subsequent projects is considered. The interim changes will also allow any testing or trials of how street space can be used flexibly by time or day of the week before the delivery of long-term infrastructure changes. This work will include traffic modelling feasibility assessments and feedback from Covid-19 response measures to enable the implementation of future projects.

A timed closure in St Mary Axe: Previous proposals to use an experimental traffic order to restrict vehicles at peak times has been put on hold. A temporary traffic order has been implemented as part of the City’s transportation response to Covid-19 which restricts through traffic and provides additional space for people walking and cycling. The monitoring and feedback gathered while this measure is in place will be used to determine the future of the experimental scheme.

- Feasibility Studies for traffic management changes in other streets:

This will include modelling of scenarios for timed vehicular closures on Leadenhall Street and Fenchurch Street and well as other functional changes on Camomile Street and Wormwood Street. The Healthy Streets Plan forms the first phase of this feasibility work with further modelling and studies being carried out later. This project area will be the subject of a future Gateway report. The work will also take into account the feedback forms the Covid-19 response strategy.

2. Well-being & Climate Change resilience:

This theme of the City Cluster Vision received the greatest level of support from the public during the consultation. The introduction of greenery and improvements to existing public spaces was considered of upmost importance to enable the long-term sustainable growth of the area. The Cluster currently contains very few public spaces to rest and spend time in, and many of those within the City's control need enhancement. Considering the current health crisis, the provision of public spaces is paramount to supporting safe social interaction.

It is proposed to carry out a series of improvements over the next three years to create inclusive public spaces, introduce urban greening and climate change resilience measures, in line with the upcoming City Climate Action Strategy and the City's Covid-19 transport response strategy. This programme will deliver public space improvements ahead of the longer-term transformational change in the area. A separate Gateway 3 report on this programme is attached in Appendix 5, for decision.

Projects within this programme include the following:

- **Improvement of existing public spaces:** This will include options for the improvement of spaces including Jubilee Gardens, St Helen's Bishopsgate and St Andrew Undershaft, amongst other areas, with the aim of delivering inclusive and high-quality green spaces. The focus is to identify the open spaces in most need of intervention to improve the amenity of the Cluster and soften the urban environment.
- **Greening interventions:** Several opportunities (planters, trees and parklets) have been identified that will seek to address the need for green infrastructure and places to rest in the area and will include measures as part of the Covid-19 response strategy. Greening interventions also provide a visible commitment to improving the street environment for all users and their physical and mental well-being and health, as well as increasing the attractiveness of the area and providing climate change resilience.
- **Implementation of a Sustainable Urban Drainage system (SUDs):** Developed in line with the City's emerging Climate Action Strategy, the benefits of this project include enhanced local biodiversity, improved air quality, and localised wind and solar mitigation in public spaces.

3. Engagement and Activation:

Feedback from the public consultation on the City Cluster Vision and the Transport Strategy highlighted the overall support to maintain the reputation of the Cluster as a global leader in services and re-affirm itself as a destination, both as a workplace and as attraction beyond the working day. The aim of this programme is to inform the development of the next phase of transformation and work with the business community to deliver streets and spaces where people feel safe and comfortable. This approach will also consider how areas of private public space can be adapted to meet the needs of the City community and form a seamless public realm alongside the areas within the City's control. The Engagement and Activation programme will deliver on these aspirations, working alongside the emerging EC Business Partnership. A gateway 3-4 report on this programme will be submitted to committees in late 2020.

Initial workstreams within this programme are listed below. The timescales are currently under review as a result of Covid-19. However, it is intended that many of the interventions will assist with the Covid-19 response strategy as the City begins to re-open for business.

- **On-site interventions and engagement:** In collaboration with the London Festival of Architecture, a design competition was organised for the delivery of site-specific installations with the aim of promoting the use of secondary and less polluted pedestrian routes. The successful entries were endorsed by the City Art's Initiative in

February 2020. Officers are working to define details of the installation which is currently deferred to a later date due to Covid-19. Site interventions are proposed to be installed for an initial period of 12 months. During this time, the delivery team will monitor the projects to assess their success and an outcome report will be brought back to Members.

- Sculpture in the City and local and cultural wayfinding: Encouraging people to notice and explore the cultural offer of the area, whilst making better use of quieter, less polluted walking routes. Alongside Sculpture in the City, the workstream will support and collaborate with local businesses and organisations to increase the visibility of the area's collective cultural offer. Functioning as an outdoor trail, it is envisaged to aid the City in promoting safe and accessible cultural experiences, as Covid-19 restrictions begin to ease in the future. Furthermore, the workstream's intended outcome is to increase the number of pedestrians using alternative, less congested pedestrian routes within the City Cluster Area.
- Lunchtime Streets: An initiative to close streets in the area during lunchtime to promote the use of streets as spaces and enhance the amenity of the area. This follows the success of last year's lunchtime streets initiative and it is intended to be implemented in St Mary Axe. Implementation is currently on hold due to Covid-19.

15. Through this proposed framework of projects, officers will be able to work alongside the business community to ensure that the long-term objectives are aligned with the ambitions expressed during the public consultation on the Transport Strategy and The City Cluster Vision. There is also a great opportunity to work closely with the stakeholder community, including the emerging EC Business Partnership, to develop coordinated initiatives that will enable the activation of both public and private areas in the Cluster. Regular communication e-bulletins will be prepared to ensure that Ward Members, stakeholders and local occupiers are consulted and updated on the progress of the projects within the programme.

Programme Governance

16. The delivery of the City Cluster programme will be overseen by the City Public Realm and City Transportation teams in close collaboration with Highways and Planning Divisions and the Open Spaces Department (See Appendix 2 for governance structure diagram). It is of utmost importance that close collaboration with external stakeholders is encouraged and maintained, particularly with the emerging EC Business Partnership and Transport for London, in order to ensure a delivery framework is established which is capable of successfully implementing radical changes, whilst also ensuring the area remains a thriving place to work and visit.
17. In response to the above and to ensure the programme delivers on the desired outcomes, a Steering Group is proposed to be established to ensure that the programme objectives are being met and priorities are in line with the Corporate Plan, the City Cluster Vision objectives, the Local Plan and the Transport Strategy, in advance of Member review and decision-making at Committees. It is proposed that the Steering group includes members from the following parts of the Corporation.
- City Public Realm
 - Planning
 - City Transportation
 - Highways
 - Open Spaces Department
 - City Property Advisory team

External representation from local stakeholders will also be considered to ensure the programme is developed in close collaboration with the EC Business Partnership.

18. Annual programme reports are planned to be submitted to Members of Planning and Transportation and Projects Sub committees to provide an update on the progress and evaluate the outcomes against the success criteria. In addition, individual Gateway reports will be submitted as projects get developed and scope is agreed by the Steering Group.

Corporate & Strategic Implications

19. The City Cluster is identified as a Key Area of Change in the emerging Local plan. The area will experience the largest increase in working population due to current and projected developments.
20. City of London Corporate plan outcomes of relevance to the City Cluster Vision are as follows:
- Corporate Outcome 1 – People are safe and feel safe
 - Corporate Outcome 2 – People enjoy good health and wellbeing.
 - Corporate outcome 5 – Businesses are trusted and socially and environmentally responsible.
 - Corporate outcome 7 – We are a global hub for innovation in finance and professional services, commerce and culture.
 - Corporate outcome 10 – We inspire enterprise, excellence, creativity and collaboration.
 - Corporate outcome 9 - A city that is physically well-connected and responsive
 - Corporate outcome 11 - A city that has clean air, land and water
 - Corporate outcome 12 - Spaces which are secure, resilient and well-maintained.

Financial implications

21. The estimated current cost of the initial three years (2020-2023) of the work programmes is £2.4 – £2.9m. However, it is envisaged that additional funding will be required as projects get developed and scope is agreed with the project Steering Group and relevant Committees. A breakdown of the estimated cost of the programmes and funding sources is attached in Appendix 4. Priorities within the programmes will be adjusted as timescales could be impacted by developments in the area.

Programmes of work		Estimated Costs (2020-2023)
1. Traffic Reduction and Pedestrian priority		£1.4 - £1.8m
2. Well-being & Climate change resilience		£765k - £850k
3. Activation and engagement		£210,000 - £300k
Total		£2.4 - £2.9 m*

*At this stage costs are indicative and are subject to change as individual programmes are developed and additional funding sources are confirmed.

22. The programme of works for 2020-23 set out in the updated Delivery Plan is proposed to be funded by:
- Existing Section 106 contributions in the area, which are specific to this location and purpose, to be used for public realm and transport improvements.
 - Transport for London Liveable Neighbourhood grant (£3.3m), which was successfully secured last year, and is subject to match funding The Liveable neighbourhoods grant is to be spent across 4 years with a fixed sum allocated for each year. The 20/21 allocation

(£200K) is currently on hold as a result of Covid-19 and further information is awaited from TfL.

23. The delivery of subsequent stages of works (2024-2029), will bring larger scale transformational change into the area. In order to secure funding for forthcoming projects, a capital bid for central funding is proposed to be submitted to the Resource Allocation Sub-Committee. Other funding sources will also be explored and reported on in due course.
24. The current spend to date on the City Cluster Vision Phase one - Activation, greening and experiments is £102,628, which also included the initiation of projects across the three programmes as described in paragraph 7. This report now seeks the approval of £37,000 for the management and coordination of the overall City Cluster area programme which will include the preparation of a gateway 3/4 report for Programme 3. Subsequent funding requests will be brought forward to Members through individual gateway reports as part of the development of the three programmes of work.

Table 1: Expenditure to date - City Cluster Vision - Phase 1 - 16800412			
Description	Approved Budget (£) for the development of City Cluster Phase 1	Expenditure (£) to outline principles of Phase 1 and initiate workstreams.	Balance (£)
Highways Staff Cost	5,000	-	5,000
P&T Staff Costs	35,000	47,718	-12,718*
Fees	55,000	54,910	90
TOTAL	95,000	102,628	-7,628

* Current overspend on staff costs is due to the additional officer time required to restructure the work programme and delivery plan, in line with Corporate priorities and departmental objectives. Current overspend is proposed to be mitigated by the additional funds requested for the overall coordination and management of the work programme across a 12-month period.

Table 2: Resources required for the overall coordination and management of the programme for the next 12 months.		
Description	Approved Budget (£) for the development of Phase 1	Increase (£) for the management and coordination of the overall programme.
Highways Staff Cost	5,000	-
P&T Staff Costs	35,000	37,000
Fees	55,000	0
TOTAL	95,000	37,000

Legal implications

25. The existing S106 contributions which are proposed to be used to fund the programme are specific to this area, in scope and geography. Section 106 payments made and held for specific purposes must be spent on the purposes for which they are held and in accordance with the City's obligations under the agreement, unless these agreements are specifically re-negotiated with the relevant parties. The TfL funding allocation is also specific for the area and therefore ring-fenced to be spent in the City Cluster's streets and spaces.
26. Where further consultation is required on individual projects this will be carried out as the project moves forward, in accordance with either the statutory requirements or the principles which guide general consultation.

Risk Implications

27. The top programme risks are as follows:

Risk	Description	Response
Funding for subsequent projects is not secured.	Existing Section 106 contributions have been secured for the initial programme of works for 2020-2023. Funding for future projects is uncertain at present. The TfL liveable neighbourhoods grant is currently on hold for this year due to Covid-19 and further guidance is expected in the coming weeks.	A funding bid is proposed to be submitted for the next round of the CoL annual capital bid process. Further additional funding sources will also be investigated as part of the ongoing management of the programme. Liaison with TfL in relation to the future contributions is ongoing.
Delivery timescales are delayed	Projects will need to be coordinated with the on-going developments in the area. This will impose various programme constraints.	On-going communication with developers and contractors is essential, as is the need for flexibility in the programme.
Lack of stakeholder support	The public consultation on the City Cluster Vision and the Transport Strategy highlighted strong overall support to deliver the proposed initiatives.	A communication strategy will be developed to ensure stakeholders are consulted at various stages of the projects. The emerging EC Business Partnership in the Cluster has expressed their support for delivering the Vision.
<u>Covid-19 risks:</u> Delivery plan requires changes	Due to the impacts of Covid-19 projects have been delayed and updated timescales are yet to be confirmed. It is likely that projects within the delivery plan will need to be reviewed and prioritised in line with potential new restrictions on social distancing and response measures.	The situation is being monitored and the scope of the projects will be evaluated to ensure projects comply with and support guidelines and response measures.
Implementation of projects is delayed		

Project delivery

28. The initial series of projects and priorities is estimated to be delivered over a period of three years, 2020-2023. The three programmes are to be coordinated with current/future predicted developments in the area. An overall update report to committees to be prepared annually. Refer to appendix 3 for overall predicted timescales.

29. Outline project programme:

Programmes of work	Project	Timescales/status*
1. Traffic Reduction and Pedestrian priority	St Mary Axe timed closure	May - June – to be delivered as part of Covid-19 transport response plan, (Phase 1 streets)

	Healthy Streets Plan	Under development
2. Well-being & Climate change resilience	Gateway 3 report is appended to this report.	For Decision
3. Activation and engagement	London Festival of Architecture	Dates under review as a result of Covid-19
	Lunchtime Streets	
	Engagement activities	
	Sculpture in the City	
*The above dates are subject to change due to impacts of Covid-19. An updated programme will be presented when available.		

Conclusion

30. The City Cluster programme highlights the need to move forward with improvements to the streets and spaces to mitigate the impacts of projected growth and provide a safe pedestrian environment. There is a need to provide more space for people for walking and cycling in order to support safe social interaction and enable businesses to re-open. The proposed programme of projects outlines how strategic improvements to key streets and spaces will create a better connected, safer and welcoming pedestrian experience. The goal is to deliver an improved and fit for purpose urban environment that responds to the changing demands of the area, whilst supporting the City Cluster as a thriving place to work, visit and live.

Background papers

- City Cluster and Fenchurch Street Area programme report approved by:

Committees:

Corporate Projects Board

Projects Sub Committee

Streets and Walkways Sub Committee

Dates:

28 June 2019

19 July 2019

22 July 2019

- City Cluster Vision Phase 1 - Gateway 2 approved by

Committees:

Projects Sub Committee

Streets and Walkways Sub Committee

Dates:

19 July 2019

28 June 2019

- St Mary Axe Experimental Timed Closure Gateway 4 report approved by:

Committees:

Projects Sub Committee

Streets and Walkways Sub Committee

Dates:

24 February 201

25 February 2019

Appendices

- Description of programme framework
- Governance structure
- Programme timescales
- Finance structure
- Gateway 3 report: Well-being and Climate resilience programme – **FOR DECISION**

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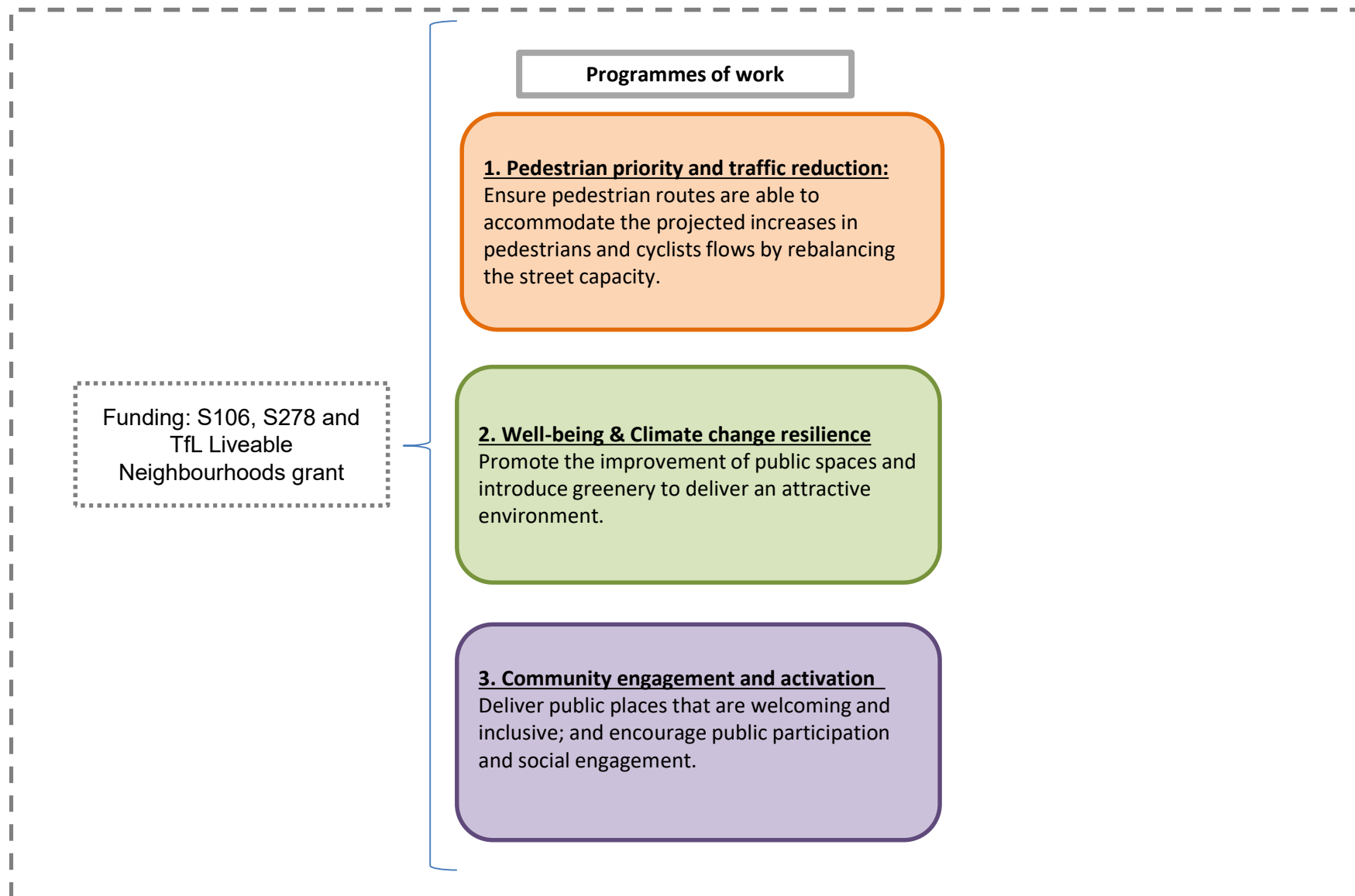
City Cluster area: Updated Delivery Plan

Appendices

1. Description of programme framework
2. Governance structure
3. Programme timescales
4. Funding tables
5. Gateway 3 report: Well-being and Climate resilience Programme – **FOR DECISION**

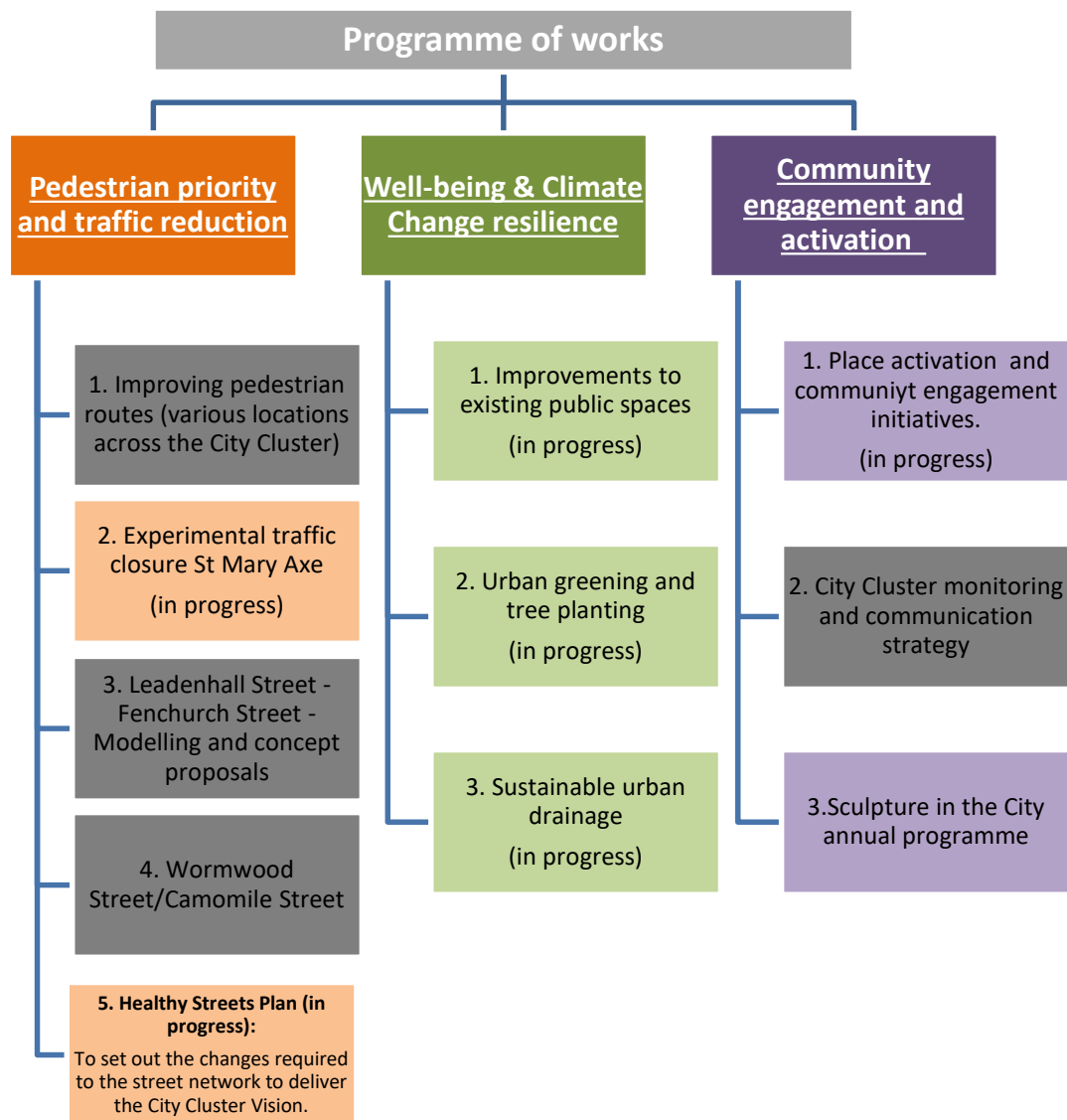
Appendix 1. Description of programme framework

City Cluster area programme : delivery framework 2020-2023

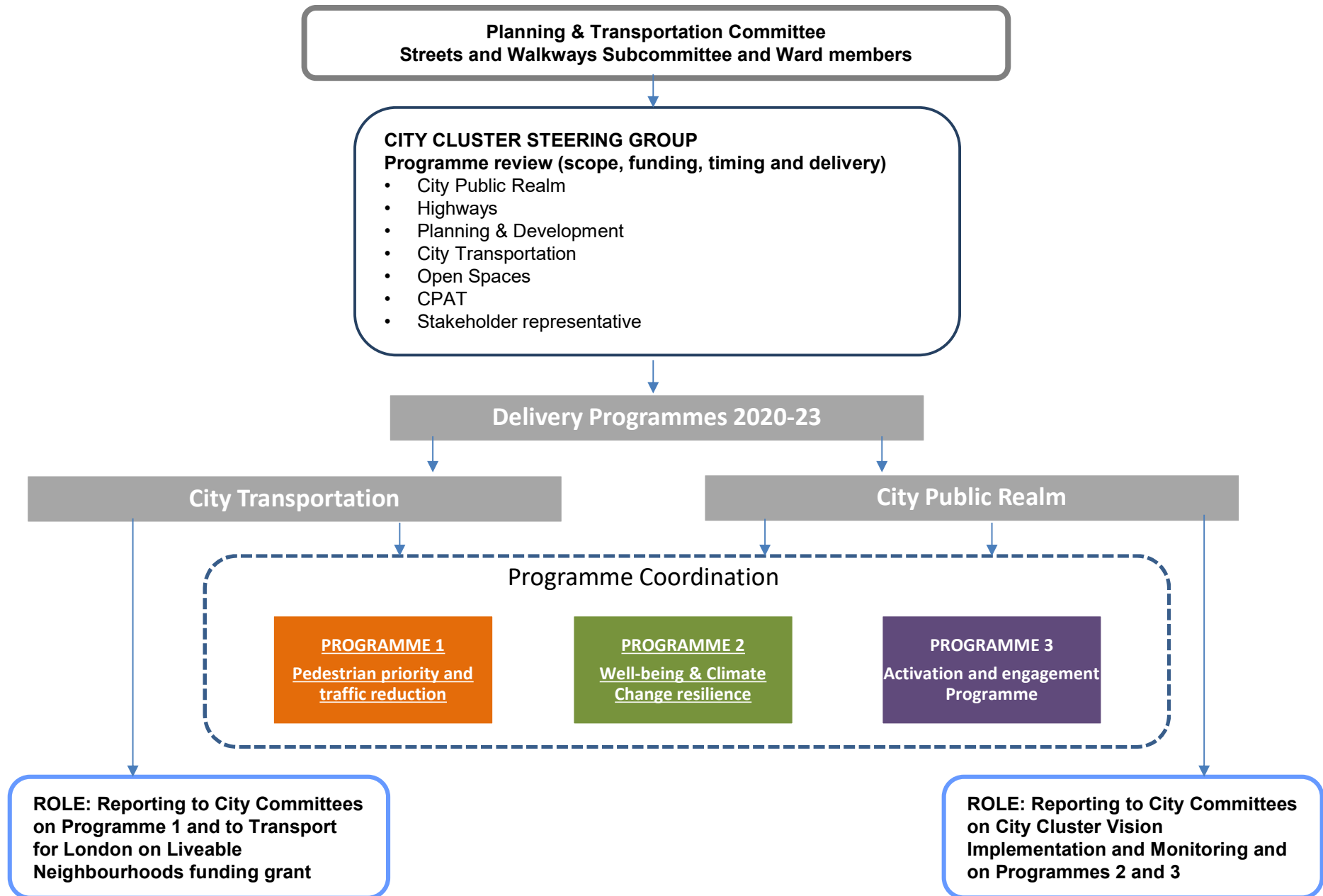


Appendix 1.

City Cluster area programme: delivery framework 2020-2023



Appendix 2. Governance structure



Appendix 3. Programme timescales

City Cluster programme area: Delivery framework 2020-2023

The 2020-2023 Programme of works will enable the implementation of experimental traffic closures, the introduction of increased urban greening in existing public spaces and the delivery of a curated engagement programme. The proposed programme of projects reflects the views expressed during the public consultation on the City Cluster Vision and the Transport Strategy and are focussed on the high priorities of the area.

Proposed timescales			2020				2021				2022				2023				
2020-2023 programme	Pedestrian Priority and traffic reduction	Improving secondary pedestrian routes																	
		St Mary Axe - Experimental traffic closure																	
		Leadenhall Street-Fenchurch street traffic modelling																	
		Wormwood Street – Camomile Street traffic modelling																	
	Well-being and climate change resilience	Improvements to existing open spaces																	
		Urban greening and tree planting																	
		Implementation of sustainable urban drainage system																	
	Community engagement and activation	Place activation and engagement																	

Table 1. Section 106 contributions allocated towards the delivery of the City Cluster Vision

Allocation	HOT	Status	Development	Balance	Total additional funding
City Cluster Vision Implementation - Phase 1 (Approved by committees* in Summer 2019, through the "Review of projects within the Built Environment Directorate" report)	LCEIW	No VAR	06/01123/FULEIA Pinnacle 30/11/2007	£257,531.00	£1,119,934.28
	LCEIW	No VAR	09/00450/FULMAJ Bevis Marks 6 25/06/2010	£53,000.00	
	LCEIW	No VAR	10/00904/FULEIA Broadgate 5 29/07/2011	£16,749.22	
	Transportation	No VAR	11/00332/FULEIA Bishopsgate 100 23/11/2011	£17,939.00	
	LCEIW	No VAR	06/01123/FULEIA Pinnacle 30/11/2007	£774,715.06	

* Approved in 2019 by:
 Priorities Board (19 June)
 Corporate Projects Board (28 June)
 Resource Allocation Sub Committee (4 July)
 Project Sub Committee (19 July)
 Streets and Walkways Sub (22 July - for information)
 Planning and Transportation Committee (30 July)

Corporate

Table 2: Additional Section 106 contributions allocated for the delivery of the City Cluster Vision

Allocation	Heads of terms	Status*	Development	Balance	Total additional funding
City Cluster Vision Implementation - Phase 1	Transportation	No variation required	11/00854/FULEIA Fenchurch Street 120 30/03/2012	£99,993.17	£237,462.17
	LCEIW- Greening/engagement		13/01082/FULMAJ Mitre Square 09/06/2014	£137,469.00	

*Deposits have been confirmed for use in the City Cluster area and no deed of variation is required.
 Developer liaison has taken place to notify on intended use of funds.

Total S106 funds*	£1,357,396.45
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* The available Section 106 sums shown above do not include interest calculations, which will be applied to the programme with further details to be provided in future reports.

Table 3. City Cluster area - estimated costs for the delivery of the 2020-2023 programme

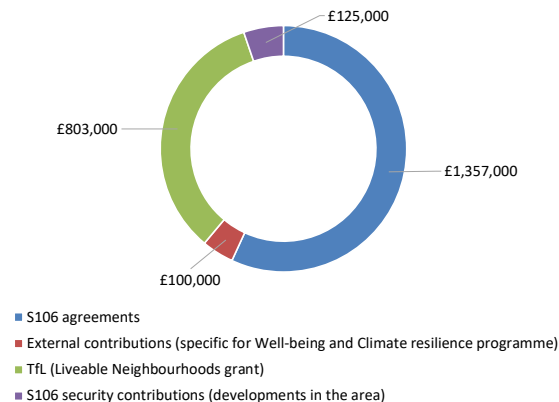
Programmes	Indicative Programme Costs	2020-21	2021-23	Funding allocation from existing sources		Notes
Traffic Reduction and Pedestrian priority	£1,410,000	£795,000	£615,000	£500,000	S106 (120 Fenchurch St)	Detailed scope of this programme will be developed following the completion of the Healthy Streets Plan.
				£785,000	TfL	
				£125,000	S106 security	
Well-being & Climate change resilience	£765,000	£230,000	£535,000	£647,000	S106 (Mitre Sq, Pinnacle dev)	Outline programme scope is described in Gateway 3 report, and will be developed in detail at the next stage.
				£18,000	TfL	
				£100,000	External/other	
Activation and engagement	£210,000	£30,000	£180,000	£210,000	S106 (Mitre Sq, 100 Bishopsgate, Pinnacle dev)	Initial stages are progressing and full extent of programme to be confirmed as the programme gets developed in collaboratoin with Stakeholders and the Steering Group.
					TfL	
					External/other	
Total*		£2,385,000	£1,055,000	£1,330,000	£2,385,000	

NOTE*: At this stage costs are indicative and are subject to change as individual programmes are developed and additional funding sources are confirmed. Cost ranges have been included in the committee report.

TABLE 4. Summary table of funding structure for Programmes.

Funding sources (as per table 3)	Total estimated cost
S106 agreements	£1,357,000
External contributions (specific for Well-being and Climate resilience programme)	£100,000
TfL (Liveable Neighbourhoods grant)	£803,000
S106 security contributions (developments in the area)	£125,000
TOTAL	£2,385,000

NOTE: Sufficient funds are currently secured for the delivery of the initial 3 years of work. However, as programmes get developed it is likely that additional requests will be made to increase programme budgets.

TABLE 4. Split of funding sources: 2020-2023

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Committees: Planning and Transportation Committee – For decision Streets and Walkways Sub – For decision Projects Sub – For decision Open Spaces Committee - For information	Dates: 14 July 2020 07 July 2020 30 July 2020 14 July 2020
Subject: City Cluster Area – Well-being and Climate Change resilience programme Unique Project Identifier: City Cluster Vision Phase one – 12072	Gateway 3: Outline Options Appraisal
Report of: Director of the Built Environment Report Author: Maria Herrera – City Public Realm	For Decision
PUBLIC	

1. Status update	<p>Project Description: The implementation of the City Cluster area delivery plan is divided between three programmes focused on pedestrian priority, well-being and activation. Each programme will deliver complementary improvements, in response to the highest priorities in the area, in close collaboration with local stakeholders.</p> <p>This report sets out the details for the evaluation and development of Programme 2 - Well-being and Climate Change Resilience, which is proposed to be taken forward to the next Gateway (4/5).</p> <p>This programme will deliver on the objectives of the City Cluster vision (adopted May 2019), the upcoming Climate Action Strategy, and the City's Covid-19 transport response strategy:</p> <ul style="list-style-type: none"> - Delivering greener, higher quality and more inclusive streets and spaces; - Creating healthy places to rest and provision of space for safe social-distancing; - Providing improved pedestrian walking routes - Introducing measures to mitigate the impacts of climate change and air pollution. <p>The programme will include improvements to a number of existing open spaces in the area, the introduction of new greenery (trees, planters and parklets) and the implementation of the first sustainable urban drainage system (SuDs) in the City.</p> <p>RAG Status: Green</p> <p>Risk Status: Low</p> <p>Total Estimated Cost of Project (excluding risk): £765-850k for the delivery of the programme for the next 3 years. Programme scope to be developed further in future to encompass transformational change over the next 10 years.</p> <p>Change in Total Estimated Cost of Project (excluding risk): NA</p>
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	<p>Spend to Date: £102,628 As part of the City Cluster Vision Phase 1 report (approved in July 2019) which also included development of elements within the other programmes.</p> <p>Funding Source: For the overall programme over the next 3 years, Section 106 contributions and Transport for London Liveable Neighbourhood grant will be utilised, subject to individual gateway reports for each project being submitted in due course.</p> <p>Costed Risk Provision Utilised: NA</p> <p>Slippage: NA</p>														
2. Next steps and requested decisions	<p>Next Gateway: Gateway 4/5: Detailed Options Appraisal</p> <p>Next Steps:</p> <ul style="list-style-type: none"> - Agree scope for the improvements to existing public spaces - Develop coordinated programme of interventions in line with Covid-19 response strategy. - Engage with stakeholders and occupiers through a comprehensive communication strategy and consultation exercise. - Develop detailed design options and produce cost estimates for the proposed improvements. - Submit Gateway 4/5 report to committees for Member approval. The Covid-19 recovery related interventions are to be delivered as a first phase, which will include greening measures and parklets in the area. These will be reported earlier. <p>Requested Decisions:</p> <ol style="list-style-type: none"> 1. That Option 1 is approved to be taken forward to the next Gateway, which involves the evaluation and development of projects within the Well-being and Climate Resilience programme. 2. That a budget of £95,000 (£80k staff costs and £15k fees) from the Section 106 Agreements from the Pinnacle and Mitre Square developments is approved to reach the next Gateway. 														
3. Resource requirements to reach next Gateway	<p>For option 1 as recommended:</p> <table border="1"> <tr> <th colspan="2">Table 1: Budget required for the development of <i>Programme 2 – Well-being and Climate Resilience</i> to reach the next gateway approval.</th></tr> <tr> <th>Description</th><th>Resources required to reach next Gateway (£)</th></tr> <tr> <td>Highways Staff Costs</td><td>20,000</td></tr> <tr> <td>CPR Staff Costs</td><td>50,000</td></tr> <tr> <td>Open Spaces Staff Costs</td><td>10,000</td></tr> <tr> <td>Fees</td><td>15,000</td></tr> <tr> <td>TOTAL</td><td>95,000</td></tr> </table>	Table 1: Budget required for the development of <i>Programme 2 – Well-being and Climate Resilience</i> to reach the next gateway approval.		Description	Resources required to reach next Gateway (£)	Highways Staff Costs	20,000	CPR Staff Costs	50,000	Open Spaces Staff Costs	10,000	Fees	15,000	TOTAL	95,000
Table 1: Budget required for the development of <i>Programme 2 – Well-being and Climate Resilience</i> to reach the next gateway approval.															
Description	Resources required to reach next Gateway (£)														
Highways Staff Costs	20,000														
CPR Staff Costs	50,000														
Open Spaces Staff Costs	10,000														
Fees	15,000														
TOTAL	95,000														

	<p>Costed Risk Provision requested for this Gateway: No risk provision is required at this stage.</p>
<p>4. Overview of project options</p>	<p>Project summary and background: Phase One of the City Cluster area delivery plan was approved in July 2019, comprising a range of S278 funded projects, alongside greening and activation projects. Further to the initial work undertaken as part of the City Cluster Phase one, officers have reviewed the delivery of the projects and an updated delivery plan has been proposed consisting of the following three programmes:</p> <ul style="list-style-type: none"> • Programme 1: Pedestrian Priority and Traffic Reduction: Ensure pedestrian routes can accommodate the projected increases in pedestrian and cyclist flows by rebalancing the street capacity. • Programme 2: Well-being and Climate Change Resilience: The improvement of public spaces and introduction of additional greenery to deliver a more attractive environment, increased carbon-absorption and improved air quality. • Programme 3: Activation and Engagement: Deliver public places that are welcoming and inclusive; and encourage public participation and social engagement. <p>(Further detail on the updated delivery plan is included in the City Cluster Area– Updated Delivery Plan report)</p> <p>Project Options: A single option is proposed to be taken forward at this stage, to undertake the full evaluation and development of the of the <i>Well-being and Climate Change resilience programme</i>, in line with the City Cluster Vision delivery framework. This report outlines the projects and initiatives that are to be developed as part of this programme. The resultant evaluation, design work and proposals will be presented as a series of options for consideration in the forthcoming Gateway 4/5 Report.</p> <p><u>Programme 2: Well-being and Climate Change Resilience</u> The Cluster currently contains very few public spaces to rest and spend time in, and many of those within the City’s control are in need enhancement. The introduction of additional space, greenery and improvements to existing public spaces were identified as the highest priorities in the recent public consultation on the City Cluster Vision. Access to as many green spaces as possible will be required to ensure urban resilience, particularly considering the current Covid-19 pandemic and resultant measures being developed for the safe ‘re-opening’ of the City.</p> <p>It is therefore proposed to carry out a series of public space improvements over the next three years. This Programme will be developed in line with the emerging City Climate Action Strategy and in response to the issues identified in the related draft “City of London Pathways Study” being produced by BuroHappold Engineering.</p> <p>The Well-being and Climate Change resilience programme is proposed to be funded by existing Section 106 contributions, which</p>

	are specific to the City Cluster, as well as by TfL through a liveable neighbourhoods grant (currently on hold for 2020/21 due to the Covid-19 pandemic). Other external contributions and funding bids will also be investigated at the next stage.
5. Recommendation	<p>That 'Option 1' is approved to be taken forward to the next Gateway, at which point several costed potential projects will be presented.</p> <p>The forthcoming Gateway 4/5 report will set out the detailed scope, benefits and cost of the programme.</p>
6. Risk	<p>The risks associated with developing the programme are low. Officers will evaluate options that will respond to the feedback provided during the public consultation exercise and in line with Corporate priorities. At this stage, the programme involves a number of potential projects and initiatives for which independent project risk registers will be developed.</p> <p>Projects within this programme will be developed in close consultation with local stakeholders, the Open Spaces department and Highways Division, and in line with the City's Transport Covid-19 response strategy.</p> <p>For top risks please refer to Appendix 1, section 4.</p>
7. Procurement approach	<p>Design work will be undertaken in-house by officers, and external consultants will be brought in as required to provide specialist services. The proposals will be developed in close collaboration with the Open Spaces department and Highways Division and will be overseen by the City Cluster area Steering Group.</p> <p>Appointment of external consultants will be carried out in line with the City's procurement guidelines for capital projects.</p>

Appendices

Appendix 1	Options appraisal matrix
Appendix 2	Map of public spaces in the City Cluster

Contact

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Appendix 1. Options Appraisal Matrix

Option Summary	Option 1
<p>1. Brief description of option</p>	<p>The aim is to develop a series of projects, that will be presented as a series of costed options in the next Gateway report.</p> <p><i>Programme 2; Well-being and Climate Change Resilience</i>; is focused on the creation of a more attractive and greener environment, increased carbon-absorption and improved air quality within the City Cluster.</p> <p>Within the current context of the global health emergency, the provision of as many green open spaces as possible in urban environments is of utmost importance, to enable the working population to spend time outside of their workplaces in a safe manner.</p> <p>Several project opportunities have already been identified in the City Cluster Vision document (adopted May 2019). This programme seeks to address the lack of green infrastructure in the area and will contribute to reducing the impact of climate change and supporting the Covid-19 transport response strategy. This programme is proposed to be funded by existing area-specific Section 106 contributions, external contributions and TfL funding over the next 3 years.</p> <p>It is proposed to develop the programme in collaboration with the Open Spaces department and Highways division, along with local stakeholder groups, including the EC Partnership.</p> <p>Programme objectives include the following:</p> <ul style="list-style-type: none"> - Increase the amount of greenery to help mitigate the impacts of climate change, noise and air pollution and soften the urban environment. - Deliver more accessible and attractive spaces to rest and spend time in, including responding to the need for social distancing. - The creation of 'green corridors' along busy pedestrian routes. - Deliver spaces which offer opportunities for place activation in a safe street environment i.e. facilitation of <i>Programme 3</i>. - Deliver sustainable urban drainage systems in line with the emerging Climate Action strategy.

Option Summary	Option 1
2. Scope and exclusions	<p><u>Programme outline:</u> The programme will include the following elements, which are subject to further evaluation work to be undertaken at the next stage:</p> <ol style="list-style-type: none"> 1. Feasibility assessments for the enhancement of existing public spaces located within the Cluster. Officers will evaluate sites which offer the greatest potential for delivering meaningful improvements in the area, including the public spaces of Jubilee Gardens, St Andrew Undershaft and St Helen's Bishopsgate. 2. Opportunities will be explored to introduce new greenery throughout the area in the form of trees, planters, and parklets, and outdoor seating, in line with the City's Covid-19 response strategy. Green infrastructure will help to provide more attractive streets and spaces to support local businesses as they begin to open. 3. The implementation of a sustainable urban drainage scheme (SuDs) in the area. An initial feasibility study has been undertaken for the implementation of a SuDs scheme in Duke's Place (off Bevis Marks). A cost-benefit study will be undertaken during the next stage to evaluate other potential locations and to ensure that the SuDs scheme(s) deliver the highest possible benefit in terms of rainwater absorption, and enhanced biodiversity. <p>At the next gateway 4/5, detailed design options and cost estimates for each potential project will be presented to Members for decision.</p>
Project Planning	
3. Programme and key dates	<p>Overall project: Programme to be developed and implemented over a period of 3 years. At the time of writing and due to the impacts of Covid-19, the proposed dates are indicative, an updated programme will be issued at a later stage.</p>

Option Summary	Option 1												
	<p>Proposed work programme:</p> <p>July-December 2020:</p> <ul style="list-style-type: none">- Develop detailed briefs to define scope.- Develop design options and costs- Establish regular review meetings with stakeholders to develop the projects jointly with the stakeholder groups.- Present regular updates to City Cluster – Steering Group and other committees/groups related to the Covid-19 recovery strategy. <p>Early 2021:</p> <ul style="list-style-type: none">- Submit Gateway 4/5 report <p>Note: specific elements that relate to the Covid-19 recovery measures will be reported separately</p>												
4. Risk implications	<p>Overall project option risk: Low</p> <p>The top risks are as follows:</p> <table><tr><th>Risk</th><th>Description</th><th>Response</th></tr><tr><td>Funding for projects is not secured.</td><td>Section 106 contributions have been secured for the initial set of interventions. TfL funding for 2020-21 is on hold</td><td>Alternative funding sources will be investigated.</td></tr><tr><td>Lack of stakeholder support</td><td>Overall support to deliver the proposed initiatives has been expressed by stakeholders. However, there will need to be further consultation as designs are developed for specific locations</td><td>A communication strategy will be developed to ensure stakeholders are consulted at various stages of the programme.</td></tr><tr><td>Underground conditions impact on</td><td>Due to existing underground conditions greening</td><td>Existing structures and conditions will be evaluated at an early stage</td></tr></table>	Risk	Description	Response	Funding for projects is not secured.	Section 106 contributions have been secured for the initial set of interventions. TfL funding for 2020-21 is on hold	Alternative funding sources will be investigated.	Lack of stakeholder support	Overall support to deliver the proposed initiatives has been expressed by stakeholders. However, there will need to be further consultation as designs are developed for specific locations	A communication strategy will be developed to ensure stakeholders are consulted at various stages of the programme.	Underground conditions impact on	Due to existing underground conditions greening	Existing structures and conditions will be evaluated at an early stage
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Underground conditions impact on	Due to existing underground conditions greening	Existing structures and conditions will be evaluated at an early stage											

Option Summary	Option 1			
	project scope and cost.	interventions may need to be reconsidered or adapted in certain locations.	through the commissioning of surveys and liaison with the Highways division to ensure project costs remain within estimated cost ranges	
	<u>Covid-19 risks:</u> Delivery plan requires changes	The development of the programme has been adapted as a result of factors, including guidelines and emerging response stemming from the health emergency.	The situation is being monitored and the scope of the projects will be evaluated to ensure projects comply with new guidelines and response strategy.	
	Implementation of projects is delayed			
5. Stakeholders and consultees	The programme is to be developed in close consultation with local stakeholder groups and City officers from various departments. The emerging EC Partnership will play a key part in the development and prioritisation of projects. Regular engagement with this group is already taking place. The City Cluster Area Steering Group will oversee the development of the work programme and regular updates will be provided as and when required.			
6. Benefits of option	<ul style="list-style-type: none">- Deliver green, inclusive and accessible spaces for people to enjoy- Increase the amount of greenery and provide spaces for safe social distancing as per the Covid-19 response strategy.- Provide a high-quality environment to meet the demands and future predicted increase in working population.- Introduce measures to help mitigate the impacts of climate change and wind, and to improve air quality- Contribute to the well-being of local users by offering outdoor spaces to rest, work and spend time in.			
7. Disbenefits of option	At this stage there are no disbenefits of progressing with this programme, it forms part of the City Cluster Programme of works and is in line with the desired outcomes identified though public consultation on the City Cluster Vision, Transport Strategy and City’s Climate Action Strategy.			
Resource Implications				

Option Summary	Option 1
8. Total estimated cost	Likely cost range (excluding risk): £765-850k for the first 3 years of the programme implementation Options will be developed to suit the estimated programme costs.
9. Funding strategy	The first three years of implementation of the programme is to be fully funded by existing site specific S106 contributions, TfL and external contributions. Additional funding sources will be sought as projects are developed. It is envisaged that additional site-specific S106 and S278 funding will be available in the future as a result of new developments coming into the area.
10. Investment appraisal	NA
11. Estimated capital value/return	NA
12. Ongoing revenue implications	Further detailed design is required to assess revenue implications. Many of the spaces under consideration are already being maintained by the City, thus the interventions can be developed to achieve high quality environments with low maintenance costs. Any new green infrastructure will include a maintenance provision within the cost estimate.
13. Affordability	N/A
14. Legal implications	Legal agreements are likely to be required for some of the initiatives within the project. Details of these will be reported at the next gateway. Early consultation with local stakeholders has indicated overall support for the implementation of the projects within this programme. Further legal implications are set out in the main City Cluster Programme Area report.
15. Corporate property implications	None
16. Traffic implications	None

Option Summary	Option 1
17. Sustainability and energy implications	<ul style="list-style-type: none"> • The projects will enhance the local carbon absorption capacity and improve air quality within the City Cluster. • SuDs schemes will reduce stress on the city drainage network and increase biodiversity. • Programme objectives are in line with the emerging City Climate Action Strategy.
18. IS implications	N/A
19. Equality Impact Assessment	<p>The programme of works will deliver accessible and welcoming spaces for all user groups and provide areas where people can spend time outside their workplace environment.</p> <p>The improvement of public spaces will deliver benefits to the wider City community, for visitors as well as workers, and will facilitate safe social interaction, and improve physical and mental health.</p>
20. Data Protection Impact Assessment	N/A
21. Recommendation	<i>Recommended</i>

City Cluster Area - delivery plan

Well-being & Climate resilience Programme

1. Improvements to existing public spaces to create accessible and welcoming open spaces.
2. Urban greening and tree planting
Increase the provision of greenery across the area.
3. Sustainable urban drainage (Suds)



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Committee(s)	Dated:
Planning and Transportation Committee	14 July 2020
Subject: City of London Corporation participation in e-scooter trials	Public
Report of: Director of the Built Environment	For decision
Report author: Giacomo Vecia, Department of the Built Environment	

Summary

As part of their e-scooter review and in response to reduced public transport capacity as a result of the COVID-19 crisis the Government has fast-tracked legal processes to allow 12-month trials of rental e-scooter schemes to take place as soon as possible.

The City Corporation does not currently have a formal position on e-scooter use. In response to the Government's acceleration of rental e-scooter scheme trials officers have reviewed our position in consultation with the City of London Police.

Research on rental e-scooter scheme risks and benefits in other global cities suggest these schemes have the potential to encourage significant modal shift and provide a viable non-car alternative to public transport that meets social distancing requirements. Given this, officers believe that the City Corporation would benefit from participating in a City of London or multi-borough rental e-scooter trial, provided we are satisfied with all final guidance issued by the Department for Transport (DfT) and all final trial criteria and terms proposed by Transport for London (TfL).

At the time of writing the DfT has stated that they are likely to provide specific construction regulations that all e-scooters will need to meet to be used in trials. These regulations include having speed limiters and vehicle identifiers. Only users with driver's licenses will be permitted to ride rental e-scooters in trial areas.

As far as possible officers will seek to ensure trial criteria and terms include:

- a. Ensuring e-scooters are parked in designated parking bays
- b. Strongly encouraging or mandating helmet use while riding
- c. Having visible unique vehicle registration numbers for identifying e-scooters
- d. Ensuring sufficient insurance is held by any scheme operator

TfL are also preparing a draft outline proposal for a multi-borough or London-wide e-scooter trial. City officers will review this proposal when it becomes available. TfL have indicated that the draft proposal criteria and terms currently include:

- a. Limiting the number of operators in any trial area to three
- d. Ensuring that vehicles are deployed or parked to not cause obstructions

- e. Allowing boroughs to identify no-go and “go-slow” areas

The deadline for participating in trials is likely to be before the next meeting of this Committee on 8 September. Final DfT guidance and London Councils and TfL criteria are not yet available. It is recommended that the agreement of the terms of the trial be delegated to the Chief Officer in consultation with the Chair and Deputy Chairman of the Planning & Transportation Committee and the Chairman and Deputy Chairman of the Streets & Walkways Sub-Committee.

Should Members decide to participate in a trial a report will be brought to the September meeting of the Planning and Transportation Committee outlining any delegated decisions, agreed trial criteria and terms and a monitoring plan to capture trial key performance indicators and data.

Recommendation(s)

Members are asked to:

- Agree that the City of London Corporation should participate in a rental e-scooter trial, subject to the terms of that trial meeting the City Corporation’s requirements.
- Delegate the agreement of the terms of the trial to the Chief Officer in consultation with the Chair and Deputy Chairman of the Planning & Transportation Committee and the Chairman and Deputy Chairman of the Streets & Walkways Sub-Committee.
- If required by DfT guidance, agree to permit rental e-scooters that are not part of any trial that the City Corporation is participating in to travel through the City of London.

Main Report

Background

1. Electric scooters (or e-scooters) are not currently legal for use on public highway the UK. The Government has committed to reviewing the legality of e-scooters but have not suggested a date for this review to be completed by.
2. As part of their e-scooter review and in response to reduced public transport capacity as a result of COVID-19 the Government has fast-tracked legal processes to allow 12-month trials of rental e-scooter schemes to take place as soon as possible. On 9 May the Transport Secretary indicated that he wishes to bring the date of these trials forward to this summer as part of Central Government’s broader COVID-19 response.
3. The Department for Transport (DfT) have provided more information on their high-level goals for e-scooter trials, which include:
 - a. Responding to COVID-19 and the need to support reduced local transport capacity
 - b. Building a robust evidence base around the safety and wider impacts of e-scooter use

- c. Informing any longer-term policy decisions Government may make on e-scooter legality in the UK
- 4. The DfT has released a draft e-scooter trial guidance document which provides an indicative outline methodology. That draft guidance also suggests trials can commence after legislation is laid and passed in parliament early this summer and until the end of August. A full list of the final regulations alongside the process for applying to host a trial will be included in the DfT's formal guidance expected to be published by end of June.
- 5. While draft guidance has been circulated, TfL has informally communicated to officers that the DfT may make additional changes to the draft guidance prior to its formal publication. At the time of writing officers have incorporated all information from draft guidance and informal discussions into this report. Should any details of the draft guidance materially change, then officers will circulate a note ahead of the Committee meeting to inform Members of those changes along with any impacts on our recommendations.
- 6. The City Corporation does not currently have a formal position on e-scooter use. In response to the Government's acceleration of rental e-scooter scheme trials officers have reviewed our position in consultation with the City of London Police.
- 7. Research on rental e-scooter scheme risks and benefits in other global cities suggest these schemes have the potential to encourage significant modal shift and provide a viable non-car alternative to public transport that meets social distancing requirements. Given this, officers believe that the City Corporation would benefit from participating in a City of London or multi-borough rental e-scooter trial, provided we are satisfied with all final guidance issued by the Department for Transport (DfT) and all final trial criteria and terms proposed by Transport for London (TfL).
- 8.
- 9. The trial could also help inform Corporation policy and possible representations on and consultations to future legislation to legalise e-scooters for general use.

Overview of e-scooters

- 10. While e-scooters have never been legal on UK public highways and pavements they are currently legal in an increasing number of countries across the globe. E-scooter use has increased exponentially in the past decade as advances in battery life and charging speed have reached vehicle markets and commercial availability has increased.
- 11. In countries where e-scooters are legal there is evidence they enable more people to make short- to medium-length journeys without using a car and encourage longer-term modal shift away from private cars.
- 12. As with dockless cycle hire schemes little to no infrastructure is required for rental e-scooter schemes. This poses similar benefits and risks to dockless cycle hire schemes including reduced implementation costs and potential risk of obstruction of pavements and streets.
- 13. Concerns have also arisen around the safety of travelling by e-scooter. There is some evidence suggesting users of e-scooters may be at higher risk of injury or

casualty than other road users on comparable vehicles, such as e-bikes and mopeds, in areas with higher speed limits. Research on e-scooter collisions and casualties has found that:

- a. e-scooter users are most likely to suffer serious injuries in a collision when a motor vehicle is involved,
 - b. a higher than average proportion of e-scooter accidents involve drink driving at night by the e-scooter user
 - c. incidences of collisions between e-scooter users and pedestrians is low and when they do occur injuries are more minor
14. The DfT are satisfied that vehicle construction and other measures to mitigate safety risk are sufficient to legalise rental e-scooters for use in trials across the UK. Officers are therefore of the view that a rental e-scooter trial in the City should not be prevented on the grounds of safety risk.
15. Overall, while e-scooters are a relatively new mode of transport in many cities, they are an efficient, convenient and green mode of private transport that potentially has a place in London's transport system.

Rental e-scooter trials

16. The DfT have indicated that local authorities may be able to set local criteria and terms for their trials through detailed procurement exercises. These local requirements will then be compared with higher-level DfT legal requirements. All trials will ultimately be approved by the Secretary of State through Administrative Orders which will allow trials to begin.
17. To authorise the use of e-scooters, the DfT needs to be satisfied that the trials will deliver robust evidence. This includes:
- a. local authorities seeking agreement and alignment between various tiers of local authority
 - b. local authorities and operators considering costs and funding mechanisms for trials, as funding may not be available from the DfT
 - c. ensuring the size of trial areas be as large as possible to create better sample sizes for analysis
 - d. ensuring vehicles used in trials are safe, of a good standard, undergo regular servicing, and that there are measures to maintain appropriate hygiene
 - e. signing data sharing agreements with operators that collect enough data for evaluation of trial outcomes
18. The DfT has stated that they are likely to provide specific construction regulations that all e-scooters will need to meet to be given vehicle special orders for use in trials. These regulations include having:
- a. Speed limiters (likely to be between 12.5mph and 15.5mph maximum)
 - b. Vehicle identifiers
 - c. Retracting stands

19. The DfT has also indicated that the use of e-scooters on pavements will not be allowed. E-scooters will only be made legal on carriageways, in dedicated cycle lanes and in shared cycle/pedestrian spaces.
20. As rental e-scooters will continue to be classed as motor vehicles during trials, requirements to have the correct type of insurance and driver's license will continue to apply. It will be required that e-scooters be covered by a motor vehicle insurance policy and that e-scooter users will have a category AM, A1, A2, A or B license. Officers are working with the DfT and TfL to understand what kinds of insurance policies will be required under the legislation and whether they will be required to cover third-party liability.
21. Given the need to establish trials swiftly, the DfT has asked those authorities interested in participating trials to begin drafting trial criteria and terms and start engaging with potential operators as soon as possible.
22. The DfT have indicated that local authorities will likely have significantly more power to manage and regulate rental e-scooter schemes compared to dockless cycle hire schemes should they wish to participate in a trial. Operators will be required to enter into contractual-like agreements with local authorities which will then be reviewed and approved by the DfT and Secretary of State for Transport.
23. The DfT have also suggested it will be possible for local authorities to end or exit trials early if necessary.
24. It is not yet clear whether users of rental e-scooter schemes will be allowed to travel through non-trial areas. Officers recommend that, regardless of whether the City Corporation participates in a trial, Members agree to allow rental e-scooter travel through the City. This would allow rental e-scooter users participating in other trials in London to travel through the City but not begin or end journeys in the Square Mile.
25. Participating in these trials will give the City Corporation more opportunity to shape future e-scooter policy and ensure that future e-scooter use is fit for purpose for the City. While the intention is to run trials for 12 months the DfT have indicated that the legality of e-scooter use is being reviewed in tandem with the trials and that e-scooters may be legalised following the trial period.
26. The DfT will likely look to local authorities participating in trials when informing the legality of e-scooter use in the UK. Participating in these trials would likely help inform any future submissions or responses associated with the DfT's regulatory review of e-scooter use.

Potential e-scooter trial criteria and terms

27. The City Corporation has prepared a comprehensive list of criteria and terms for Dockless Cycle Hire (Appendix 1). It is the intention that these criteria and terms be adapted and applied for rental e-scooter schemes were the City to undertake our own trial or participate in any joint trials with London boroughs. As far as possible officers will seek to ensure trial criteria and terms include:
 - a. Ensuring e-scooters are parked in designated parking bays
 - b. Managing the distribution and deployment of e-scooters to minimise street clutter and negative impacts on other street users

- c. Sharing data on trips and usage to inform policymaking and improve dockless vehicle schemes
 - d. Ensuring any operator is an accredited London Living Wage Employer
 - e. Strongly encouraging or mandating helmet use while riding, including through the use of incentives for users, if deemed safe and hygienic in light of the potential for shared helmets to transmit COVID-19
 - f. Having visible unique vehicle registration numbers for identifying e-scooters participating in the trials
 - g. Ensuring sufficient insurance is held by any scheme operator to protect themselves, users and the City from any damages
28. Certain powers, such as the ability to mandate helmet use, are still being reviewed by the DfT and TfL to ensure that they are enforceable and practical given concerns around shared helmet use during COVID-19. If confirmation is received ahead of Committee then officers will circulate a note to inform Members.
29. Officers will look to identify new e-scooter parking bays around the City for the purposes of the trial. In some cases, existing temporary or permanent dockless cycle parking bays may be partially converted to e-scooter parking bays or shared dockless vehicle parking bays where demand for e-scooters is likely to be high.
30. DfT draft guidance has stated that where trial areas include and involve several tiers of local government, the Department's preferred approach is for a lead authority to be agreed. In most cases it is expected that the lead authority will have strategic oversight across all local trial areas.
31. Officers believe it would be best to enter into a joint trial with adjacent boroughs if possible. Should a multi-borough trial take place in London, the scope of trial coordination would need to be agreed by all participating boroughs as soon as possible.
32. TfL and London Councils are aiming to provide a co-ordinating function for any multi-borough trials, ensuring consistency, commercial procurement expertise and IT system support.
33. TfL are also preparing a draft outline proposal for a multi-borough or London-wide e-scooter trial. City officers will review this proposal when it becomes available. TfL have indicated that the draft proposal criteria and terms currently include:
- a. Limiting the number of operators in any trial area to three
 - b. Using dynamic capping to ensure an appropriate maximum number of rental e-scooters in the trial area at all times
 - c. Giving operators a target time of three hours and a maximum time of 24 hours to remove or repark any vehicle parked outside of an agreed parking space
 - d. Ensuring that vehicles are not deployed or parked in a manner that inhibits access to dropped kerbs, crossing, or creates and access, safety or pedestrian crossing visibility issues

- e. Allowing boroughs to identify no-go and “go-slow” areas (where the maximum speed is reduced)
 - f. Extending minimum vehicle standards to include having a means of notifying operators in real-time when a vehicle has been knocked over (when parked) or otherwise moved outside of a rental area
34. The deadline for participating in trials is likely to be before the next meeting of this Committee on 8 September. Final DfT guidance and London Councils and TfL criteria are not yet available. It is recommended that the agreement of the terms of the trial be delegated to the Chief Officer in consultation with the Chair and Deputy Chairman of the Planning & Transportation Committee and the Chairman and Deputy Chairman of the Streets & Walkways Sub-Committee.

Pan-London Dockless Vehicle Byelaw

35. TfL and London Councils have continued their work on the proposed pan-London byelaw. The byelaw has been drafted to refer to dockless vehicles, which includes e-scooters.
36. The draft byelaw text includes requiring all dockless vehicles to be left (whether by dockless operators or their customers) only in places agreed by the relevant local authority, and makes it an offence for dockless operators to place or allow their vehicles to be parked anywhere other than at a location agreed by the local authority.
37. The Byelaw will support the effective management and operation of rental e-scooters in the City once adopted.
38. The COVID-19 crisis has delayed the adoption of the Byelaw. A timeline for adoption is not currently available. This is unlikely to hinder the effective management and operation of rental e-scooter schemes given local authorities will likely be able to contractually bind operators to meet set criteria and terms. This differs from our limited powers to regulate dockless bike share.

Corporate & Strategic Implications

39. The proposals support the delivery of Corporate Plan Outcome 9: We are digitally and physically well-connected.
40. The City of London Transport Strategy (Proposal 28) sets out our approach to improving cycle hire in the Square Mile. While rental e-scooters schemes technically fall outside the remit of this proposal their benefits and challenges will be similar. The need for designated parking areas is also included in Proposal 17: Keep pavements free of obstructions.
41. The trials will form part of the Future City Streets Programme (Proposal 42).
42. There is a possible reputational risk to the City Corporation if innovative approaches to supporting COVID-19 recovery and increasing sustainable and healthy transport modes are not carefully considered. There are also possible reputational risks if potential adverse impacts of rental e-scooter scheme operations are not carefully managed.

Legal implications

- 43. The City Corporation has no jurisdiction over the legality of e-scooters. Any trial conducted by the City will be fully compliant with any laws and regulations as set out by the DfT.
- 44. The trial could also help inform Corporation policy and possible representations on and consultations to future legislation to legalise scooters for general use.

Financial implications

- 45. At the time of writing the DfT has not indicated whether any funds will be made available to support rental e-scooter trials.
- 46. The DfT requires local authorities to be realistic in identifying funding mechanisms for trial costs, particularly as COVID-19 has posed a financial challenge to traditional dockless vehicle operators.
- 47. As with our current approach to dockless cycle hire, we will seek to recoup costs from operators for any trial run by the City. Officers are working with TfL and the DfT to investigate options for charging operator for participation.
- 48. Costs of deploying additional parking bays for e-scooters will likely be met by existing budgets supporting temporary COVID-19 related interventions.
- 49. Additional costs will be incurred if the City Corporation has to remove e-scooters deemed to be causing a danger from the streets in default of the operator removing them. Removal and storage costs would be incurred in these circumstances and will be recovered through charging operators for removal.

Health Implications

- 50. Well managed rental e-scooter schemes have the potential to reduce the number car journeys within central London, and potentially shift journeys from short taxi, private hire and public transport trips, with associated benefits to air quality and public health.
- 51. E-scooter use can also help people observe social distancing requirements while travelling.
- 52. Concerns exist around the safety of travelling by e-scooter, with some evidence suggesting users of e-scooters may be at higher risk of injury or casualty than other road users on comparable vehicles such as e-bikes and mopeds in areas with higher speed limits. DfT has deemed this risk to be manageable and mitigatable given its decision to legalise rental e-scooters in the UK.

Equality Implications

- 53. Any e-scooter activity in the City will be closely monitored to understand impacts on vulnerable road users (e.g. visually impaired, wheelchair users). This is consistent with the public sector equality duty.

Conclusion

54. Based on research of rental e-scooter scheme risks and benefits in other global cities, including modal shift and providing a non-car alternative to public transport that meets social distancing requirements, officers believe that the City Corporation would benefit from participating in a rental e-scooter trial, provided we are satisfied with all guidance and procedures issued by the DfT, TfL and London Councils as a part of these trials. The trial could also help inform Corporation policy and possible representations on and consultations to future legislation to legalise scooters for general use.
55. The deadline for participating in trials is likely to be before the next meeting of this Committee on 8 September. Final DfT guidance and London Councils and TfL criteria are not yet available. It is recommended that the agreement of the terms of the trial be delegated to the Chief Officer in consultation with the Chair and Deputy Chairman of the Planning & Transportation Committee and the Chairman and Deputy Chairman of the Streets & Walkways Sub-Committee.
56. Should Members decide to participate in a trial an update report will be brought to the September meeting of the Planning and Transportation Committee outlining any delegated decisions, agreed trial criteria and terms and a monitoring plan to capture trial key performance indicators and data.

Appendices

- Appendix 1 – City of London Corporation Dockless Cycle Hire Trial criteria and terms

Giacomo Vecia

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Appendix 1 – City of London Corporation Dockless Cycle Hire terms for operational approval

The City Corporation is looking to approve and support dockless hire schemes who adhere to the following criteria and terms:

1. Operators must be able to accurately locate their bicycles and have redistribution processes in place to move or remove inappropriately parked bicycles within:
 - a. 90 minutes on Mondays to Fridays between 06:00 and 21:00
 - b. 4 hours at any other time

Operators must also be able to remove their bicycles for security reasons at the request of the City Corporation at any time within 90 minutes.

2. Operators must manage operations in a way that minimises traffic impacts and emissions from any operational vehicles. Compliance with FORS accreditation will contribute to this. It is also recommended that Operators comply with ISO 14001:2015.
3. Operators must make their users aware of agreed parking locations and have appropriate means of requiring users to comply with parking requirements and encourage good parking behaviours.
4. Operators must design their bicycles to reduce the risk of vandalism and theft of the bike and of the bicycle falling over.
5. Operators must be committed to encouraging safer behaviours and enabling a more diverse range of people to cycle.
6. Operators must ensure the design of their cycles achieve and maintain ISO 4210:2014 standards for bicycles in the UK, especially regarding part quality and sustainability, safety and engine specifications, including:
 - a. Providing hand-operated brakes arranged left-hand rear and right-hand front
 - b. Providing 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
 - c. Providing a rear red reflector and amber/yellow reflectors on the front and rear of each pedal
 - d. Making sure all bicycles have an individually identifiable asset number.

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

7. Operators must ensure their bicycles are always well maintained and safe to ride and have a mechanism to disable any bicycles that are broken or damaged. Operators must also have a Sustainability Policy, including details on reusing and recycling their assets.

8. Operators must have an easy to use reporting mechanism that allows the public and the City Corporation to report bicycles that are damaged, vandalised, or inappropriately parked.
9. Operators must offer 24-hour communication channels. This includes a telephone number that is clearly advertised on their bicycles, website and mobile apps.
10. Operators must not operate in neighbouring boroughs without agreement and promptly remove any bicycles left in those boroughs within a fixed time period as determined by the borough and the City Corporation.
11. Operators must share at least the following data with the City Corporation on a monthly or better basis:
 - a. Origins and destinations of all trips that start or finish in the Square Mile by month in GIS format
 - b. The number of trips per street by month in GIS format
 - c. The number of hires by hour in tabular format
 - d. The number of times bike journeys have been paused or stopped outside of agreed parking areas by month in tabular format
 - e. The number of requests they received from the City Corporation, public, and any other groups to move a cycle
 - f. The number of their cycles parked in the City by hour for the previous week in tabular format
1. Operators must provide us real-time location data of all dockless bikes via an API.
12. Operators must have levels of insurance coverage that meet or exceed the minimum requirements as determined by the City Corporation.
13. The City Corporation may change the maximum number of Bicycles permitted in the Square Mile and close or update approved parking locations at any time.
14. Operators must only deploy bicycles at locations specified by the City Corporation, in numbers for that location determined by the City Corporation, and on dates and at times agreed with the City Corporation
15. Operators must not deploy more than their allocated number of bicycles parked in the Square Mile at any time and remove or redistribute any excess bicycles from our streets within:
 - a. 90 minutes on Mondays to Fridays between 06:00 and 21:00
 - b. 4 hours at any other time
16. Operators must contact neighbouring boroughs and agree with them how they will manage any bikes that are left in their borough.

17. The cost of any additional signage, markings, or infrastructure needed to facilitate Dockless Bicycle Schemes will be borne by the Operator.
18. Operators must not use any City Corporation logos or branding in any way without written permission from the City Corporation.
19. Operators must agree any marketing or public communications with the City Corporation prior to publication.
20. Operators must be accredited with CoMoUK.
21. Operators must be accredited as a London Living Wage employer.
22. Operators must comply with the TfL Code of Conduct and any details of Proposal 28 of the draft City of London Transport Strategy not covered by any other criteria or term
23. The City Corporation may rescind operational approval at any time for failing to reasonably meet any of the listed operational terms. If an Operator has their approval rescinded, they will have 48 hours from the time of our suspension instruction to remove all their bicycles from the City.

Committee(s): Planning & Transportation Committee	Date(s): 14/07/2020
Subject: Consultation on draft s106 Planning Obligations Supplementary Planning Document	Public
Report of: Carolyn Dwyer - Director of the Built Environment	For Decision
Report author: Peter Shadbolt – Department of the Built Environment	

Summary

The City Corporation adopted a Planning Obligations Supplementary Planning Document (SPD) in 2014. The SPD needs to be updated to reflect changes in national legislation, national planning guidance, revised policies in the Intend to Publish London Plan and draft policies in the emerging City Plan 2036. In particular, there is a need to update provisions in the SPD in relation to affordable housing to ensure that sufficient provision is made in new development to address local housing needs. Changes are also needed to reflect updated guidance on carbon offsetting, to ensure that training, skills and local procurement provisions align with City Corporation priorities and ensure that appropriate provision is made for the mitigation of the impacts of development. These changes will ensure that mechanisms are in place to help fund training and skills initiatives, provide affordable housing and mitigation of carbon emissions and help deliver other infrastructure necessary to support the City recover from the economic and social impacts of the Covid-19 pandemic.

Draft revisions to the Planning Obligations SPD will be subject to public consultation for a period of 6 weeks. This consultation will take place in September and October 2020 alongside the pre-submission consultation on the draft Local Plan. The SPD will then be brought back to this Committee for approval.

Recommendation(s)

Members are asked to:

- Approve the draft Planning Obligations Supplementary Planning Document, attached as Appendix 1, for public consultation.

Main Report

Background

1. Planning obligations are used to mitigate the impact of development in order to make it acceptable in planning terms. The legislative basis is contained within the Town and Country Planning Act 1990 and the Community Infrastructure Levy Regulations 2010 (as amended). Community Infrastructure Levy (CIL)

Regulation 122 sets out three statutory and policy tests for the use of planning obligations, indicating that:

“A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is-

- necessary to make the development acceptable in planning terms;*
- directly related to the development; and*
- fairly and reasonably related in scale and kind to the development.”*

2. CIL Regulations also set out how planning obligations should operate alongside the CIL. Previous guidance, which restricted the use of planning obligations where a CIL is in place, has been amended to allow for CIL and planning obligations to operate in concert to deliver the infrastructure needed to deliver development and Local Plan objectives.
3. In July 2014, the City Corporation adopted a Planning Obligations Supplementary Planning Document (SPD). This set out how the City Corporation would seek planning obligations from development and complemented the policies in the 2015 Local Plan and the City of London Community Infrastructure Levy. It set out that the City CIL would be the primary source of development-related infrastructure funding, with planning obligations concentrated on the delivery of affordable housing, training, skills and employment provision, site specific mitigation and carbon offsetting.

Current Position

4. The City Corporation is preparing a revised Local Plan, City Plan 2036. The Plan is at an advanced stage of preparation. At its meeting on 21 May 2020, the Court of Common Council approved the draft Plan for its final stage of pre-submission public consultation (Regulation 19 consultation) in autumn 2020, with the aim of moving to Public Examination and adoption in 2021.
5. The draft Local Plan sets out new policy requirements for development in the City. It updates policy in line with changes to the National Planning Policy Framework and the national Planning Practice Guidance and the Intend to Publish London Plan. Draft Local Plan policy aligns with the aims and objectives of the City's Transport Strategy, other Corporation strategies and the emerging City Corporation Climate Action Strategy.
6. The draft Plan is supported by an evidence base, including a Local Plan Viability Assessment, undertaken in March 2020. This Assessment concluded that the policies in the draft Plan would not have a detrimental impact on the overall viability of development in the City. The Assessment also considered the potential impact of changes in planning obligations and the City's Community Infrastructure Levy upon development viability, clarifying that changes would have a marginal impact on the overall cost of development in the City.
7. The Planning Obligations SPD now needs to be updated to bring it into line with changes in national and London-wide guidance and to provide a framework for delivery of planning obligations to support the draft Local Plan and other City

Corporation strategies. These changes will ensure that policies are appropriate to meet the City Corporation's priority needs and that mechanisms are in place to help fund training and skills initiatives, provide affordable housing and mitigation of carbon emissions and other infrastructure necessary to support the City recover from the economic and social impacts of the Covid-19 pandemic.

Proposals

8. Draft revisions to the Planning Obligations SPD are attached at Appendix 1 to this report. The proposed changes have been tested through the wider Local Plan Viability Assessment undertaken to support the draft Local Plan. This Assessment has demonstrated that the proposed changes to planning obligations would have a marginal impact on the overall cost of developing in the City and not have a detrimental impact on the overall viability of development. The Assessment also considered that there is sufficient flexibility built into the draft Local Plan to address, as an exception, any individual development viability concerns.
9. The key changes proposed in this draft SPD are:
 - Updated explanation of the legislative basis for Planning Obligations and the Community Infrastructure Levy and changes to the Mayoral Community Infrastructure Levy.
 - Providing further guidance on development viability testing, emphasising that land value should take into account the full cost of meeting Development Plan policies. The price paid for a site will not be accepted as a justification for not meeting Local Plan requirements. Any viability information submitted by a developer should be publicly available.
 - Changes to the requirements for contributions towards affordable housing, seeking increased requirements from commercial development; emphasising that affordable housing should be provided on-site on residential development; and, where commuted sums are agreed, requiring that there is no financial benefit to the developer in not providing the affordable units on-site.
 - Updated provisions for contributions towards local skills, training and employment and local procurement, which are essential to put in place mechanisms to support the City's recovery from the Covid-19 pandemic.
 - A new contribution from developments within and close to the City Cluster to contribute towards the design and implementation of area-wide security measures.
 - An update to the cost of carbon used to calculate carbon offsetting contributions, reflecting London Plan guidance and the direction in the emerging City of London Climate Action Strategy.
 - Other provisions to ensure that development meets the policy requirements in the draft Local Plan, including for transportation, for urban greening, for the provision of cultural plans and public art and for site specific mitigation.
10. Following approval of this draft SPD, it will be subject to public consultation for a period of 6 weeks in September and October, at the same time as the pre-submission (Regulation 19) consultation on the draft Local Plan. Comments and

any proposed changes to the SPD would then be brought back to this Committee for consideration and for formal adoption.

Corporate & Strategic Implications

11. The proposed changes will support the delivery of the draft City of London Local Plan, the Transport Strategy, the emerging Climate Action Strategy and other City Corporation Strategies. The SPD will ensure that the impacts of development are mitigated and contribute towards meeting the strategic aims of the City Corporation's Corporate Plan and towards the social, environmental and economic recovery of the City from the Covid-19 pandemic.

Implications

12. The proposed changes will update funding provisions to assist in the delivery of new infrastructure in the City necessary to allow development to take place and contribute towards the delivery of affordable housing. The proposals in the draft SPD have been considered through the draft Local Plan Viability Assessment and will not have an adverse impact on the overall viability of development across the City. There is sufficient flexibility built into the draft Local Plan and the SPD to allow for variation on individual sites in exceptional circumstances.

Conclusion

13. The City of London adopted a Planning Obligations Supplementary Planning Document in 2014, providing a mechanism for developer contributions towards affordable housing, local training and skills initiatives and local procurement, carbon offsetting and the necessary mitigation of development to make it acceptable in planning terms.
14. Since 2014, changes to the relative role of Planning Obligations and the Community Infrastructure Levy and the approach to viability assessments have been published in the National Planning Policy Framework and the national Planning Practice Guidance. The London Plan has been updated and is due to be adopted shortly. A pre-submission draft Local Plan has also been agreed for consultation by the City Corporation. The Planning Obligations SPD needs to be reviewed and updated to reflect this changing policy framework to ensure that it provide an effective mechanism for financial contributions and the mitigation of the impacts of development in the City.
15. The proposed draft Planning Obligations SPD will be subject to public consultation for a period of 6 weeks in the autumn, alongside the draft Local Plan. The SPD will then be brought back to the Planning & Transportation Committee for approval.

Appendices

- Appendix 1 – Draft City of London Planning Obligations Supplementary Planning Document

Background Papers

City of London Local Plan Viability Assessment, March 2020

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/local-plan/Documents/local-plan-viability-assessment-march-2020.pdf>

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City of London

Draft Planning Obligations

Supplementary Planning Document



July 2020



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INTRODUCTION

1. This Supplementary Planning Document sets out further guidance on how the City Corporation will operate s106 planning obligations in the City of London, alongside the City of London Community Infrastructure Levy and the Mayor of London's CIL (MCIL2).
2. This SPD has been prepared to support policies in the emerging City of London Local Plan, City Plan 2036 and the Intend to Publish London Plan. All references to the Local Plan or the London Plan in this document relate to these draft plans.
3. The NPPF, paragraph 48, indicates that local planning authorities may give weight to relevant policies in emerging plans according to:
 - the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
 - the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
4. The City Plan 2036 was considered, and agreed for Regulation 19 pre-submission consultation, by the City Corporation's Court of Common Council on 21 May 2020. In accordance with the National Planning Practice Guidance, the City Corporation considers that the draft Plan is ready for examination and, in particular that it meets the tests of soundness set out in paragraph 35 of the National Planning Policy Framework (NPPF), i.e. that the draft Local Plan is:
 - Positively prepared
 - Justified
 - Effective, and
 - Consistent with national planning policy, in particular those provisions of the NPPF which relate to the delivery of affordable housing.
5. The requirements set out in this SPD are also in alignment with the policies in the emerging Intend to Publish version of the London Plan. The London Plan has reached an advanced stage of preparation and formal publication (adoption) of the Plan is expected prior to the adoption of this SPD.
6. For the reasons set out above, the City Corporation considers that the draft City Plan 2036 and the Intend to Publish London Plan both carry weight in the determination of planning applications and that this SPD, which provides more detailed guidance on policies in both those Plans

and has been subject to statutory public consultation, is a material consideration carrying weight in decision making. This SPD will therefore be applied in the determination of planning applications in the City in advance of formal adoption of the Intend to Publish London Plan and the draft City Plan 2036.

NATIONAL POLICY CONTEXT

7. Planning obligations are legal obligations that are used to mitigate the impact of unacceptable development in order to make it acceptable in planning terms and are entered into via a planning agreement or unilateral undertaking. The legislative basis for s106 planning obligations is contained within the Town and Country Planning Act 1990 (as amended). Further guidance is contained in the Community Infrastructure Levy Regulations 2010 (as amended) Regulation 122, and the National Planning Policy Framework (NPPF), February 2019, paragraph 56, which set out three statutory and policy tests for the use of planning obligations, indicating that:

“A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is-

 - (a) necessary to make the development acceptable in planning terms;
 - (b) directly related to the development; and
 - (c) fairly and reasonably related in scale and kind to the development.”
8. Paragraph 57 of the NPPF indicates that where developer contributions are set out in up to date policies, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage and the weight attached to that viability assessment is a matter for the decision maker (i.e. the City Corporation for applications within the City of London).
9. The 1990 Act provides for the review of planning obligations when they no longer serve their original purpose, or the amendment of the provisions relating to affordable housing.
10. CIL Regulation 122 (2A) allows for the local planning authority to seek contributions from a developer in respect of the cost of monitoring of planning obligations, including reporting of planning obligations through the Infrastructure Funding Statement. The monitoring cost should relate fairly and reasonably in scale and kind to the development and not exceed the cost to the authority of monitoring the obligation over the lifetime of the obligation.

11. CIL Regulation 121A requires the local planning authority to report, no later than 31st December in each calendar year, through an Annual Infrastructure Funding Statement:

- A statement of the infrastructure projects or types of infrastructure that will be wholly or partly funded by CIL.
- A report about CIL in the previous year, including details of CIL receipts, CIL expenditure and remaining CL funds.
- A report about planning obligations in the previous year, including information on planning obligations entered into during the reported year; expenditure or provision of infrastructure required under agreed obligations during the year; and summary details of agreements under section 278 of the Highways Act 1980.

12. The 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended) provide for the setting and collection of a statutory charge levied on development, intended to address the infrastructure needs arising out of the implementation of the Local Plan. The Community Infrastructure Levy (CIL) is the primary mechanism for seeking contributions from developers towards the provision of new infrastructure and operates alongside s106 planning obligations. Infrastructure is defined broadly in the Act to include transport, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces.

MAYORAL CIL REQUIREMENTS

13. The London Plan (Policy T9: Funding Transport Infrastructure through Planning and Policy DF1: Delivery of the Plan and Planning Obligations) requires contributions through the Mayoral Community Infrastructure Levy (MCIL2) towards the provision of transport infrastructure of strategic importance, including the completion of Crossrail 1 (the Elizabeth Line) and Crossrail 2. MCIL2 contributions within the Central London area, including the City of London, are required at a rate of:

- £185 per square metre for office development.
- £165 per square metre for retail development.
- £140 per square metre for hotel development.
- £80 per square metre for all other development, except for public health and education provision which are charged at a Nil rate.

14. The City Corporation is the designated 'collecting authority' responsible for the administration and collection of the Mayoral CIL within the City.

15. London Plan Policy DF1 also indicates a strategic priority in the use of s106 planning obligations for affordable housing provision and public transport improvements.

CITY OF LONDON CIL AND PLANNING OBLIGATIONS REQUIREMENTS

16. The City of London Local Plan (City Plan 2036) (Policy S27: Planning Contributions) sets out the justification for continued s106 planning obligations and the relationship between planning obligations and the City of London Community Infrastructure Levy.

17. The City of London Community Infrastructure Levy, was implemented from 1st July 2014 and sets the following charge rates:

Land Use	Zone	CIL Rate (£ per m ²)
Offices	City-wide	£75
Residential	Riverside	£150
Residential	Rest of City	£95
Development used wholly or mainly for the provision of medical or health services, except the use of premises attached to the residence of the consultant or practitioner	City-wide	Nil
Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education	City-wide	Nil
Development used wholly or mainly for the operational purposes of the emergency services	City-wide	Nil
All other uses	City-wide	£75

18. The City of London Local Plan and the Community Infrastructure Levy are supported by an Infrastructure Delivery Plan identifying the infrastructure required to meet the requirements of the City's Local Plan, and a Local Plan Viability Assessment, which considers the combined impact of MCIL2, City CIL and s106 planning obligations on development viability in the City. Supporting documents for the City of London Local Plan and the City CIL are available on the City Corporation's website.

19. The City Corporation will primarily use contributions through the Community Infrastructure Levy to fund the new infrastructure necessary to support development, as required by CIL Regulations. Section 106 planning obligations and s278 contributions will continue to be used where appropriate to deliver new infrastructure and to manage and mitigate the impacts of development in the circumstances set out in Local Plan Policy S27:

- Site specific mitigation to make a development acceptable in planning terms and obligations which are necessary to ensure compliance with Local Plan and London Plan policy.
- The provision of affordable housing. CIL Regulation 63 specifically excludes the use of CIL to fund affordable housing, which will therefore continue to be funded through s106 planning obligations.
- Local skills, training, employment and local procurement.
- Measures to enhance area-wide security within the City.
- Carbon offsetting, where a developer is not able to deliver the required level of carbon reduction on-site.

20. This SPD sets out how s106 planning obligations in the City of London will be applied within the context of the City of London Local Plan and the City of London Community Infrastructure Levy.

VIABILITY TESTING

21. A Local Plan Viability Assessment has been undertaken to support the development of the City Plan 2036. This assessment has considered the impact of Local Plan policies and requirements, together with the City of London CIL and MCIL2, on the overall viability of development in the City of London. The assessment has concluded that the planning obligation requirements in the Local Plan, together with other policy requirements, would not have an adverse impact on the overall deliverability and viability of development in the City. Financial contributions sought through the planning obligations outlined in this SPD have been considered through the Local Plan Viability Assessment and found not to impact adversely on the overall viability of development in the City. Where individual schemes are at the margins of viability, due largely to site specific considerations, there is sufficient flexibility in the implementation of Local Plan policies to ensure necessary development can proceed.

22. Local Plan Policy PC1: Viability Assessments, sets out the City Corporation's approach to viability. In line with advice in the NPPF and the Planning Practice Guidance, it is expected that Local Plan policy requirements, including planning obligation requirements and CIL and MCIL2 requirements, can be delivered without adversely impacting on the viability of development in the City. Where a developer considers that policy requirements cannot be met in full, then applications must be accompanied by a site and development specific viability assessment. The viability assessment must be prepared in accordance with the standard methodology set out in national planning practice guidance. The price paid for a site and/or building **must** take into account the cost of meeting Local Plan and London Plan requirements in full, including the full requirement for affordable housing. The price actually paid for, or market value of, a site will not be accepted as relevant justification for failing to meet plan requirements.

23. Submitted viability assessments will be made available on the Planning Register reflecting the expectation that these should be publicly available. If the applicant considers that the assessment in part or whole should be redacted for reasons of confidentiality, there will be an opportunity for the applicant to make the case. In the exceptional circumstances that an assessment is redacted, an executive summary will be made public.
24. Where an applicant submits a viability study in support of a lower level of provision of planning obligations, the City Corporation will normally appoint an independent and suitably qualified individual or company to review the viability study and provide independent advice to the City Corporation. The City Corporation will expect the applicant to meet the cost of this independent assessment. The City Corporation will have regard to the recommendations of this independent assessment when determining the planning application. Where it is agreed that a development cannot viably deliver all required planning obligations at the date of permission, but that there are nevertheless other policy considerations which justify the approval of planning permission, the City Corporation will normally require a review of the viability information at a later stage of the development, or upon occupation.
25. In determining the appropriate review mechanism, the City Corporation will have regard to national Planning Practice Guidance, the London Plan and the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance. Where a development is proposed to be undertaken in phases, the City Corporation will normally require a review of the viability prior to the commencement of each phase of the development.
26. Local Plan Strategic Policy S3: Housing requires the use of upwards only review mechanisms in circumstances where the affordable housing targets in that policy are not met.

PAYMENT OF S106 PLANNING OBLIGATIONS

27. The City Corporation will normally require that any financial sums required under agreed s106 planning obligations, should be paid to the City Corporation upon commencement or on implementation of the development scheme, unless otherwise agreed by the City Corporation. In determining alternative payment arrangements, the City Corporation will have regard to evidence of the impact of payment terms on viability and/or the need for payments to be related to phased construction of development.
28. Payment of financial contributions towards carbon off-setting will be required upon completion of the development.

AFFORDABLE HOUSING

1) Affordable housing requirement on commercial development

29. London Plan Policy SD5: Offices, other strategic functions and residential development in the CAZ, indicates that residential development is not appropriate in defined parts of the City. Elsewhere in the City, office use and other CAZ strategic functions are to be given greater weight relative to new residential development. The City Corporation seeks to balance this policy focus on office development with the need to provide housing to meet identified needs, including the need for affordable housing. The City Corporation therefore uses the London Plan concept of land use swaps, housing credits or off-site contributions towards housing from commercial development within the City of London, rather than requiring on-site mixed commercial and residential use. Such contributions will be delivered through the mechanism of s106 planning obligations.

30. To address this policy approach, the City Corporation requires new commercial development, where there is a **net increase of 500m²** or more Gross Internal Area, to make a financial contribution towards the off-site provision of affordable housing, either elsewhere in the City, or within reasonable travel distance of the City. The financial contribution will be sought at a rate of **£50 per m² GIA** of additional floorspace.

2) Affordable housing requirement on residential development

31. Local Plan Strategic Policy S3: Housing seeks affordable housing contributions from new residential developments, which have the potential for more than 10 units of housing. The presumption in policy is that affordable housing should be provided on-site and off-site provision or the payment of a commuted sum in-lieu of on-site provision will only be acceptable in exceptional circumstances. Affordable housing on-site must be provided at a rate of:

- a minimum of 35% of the total number of housing units proposed; or
- A minimum of 50% affordable housing on public sector owned land.

On-Site Provision

32. Where the affordable units are provided on-site, the City Corporation will normally require a mix of units in terms of size (number of bedrooms) and tenure to meet identified needs in the City of London. This mix should include social or London affordable rented housing and intermediate housing for rent or sale. Developers should contact the City Corporation's Department of Community & Children's Services to discuss specific needs and requirements.

Off-Site Provision

33. The presumption is the new affordable housing should be provided on-site alongside market housing development in the City of London. Off-site provision will only be accepted in exceptional circumstances where it can be robustly demonstrated that affordable housing cannot be delivered on-site or where off-site provision or a financial contribution would better deliver mixed and inclusive communities that meet the needs of households on the City Corporation's Housing Register, or other priority housing needs.
34. Where the City Corporation is satisfied that exceptional circumstances have been demonstrated and that off-site provision or a cash in-lieu contribution is acceptable in principle, the level of contribution required will be set at a level which ensures that there is no financial benefit to the developer relative to on-site provision. This means that the value of the contribution will be set at a level which captures the full uplift in value on the application site when delivering 100% market housing and ensures, as a minimum, that the same number, size and type of affordable housing will be delivered that would be required on-site.
35. Where the principle of off-site provision has been accepted, this should be met either through:
 - provision of the required number of affordable units on an alternative site elsewhere in the City of London or within reasonable travel time of the City. Where provision is made on an alternative site, it must result in additional affordable homes being provided, taking account of any affordable housing expectations on the alternative site as well as the requirement from the application site. Developers will need to liaise with the Department of Community & Children's Services Department, on appropriate locations and the proposed mix and tenure of the units to be provided; or
 - provision of a commuted sum, also known as a cash in-lieu payment, to enable the City Corporation to provide suitable affordable housing elsewhere in the City, or within reasonable travel distance of the City, normally on City Corporation-owned or managed housing estates. The level of this contribution will be calculated on a site by site basis, to ensure that the full uplift in value when delivering a 100% market scheme is reflected in the contribution and that there is no financial incentive to the developer deliver the affordable housing by means of a commuted sum. The Local Plan Viability Assessment indicates that a viable contribution to off-site provision should lie in the range of £440,000 to £460,000 per unit. Developers proposing a commuted sum must submit 2 appraisals of the development scheme – one incorporating a policy compliant level of affordable housing on-site and a separate appraisal of the same scheme but with all units

provided as private/market housing. The required commuted sum payment will be the greater of £440,000 per unit or the difference between these two submitted appraisals.

Viability Review Mechanisms

36. Where a viability assessment is submitted which demonstrates that a development cannot meet in full the required affordable housing requirement at the time of permission, the City Corporation will require an upwards only review mechanism within the s106 planning obligation agreement. This mechanism will ensure that any increase in scheme value, or reduction in development cost, are appropriately reflected in increased contributions towards affordable housing. This review will normally take place at the point where the sale of 75% of the permitted units has legally been completed.
37. In line with the requirements in the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (2017), to incentivise delivery of a development, an early stage review will be required where a development has not reached an agreed level of progress two years after the grant of permission, or an alternative period of time agreed by the City Corporation.

LOCAL SKILLS, TRAINING AND EMPLOYMENT AND LOCAL PROCUREMENT

38. While the City of London continues to develop as a world-leading international centre for financial, professional and business services, London – including parts of Central London - still has some of the most deprived localities in the country, with persistent high levels of unemployment, social exclusion and child poverty. Within the City itself, Portsoken Ward is ranked within the 30% most deprived areas in England, and unemployment in London remains above the national average. The City Corporation is fully committed to promoting construction as a career and maximising the opportunities for supporting residents into apprenticeships and employment.
39. Since 2004, the City Corporation has used s106 planning obligations to seek contributions from commercial development in support of training, skills and job brokerage activity.
40. The City Corporation's Corporate Plan aims to maximise the opportunities and benefits afforded by the City's international role in supporting London's communities, including working with partners and neighbouring boroughs to promote employability, provide jobs and growth and deliver a diverse and inclusive workforce. This is reflected in Local Plan Strategic Policy S27: Planning Contributions. The City Corporation continues to seek

s106 planning obligations towards the provision of local training, skills and local procurement activity to help address some of the issues relating to unemployment, employability, skills and the need for a diverse and inclusive workforce in the City, in Central London, and in other parts of the capital where the City Corporation is supporting access to training and jobs in the Square Mile. This approach will be kept under review and amendments made to reflect changing labour market trends in the City and central London to ensure that it remains relevant and effective.

41. City developments offer significant opportunities in traditional and modern construction methods combined with a range of professional careers, with opportunities for progression in a wide range of construction and built environment roles across the development cycle. The City Corporation seeks to help local residents into such jobs by ensuring that more suitable job opportunities and career paths are available to them, supported by a focus on apprenticeships, and backed by the brokerage, training and employer engagement mechanisms required to make this work.
42. The City Corporation will apply s106 planning obligations to increase local employment opportunities that provide recognised training and offer progression opportunities. This will help to better match skills needs and opportunities in construction, and support the City Corporation's efforts to address unemployment, lack of vocational progression and a mismatch of skills and opportunities for the local population both in the City and in London, as well as support the City's access to skills and talent.
43. This will be achieved through:
 - requirements to provide apprenticeship opportunities and measures to ensure the uptake and completion of apprenticeships, thereby ensuring meaningful job and progression opportunities;
 - cash contributions to support employment, training and skills initiatives, collaborating with partners across London to ensure a match of residents with opportunities and skills shortages on City developments; but also supporting training, apprenticeships and skills development work that reflects the opportunities in City-type jobs (e.g. Financial and Professional Services sector that drives City developments, and the sectors of the economy that support them, e.g. hospitality and retail);
 - curriculum support and community benefit initiatives to be delivered by the developer;
 - maximising economic opportunity for local small to medium sized businesses through a local procurement target.

Financial Contributions

44. New commercial development where there is a **net increase of 500m² or more GIA** will be required to make a financial contribution towards local

training, skills and employment initiatives at a rate of **£30 per m²** of additional floorspace.

45. Residential development, where there is the potential to deliver **more than 10 housing units**, will also be required to make a contribution at a rate of **£5 per m² GIA** of additional floorspace.
46. The levels of contribution are derived from a formula is based on occupancy levels of these developments, measures of local residents seeking employment, and the cost of providing sustained work placements. Further information is set out in Appendix 1.
47. The presumption is that developers should make a financial contribution. However, the City Corporation will consider proposals from developers to deliver local training, skills and employment initiatives in place of a financial contribution. Where a developer wishes to consider direct provision of such initiatives, they should liaise with the City Corporation's Innovation and Growth Team to agree the scope and nature of the proposal, ensuring that:
- provision meets the City Corporation's policies and criteria for local training, skills and employment, as set out in the Code for Local Employment and the Employment and Skills Plan Guidance;
 - the level of provision is commensurate with the required level of any financial contribution under this SPD;
 - any initiatives are over and above those that could reasonably be expected from an employer as part of good recruitment and training practices; and
 - any initiatives represent new activity which would not have taken place without the development in question.

Local Skills, Training and Employment

48. In addition to any financial contribution, any development where there is a net increase of 500m² or more GIA will be required to submit an Employment and Skills Plan (ESP) for the site that meets the requirements of the City Corporation's Code for Local Employment and has been agreed with officers from the City Corporation's Skills Policy Team. All such developments will provide:
- a minimum of one apprenticeship start or a job start lasting at least 26 weeks for every £3 million in contract value. (Eligibility for apprenticeships and job starts for residents of local boroughs is defined in the Code for Local Employment);
 - a target number of completions of existing apprentices already employed by the developer or contractors transferring to and/or from other sites;

- work placements for local school age children and / or local adults resident in the City or local boroughs;
- curriculum support activities for students of any institution in the City or local boroughs.

49. The ESP will also require:

- identification in advance of labour requirements across all phases of the development, including numbers and types of job; work packages and timing; recruitment methods; skills needs which could be met through local training providers and provide a plan for meeting such needs;
- details of initiatives to provide appropriate training to ensure effective transition from unemployment into work;
- compliance with the requirements of sharing vacancies, as set out in the City of London Corporation's Code for Local Employment, for collaboration with local boroughs and partnerships established for the purposes of supplying candidates that meet S106 local labour criteria.

50. Where a hotel development is proposed, the City Corporation will require two ESPs addressing local training, skills and employment initiatives: one covering the construction period and the second covering operation of the hotel. The ESP for the operation of the hotel will propose a level of jobs and apprenticeships commensurate with the value of the project.

Local Procurement

51. The City Corporation encourages City businesses and developers to procure locally from small to medium sized businesses. The definition of local business includes businesses within the administrative area of the City and the Central London sub-region (Camden, Islington, Haringey, Hackney, Tower Hamlets, Lewisham, Southwark, Lambeth, Wandsworth, City of Westminster, Kensington and Chelsea).

52. Local procurement can be an effective means of stimulating the economies of neighbouring boroughs, promoting small business growth and associated job creation. The sourcing of goods and services locally may also help to achieve a more sustainable pattern of land use and reduce the need to travel, leading to reduced road congestion, pollution and carbon emissions, in line with the objectives of the London Plan and the City of London Local Plan.

53. Further guidance is available from the City Corporation's Skills Policy Team on the criteria for eligible local businesses, the Procurement Charter and associated guidance notes, which set a target for developers to source 10% of goods and services, relating to development, from small and medium sized enterprises in the City and its neighbouring boroughs. The City Corporation will seek s106 obligations with developers of qualifying

commercial (500m² or more net increase in floorspace, measured by GIA) and residential development (more than 10 housing units), requiring them to use best endeavours to meet the 10% target through their development.

SITE SPECIFIC MITIGATION

54. The City Corporation will principally seek to mitigate the impact of development and provide necessary infrastructure through the use of CIL but, in some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Under the provisions of CIL Regulation 122 and the NPPF paragraph 56, such s106 planning obligations must only be sought where they meet all of the three statutory tests.
55. The nature and amount of contribution sought for such mitigation will be determined by the individual circumstances of each development proposal. The Local Plan Viability Assessment confirms that the need for site specific mitigation has been reflected through estimates of construction costs and exceptional costs.

AREA SECURITY REQUIREMENTS

56. Local Plan Strategic Policy S2: Safe and Secure City and Policy SA3: Designing in Security, indicate that developers will be required to contribute towards the funding of measures to enhance security across the City, including collective security across broad areas. Developers will be expected to contribute towards the cost of necessary and proportionate on-street mitigation of the risk of vehicle attack, or the provision of security across a wider area as part of an area-based security approach. The requirement will be assessed on a site by site basis, in liaison with the City of London Police.
57. Policy S21: City Cluster, further indicates that area-wide security measures will be pursued within the City Cluster area, funded in part through s106 planning obligations proportionate to the scale of the development. Contributions will be required from development within the City Cluster area as set out in the Local Plan. Major development or developments requiring higher levels of security which are in close proximity to the City Cluster will also be required to make a proportionate contribution, where this is deemed appropriate through discussions with the City of London Police.
58. Area specific security mitigation may include, but is not limited to:
- The design, installation and maintenance of additional HVM bollards
 - The design, installation and maintenance of additional HVM rated street furniture and landscape features

- The development, construction and monitoring of area wide security checks
- The design, improvement and installation of soft security measures
- The development, construction and monitoring of vehicle restrictions, detection and/or check points
- The design and enhancement of physical infrastructure for on-street policing

Financial Contribution

59. Within the City Cluster area, and other areas as advised on a site by site basis by the City of London Police, a financial contribution towards Area-based security measures will be required on commercial development where there is net increase of **500m² GIA or more**, at a rate of **£10 per square metre** of additional floorspace.

HIGHWAYS WORKS AND S278 AGREEMENTS

60. Section 278 Agreements are legal agreements between a developer and the highway authority made under s278 of the Highways Act 1980. The agreements ensure that highways works necessary to make a development acceptable in principle are funded by the developer and implemented by the highway authority. As such they are a necessary cost on development and will continue to be sought by the City Corporation in addition to any CIL or s106 planning obligation. Both the City Corporation and Transport for London are highway authorities within the City of London.

61. The nature and amount of any s278 Agreement will vary according to the individual circumstances of the development, specifically the impact of the development on the highway.

TRANSPORTATION

62. The City's Local Plan Strategic Policy S9: Vehicular Transport and Servicing requires: developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development, including through the use of river transport.

63. The City Corporation will use s106 planning obligations or planning conditions in order to ensure that information on the transport implications of development, both during construction and operation, is provided and the arrangements to minimise impacts complied with.

64. Transport Assessments and Travel Plans, incorporating Cycle Promotion Plans, are required for all major development as set out below and for any other development that will cause significant impacts over the local or wider area.

Threshold for Transport Assessments and Travel Plans (incorporating Cycle Promotion Plans)

Land use	Threshold
Offices	1000m ²
Residential	10 units
Retail	1000m ²
Hotel	10 bed spaces
Health	1000 m ²
Transport infrastructure	>500 additional trips per peak hour
Mixed use	1000 m ²

65. The City Corporation will also use s106 planning obligations or planning conditions to require the submission of:

- Delivery and Servicing Plans for all major commercial development over 1,000m² and any other development or refurbishment that will cause significant transport impacts on the local or wider area, through operational deliveries and servicing. For smaller development a Delivery and Servicing Plan is encouraged and may be required in areas where this is a particular need to manage delivery and servicing requirements. Delivery and servicing plans will be required to set out proposals for off-site consolidation of servicing and deliveries. Further information is set out in the City Corporation's Freight and Servicing Supplementary Planning Document.
- Construction Logistics Plans for all major developments or refurbishments and for any development that would have a significant impact on the transport network during construction.

66. The s106 planning obligation or planning condition will also require compliance with and monitoring of the above Plans.

CULTURAL STRATEGIES AND PUBLIC ART

67. The City's cultural infrastructure is important to the distinctive and historically significant character of the Square Mile. The international reputation and high quality of this cultural activity has a critical part to play in the vibrancy of the working environment and adds to the appeal of the City as a place to do business. The City Corporation's Cultural Strategy highlights that commerce and creativity thrive side by side and sets out a vision to position the City as a world capital for commerce and culture.

68. Local Plan, Strategic Policy S6: Culture, Visitors and the Night-Time Economy, requires developers to submit Cultural Plans for major development. The City Corporation will require developers to enter into s106 Planning Obligation agreements to ensure the delivery of these plans. The City Corporation will set out further detail on the scope and content of Cultural Plans in an SPD. The expectation is that cultural provision will be made on or around the application site and may include the incorporation of cultural activities or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures. Where agreed with the City Corporation, a developer may make a financial contribution towards cultural provision elsewhere in the City. The amount of this financial contribution and how it will be used to enhance cultural provision in the City will be determined on a case by case basis.
69. Local Plan Policy CV5: Public Art encourages the provision of new artworks in appropriate locations in the City. The City Corporation may use s106 Planning Obligations to ensure the delivery of such artworks. Financial or other contributions may be required towards the provision and maintenance of new artworks.

CARBON OFFSETTING

70. London Plan Policy SI2: Minimising greenhouse gas emissions, requires major development to be net zero-carbon, reducing greenhouse gas emissions in operation. The London Plan requires a minimum on-site reduction in carbon emissions of at least 35% beyond 2013 Building Regulations for major development. Where it is demonstrated that the zero carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the relevant borough, either:
- Through a cash in lieu contribution to the borough carbon offset fund, or
 - Off-site provided that an alternative proposal is identified and delivery is certain.
71. The London Plan is supported by further detailed guidance in a number of documents, including the Mayor's Environment Strategy 2018; the Mayor's Energy Assessment Guidance 2020; Whole life-cycle carbon assessments and "Be seen" energy monitoring guidance – both pre-consultation drafts 2020; and the Mayor's Sustainable Design and Construction SPG 2014.
72. The London Plan indicates that boroughs should develop a price for offsetting carbon using either a nationally recognised carbon pricing mechanism or a price based on the cost of offsetting carbon across the borough. The London Plan suggests a nationally recognised non-traded

price of £95 per tonne which boroughs may use to collect offset payments in lieu of any locally defined value. The suggested carbon offset price has been tested as part of the viability assessment of the London Plan.

73. The City of London Local Plan, Strategic Policy S8: Design seeks to deliver world class sustainable buildings which contribute towards a zero emission, zero carbon and climate resilient City. Local Plan Policy DE1: Sustainability Standards requires major development to meet London Plan carbon emission standards on site and, in exceptional circumstances, where standards cannot be met on site, for offsetting payments to be made.
74. The City Corporation will use s106 planning obligations to require the provision of offsetting payments at a price of **£95 per tonne of carbon to be offset over a period of 30 years**. This level of contribution accords with the nationally recognised figure identified in the London Plan. It will be periodically updated in line with amendments published by the Mayor.
75. The City Corporation is preparing a Climate Action Strategy to guide actions by the City Corporation, developers and occupiers within the Square Mile towards a net zero carbon City. This Strategy will be published in 2020 or early 2021. The City Corporation may, through this Strategy, publish a locally defined Carbon Offset Price which will replace the nationally defined figure of £95 per tonne.
76. Financial contributions for carbon offsetting will be required on completion of development and prior to occupation. The level of contribution required will be calculated on the basis of carbon reduction projections set out in an Energy Statement submitted as part of the planning application. Developers may submit a further revised assessment demonstrating levels of carbon reduction and revised off-setting contributions upon completion. Financial contributions will be placed into the City Corporation's Carbon Fund, which will be used for carbon reduction projects both within and outside of the City of London. Initially this Fund will aim to deliver carbon reduction on City Corporation owned properties (excluding investment properties) where the widest community benefit can be achieved and where measures will deliver carbon reductions additional to those which could otherwise be achieved. The City Corporation is also developing a Climate Action Strategy which will identify further options for carbon offsetting to contribute towards the ambition of a zero carbon City.

OPEN SPACES AND GREEN INFRASTRUCTURE

77. Local Plan Strategic Policy S14: Open Spaces and Green Infrastructure, and Policy OS1: Protection and Provision of Open Spaces, seek to protect existing open spaces across the City and require development to provide new open spaces or improvements to existing open spaces. Local Plan Policy OS2: Urban Greening requires new development to meet a

minimum Urban Greening Factor target of 0.3 and to submit an operation and maintenance plan to ensure that green features will be maintained successfully for the life of the building. Policy OS3: Biodiversity aims to secure improvements to the City's biodiversity and requires developments to deliver a net gain in biodiversity. Policy OS4: Trees, seeks to protect existing trees in the City and the provision of additional trees both in open spaces and street trees.

78. Where necessary, the City Corporation will use s106 planning obligations to ensure that developers protect existing open spaces, trees and biodiversity and deliver the necessary improvements. Developers will be required to maintain new open spaces and greenery and contribute towards the future maintenance of public open spaces where these are enhanced through development activity. Maintenance will be secured through s106 obligations. The City Corporation will also seek to secure public access to newly provided open spaces and existing open spaces, where feasible, through s106 obligations. The City Corporation may require a financial contribution in lieu of actual provision to contribute towards the improvement of existing public open spaces or the provision of new publicly accessible spaces.

UTILITY CONNECTIONS TO THE DEVELOPMENT

79. Local Plan Strategic Policy S7: Smart Infrastructure and Utilities encourages early engagement between developers and utility providers to identify the infrastructure needs arising from development and ensure that this provision is in place in time to serve the development. Developers will be required to identify and plan for necessary connections, including for electricity, gas, water supplies, heating and cooling, telecommunications and drainage, including the use of Sustainable Drainage Systems (SuDS). Developers will be required to submit written evidence from utility providers that effective engagement has been carried out. The City Corporation may use s106 planning obligations to ensure that these provisions are delivered in a timely fashion, to ensure continuous engagement regarding route planning and confirmation of load demands; that all necessary utilities are in place prior to occupation of the development and that adverse impacts arising from installation of utilities infrastructure under public highways is minimised, for example by promoting the co-ordination of street works, where possible.

OTHER PLANNING OBLIGATIONS

80. This SPD has set out the principal s106 planning obligations that the City Corporation may seek from developers, to ensure that development is acceptable in planning terms. The City Corporation reserves the right to seek additional or alternative s106 planning obligations to those listed above, where justified by local circumstances or to deliver other priorities

in the Local Plan and London Plan and where such planning obligations meet the statutory tests in CIL Regulation 122. Examples may include mitigating the impact of development on heritage assets, mitigating the impact on mobile telephone, Wi-Fi and television reception and the need for wind, thermal comfort, solar glare and convergence and daylight and sunlight assessments.

EXEMPTIONS

81. The City Corporation will seek s106 planning obligations on all new development where required and where that development meets or exceeds the thresholds set out in this SPD.
82. Community Infrastructure Levy Regulations provide for relief from CIL for charities undertaking development wholly or mainly for charitable purposes, where the charity owns a material interest in the relevant land for a period of 7 years beginning with the day on which the development commences. If the development ceases to be used for charitable purposes within this 7 year period, CIL then becomes liable to be paid.
83. To ensure consistency of approach between CIL and s106 in the City, the City Corporation proposes to offer a similar exemption from s106 planning obligations for development where:
 - (a) a registered charity has a material interest (a freehold or lease for more than seven years after the date planning permission is granted) in the relevant land; and
 - (b) the development will be used wholly or mainly for charitable purposes.
84. This exemption will not apply where s106 planning obligations are required to deliver site specific mitigation necessary to make a development acceptable in planning terms, or to a requirement to enter into a s278 agreement to deliver necessary highways works.

AMENDMENTS TO PLANNING PERMISSIONS

85. Under s73 of the Town and Country Planning Act 1990, amendments can be made to the conditions attached to a planning permission. Where such amendments are made, they constitute a new consent. Where a s73 application is made, the City Corporation will only seek additional financial contributions through a s106 planning obligation where the new application results in a net increase in floorspace above the original permission. The need for any additional site specific mitigation measures will be assessed on a site by site basis.
86. Where a s73 application results in a reduction in floorspace, when compared with the original permission, the City Corporation will make a refund.

87. S96A of the 1990 Act allows non-material changes to be made to a planning permission. Such changes are unlikely to result in an increase in floorspace and should not, therefore, generate any additional requirement for s106 planning obligations.

INDEXATION

88. The charge rates for affordable housing and other financial contributions set out in this SPD will be subject to indexation from the date of adoption of this SPD to the date of permission, as set out below:

- Indexation for affordable housing, will be by reference to the RICS CIL Index (or other indices specified by national CIL Regulations), to ensure consistency with the approach required for the City CIL.
- Indexation for other financial contributions will be by reference to the Consumer Price Index.

89. Where site specific mitigation, or other financial contributions which are not set out in the charge rates contained in this SPD, are required through a s106 planning obligation, these contributions will be indexed by reference to the Consumer Price Index from the date of the Planning & Transportation Committee's resolution to permit the development until the date that payment is due.

90. Contributions required under s278 agreements should meet the full cost of the required remedial or reinstatement works and will not be subject to indexation.

91. Carbon off-set contributions will be calculated according to the price of carbon set out in this SPD, or otherwise notified on the City Corporation's website, at the date of signature of the s106 agreement. They will not be subject to further indexation.

ADMINISTRATION AND MONITORING

92. The City Corporation requires charges to be applied to cover the cost of administration and monitoring of City of London s106 planning obligations. These charges are set out on the City Corporation's website and will be reviewed from time to time to ensure that they continue to cover City Corporation costs. The costs incurred by the Comptroller and City Solicitor in negotiating, drafting and executing s106 agreements will also be charged and the amount will depend on the circumstances.

PROCESS

93. The City Corporation's Section 106 template is available on the City Corporation's website. It will be updated from time to time as appropriate

to reflect the Local Plan and London Plan. Where a section 106 agreement is required, applicants will be expected to enter into section 106 agreements in the form indicated in the template and in a timely manner, and to ensure that all parties with interests in the land, including chargees, will join in the agreement before making the application.

94. The applicant will be expected to provide Heads of Terms reflecting the requirements in the template, the obligations outlined in this SPD, and reflecting all parties with interests in the relevant land.
95. Where appropriate the City Corporation will make it a condition of a planning permission that there shall be no commencement (including demolition) until such time as the terms of the section 106 agreement in accordance with the approved Heads of Terms and template have been agreed and entered into by all the parties with interests in the land.
96. Where such a condition is not appropriate, for example because one or more of the site specific Heads of Terms are not drafted with sufficient certainty, the permission will not be issued until the section 106 agreement has been completed. Failure to complete the agreement in a timely manner may risk refusal.

SUMMARY OF FINANCIAL REQUIREMENTS

Contribution Type	Threshold	S106 obligation
Affordable Housing (commercial development)	500m ² GIA	£50 per m ² net increase
Affordable Housing (residential development)	More than 10 units	Site specific assessment
Local skills, training and employment (commercial)	500m ² GIA	£30 per m ² net increase
Local skills, training and employment (residential)	More than 10 units	£5 per m ² net increase
Area-wide security	500m ² GIA	£10 per m ² net increase
Carbon Offsetting	Minimum 35% on-site improvement in CO ₂ emissions over 2013 Building Regulations	£95 per tonne of carbon to be offset over a 30 year period

APPENDIX 1 – Calculation of Financial Contributions for Local Skills, Training and Employment

97. The formula below is used to establish the required level of contribution for developments of more than 10 residential units or more than 500 m² of additional GIA of commercial/office floorspace.

98. The formula is based on occupancy levels of these developments, measures of workless people in Central London boroughs seeking employment, and the benchmarked cost of supporting an unemployed London resident into sustained employment.

99. The contribution is generated by the formula:

Occupancy Level x Worklessness Rate x Cost of Placement

Occupancy Level is the average occupancy for the development type (commercial or residential), measured in persons per m².

Worklessness Rate is the percentage of London's resident population claiming Job Seeker's Allowance (JSA) and those that are economically inactive that want to work.

Cost of Placement is the benchmarked cost of Central London local employment services to place an individual into sustained employment.

100. The figures used to calculate this are as follows:

Development	Occupancy Level	Worklessness Rate*	Cost of Placement	Indicative s106 contribution per m ² (GIA)
Commercial	0.083 ¹	0.078	£5,000	£32.37 (£30)
Residential	0.0125 ²	0.078	£5,000	£4.88 (£5)

*Central London: the Jobseekers Allowance claimant rate @ 3.4% plus (NOMIS) Combined rates of Jobseekers Allowance claimants plus the rate of economically inactive people (who want to work) = 7.8%.

¹ Based on Employment Densities Guide, HCA Guide (2010)

² Method used by WCC in draft City Plan

APPENDIX 2: Definition of qualifying SME for local procurement purposes

101. To qualify as an SME, a business should:

- (a) Be autonomous (i.e. not be majority-owned by, or be a subsidiary or branch of, a larger concern);
- (b) Have an employee headcount of 250 or fewer.

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Committee(s)	Dated:
Planning & Transportation	14 July 2020
Subject: Naming of new City Walkway and associated open space: Bazalgette Embankment	Public
Report of: Director of the Built Environment	For Decision
Report author: Stuart O'Callaghan, Department of the Built Environment	

Summary

This report advises Members that an application has been made by Thames Tideway in consultation with Thames Water Utilities Limited to name the new publicly accessible City Walkway and associated open space located at the site of the Thames Tideway Tunnel project along the river foreshore to the west of Blackfriars Bridge as 'Bazalgette Embankment'. It recommends that the name Bazalgette Embankment should be approved in recognition of the civil engineer Sir Joseph Bazalgette who, as chief engineer of London's Metropolitan Board of Works, was responsible for the construction of the London's Victorian sewer network which was an integral part of the Thames embankments constructed in central London.

Recommendation

Members are recommended to approve the name Bazalgette Embankment and require that a statutory order be issued.

Main Report

Background

1. The City Corporation is responsible for the authorisation of all building names, street numbers and street names within the City in accordance with the London Building Acts (Amendment) Act 1939. The normal procedure is for most applications to be dealt with by officers under delegated authority, but it is usual for new street names and other high profile or contentious cases to be reported for decision by Planning & Transportation Committee.
2. The Thames Tideway Tunnel project which is expanding London's sewer network is due for completion in 2024. It is being created from 24 construction sites between Acton in West London to Beckton in East London. Many sites are located on the river edge in the centre of London, and the project includes a site in the City at the foreshore of the River Thames to the west of Blackfriars Bridge.

The site

3. The site is located at the foreshore of the River Thames west of Blackfriars Bridge alongside Victoria Embankment and close to Blackfriars Bridge. Appendix 1 shows the site plan, detailing the new embankment space which comprises a proposed City Walkway and publicly accessible open space (ref BAZALG0001). The existing Victoria Embankment will continue as currently named and the new name will not lead to any changes of address for existing occupiers on Victoria Embankment. The new name will apply only to the new space being constructed.
4. A City Walkway is defined as
“A way, place, public circulation space or precinct over which the public have a right to pass and repass and a right of access, on foot only, but nevertheless without being a public highway, pursuant to the City of London (Various Powers) Act 1967”.
5. The new City Walkway and associated open space will provide a significant new area of public realm beside the river for recreation and leisure activities.

The naming as Bazalgette Embankment

6. An application has been submitted for the naming of the Embankment by Thames Tideway in consultation with Thames Water Utilities Limited. The new City Walkway and associated open space will be within a publicly accessible embankment once the current Thames Tideway construction works have been completed.
7. The City Corporation “Street Naming and Numbering Advice Note” sets out
“In applications to name streets after deceased persons, permission must be obtained from the person’s family or estate administrators. In order to be considered the individual in question should:
 - Have been dead for 20 years or have passed the centenary of their birth
 - Have a significant and demonstrable connection to the site in question”.
8. The proposed naming of the site as Bazalgette Embankment is in honour of Sir Joseph Bazalgette who created the original sewer network which the City still relies on today. His work not only cleaned up the river Thames during the late 19th Century but also had a major impact on the public health of Londoners by helping to reduce and eliminate cholera epidemics. His work had both a valuable and demonstrable connection to the site.
9. The Bazalgette family have been consulted and consider “It is an honour to see his name getting the credit it deserves as his system is expanded to cope with modern-day London”.

Consultation

10. A full consultation has been undertaken on the proposed name. Statutory consultees have been consulted and a public notice was posted on-site and on-line inviting comments. There were several responses from the site notice and online notice, who were supportive of the proposed name.
11. Ward Members for the ward of Castle Baynard and members of the Open Spaces and City Gardens Committee have been consulted and are supportive of the proposed name.
12. The landowner Thames Water Utilities Limited have confirmed that they fully support the proposed name.
13. Current members of the Bazalgette family have been consulted and support the proposed naming of the embankment.
14. Statutory consultees and Royal Mail have raised no objections to the proposed name.
15. Several respondents were in favour of there also being a statue or an explanatory plaque relating to Sir Joseph Bazalgette and his work. This suggestion is a separate matter and is not being considered as part this naming application. Separate discussions can be held with the landowner Thames Water Utilities Limited concerning their interest in the suggestion.

Conclusion

16. The proposed new name in honour of Sir Joseph Bazalgette meets the street naming and numbering guidelines set out by the City Corporation recognising his significant and demonstrable connection to the building of London's original sewer network which improved the health of Londoners and formed an integral part of central London's Thames embankments.
17. The proposal has received supportive comments as part of the consultation process.
18. This report recommends that Members:
 - A. Grant approval for the name: 'Bazalgette Embankment'.
 - B. Require that a Statutory Order be issued.

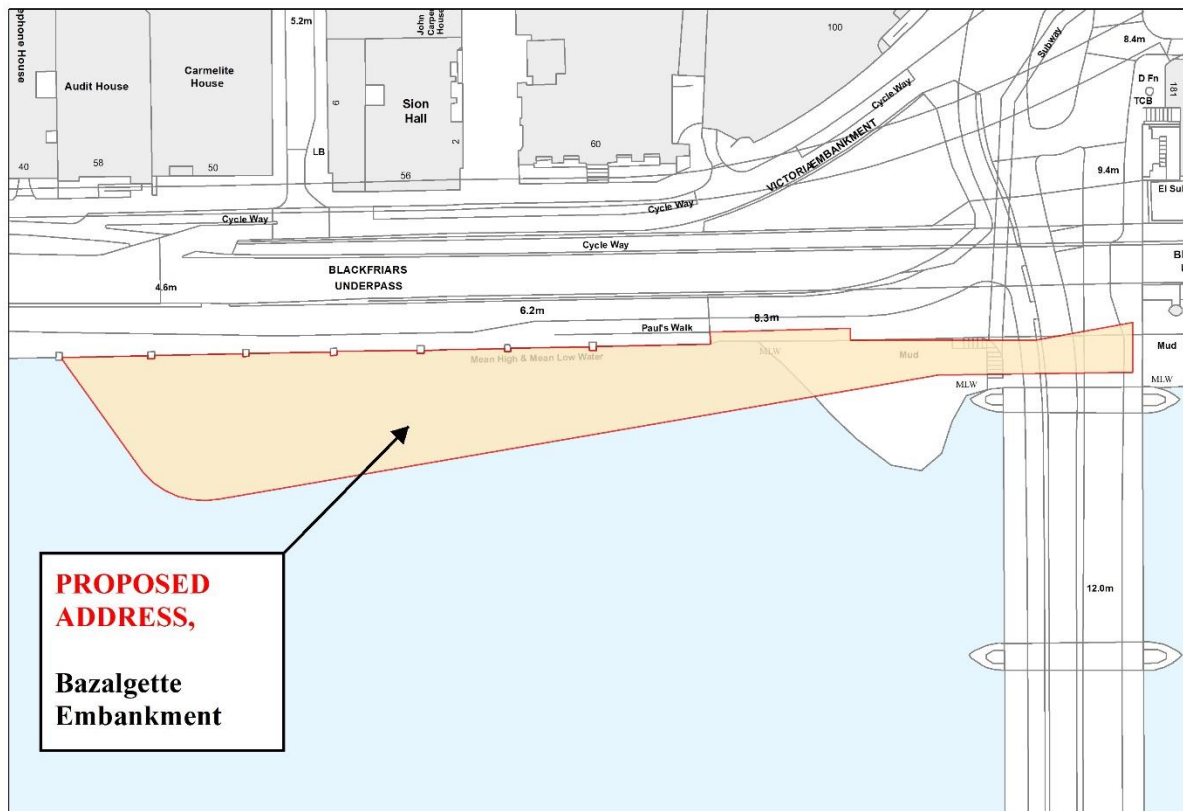
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Appendix 1: Drawing Reference BAZALG0001



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(2020)

Map Reference: TQ531535,180180

If you require further details reference can be made to the Thames Tideway Tunnel Order 2014 and on the Thames Tideway internet page

<https://www.tideway.london/locations/blackfriars-bridge-foreshore/>

Committee	Dated:
Planning & Transportation Committee	14 July 2020
Subject: Revenue Outturn 2019/20	Public
Report of: Chamberlain Director of the Built Environment Director of Open Spaces The City Surveyor	For Information
Report author: Dipti Patel, Chamberlain's Department	

Summary

This report compares the revenue outturn for the services overseen by your Committee in 2019/20 with the final budget for the year. Overall total net expenditure across all risks during the year was £20.219m, whereas the total budget was £20.764m, representing an underspend of £545,000 as set out below.

Summary Comparison of 2019/20 Revenue Outturn with Final Agreed Budget			
	Final Budget £'000	Revenue Outturn £'000	Variation Better/ (Worse) £'000
Direct Net Expenditure			
Director of Built Environment	(4,809)	(4,826)	(17)
Director of Open Spaces	(1,772)	(1,860)	(88)
The City Surveyor	(1,271)	(784)	487
Total Direct Net Expenditure	(7,852)	(7,470)	382
Capital & Support Services	(12,912)	(12,749)	163
Overall Total	(20,764)	(20,219)	545

Chief Officers have submitted requests to carry forward underspendings, and these will be considered by the Chamberlain in consultation with Chairman and Deputy Chairman of the Resource Allocation Sub Cttee. Overspendings will be carried forward to be repaid in 2020/21.

Recommendation

Members are asked to:

- Note this revenue outturn report for 2019/20 and the carry forward of local risk overspending to 2020/21 of £236,000 for the Director of Built Environment.

Main Report

Revenue Outturn for 2019/20

- Actual net expenditure across all risks for your Committee's services during 2019/20 totalled £20.219m, an underspend of £545,000 compared to the final budget of £20.764m. A summary comparison with the final budget for the year is tabulated below. In this and subsequent tables, expenditure and adverse variances are presented in brackets. Only significant variances (generally those greater than £50,000) have been commented on.

Table 1 - Summary Comparison of 2019/20 Revenue Outturn with Final Budget				
	Final Budget £'000	Revenue Outturn £'000	Variation Better/ (Worse) £'000	Variation Better/ (Worse) %
Local Risk				
Director of Built Environment	(11,542)	(11,832)	(290)	(25.1)
Director of Open Spaces	(1,772)	(1,860)	(88)	(5.0)
The City Surveyor	(295)	(221)	74	25.1
Total Local Risk	(13,609)	(13,913)	(304)	(2.2)
Central Risk				
Director of Built Environment	6,733	7,006	273	4.1
Total Central Risk	6,733	7,006	273	4.1
Cyclical Works Programme	(976)	(563)	413	42.3
Capital and Support Services	(12,912)	(12,749)	163	1.3
Overall Total	(20,764)	(20,219)	545	2.6

- The most significant local risk variations comprise:

- Director of Built Environment £290,000 overspend:**

- Traffic Management overspend £364,000 – shortfall in road closure, hoarding and scaffolding licences and road permitting fees income £473,000. This was partly offset by salary underspends £70,000 and reduced advertising costs £39,000.
- Highways overspend £219,000 – decrease in staff cost recovery income from capital projects £264,000 due to vacancies and overspend in R&M works £241,000 due to increase in indices within the R&M works contract, increase in carriageway surface repairs and undertaking repairs to old lanterns which was not anticipated. This was partly offset by salary underspends £142,000 and reduced electricity costs £132,000.
- Off Street Parking overspend £234,000 – shortfall in car park fee income as a result of losing a high value season ticket holder and closure of car parks due to the lockdown.

- (iv) Building Control overspend £78,000 – shortfall in Building Regulation Fee income.
- (v) Town Planning underspend £268,000 – staff vacancies, recruitment freeze and reduced advertisement costs.
- (vi) On Street Parking underspend £99,000 – reduced enforcement contract costs as a result of lower than anticipated inflationary increases.
- (vii) Road Safety underspend £96,000 – due to staff vacancies and freeze on recruitment.
- (viii) Directorate underspend £72,000 – staff vacancies and freeze on recruitment.
- (ix) Structural Maintenance underspend £58,000 – highway structures breakdown maintenance works not required.

- **Director of Open Spaces £88,000 overspend:**

Overspend as a result of exceptional use of specialist agency staff to ensure the City's statutory obligation for raising and maintaining the Bridge continued.

- **The City Surveyor £74,000 underspend:**

Underspend mainly due to reduced requirement for reactive works at the car parks.

3. Director of Built Environment central risk underspend of £273,000 comprises of the following most significant variations:
 - (i) Off-Street Parking underspend £230,000 – increase in transfer required from the Parking Reserve Account as a result of an overall increase in local risk operating costs.
 - (ii) Highways underspend £172,000 – increase in transfer required from the Parking Reserve Account for R&M works costs which are eligible to be met by the Parking Reserve Account.
 - (iii) Bridge House Estates underspend £51,000 – consultant works for the Thames Bridges not required.
 - (iv) On-Street Parking overspend £99,000 – increase in bad debt provision and additional transfer to the Parking Reserve Account £4,233,000, largely offset by increase in parking meter, suspensions and PCN income £4,134,000.
 - (v) Town Planning overspend £72,000 - reduction in planning application fee income.
4. The Cyclical Works Programme (CWP) underspend of £413,000 was mainly due to delays in projects being started at Shoe Lane Bridge (undertaken by DBE) and Wood Street Lift refurbishment. The CWP does not form part of the City Surveyor's local risk budget and any variances will be carried over to 2020/21. This is a three-year rolling programme reported to the Corporate

Asset Sub Committee (CASC) quarterly, where the City Surveyor will report on financial performance and also phasing of the projects. Under the governance of the programme, variances on budgets are adjusted for the life of the programme to allow for the completion of projects which span multiple financial years

5. The £163,000 underspend on capital and support services is mainly due to decrease in support Services and IS costs recharged from Finance Committee
6. Appendix A1 and A2 provides a more detailed comparison of the local and central risk outturn against the final budget, including explanation of significant variations.
7. Appendix B shows the movement from the 2019/20 original budget and the latest approved budget (as reported to your Committee in January 2020) to the final budget.

Local Risk Carry Forward to 2020/21

8. The Director of the Built Environment has a local risk overspending of £290,000 on the activities overseen by your Committee. The Director had net local risk overspendings totalling £31,000 on activities overseen by other Committees and after adjusting for the unspent portion of carry forwards from 2018/19, has a total overspend of £336,000. Any overspend on a Chief Officer's local risk budget is required to be carried forward and recovered from within the department's budget allocation for the following year unless specifically waived by the Finance Committee. Subject to agreement by the Chamberlain in consultation with the Chairman and Deputy Chairman of the Resource Allocation Sub Committee, it is proposed to reduce the carry forward overspend by £100,000 to take into account the DBE contribution to the Climate Action Strategy. An overspend of £236,000 will therefore be carried forward to be repaid in 2020/21, and the Director is working to identify savings to offset this additional budget pressure.
9. The Director of Open Spaces had a local risk overspend of £88,000 on activities overseen by your Committee, this being the result of exceptional use of specialist agency staff to ensure the City's statutory obligation for raising and maintaining the Bridge continued. The Director also had local risk underspendings totalling £554,000 on activities overseen by other Committees. The Director is proposing that £358,000 of his eligible underspend of £466,000 be carried forward, none of which relates to activities overseen by your Committee.

Thames Bridges' Repairs, Maintenance and Major Works Fund

10. The Bridges Repairs, Maintenance and Major Works Fund is operated to provide sufficient resources to meet the maintenance costs of the five bridges. The 50-year programme of works undertaken by the City Surveyor and the Director of the Built Environment to be met by the fund was agreed by your Committee in January 2020. The breakdown is shown overleaf in Table 2.
11. The actual expenditure for 2019/20 was £2.229m against a budget of £4.029m, representing an underspend of £1.8m.

Table 2: Thames Bridges Repairs, Maintenance and Major Works Fund Analysis of Outturn for 2019/20				
	Final Budget £'000	Outturn £'000	Variance Better/ (Worse) £'000	Variation Better/ (Worse) %
Blackfriars Bridge	(237)	(48)	189	79.6
Southwark Bridge	(56)	(67)	(11)	(19.8)
London Bridge	(2,039)	(354)	1,685	82.6
Millennium Bridge	(195)	(127)	68	34.9
Tower Bridge	(1,502)	(1,633)	(131)	(8.7)
Total	(4,029)	(2,229)	1,800	44.7

12. The main reasons for the £1.800m underspend are set out below:

- **Blackfriars Bridge** – underspend as a result of delays in parapet refurbishment works due to restricted access, contractual issues delaying distribution board replacement and issues in arranging access with TfL for column testing.
- **London Bridge** – underspend as a result of delays to the Bridge waterproofing /bearing replacement works due to Cadent gas work. Spend is now expected in 2020/21.
- **Millennium Bridge** – underspend due to scour protection works and additional survey work being re-programmed around the Thames Tideway works.
- **Tower Bridge** – overspend due to large scale replacement of existing Bridge Lighting luminaires as a result of failures with the lighting units, cabling/wiring and in some instances fixings which were originally installed for the 2012 Olympics.

13. Designated funds relevant to the BHE Bridges are now managed as follows:

- **Bridges Repairs** – representing funds required to maintain the bridges for the next 5 years. The balance held at each financial year-end will be adjusted in line with the maintenance reports provided by the specialist structural engineers contracted by DBE to advise on matters relating to the Bridges owned by BHE, to ensure sufficient funds have been ring-fenced for this purpose.
- **Bridges Replacement** – representing funds set aside for the future rebuild of the bridges, based on the present value of estimated future costs and adjusted for increases in construction costs.

14. The value of the designated funds as at 31 March 2019 was:

Bridges Repairs	£34.0m
Bridges Replacement	£104.5m

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Appendices:

Appendix A1 – Planning & Transportation Committee – Comparison of 2019/20
Local Risk Revenue Outturn with Final Budget

Appendix A2 – Planning & Transportation Committee – Comparison of 2019/20
Central Risk Revenue Outturn with Final Budget

Appendix B – Planning & Transportation Committee – Movement in 2019/20
Latest Approved Budget to Final Budget

Planning & Transportation Committee**Comparison of 2019/20 Revenue Outturn with Final Budget – Local Risk**

	Final Budget £'000	Revenue Outturn £'000	Variation Better/ (Worse) £'000	Variation Better/ (Worse) %	Notes
LOCAL RISK					
Director of Built Environment					
City Fund					
Town Planning	(2,742)	(2,474)	268	9.8	1
Planning Obligations	(1)	0	1	100.0	
Transportation Planning	(659)	(628)	31	4.7	
Directorate	(1,226)	(1,154)	72	5.9	2
Road Safety	(445)	(349)	96	21.6	3
Street Scene	(70)	(70)	0	0.0	
Building Control	(291)	(369)	(78)	(26.8)	4
Structural Mtce/Inspections	(508)	(450)	58	11.4	5
Highways	(3,268)	(3,487)	(219)	(6.7)	6
Traffic Management	1,253	889	(364)	(29.1)	7
Off-Street Parking	335	101	(234)	(69.9)	8
On-Street Parking	(3,417)	(3,318)	99	2.9	9
Drains & Sewers	(230)	(249)	(19)	(8.3)	
Committee Contingency	0	0	0	0.0	
Total City Fund	(11,269)	(11,558)	(289)	(2.6)	
Bridge House Estates					
Thames Bridges	(273)	(274)	(1)	(0.4)	
Total Director of Built Environment	(11,542)	(11,832)	(290)	(3.0)	
Director of Open Spaces					
Tower Bridge	(1,772)	(1,860)	(88)	(5.0)	10
The City Surveyor*					
Town Planning	(6)	(1)	5	83.3	
Highways	(90)	(98)	(8)	(8.9)	
Off-Street Parking	(199)	(122)	77	38.7	
Total City Surveyor	(295)	(221)	74	25.1	11
TOTAL LOCAL RISK	(13,609)	(13,913)	(304)	(2.2)	

(*excludes the Cyclical Works Programme)

Reasons for significant Local Risk variations

1. **Town Planning** – underspend mainly due to reduced salary costs as a result of vacancies and a freeze on recruitment £268,000.
2. **Directorate** – underspend due to reduced salary costs as a result of vacancies and a freeze on recruitment £72,000.
3. **Road Safety** – underspend mainly due to reduced salary costs as a result of vacancies £81,000 and reduced work costs for traffic management schemes £13,000.
4. **Building Control** – overspend due to shortfall in income for Building Regulation fees, approvals in principle income and fire risk assessments £204,000, this has been partly offset by salary underspends £108,000 and other running costs £18,000.
5. **Structural Maintenance** – underspend mainly due to reduced highways structures breakdown maintenance works £58,000.
6. **Highways** – overspend due to:
 - Shortfall in staff cost recovery from capital projects due to vacancies £264,000.
 - overspend in repairs & maintenance works due to increases in indices within the contract for the first time, increase in carriage resurface works and undertaking repairs to old Lanterns £241,000.
 - This was partly offset by staff vacancies £142,000, reduced electricity costs £132,000 and other running expenses £12,000.
7. **Traffic Management** – overspend due to shortfall in road closure fees, hoarding and scaffolding licences and road permitting fees £473,00. This was partly offset by salary underspends £70,000 and reduced advertising costs £39,000.
8. **Off Street Parking** – overspend mainly due to shortfall in car parking fees £234,000 due to cancellation of a large annual season ticket holder, drop-in general parking activity and impact of the lockdown.
9. **On Street Parking** – underspend mainly due to reduced enforcement contract costs as a result of lower inflationary and London Living wage increases than anticipated £99,000.
10. **Tower Bridge Operational** – overspend as a result of exceptional use of specialist agency staff to ensure the City's statutory obligation for raising and maintaining the Bridge continued.
11. **City Surveyor** -underspend of £74,000 mainly due to reduced requirement for reactive works at the car parks.

Planning & Transportation Committee**Comparison of 2019/20 Revenue Outturn with Final Budget – Central Risk**

	Final Budget £'000	Revenue Outturn £'000	Variation Better/ (Worse) £'000	Variation Better/ (Worse) %	Notes
CENTRAL RISK					
Director of Built Environment					
City Fund					
Town Planning	690	618	(72)	(10.4)	12
Street Scene	(246)	(246)	0	0.0	
Highways	2,179	2,351	172	7.9	13
Off-Street Parking	421	651	230	54.6	14
On-Street Parking	3,769	3,670	(99)	(2.6)	15
Structural Maintenance	60	36	(24)	(40.0)	
Committee Contingency	(15)	0	15	100.0	
	6,858	7,080	222	(3.2)	
Bridge House Estates					
Thames Bridges	(125)	(74)	51	40.8	16
TOTAL CENTRAL RISK	6,733	7,006	273	(4.1)	

Reasons for significant Central Risk variations

12. **Town Planning** – overspend due to shortfall in planning fee, planning performance agreements and land charges income £132,000. This is offset by additional pre-planning application advice income and administration costs £59,000.
13. **Highways** – Underspend due to increase in funding transfer required from the Parking Reserve Account for eligible repairs and maintenance works as these costs were higher than anticipated.
14. **Off-Street Parking** – Underspend due to increase in funding transfer required from the Parking Reserve Account as a result of increase in local risk operating costs due to shortfall in car park income.
15. **On-Street Parking** – Overspend due to an increase in bad debt provision and transfer of funding to the Parking Reserve Account £4,233,000 which has been off-set by increase in parking meter, suspensions and PCN income £4,134,000.
16. **Bridge House Estates** – underspend on consultant fee work not required for the Thames Bridges.

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Planning & Transportation Committee**Movement in 2019/20 Latest Approved Budget to Final Budget**

Service Managed	Original Budget 2019/20 £'000	Latest Approved Budget* 2019/20 £'000	Final Budget 2019/20 £'000	Movement LAB to Final Budget £'000	Notes
CITY FUND					
Town Planning	(2,899)	(3,249)	(3,157)	92	1
Transportation Planning	(1,888)	(1,722)	(1,727)	(5)	1,2,3
Planning Obligations	0	0	(1)	(1)	1
Directorate	0	0	0	0	
Road Safety	(543)	(542)	(555)	(13)	3
Street Scene	(70)	(70)	(316)	(246)	2
Building Control	(730)	(773)	(760)	13	1
Structural Maintenance/Inspections	(129)	(228)	(230)	(2)	1
Highways	(9,306)	(10,357)	(10,530)	(173)	1,2
Rechargeable Works	0	0	0	0	
Traffic Management	890	866	857	(9)	4
Off-Street Parking	0	0	0	0	
On-Street Parking	0	0	(38)	(38)	1,4,5
Drains & Sewers	(389)	(384)	(384)	0	
Contingency	147	(15)	(15)	0	
TOTAL CITY FUND	(14,917)	(16,474)	(16,856)	(382)	
BRIDGE HOUSE ESTATES					
Bridges	(2,610)	(1,416)	(1,419)	(3)	1
Tower Bridge Operational	(2,457)	(2,508)	(2,489)	19	6
TOTAL BRIDGE HOUSE ESTATES	(5,067)	(3,924)	(3,908)	16	
TOTAL	(19,984)	(20,398)	(20,764)	(366)	

*Latest Approved Budget as reported to your Committee on 28th January 2020.

Notes:

- Overall, there was budget decrease of £88,000 across divisions of service for internal legal fees. The new charging regime is a shift from the current recharge method within the recharge risk to an internal trading account where the costs are charged to local risk based on the actual time recorded for legal support.
- Supplementary Revenue project budget increase of £445,000 relates mainly to Cultural Hub Public Realm Projects and St Pauls Area Enhancement Strategy Cultural Hub Project.
- Budget virement of £13,000 from Transportation Planning to Road Safety for Traffic Management Road Safety works.
- Film Liaison Staff costs budget adjustment £62,000.
- Transfer to reserve adjustment £34,000.
- Open Spaces Directorate recharge adjustment £19,000.

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Committee(s): Planning & Transportation Committee	Date(s): 14 July 2020
Subject: 2019/20 Business Plan Update Q4	Public
Report of: Director of the Built Environment	For Information
Report author: Elisabeth Hannah	

Summary

This report sets out the progress made during Q4 of the 2019/20 Departmental Business Plan. This report continues to build on our new approach to share high level data, awards and results as infographics (Appendix 1), you will find further details and additional information at Appendix 2.

This is the fourth infographic update provided to this Committee, and development continues alongside work of our colleagues in Town Clerks team, and the Corporate Performance Framework.

Recommendation

Members are asked to:

- Note the report and appendices.

Main Report

Background

1. The 2019/20 Business Plan of the Department of the Built Environment was approved by this committee on 18 March 2019.

Current Position

2. Appendix 1 shows our Infographic approach to presenting departmental high-level data, awards and results. The work of the department continues to support City of London's Corporate Plan.
3. Appendix 2 gives more details on the infographic, as well as measuring outputs alongside our 19/20 high level objectives as outlined in the Departmental 2019/20 Business Plan.
4. Members feedback continues to shape these reports to provide valuable key strategic updates to Members.

Key Updates

5. Our climate resilience team have been working with Buro Happold to look at scientific data and climate projections as part of establishing information on climate resilience measures required for the City as part of the Corporations Climate Action Strategy preparation. This work is due to be presented to Members on the 2nd July and then go to relevant Committees the following week before going out for Public Consultation during July 2020.
6. The City's District Surveyors team are working with HSE (Health & Safety Executive) and MHCLG (Ministry of Housing, Communities and Local Government's) to advise on implementation of new building control standards and the Building Safety Regulator which will have a major impact on the way the building control system operates.
7. Gordon Roy was voted in as Junior Vice President of the London District Surveyors Association.
8. Mark Pundsack has joined an Institution of Structural Engineers steering group looking at setting up a specialist register of structural checking engineers, on behalf of MHCLG. This is to drive up competence within the checking and review of high risk structures.
9. Mark has also joined the '*Future of Building Control Working Group*' which has been established to make recommendations to MHCLG about developing detailed building control competency. Government aims to regulate the Building Control sector much more strictly and this group aims to recommend a system of mandatory competence for Building Control Officers.
10. Following on from the improvements in the City's Lighting, Carter Lane has benefitted from the installation of Heritage lanterns that have a warmer light

source which save energy and can be dimmed, enhancing the look and feel of the area.

11. The City of London's Wind Microclimate Guidance won the Mayor's Award for Sustainable & Environmental Planning at London First's Building London Planning Awards 2020.
12. The Secure City Programme (SCP) is a joint programme between the City Corporation and the City of London Police that seeks to enhance the security of the Square Mile and provide benefits in terms of transport planning & monitoring by upgrading out-of-life CCTV camera and supporting systems as well as adding coverage where proportionate and appropriate. Additional key SCP elements including integration with wider policing security management systems and establishing the new, permanent Joint Command & Control Room. The programme was approved by relevant Committees in March with the appointment of DBE Director as Single Responsible Officer for the Programme.
13. The Department continues to work closely with colleagues in the Town Clerk's Department to develop the new corporate performance framework (CPF). This new approach to data management and KPIs will be rolled out across the Corporation and is currently in development. DBE are currently reviewing our data, KPIs and other sources of information so we can better provide assurance to Members that we are delivering our objectives.

Covid 19

14. The Department are represented on the Public Services Silver Group, with a remit including Planning and Construction, Highways and Transportation and Cleansing. The Director of the Department of the Built Environment also sits on the organisation Gold group. Regular Bronze and Silver meetings are being held, and Members have been fully engaged with the phased work being done on the highways.
15. Officers, agents and applicants quickly adapted to MS Teams meetings and officers are now keen to explore the facilities that MS Teams offers to enable improved working practices in the 'new normal'. Officers have also adapted well to home working in often challenging context of limited workspace and balancing childcare and home schooling. Officers have put measures in place to ensure existing service standards are maintained.
16. We have introduced new systems and procedures including Press, Site Notices and neighbours consultation to maintain a continuous service post Lockdown so departmental services continued to operate as normal and maintain close liaison and co-ordination with the CPA and other key stakeholders.
17. Where possible 'virtual site visits' are being undertaken by both Building Control and Planning Officers, and strict protocols and procedures being agreed for any visits requiring officers to go to premises.
18. There has been a significant decline in new planning applications being received and this decline mirrors the decline in London and the UK. However, the number of pre-application negotiations on major schemes currently underway are at an

almost unprecedented high level. These schemes collectively have the potential to transform areas such as Fleet Street as well as transforming the City's skyline in the City Cluster. Officers are working in project teams to progress these negotiations with pace through the Planning Performance Agreement process. This intense activity at pre application stage is a clear sign of confidence in the City's future amongst developers and investors. These major schemes will appear on Committee agendas from the Autumn onwards.

19. Priorities for Department of Built Environment as we move out of lockdown

- Steps to address budget deficits at each of the Divisions to maintain realistic expectations on income streams.
- To facilitate and support social distancing for the City to safely return to the workplace and for residents, through on-street measures to provide additional space for people walking and cycling, including changes to street operation, reallocation of carriageway space and street closures.
- To adapt cleansing and waste services in line with increased footfall
- To support the development and construction industry.
- To progress and implement longer term strategies for sustainable growth in the City.

Equalities

20. In Q4 the DBE undertook an Equalities self-audit for reporting to the Corporate Equalities Board, key highlights include:

- The DBE has three staff network leads, Holly Smith (WiN), Claire Callan-Day (City Pride, joint chair) and Zahur Khan (BAME). Our staff are encouraged to join a staff network and be involved in promoting diversity and being an ally to those who need it.
- Our apprentices deliver a programme of fundraising for The Stephen Lawrence Trust, this not only builds their confidence, professional and team skills but also supports those who are looking for a career in the Built Environment industry and build social responsibility as they start careers.
- Cross department/staff network events are supported by SLT. In 2019, a BAME/City Pride/DBE event was held with external speakers who delivered and encouraged discussion on the subject of inspiration. In March, a City Pride/Apprentice Network/DBE event saw guest speaker Shaun Dellenty speak with our apprentices about inclusion, diversity and workplace behaviours; apprentices also donated items for the Hackney foodbank.

Staff Development

21. The DBE Talent Strategy, launched in 2018, saw completion of the Release Your Potential programme (grade A-C) and Talent Management programme (D-F), and launched the ILM7 Leadership programme (F Plus). These programmes brought DBE staff together with colleagues from the City Surveyor, Barbican, and Chamberlains.

22. These programmes provide staff the opportunity to collaborate on projects, build confidence, leadership skills and relationships within the department, and beyond, along with gaining a recognised national qualification (which was important to the participants).
23. Our apprentices are the first step in our talent programme, and we work with the apprentices to enable them to be the best version of themselves through a varied programme of development, mentoring and self-reflection. In 2019/20 we recruited our first Building Control degree-level apprentice part of a national programme run by the University of Wolverhampton in association with the LABC (Local Authority Building Control); we also appointed a Town Planning degree-level apprentice who will be studying at London Southbank University. These apprenticeships are four/five years long but form a key part of our workforce plan and address national skills shortages.
24. Our apprentices build social responsibility skills and work collaboratively with a series of fundraising events; build leadership and negotiation skills with the quarterly Apprentice newsletter and are currently preparing to launch a reverse mentoring scheme with the support of our colleagues in L&D.

Finance Implications

25. This report links to the outturn report prepared by the Chamberlain presented to this Committee on 14 July 2020.

Appendices

- Appendix 1 – Infographic
- Appendix 2 – Supporting Data

Background Papers

DBE Business Plan 2019/20
Transport Strategy Update Q4
DBE Outturn Report 2019/20


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The Wind Microclimate Guidelines won the RTPI Award for Excellence in **Plan Making Practice**




The City of London Zero Emission Fleet won the **London Transport Award** for contribution to sustainable transport




Local Plan was approved by **Planning & Transportation Committee** in March for pre-submission consultation





Beech St Zero Emission Street trial scheme went live in March 2020

Quarter 4 street lighting down **30%** from last year, **77%** lower than 2 years ago





Heritage lanterns installed at Carter Lane

Citywide anti-idling **Traffic Management Order** approved at March Planning & Transportation Committee



Winter campaign to improve compliance with the **20mph** speed limit delivered in partnership with the City Police

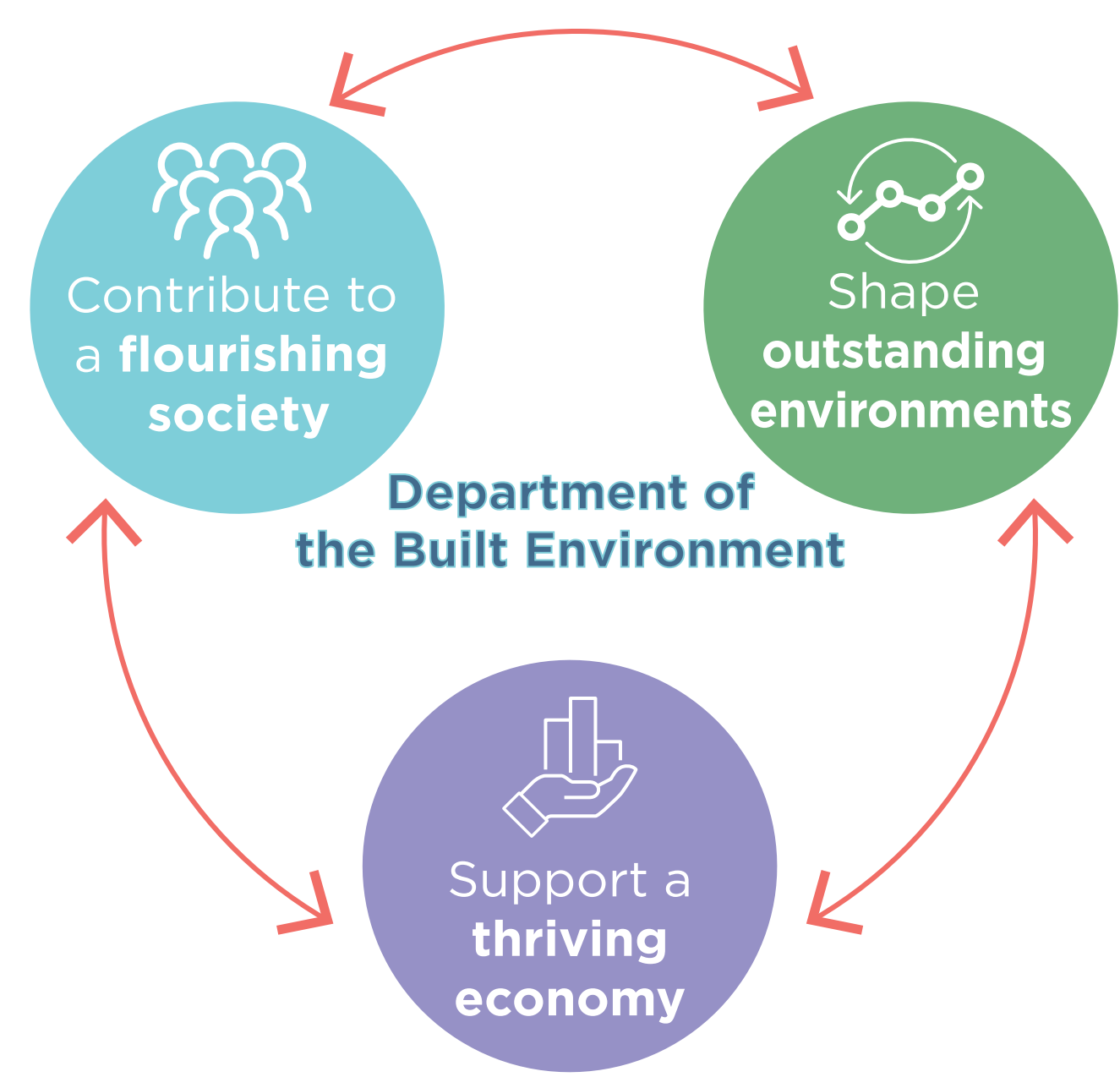




- Hosted the Central London North Flood Risk Partnership Meeting, engaging with 5 other boroughs
- Commissioned Buro Happold to carry out Climate Resilience Adaptive Pathways Study, due for completion July 2020

Construction began in **January 2020** on a footway widening scheme at **Bank Junction** Due for completion **July 2020**






Quarter 4 street lighting energy usage down **29%**, **31%** lower than 2 years ago






Secured Mayor's Air Quality Funding to support the delivery of the City Cluster **Zero Emission Zones**

Planning applications determined within agreed timescales:



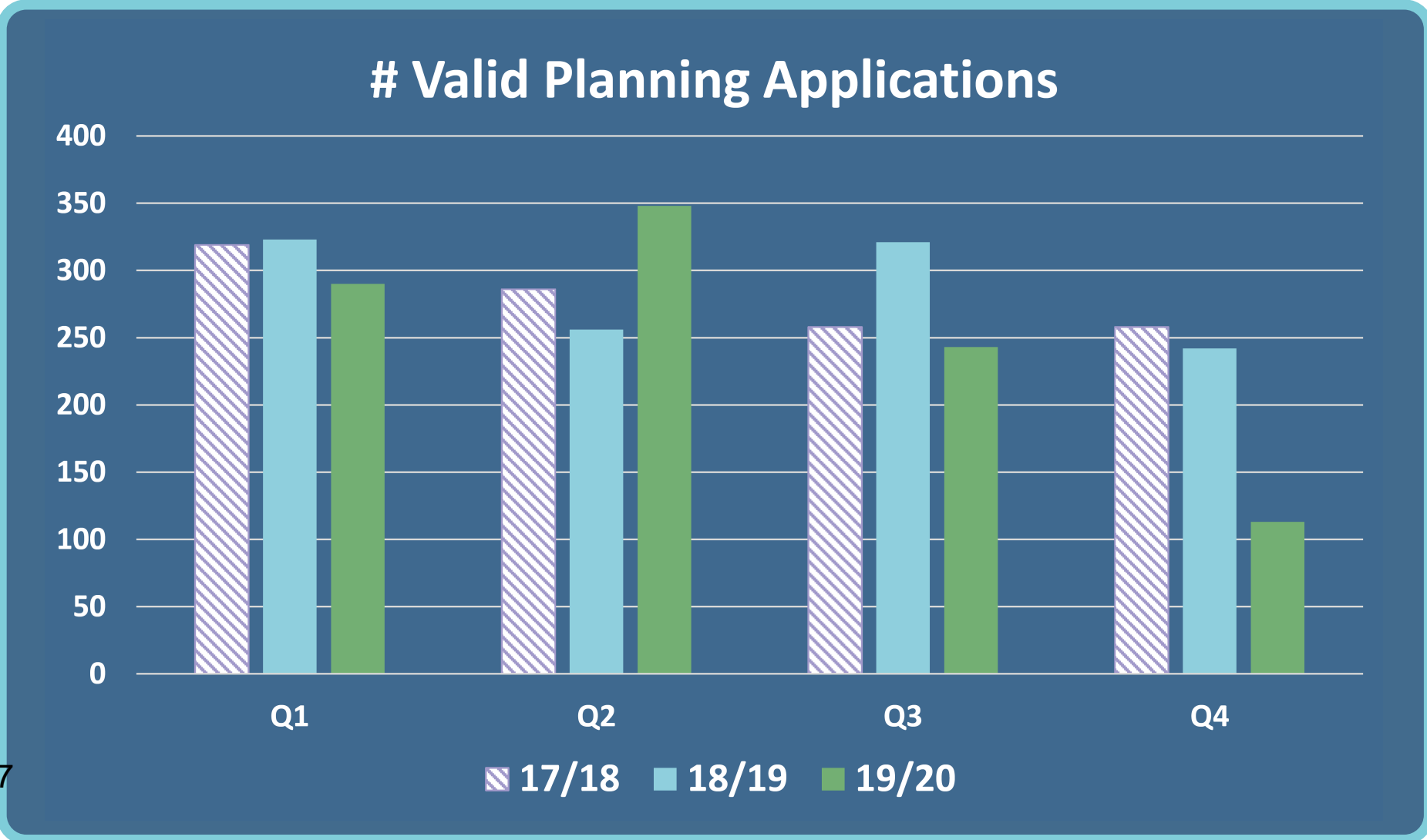
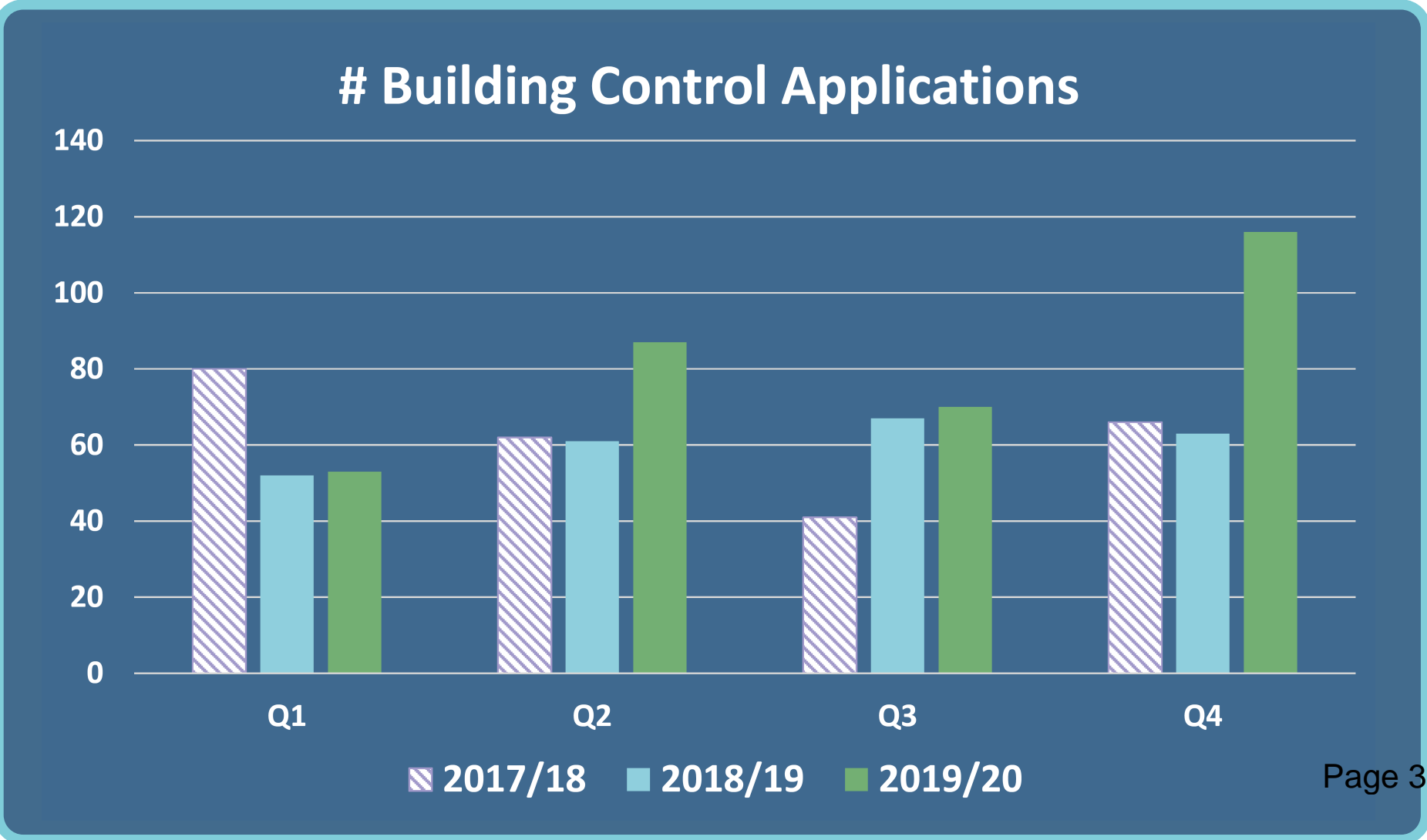
100% - Major (Target 100%)
97% - Minor (Target 65%)
93% - Other (Target 75%)



CoL Properties to be offered to mobile operators for deployment of 5G equipment.
 Deployment expected Q4 2020

Citywide anti-idling **Traffic Management Order** approved at March Planning & Transportation Committee





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DBE Top Level Objectives	Activity	Target (if applicable)	Progress Update Quarter 3 2019/20
Advancing a flexible infrastructure that adapts to increasing capacity and changing demands. <i>(Shape outstanding environments)</i>	Improve efficiency and effectiveness of lighting		<ul style="list-style-type: none"> • Quarter 4 carbon usage down 30% from last year, 77% lower than 2 years ago • Quarter 4 street lighting energy usage down 29%, 31% lower than 2 years ago • Due to COVID-19, in the latter part of quarter 4 all the Central Management System (CMS) enabled lights were dimmed to 30%. • Over 100 lanterns have been removed across the City to fit with new lower strategy levels, while maintaining integrity of CMS mesh network. • Carter Lane has benefitted from the installation of Heritage lanterns that have a warmer light source which save energy and can be dimmed, enhancing the look and feel of the area.
	Electric Vehicle charging infrastructure		<ul style="list-style-type: none"> • Installation of 6 new rapid EV charge points in a hub at Baynard House completed March 2020. Operational start date is dependent on UKPN completing installation of electricity sub-station and CoL completing ventilation requirements. This will be delayed due to COVID-19, awaiting confirmation of new delivery timetable.




Promoting the construction of high quality, inspiring buildings which attract diverse uses and users. <i>(Shape outstanding environments)</i>	City Plan 2036		Local Plan was approved by Planning & Transportation Committee in March for pre-submission consultation.																			
	Planning Applications		Decisions Made within agreed timescales <table border="1"> <thead> <tr> <th>Quarter</th><th>Major (target 100%)</th><th>Minor (target 65%)</th><th>Other (target 75%)</th></tr> </thead> <tbody> <tr> <td>1</td><td>3 of 3 (100%)</td><td>56 of 59 (95%)</td><td>66 of 67 (99%)</td></tr> <tr> <td>2</td><td>3 of 3 (100%)</td><td>60 of 64 (94%)</td><td>86 of 87 (99%)</td></tr> <tr> <td>3</td><td>3 of 4 (75%)</td><td>59 of 62 (95%)</td><td>109 of 119 (92%)</td></tr> <tr> <td>4</td><td>1 of 1 (100%)</td><td>39 of 42 (93%)</td><td>68 of 70 (97%)</td></tr> </tbody> </table>	Quarter	Major (target 100%)	Minor (target 65%)	Other (target 75%)	1	3 of 3 (100%)	56 of 59 (95%)	66 of 67 (99%)	2	3 of 3 (100%)	60 of 64 (94%)	86 of 87 (99%)	3	3 of 4 (75%)	59 of 62 (95%)	109 of 119 (92%)	4	1 of 1 (100%)	39 of 42 (93%)
Quarter	Major (target 100%)	Minor (target 65%)	Other (target 75%)																			
1	3 of 3 (100%)	56 of 59 (95%)	66 of 67 (99%)																			
2	3 of 3 (100%)	60 of 64 (94%)	86 of 87 (99%)																			
3	3 of 4 (75%)	59 of 62 (95%)	109 of 119 (92%)																			
4	1 of 1 (100%)	39 of 42 (93%)	68 of 70 (97%)																			
Enabling digital connectivity that meets business and lifestyle needs. <i>(Shape outstanding environments)</i>	Fibre providers to complete roll out of Fibre to all 12 CoL housing estates		<ul style="list-style-type: none"> Currently on hold due to Covid-19. Housing Department has halted work due to contractors not social distancing. 																			
	Increase small cell locations		<ul style="list-style-type: none"> Proposals reviewed with Freshwave to discuss 5G small cells rollout. Discussions undertaken with Highways and Comptrollers. Further more in depth proposal required from Freshwave Deployment to begin in Q4 2020 																			

	Increase Wireless / mobile infrastructure		<ul style="list-style-type: none"> City Surveyors appointed Lambert Smith Hampton as Specialist Telecoms Advisor to enable offering of CoL properties to mobile operators for deployment of 5G equipment. Deployment expected Q4 2020/21.
	Openreach provided with Schedule of unknown building ownerships by Q2		<ul style="list-style-type: none"> Completed. City Property Advisory Team continues to work with Openreach to ensure timely roll out to private and CoL investment properties. CoL properties expected to be completed by end of 2020.
<p>Leading and initiating research into microclimate issues for the benefit of London and the UK; to increase our environmental resilience and lead on climate action.</p> <p><i>(Shape outstanding environments)</i></p>	Strengthening our response to environmental and Climate change issues facing the City		<ul style="list-style-type: none"> Commissioned Survey of the City's riverside from Arcadis. (Survey will be carried out by drone in mid-June – delayed due to Covid 19) Hosted the Central London North Flood Risk Partnership Meeting, engaging with Hammersmith, Kensington & Chelsea, Camden, Islington and Westminster councils. Commissioned Buro Happold to carry out Climate Resilience Adaptive Pathways study Finalised Flood Risk Management Strategy Objectives (cycle two 2021-27) for submission to the Environment Agency Developed new website flood risk pages Finalised climate resilience and flood risk section of City Plan 2036 and associated Infrastructure Delivery Plan for Submission. Promotion of resilience agenda internally to CPAT, GIS user group and resilience forums. External discussions with Met Office on climate projections, Thames Water on burst watermain, Environment Agency on TE2100 implementation and Marine Management Organisation on Marine Plans

<p>Creating an accessible and inclusive City which is stimulating, safe and easy to move around in.</p> <p><i>(Contribute to a flourishing society)</i></p>	Increasing pedestrian priority		<ul style="list-style-type: none"> The works at Gresham Street/Old Jewry and Basinghall St are substantially complete. The final parts will be completed when the COVID-19 restrictions are lifted. Works at Gresham Street/Wood Street and Creechurch Lane/Leadenhall St will be completed in 2020/21.
	Bank on Safety		<ul style="list-style-type: none"> Construction began in January 2020 on a footway widening scheme at Bank Junction, which will include wider pedestrian crossings and enhanced cycle advanced stop lines at the junction. Work is due to be completed by July 2020.
	City of London Street Accessibility Standard		<ul style="list-style-type: none"> Delivery has been delayed until 20/21 the research phase is currently on hold due to COVID-19.
<p>Enable a rich and thriving social and cultural offer</p> <p><i>(Contribute to a flourishing society)</i></p>	Curating cultural spaces and cultural programming		<ul style="list-style-type: none"> Following the lockdown due to COVID-19, Culture Mile has re-prioritised its approach to focus on supporting the local communities, residents and businesses part of the Culture Mile network. Key projects in development are the delivery of a greening project in Moor Lane design with local residents, the design of a seasonal stage in London Wall funded by external sponsor, and the development of the Culture Mile branding design for the wider area.
<p>Improving quality and safety of the environment for workers, residents and visitors</p> <p><i>(Contribute to a flourishing society)</i></p>	Beech Street Zero Emission Zone		<ul style="list-style-type: none"> Beech St Zero Emission Street trial scheme went live in March 2020.
	City Cluster Zero Emission Zone		<ul style="list-style-type: none"> Secured Mayor's Air Quality Funding to support the delivery of the City Cluster Zero Emission Zones. Discussion with Transport for London (TfL) and neighbouring boroughs has commenced on the overall approach. Work on the City Cluster Healthy Streets Plan, including traffic modelling and feasibility appraisal will determine the need for further air quality restrictions.

	Improving air quality		<ul style="list-style-type: none"> City-wide anti-idling Traffic Management Order approved at March Planning & Transportation Committee. 				
	All Change at Bank		A Gateway 3 report is being prepared based on the top five options for a 2-3 arm closure at the junction.				
	Vision Zero		<ul style="list-style-type: none"> A Winter campaign to improve compliance with the 20mph speed limit delivered in partnership with the City Police, who are providing extra resource to tackle speeding vehicles. 				
	Increasing number of cyclists in the City		<ul style="list-style-type: none"> <u>Provisional</u> data indicates an 11% increase against 2017 baseline 				
	Building Control			Q1	Q2	Q3	Q4
			Standard 5 week applications decisions within the timescale. (Target 90%)	100% 13 of 13	100% 15 of 15	100% 13 of 13	88% 22 of 25
			8 week applications decisions within the timescale where this has been agreed (Target 90%)	90% 19 of 21	96% 22 of 23	100% 19 of 19	88% 28 of 32
			Completion certificates issued within 10 days of the final inspection of completed building work. (Target 85%)	97% 35 of 36	100% 47 of 47	100% 42 of 42	98% 58 of 59
			<ul style="list-style-type: none"> 				

Awards & Achievements

<ul style="list-style-type: none"> The Wind Microclimate Guidelines won the RTPI Award for Excellence in Plan Making Practice 	
<ul style="list-style-type: none"> The City of London Zero Emission Fleet won the London Transport Award for contribution to sustainable transport 	
<ul style="list-style-type: none"> Shortlisted for the Fleet Electrification Strategy of the Year at the Evie (Electric Vehicle Innovation & Excellence) awards 	

Committees:	Date
City Bridge Trust Planning and Transportation	8 July 2020 14 July 2020
Subject Bridge House Estates Strategy: <i>Bridging London</i> , 2020 – 2045	Public
Report of David Farnsworth, Chief Grants Officer and Director of City Bridge Trust	For information
Report Author Amelia Ehren, BHE Project Manager	

Summary

This report presents the proposed final version of the Bridge House Estates (BHE) Strategy: *Bridging London*, 2020 – 2045. The strategy represents an exciting moment in BHE's long history, providing a framework for all of the charity's activities and outlining the collective impact it wishes to have through its primary and ancillary objects. It also sets out a new vision for the charity which that 'every person in London becomes truly connected' and outlines three new aims to be: catalytic, sustainable and impact driven.

The paper also sets out the next steps required to progress the approval and implementation of the strategy. It seeks Members' endorsement of the strategy, subject to any feedback received being incorporated, for onward approval by Policy & Resources Committee and the Court of Common Council, for the City Corporation as the sole corporate Trustee of the charity.

Recommendations

Members are asked, acting in the charity's best interests for the City of London Corporation as Trustee, to:

- i. Endorse the proposed final version of the BHE Strategy, subject to any feedback received being incorporated, for onward approval by the Court of Common Council; and
- ii. Note the proposed next steps for the Strategy's delivery.

Main report

Background

1. BHE is currently the 7th largest charity in the UK in terms of asset valuation. The City of London Corporation (City Corporation), acting by the Court of Common Council, is the charity's Trustee, with the administration of BHE being undertaken in accordance with the charity's various governing documents, and the City Corporation's usual procedures and governance framework.
2. The "primary object" of BHE is to maintain and support the five bridges crossing the River Thames – London Bridge, Blackfriars Bridge, Southwark Bridge, Tower

Bridge and Millennium Bridge. A cy-près scheme of 1995 permits income surplus to that required for the bridges to be used for broader, and more general, charitable purposes within Greater London (“the ancillary object”). Any available income surplus is distributed through a policy approved by the Court of Common Council and notified to the Charity Commission, following considerable consultation with external and internal stakeholders. The current such policy is ‘Bridging Divides’ delivered by City Bridge Trust (CBT), the charity’s “funding arm”.

3. As part of the BHE Strategic Governance Review, which was initiated to assess how the governance of BHE could be enhanced, it was identified that there was a need to develop a new overarching strategy for BHE, with the purpose of providing a framework for the advancement of both the charity’s primary and ancillary objects.

Current position

4. In late 2019, work began on the development of a BHE overarching strategy which has been led by the BHE Project Manager, in conjunction with the Chief Grants Officer & Director of CBT. The thinking and ambition of the scope, purpose and measures of success of the proposed Strategy, attached at **Appendix 1**, have also been developed in consultation with the BHE officer Task & Finish Group, other key officers within the City Corporation, and with the Chairs and Deputy Chairs of Committees that have responsibility for the discharge of BHE functions.
5. The Strategy seeks to provide a framework for all of BHE’s activities and outlines the collective impact the charity seeks to achieve through the charity’s maintenance and support of the five Thames bridges, and through its further charitable funding activities delivered in the name of CBT. The proposed Strategy highlights BHE’s commitment to London and Londoners through its newly defined vision towards a future where ‘*every person in London becomes truly connected*’. By this, the charity means it wants to see a flourishing society where people are physically connected by world-class sustainable bridges and connected socially and digitally through thriving communities that have access to a diversity of social, cultural and economic opportunities. Ultimately, the Strategy outlines the positive and sustainable role that BHE intends to have in bridging and connecting London, for the benefit of Londoners today and generations to come.
6. The vision, aims and length of the proposed Strategy articulate a high level of ambition for the charity, which is built upon all that BHE has learned and achieved over its more than 900-year history and through its relationship with the City Corporation as its Trustee. The benefits of BHE having the City Corporation as its sole Trustee have been recognised in the development of this Strategy and will be central to its implementation.

Next steps

7. Members are asked to review, discuss and endorse the proposed final version of the BHE Strategy: *Bridging London* at **Appendix 1**, for onward approval by the Policy & Resources Committee and the Court of Common Council for the City Corporation as Trustee of the charity. Any feedback received today will be

incorporated before the Strategy is presented for approval, following the timetable set out below.

Committee	Date	Purpose
Policy & Resources	24 September 2020	For decision
Court of Common Council	8 October 2020	For decision

8. It is the intention that a high-level implementation plan will also be presented alongside the proposed final version of the Strategy to the Policy & Resources Committee and the Court of Common Council. This will outline the steps that will be taken in the first year of the Strategy in pursuit of the aims and vision and will include high-level measures. The high-level implementation plan will also include details of how the Strategy will be communicated effectively both internally and externally.
9. If the Strategy is approved, further time and resource will be dedicated to further develop a more detailed implementation plan for the Strategy. For example, this will include details of the review cycle that will be implemented over the course of the 25-year strategy, to ensure that the Strategy remains relevant and aligns with the development of CBT's funding strategy which is reviewed every five years.

Corporate and Strategic Implications

10. A charity of the size of BHE would be expected to have in place an over-arching strategic plan for the charity's administration and vision. This proposed Strategy, which is before Members for consideration, therefore achieves one of the objectives of the BHE Strategic Governance Review, namely, to enhance the governance of the charity and to align it with best practice in the sector. The Strategy sets out a framework for all of BHE's activities and is supported at an operational level by several of the charity's other existing strategies and plans, including its: Bridge Replacement Strategy, 50-year Bridge Maintenance Plan, charitable funding strategy 'Bridging Divides', Philanthropy Strategy and the developing BHE Investment Strategy.
11. The Strategy is also supportive of, and supported by, the vision set out within the City Corporation's Corporate Plan (CP) for 2018-23 and reinforces the CP Outcomes 3, 4, 5, 9, 11 and 12 as these are considered by officers to be aligned with outcomes which are in the best interest of the charity to support. Similarly, the BHE Strategy is also supportive of, and supported by, a number of the City Corporation's strategies including the Responsible Business Strategy 2018-23 and the developing Climate Action Strategy.
12. Any learning and/or synergy between the City Corporation's own strategies, and those of BHE, will continue to be explored as relevant to the charity's own objects and activities, and always having regard to what it is in the charity's best interests.
13. Security implications: there are no direct security implications for this overarching Strategy.

14. Financial implications: funding for the development of the Strategy is within already allocated resources. Financial resources may be required to implement certain actions outlined in the proposed Strategy. Where appropriate, it is proposed that funding for key activities in the first year of implementation are met by the BHE Strategic Review Fund. Any future funding requirements in support of the 25-year Strategy will be considered as part of the regular budget setting process.
15. Equalities and resources implications: A test of relevance was conducted and indicated that a full EQIA was not needed.

Conclusion

16. Members are asked to endorse the proposed BHE Strategy: *Bridging London* at **Appendix 1**, for onward approval by the Court of Common Council for the City Corporation acting in its capacity as Trustee of the charity. The Strategy is a key outcome for the BHE Strategic Governance Review, which will support the charity in enhancing and demonstrating its impact and reach across London, by working towards its vision of a future where '*every person in London becomes truly connected*'.

Appendices

- Appendix 1 – BHE Strategy, Bridging London 2020 – 2045.

Amelia Ehren

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Bridge House Estates Strategy: *Bridging London* 2020 - 2045

Charity no: 1035628

Author: Amelia Ehren, BHE Project Manager



Foreword

On behalf of Bridge House Estates (BHE)¹, we are delighted to share the charity's new 25-year strategy, *Bridging London*. This strategy represents an exciting time in BHE's long history, providing a framework for all of the charity's activities and outlining the collective impact it seeks to have, firstly through its maintenance and support of five of London's most iconic Thames bridges (Tower Bridge, London Bridge, Southwark Bridge, Millennium Bridge and Blackfriars Bridge) and also through its further charitable funding and activities, aimed at tackling inequality and disadvantage across Greater London.

Over more than 900 years, BHE's role and value in supporting London's physical and community infrastructure has remained integral to London – even as the City of London, and Greater London itself, has been transformed. The charity's bridges are significant and iconic landmarks; whilst they may just be bridges to some, they are so much more to millions of people in London, the UK, and beyond. They are hubs of connectivity, enabling people, ideas and information to move across physical, virtual and digital boundaries. They are part of London's communities and culture. They are symbols of London's history and beacons for its future. Beyond its support for the bridges, in the last 25-years, BHE has also supported Londoners experiencing disadvantage and marginalisation to thrive through the distribution of over £400m of charitable funding, delivered in the name of City Bridge Trust. BHE has always existed, and continues to exist, for the benefit of London and is anchored by the needs of London's communities – whom it inclusively defines as anyone that is in the capital at any given moment in time, whether living, working, learning or visiting there².

Recent events, such as the COVID-19 pandemic and the unprecedented impact this has had on the charity sector, across the UK and around the world, have shone a spotlight on the value and importance of community cohesion and resilience. BHE's role, therefore, is more important than ever in bridging London, both in providing world-class infrastructure across the River Thames and in supporting those causes at the heart of London's communities that enable strong social connections. The charity recognises there will be more testing times ahead, but by drawing on the learning from challenges it has faced, such as the devastating terrorist attacks in 2017 and 2019 on and near London Bridge, it will be better prepared to work, proactively and responsively, towards its vision of a truly connected London. BHE's ability to respond to such challenges is supported by its central ethos of collaboration and partnership-working with others.

Bridging London is the result of an in-depth review focused on enhancing the charity's governance, in order to ultimately increase its impact and reach. The review presented BHE with the opportunity to reconsider its future strategic direction and better articulate why it does what it does. BHE will use this strategy to better communicate its story and increase the awareness and understanding of its vision and dynamic impact.

¹ Throughout the strategy, the terms 'we' and 'our' have been used in place of 'Bridge House Estates' [or the City Corporation as Trustee of Bridge House Estates] unless otherwise stated.

² BHE charitable funding, delivered through City Bridge Trust, is for the benefit of the inhabitants of Greater London only.

We hope that this strategy, and BHE's commitment to make it a reality over the next 25-years, will inspire others to join in striving to achieve the charity's vision where *'every person in London becomes truly connected'*.

[Signed by the Lord Mayor and Chief Grants Officer & Director of City Bridge Trust]

Our background

BHE is an historic charity, with its origins lying in ancient bequests of property made over 900 years ago to support and maintain London Bridge in perpetuity. The fund was only permitted to be spent on the maintenance or support of London Bridge, or on replacing it when it became unfit for purpose; although in more recent centuries the charity's objects were widened, and specific powers granted, to allow it to maintain and support additional bridges. BHE has since been administered by the City of London Corporation (City Corporation), which is the charity's corporate Trustee, acting by the Court of Common Council – the organisation's primary decision-making body, consisting of 125 elected Members.

Through the City Corporation's responsible stewardship and governance of the charity, BHE is able to effectively fulfil its charitable objects to this day. Our primary object is to maintain and support five bridges crossing the River Thames. In 1995, our charitable purposes were widened so that after the responsibilities relating to the bridges have been met, we can use any surplus income for the provision of transport for elderly or disabled people in the Greater London area and/or for other charitable purposes for the general benefit of the inhabitants of Greater London. This is known as our 'ancillary object' and activities undertaken in support of this are primarily delivered in the name of City Bridge Trust (CBT) – which is described as our 'funding arm'. Through the activities of CBT, we are London's largest independent funder, currently distributing around £25 million in grants each year to charitable causes across Greater London.

The ability to meet the charity's primary object over the past 900 years, and more recently the ancillary object, has been enabled by the responsible management of our permanent endowment and financial assets. The level of capital growth and income generated, most notably through the rental income from our investment property portfolio, together with the strong performance of our financial investment portfolio, has enabled us to first and foremost meet the needs of the bridges and then to go further to deliver expansively on our 'ancillary object' for the benefit of Londoners.

This focus on London and Londoners has always been at the heart of what we do. We adopt an inclusive definition of Londoners, meaning anyone that is in the capital at any given moment in time – whether living, working, learning or visiting there. Whilst much has changed over the centuries since we were established, we continue to reach out across the capital in many important and diverse ways, anchored in supporting the needs of London and its communities.

Our bridges act as gateways to the City of London (also known as the 'City' or 'the Square Mile') and play a vital role in London's infrastructure – strengthening its character, capacity and connections. Our bridges are also celebrated as important assets, contributing to London's unique sense of place and status as a world-class city. Each and every day, the bridges provide safe passage for tens of thousands of

people crossing the Thames, either by foot or vehicles, whilst offering some of London's most spectacular and unique views. The bridges not only provide physical connections, but also digital connections by supporting London's telecommunications infrastructure – providing City businesses with unparalleled connectivity, speed and resilience. In recent years, the bridges have also played host and neighbour to a number of cultural projects aimed at connecting, celebrating and capturing the spirit of the Thames and its diverse communities, as well as the Thames Tideway Tunnel which aims to clean up the river for the benefit of London.

The iconic, world-renowned, Tower Bridge recently celebrated its 125th year anniversary and continues to strengthen London's cultural, heritage and learning offer. In 2019, Tower Bridge attracted over 800,000 visitors and engaged with nearly 4,000 people through its dynamic learning and community outreach programmes. Tower Bridge is to this day considered an engineering marvel and is arguably one of the most famous and instantly recognisable structures in the world.

Over the last 25 years in delivering our ancillary object, we have further demonstrated our reach and impact beyond the needs of the bridge, through our charitable funding and activities delivery primarily by CBT. Our funding is aimed at improving the lives of Londoners – by working to reduce inequality and foster stronger, more resilient and thriving communities in pursuit of a London that serves everyone. Since 1995, through CBT, we have distributed over £400m of charitable funding across London supporting those most in need and have remained a stable anchor for Londoners.

Introduction

This strategy sets out our vision and aims and outlines our approach to achieving our ambitions over the next 25-years. We are pleased to take a long-term view with our new strategy, showing our commitment to supporting London now and in the future. We are able to do this because this strategy is built upon all that we have learned and achieved over our long 900+-year history and through our Trustee's unique and historic role at the centre of a thriving and outward-looking London served by the charity.

Our charitable objects clearly state 'what' we will do as a charity, but the purpose of this strategy is to clearly outline 'why' we do what we do through the articulation of our new vision, and 'how' we will achieve this through our aims and actions.

This strategy provides a framework for all our work and is supported at an operational level by several other strategies and plans, including our: Bridge Replacement Strategy, 50-year Bridge Maintenance Plan, charitable funding strategy '*Bridging Divides*', Philanthropy Strategy, and Investment Strategy. This strategy is also supportive of, and supported by, the vision set out within our corporate trustee's, the City Corporation's, Corporate Plan for 2018-23 of a '*vibrant and thriving City, supporting a diverse and sustainable London within a globally successful UK*'. Throughout the lifespan of this strategy, we commit to delivering in-depth reviews of our work and strategies to help ensure that we achieve our vision, continue to learn, and are responsive to the needs of the time.

Ultimately, this strategy outlines the positive and sustained role that we intend to fulfil in bridging and connecting London, for the benefit of Londoners today and generations to come.

Our strategy

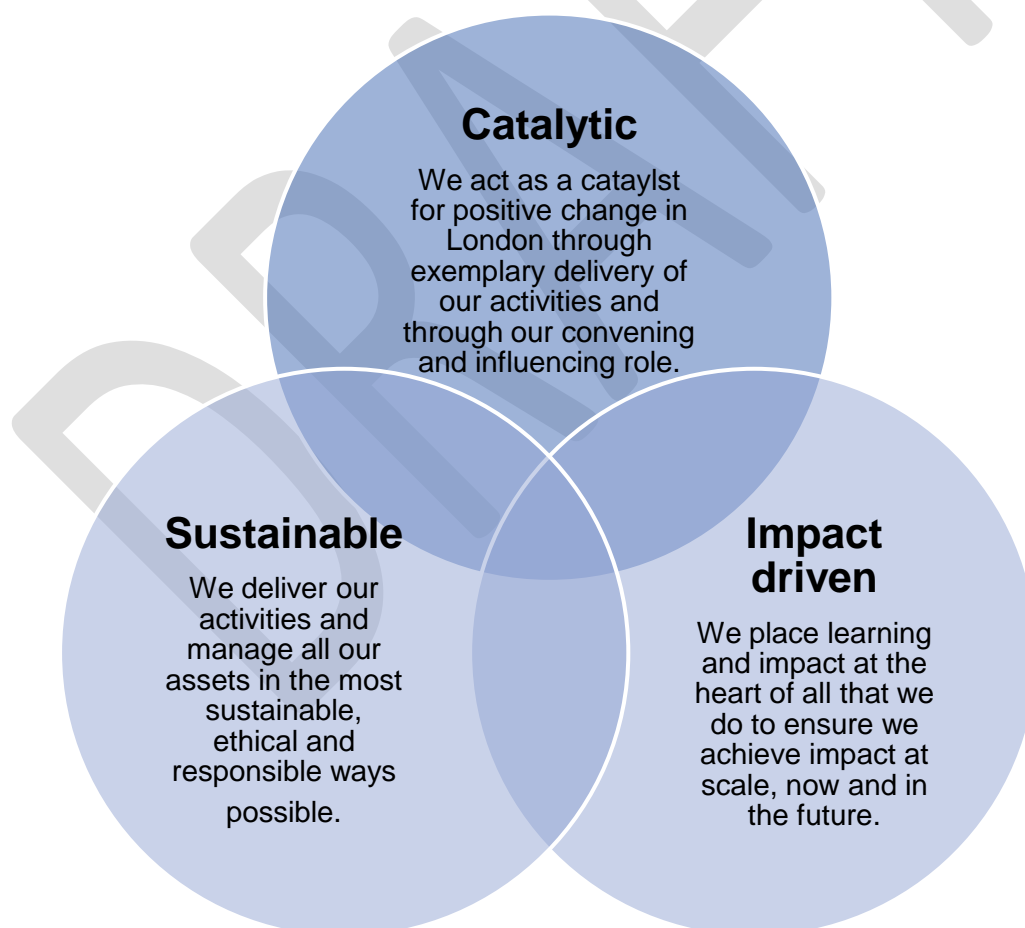
Our vision is that...

‘Every person in London becomes truly connected’

Our vision outlines the change we want to see and explains why we do what do. We want to see a flourishing society, where every person in London is truly connected - physically by world-class sustainable bridges, and connected socially and digitally through thriving communities that have access to a diversity of social, cultural and economic opportunities.

Our aims

Our longevity, diverse charitable purposes, large asset base and historic relationship with our corporate Trustee (the City Corporation), place us in a unique position to achieve our vision. To do this, we will deliver upon our charitable objects by supporting and maintaining our five Thames bridges, and through using any available surplus income to advance our more general charitable purposes. We will meet these objectives by taking a values-led approach of aiming to be a charity that is:



What we will do

This section outlines the next steps that we will take to achieve our vision and aims. We commit to reviewing these actions on a regular basis to ensure that they are bringing us closer to the impact we wish to achieve and the change we want to facilitate in bridging London.

Be catalytic

In an ever-changing society, we must ensure that we remain relevant and find new ways of working to deliver positive change for London and Londoners. At the same time, we recognise that the goal of a truly connected London is not just ours and that there are many other stakeholders and organisations working towards a similar vision, whom we will strive to bring together and work in collaboration with to catalyse change.

To achieve our aim of being catalytic, we will:

- Keep our internal governance structure under review to ensure that we operate effectively and efficiently, and in accordance with charity good governance best practice.
- Deliver world-class bridge engineering management services for all five of our bridges.
- Utilise our expertise in charitable funding to support a reduction in inequality in London and to foster stronger, more resilient and thriving communities.
- Build, sustain and leverage partnerships in order to catalyse greater levels of giving across London.
- Contribute to contemporary debates within the charitable sector on the complex social challenges facing Londoners and amplify the voices of marginalised people and communities in these discussions.
- Take a 'total assets' approach, drawing on our expertise and networks, and that of our Trustee (the City Corporation), across the private, public and charitable and community sectors.
- Demonstrate thoughtful leadership, by using our influence and partnerships to convene others around shared aspirations; whilst at the same time championing diverse perspectives and finding solutions that bring the two together.
- Nurture and tell real stories of change and share our knowledge, learning and progress with others.

Be sustainable

We will place sustainability at the heart of everything we do, with the aim of achieving lasting sustainable impact. By this we mean managing our financial assets in a responsible manner, which enables us to deliver activities, for the bridges and through CBT, that produce positive social, environmental and economic impacts for our beneficiaries which can be maintained in the long-term.

To achieve our aim of being sustainable, we will:

- Reduce our environmental harm and protect all our assets through better use of our resources and increase our positive impact through greening, advocacy and influencing – working towards being net carbon neutral by [x]³.

³ This target date is currently being worked through to align, where appropriate, with the target set out in the City Corporation's Climate Action Strategy that is currently being developed.

- Champion responsible investment and manage our investments in alignment with our values and the UN Sustainable Development Goals.
- Work with our supply chain to maximise social value, minimise environmental harm and strive to ensure the ethical treatment of people throughout our supply chains.
- Responsibly manage our bridges and investment property portfolio to the highest sustainability standards possible, without detracting from delivery of the financial returns required to fulfil our charitable objects.
- Enhance the resilience of our physical infrastructure assets to adapt to future climate conditions.
- Embed employment practices through our Trustee which reflect the values of the charity and which create and champion equality, diversity and inclusion.
- Through the work of CBT and working with our networks, fund and encourage work that supports environmental education and responsibility, especially relating to climate action, air quality and clean water.

Be impact driven

We will work towards ensuring everything we do has the strongest and most positive impact possible. We will focus our efforts where the need is greatest, in order to make a lasting impact for the benefit of Londoners now, and for generations to come. We will also draw upon the reach of our corporate Trustee, which extends across sectors and far beyond the Square Mile's boundaries, to achieve maximum impact for our beneficiaries and provide leadership in best practice for the voluntary and community sector across London, the UK and beyond.

To achieve our aim of being impact driven, we will:

- Keep the governance and powers of the charity under review to ensure they enable and support the charity's effective administration.
- Contribute to higher impact and higher value philanthropy through our role modelling in London and our support and awareness-raising in the UK and internationally.
- Undertake philanthropic collaborations to generate positive impact within London, which our partners can extend nationally and internationally.
- Lead the development of the UK as a global centre for social investment and help to grow the market.
- Provide an inclusive and high-quality cultural and learning offer on Tower Bridge.
- Promote, enhance and celebrate the heritage and cultural value of our bridges.
- Grow our learning culture and become more evidence-based and data driven to improve our methods and solutions, and consistently work to improve our practice.
- Deepen our understanding of what we are achieving through continuous monitoring and evaluation.

Defining success

Delivering on this strategy will help us to communicate our vision and aims more powerfully, so that our role and heritage is valued and understood by our beneficiaries, and other audiences. We see success as building on our achievements and delivering our aims to become a charity that is a:

World class

Bridge
owner

Charitable
funder

Responsible
leader

We want to amplify our reach and impact to a world class level as, ultimately, we want our work to make the most positive impact possible in bridging London's physical and community infrastructure. We aim to position ourselves as a consistently credible champion for London and Londoners, working towards achieving our vision where *'every person in London becomes truly connected'*.

Our successes will be defined both quantitatively in terms of reaching and exceeding set targets in the context of the management and conservation of world-class bridges, and in terms of the delivery of our charitable funding activities and role-modelling of high impact and high value philanthropy; and qualitatively in the context of setting new standards in being catalytic, sustainable and impact driven. For us, success will also be achieved by having an investment portfolio that is aligned with our aims and embedding a learning culture to ensure we continually reflect and improve our practices. Such measures in pursuit of our vision and three core aims will be designed during the implementation phase of this strategy, and progress against them will be shared in regular evaluation reports.

Conclusion

This strategy represents an exciting opportunity for us to demonstrate our commitment to London. *Bridging London* highlights the role we will continue to play in connecting the capital through support of London's physical and community infrastructure and signals the type of charity that we wish to be.

Making this strategy a reality will require us to build upon our successes to-date but also to learn, evaluate and model new innovative ways of working to achieve our charitable objects, and to deliver sustainable impact for our beneficiaries, over the long term. We recognise that achieving our vision and aims will not happen overnight, but we are committed to sharing our progress over this exciting 25-year journey as we continue to bridge London and work towards a future where *every person in London becomes truly connected*.

Agenda Item 18

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Committees: Planning and Transportation - <i>for information</i> Projects Sub - <i>for information</i>	Dates: 14 July 2020 30 July 2020
Subject: City Streets: Transportation response to support Covid-19 recovery Unique Project Identifier: PV Project ID	Gateway 5 Regular Progress Report
Report of: Director of the Built Environment Report Author: Leah Coburn – City Transportation	For Information
PUBLIC	

1. Status update	<p>Project Description:</p> <p>To implement temporary traffic management measures on City streets in response to COVID-19. These measures will provide safer spaces for people walking and cycling, and queuing outside shops and offices to socially distance, and support businesses in their return to work.</p> <p>The City Corporation's transport response will focus on achieving two main aims:</p> <ul style="list-style-type: none"> • Residents, workers and visitors are safe and feel comfortable travelling into and within the Square Mile, particularly when travelling on foot, by bike and on public transport. • City businesses are supported in their COVID-19 recovery and the City remains an attractive location for business. <p>The project consists of on street changes to provide additional space for people walking and cycling. These are first being installed using signs, lines and barriers to allow for easy adaptation if required. Changes are being delivered in a phased approach.</p>
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	<p>On-street changes will be delivered alongside measures to support businesses, manage travel demand and encourage travel on foot, by cycle and on public transport.</p> <p>RAG Status: Green</p> <p>Risk Status: Medium</p> <p>Total Estimated Cost of Programme (excluding risk): £1M-£2M</p> <p><i>Phase 1-£116,500</i></p> <p><i>Phase 2- £832,244</i></p> <p><i>Phase 3 - £ 650,500</i></p> <p>Spend to Date: £268,962</p> <p>Costed Risk Provision Utilised: N/A</p>
2. Key points to note	<p>Next Gateway: Progress report - September</p> <p>Key Points: A formal review report will be bought to members in December 2020.</p>
3. Reporting period	<p>This report covers progress made on Phases 1, 2 and 3 of the COVID-19 recovery work between the 12 June and submission of the report (approx.30 June).</p>
4. Progress to date	<p>The last report which was approved by Planning and Transportation Committee on the 23 June concentrated on the Phase 3 proposals and gave a short update on the progress of Phases 1 and 2.</p> <p>In summary</p> <p>Phase 1:</p> <ul style="list-style-type: none"> • completed, other than Cheapside which is planned to switch to the City's layout at the completion of the current gas works; and Leadenhall Street which is due to be implemented in early July. • Funding of £116,500 has been approved by Transport for London (Streetspace scheme). • Estimated spend to date on Phase 1 currently stands at £131,437 (overspend will be subsumed into the Phase 2 TfL allocation). <p>For those streets which have cycling contraflow and reallocation of carriageway to footway we are considering replacement of some of the barriers and cones with more semi-</p>

	<p>permanent measures. These will continue to be moveable and adaptable but will require less regular maintenance.</p> <p>Phase 2:</p> <ul style="list-style-type: none"> • The Phase 2 report was approved by Policy and Resources Committee on 11 June. • A delegated report on the detailed interventions was submitted to the Director as per the delegated authority on 30 June for approval. • Materials have been pre ordered with implementation planned to commence from the 6 July. • Funding confirmation from TfL was received on the 19 June for a further £832,244 for Phase 2 (total £948,744) • Department for Transport (DfT) has confirmed additional funding of £100k. • Phase 2 is now fully funded. • Estimated spend to date on Phase 2 is £137,525. <p>Phase 2 supporting measures:</p> <p>As part of the Phase 2 works, measures have also been rolled out to support businesses to return to the City including:</p> <ul style="list-style-type: none"> • Freight Guidance <p>Freight guidance has been developed and has been consulted on with stakeholders and neighbouring authorities. The guidance is ready to issue to freight trade organisations and directly with facilities managers. Communications to commence week commencing 6 July 2020.</p> <ul style="list-style-type: none"> ○ Business engagement to encourage retiming of deliveries, use of cargo cycles and consolidation. ○ Issue guidance documents for City businesses to support essential freight and servicing activity outside peak hours and, where appropriate, overnight. ○ Encouraging night-time deliveries, where appropriate, and monitor complaints.
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	<ul style="list-style-type: none"> • Behaviour change activities <ul style="list-style-type: none"> ○ Working with TfL to provide clear communication to City businesses to help them plan for the return of their workforces and to support travel demand management. Work already commenced in June with TfL promotion and contact generally - communications to be ongoing and in time with re-opening of businesses. ○ Supporting City of London Police engagement and enforcement to tackle speeding and dangerous driving and riding. Police to agree additional presence for speed enforcement dependent on vehicle flows and return to work rates. • Cycle training/maintenance <ul style="list-style-type: none"> ○ Campaigns to improve awareness of cycling routes to and from the Square Mile, highlight cycle hire options and promote cycle training and other support for residents and workers. ○ Work has commenced through Active City Network with a meeting 2 June and updates on that website. • Provision of social distancing vinyls <ul style="list-style-type: none"> ○ To be placed on footways outside of shops and offices to encourage socially distanced queuing. Businesses can request these online for installation by the City Corporation. To date 34 requests have been received and installation in City streets started on the week commencing 22 June. <p>Phase 3 progress:</p> <ul style="list-style-type: none"> • The Phase 3 report has been approved by the Planning and Transportation Committee and Projects Sub Committee. It is due to go the Policy and Resources Committee for information on 9 July. • A bid for central funding for the full Phase 3 budget will be determined by Resource Allocation Sub-Committee on 9 July also. • Phase 3 focusses on the provision of seating, planters and cycle parking in the City to support businesses return to work. An initial 12 locations have been
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	<p>identified and will be monitored.</p> <ul style="list-style-type: none"> • The first tranche, involving moveable seating and use of barriers to reallocate carriageway space, is expected to be completed within 3-5 weeks of the funding being secured, subject to obtaining necessary consents. The larger elements (planters and parklets) are expected to follow around 7-9 weeks after funding is secured. • In addition to the initial 12 locations, officers are exploring opportunities to reallocate carriageway space for tables and chairs where it is safe and practical to do so. This will align with the City Alfresco Eating and Drinking policy currently being drafted. • A School Street by Charterhouse Square School is also included within the Phase 3 report for implementation in time for the new school year. <p>Progress on Transport for London led schemes</p> <p>Bishopsgate:</p> <ul style="list-style-type: none"> • Transport for London have proposals to restrict motor vehicles through traffic along Bishopsgate using “bus and cycle gates” during the day. These restrictions will be in place Monday to Friday 7am to 7pm, matching the other timed restrictions in the City. The aim of their proposals is to significantly reduce the volume of through traffic on this corridor so that more and safer spaces can be reallocated for people walking, cycling and to improve bus priority. • These proposals also introduce several banned turns to encourage people away from the Bishopsgate corridor. The banned turns will be in place 24 hours a day, and permitted movements for all vehicles will now include: <ul style="list-style-type: none"> ➤ Worship Street (left only except buses) ➤ Artillery Lane (left turn only) ➤ Middlesex Street (left turn only) ➤ Liverpool Street (right turn only out) ➤ Cornhill (ahead and left only) ➤ Lombard Street (ahead and left only) ➤ Fenchurch Street (left only) ➤ Gracechurch Street at Fenchurch Street (northbound and ahead only) ➤ Gracechurch Street (left turn only into Eastcheap) • TfL have received all of their approvals and intend to implement the scheme from the 11 July.
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	<p>Farringdon:</p> <ul style="list-style-type: none"> • Early discussions at officer level have been had to help guide early designs but no firm proposals have been established. <p>Tables and Chairs</p> <ul style="list-style-type: none"> • Officers have reviewed all 138 Highways Act Table and Chairs Licenses based on the 5 principles agreed at Committee, over 50 licenses were safely reinstated prior to the 4 July reopening of the hospitality industry. • On 25 June the Business and Planning Bill 2019-21 was introduced to the House of Commons by the Government and given its (formal) First Reading. • The Bill introduces a new expedited licence – a “pavement licence”. The operators of businesses selling food and drink may apply to their local authority for authorisation to put furniture such as tables and chairs on the highway adjacent to their premises to sell food and drink from and/or for their customers to use. • Officers are working with pace to receive and assess the first applications as soon as the Bill receives Royal Assent. <p>Communications and Engagement:</p> <ul style="list-style-type: none"> • The consultation survey for feedback on the temporary measures went live online 29 June. Further streets will be included as appropriate. • Social media campaign underway to promote survey. • Business and stakeholder engagement ongoing. • Press activity planned regarding update on Phase 2 implementation and Phase 3 Committee and funding progress. • As of 30 June, we have received around 230 pieces of correspondence to our mailbox, including: <ul style="list-style-type: none"> ○ 86 from businesses ○ 50 from general public / commuters ○ 49 from the taxi trade ○ 26 from Members ○ 22 from residents <p>Monitoring and review of temporary measures:</p> <ul style="list-style-type: none"> • The Monitoring Strategy will monitor and report on a
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	<p>range of factors that may be impacted by the temporary Covid-19 recovery measures. Monitoring will capture reports of casualties and collisions, journey times, air quality, traffic flows, pedestrian volumes and the perceptions and experiences of all street users.</p> <ul style="list-style-type: none"> • Comments and feedback from the public will be captured using an online map-based survey. This survey went live on 29 June and all City residents will receive a letter detailing how to access the survey. • The Monitoring Strategy will enable officers to react quickly to change in demand, safety issues or feedback from street users. • It will also help inform when it may be appropriate to begin removing temporary measures and whether any of the temporary measures could potentially be made permanent. Any proposals to retain the temporary measures will be subject to a formal process including consultation and traffic order making. <p>Financials:</p> <ul style="list-style-type: none"> • With the first phase of work completed and actual costs being received, a more comprehensive review of the estimates for the phases is being undertaken to ensure that the estimates and actuals are similar. • Accurate cost estimates were difficult to determine at the outset of the project with the scope of the project not defined and the short timeframe in which to initiate the project. • We are now assuming that social distance interventions will be in place until at least December 2020. • The level of staff time required to deliver the project was underestimated. A more accurate forecast has now been undertaken assuming the measures will be in place until December 2020. A revised budget is being progressed using a budget adjustment. Details are included at Appendix 1 for information. • The cost of materials and works has been less than that estimated so the project cost is within the overall budget envelope approved by Committee. A budget adjustment is currently in progress to adjust the budget lines. Further information is detailed at Appendix 2
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	<ul style="list-style-type: none"> • Department for Transport and Transport for London (Streetspace) funding has been confirmed for Phases 1 and 2. These phases are now fully funded. • A bid for central funding for Phase 3 works is due to be considered by Resource Allocation sub Committee on 9 July.
5. Next steps	<ul style="list-style-type: none"> • Subject to receiving delegated Gateway 5 approval and Transport for London TMAN approval implementation of Phase 2 will commence on the 6 July and take four weeks. • Implement Phase 3 measures. • Replace some of Phase 1 and Phase 2 interventions with semi permanent measures to reduce the ongoing maintenance liability and provide a safer environment for people walking and cycling. • Monitor and review the proposals in place including feedback from users via the consultation online survey. • Work with TfL on any proposals for Farringdon. • Update report to the Planning & Transportation Committee in September and review in December.

Background Reports

City Streets: Transportation response to support Covid- 19 recovery
<http://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=100994>

City Streets: Transportation response to support Covid-19 recovery (Phase2)
<http://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=101568>

City Streets: Transportation response to support Covid-19 recovery (Phase 3)
<http://democracy.cityoflondon.gov.uk/ieListDocuments.aspx?CId=143&MIId=20591&Ver=4>

Equalities Analysis Phase 1 and 2
 reports (Steer) www.cityoflondon.gov.uk/covid19citystreets

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Appendices

Appendix 1	Phasing Plan
Appendix 2	Finance Summary
Appendix 3	Photos of completed work
Appendix 4	Phase 2 delivery programme

Contact

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Covid-19 Street Changes



KEY

Phase 1

Phase 2

Phase 3

Existing restrictions

London Bridge maintenance

The map illustrates the geographical distribution of Covid-19 related street changes across a portion of London. The River Thames flows along the bottom, with bridges including Blackfriars, Millennium, Southwark, and London Bridge. Major thoroughfares like Fleet Street, Cannon Street, and Queen Victoria Street are visible. The color-coding indicates the progression of restrictions: Phase 1 (blue) covers areas like the Bank and parts of the City; Phase 2 (orange) extends to areas like Barbican and Finsbury; Phase 3 (red) is seen in areas like the Barbican and parts of the City. Existing restrictions (green) and London Bridge maintenance (yellow) are also indicated. The map is oriented with North at the top, as shown by the north arrow.

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Phase 1 - fully funded

Phase 1 Initial Costs	Estimated cost (£)	Approximate spend to date	Balance
Staff costs– P&T	£ 15,500	£ 45,885	-£ 30,385
Staff costs- Highways	£ 15,500	£ 6,571	£ 8,929
Fees	£ 15,000	£ 8,481	£ 6,519
Works	£ 70,500	£ 70,500	£ -
Total	£ 116,500	£ 131,437	-£ 14,937

Phase 2 - fully funded

Phase 2 Initial Costs	Estimated cost (£)	Approximate spend to date	Balance
Staff costs– P&T	98,000	£ 66,733	£ 31,267
Staff costs- Highways	48,000	£ 13,031	£ 34,969
Fees	101,000	£ 38,000	£ 63,000
Works	685,244	£ 19,761	£ 665,483
Total	£ 932,244.00	£ 137,525	£ 794,719

Combined phases 1 and 2 with readjusted budget lines

Combined Phase 1 and 2	Revised Estimated cost (£)	Approximate spend to date	Balance
Staff costs– P&T	345,093	112,618	232,475
Staff costs- Highways	88,750	19,602	69,148
legal staff costs	5,000	0	5,000
Fees	123,500	46,481	77,019
Works	486,401	90,261	396,140
Total	1,048,744	268,962	779,782

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Appendix 3 – Photographs of Phase 1 measures

Threadneedle Street



Junction of Threadneedle Street / Old Broad Street. Photograph credit Carlton Reid.



Poultry



APPENDIX 4: Phase 2 – Delivery Programme from 6th July

Date (Approx)	Streets	Duration (Approx)
Week1 (from 6 th July 2020)	King William Street Abchurch Lane Princes Street Cornhill Queen Victoria Street (Cannon Street to Poultry) Lime Street/Cullum Street Old Jewry Moorfields Fenchurch Street Chancery Lane Cheapside / Poultry	5 Days
Week2 13 th July	Middlesex Street South Place Liverpool Street Devonshire Row Devonshire Square Cutler Street White Kennet Street Dukes Place Bevis Marks Camomile Street Houndsditch Outwich Street King Street Queen Street Cooper's Row/Trinity Square Crutched Friars Jewry Street Eastcheap / Great Tower Street Charterhouse Street / Charterhouse Square/Carthusian Street	5 Days
Week 3 20 th July	Moorgate (north of London Wall) London Wall Moorgate (south of London Wall) Lothbury and Bartholomew Lane Threadneedle Street Gresham Street Cannon Street (New Change to Queen Vic St) St Paul's Churchyard Ludgate Hill Fleet Street Aldgate/Aldgate High Street Eldon Street Blomfield Street Newgate street Holborn Viaduct High Holborn	5 Days

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Committee(s)	Dated:
Planning & Transportation	02/06/2020
Subject: District Surveyors Annual Report 2019/20	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Information
Report author: Gordon Roy, District Surveyor & Environmental Resilience Director	

Summary

The purpose of this report is to update the committee on the workings of the District Surveyor's office which reports to it for the purposes of building control, engineering services for the City's major infrastructure and to provide resilience to buildings and businesses within the square mile that maybe affected by climatic and environmental risks. To provide members with a better understanding of the District Surveyor it was agreed to submit annual reports to the committee for information.

Recommendation(s)

Members are asked to:

- Members are asked to note the report as information.

Main Report

Background

1. The principle role of the District Surveyor's Building Control Service is to ensure that all building work complies with the requirements of the Building Act 1984 and the Building Regulations 2010. Building Regulations are minimum standards laid down by Parliament to secure the health and safety of people in or about buildings with an increasing emphasis on improving energy efficiency, sustainability and accessibility. The building control section is also responsible for notices submitted under Section 30, London Building Act (Amendment) Act 1939 for temporary demountable structures.
2. In offering this Building Regulation regulatory service within the City, the District Surveyor's Office is in direct competition with approximately 90 private firms operating as corporate Approved Inspectors authorised to offer a building regulations approval service. The number of private companies offering this service has decreased from 96 last year, due to issues in the insurance industry where a number of firms were refused insurance cover.
3. In addition, Dangerous Structures within Inner London are dealt with under the London Building Acts 1930-1939. Responsibility for dealing with them is delegated, by your committee to the District Surveyor.
4. This service is provided on a continuous basis, 24 hours a day throughout the year to ensure public safety. A record of all calls is maintained on the CAPS Uniform software.
5. Other responsibilities placed upon the District Surveyor include:

- Maintaining a register of all work under the control of Approved Inspectors.
 - Registering certificates under the Competent Persons Schemes.
 - Processing and recording Demolition Notices.
 - Advice to the Community and Children's Services on Marriage Licence applications on the technical standards in relation to Health and Safety.
 - Advice to the Planning Service on major Planning Applications on the design of Sustainable drainage systems. This service has been extended from April 2020, to include Fire Safety and Energy Statements, which are additional requirements for major planning applications under the Local Plan.
6. Advice and guidance on technical and procedural requirements are made freely available to other areas of the City of London Corporation and the public upon request.
 7. The engineering team are responsible for the City's 5 river Bridges, approximately 80 Highway Structures and a number of Statutory Reservoirs on which they report separately to your committee and Open Spaces Committees respectively. They also provide advice on major Infrastructure Projects to protect the City's interests.
 8. The Environmental Resilience team, formed in June 2019, aims to improve the resilience of the City Corporation and the Square Mile to environmental impacts including flooding, fulfilling the City Corporation's statutory duties as Lead Local Flood Authority under the Flood and Water Management Act 2010.
 9. The Building Regulations are the primary means of government ensuring acceptable building standards and raising them when necessary.
 10. Following the Grenfell tragedy, the Government appointed Dame Judith Hackitt to conduct a review into the Building Regulations and Fire Safety, and in the summer of 2019 the government published proposals for reforming the building safety system. A briefing paper for your information, is attached in Appendix A of this report. The government have also recently announced a new Building Safety Regulator to whom we are likely to need to report to in the future.

Current Position

11. As referenced earlier in the report the Building Regulations function of the District Surveyor's office is open to extensive competition. This competition has steadily increased since its introduction to the commercial market in 2001.
12. The workload into the office is affected by the fluctuating extent of building work within the City as much as it is by the degree of challenge from private competitors. Workload this year has also been affected by the Approved Inspector insurance issues, where a number of projects have had to revert to the City District Surveyors for compliance checks, as required under The Building (Approved Inspector etc.) Regulations 2010. This work is complex and time consuming but essential to ensure the safety of buildings. Table one shows the number of applications and Initial Notices received by the City District Surveyors office over the years 2015 to 2020. It also shows the market share percentage enjoyed by the District Surveyors for each of these years, which has remained

steady over these years. However, in the last year our market share has increased by 6%.

Table 1

Market Share					
	Yr. 2015/16	Yr. 2016/17	Yr. 2017/18	Yr. 2018/19	Yr. 2019/20
City of London Applications	266	216	248	244	300
Initial Notices Received	750	763	773	791	697
Total Number of Applications	1016	979	1021	1035	997
City of London Market Share	26%	22%	24%	24%	30%

13. The market share is only one way to measure the amount of work. From an analysis of the Initial Notices received, the vast majority of the work that Approved Inspectors are employed on is generally office and shop fitouts. The District Surveyors office is employed on the full spectrum of construction work with approximately 70% of the new buildings, requesting the District Surveyors provide the Building Regulation service.

14. A summary of the Building Control workload is shown in table two:

Table 2

Building Control Stats					
	2015/16	2016/17	2017/18	2018/19	2019/20
Corporate Complaints	1	0	0	0	0
Jobs Commenced	263	224	237	205	278
Jobs Completed	197	138	188	142	186
Full Plans Applications Submitted	183	126	159	110	174
Building Notice Applications submitted	66	66	63	73	78
Partnership Applications	6	11	9	24	10
Regularisations	11	13	17	28	29
Cross Boundary	N/A	N/A	N/A	9	9
Total Number of Applications	266	216	248	244	300
Competent Person Notifications	472	333	739	827	376
Dangerous Structure Call Outs	27	32	29	33	23
Site Inspections	1812	1457	1603	1537	1759
Income	£1,353,248	£1,295,411	£874,660	£957,150	£1,058,245
Market Share	26%	22%	24%	24%	30%

15. Tables 1 and 2, are showing that while the total number of Building Regulation applications remains steady, the percentage requesting the City of London to be their Building Control Body has increased. The department has prioritised ensuring the team are technically competent to work on major projects and are able to provide an efficient service, and this investment in our team members is paying dividends.
16. Workload in the year 2019/20 appeared healthy but analysis was undertaken on applications received in a calendar year and their respective fee income was plotted and the results are found in table three:

Table 3

Year	Number of Applications	Fees Generated
2012	303	£1,064,276
2013	322	£1,782,056
2014	282	£1,176,908
2015	280	£1,210,007
2016	228	£847,099
2017	236	£531,836
2018	246	£778,279
2019	266	£1,091,265

17. Large scale development within the City of London occurs over a number of years, and the associated fee income for these projects is received over this time, rather in a single payment. When just looking at overall income for a particular year as shown in Table 2, the fee income is from new as well as old applications which are currently in the process of being constructed. The analysis of Table 3 suggests that large scale construction activity is starting to grow, following the events of 2016 and the Brexit vote.
18. Since 2016 we have been monitoring the market, training our staff, and concentrating our marketing to major developments particularly around the advantage of having the City of London as their building control body over the lifetime of a building and not just, it's initial construction. This change, has ensured that fit-out applications in buildings where we have agreed this approach with the building owner, are now being submitted to the City rather than an Approved Inspector, increasing the demand for our services. Owners such as British land, acknowledge the trust and experience of our service, and as a consequence, this has improved the divisions business activity.
19. Applications in the early part of 2020 were also monitored as they were showing increased activity, on the previous year. Further analysis over the last five years was undertaken and the results are shown in table 4. Construction was showing signs of accelerating activity until the COVID-19 epidemic arrived during March 2020. At this time, it is unclear how construction activity over 2020/21 will be affected, but the division is in a strong position.

Table 4 Applications and fees generated in January to March, over the last 5 years.

	2016		2017		2018		2019		2020	
	No of Apps	Fees Generated	No of Apps	Fees Generated	No of Apps	Fees Generated	No of Apps	Fees Generated	No of Apps	Fees Generated
Jan	17	£11,732	25	£23,996	21	£30,132	24	£28,777	32	£234,000
Feb	16	£12,212	10	£33,160	26	£132,051	15	£53,034	38	£64,972
Mar	22	£36,869	18	£32,735	19	£105,546	21	£47,724	20	£39,899
Total	55	£60,813	53	£89,891	66	£267,729	60	£129,535	90	£338,871

20. Dangerous structure call outs remain constant over the last three years with 23 reported dangerous structures investigated. There were no significant incidents, however one dangerous building did require our specialist contractor to be called out, to remove the danger.

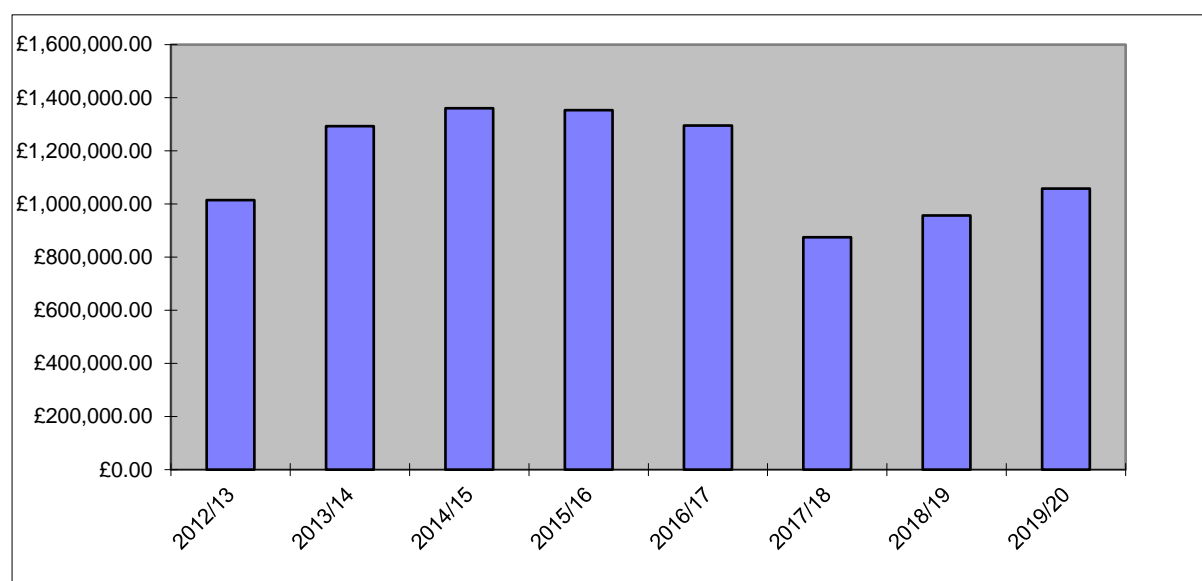
21. Other areas where Building control services have been requested include:

- Special and Temporary and Special Structures-(including structures for the Lord Mayors Show)- 31 applications.
- Approvals in Principal for Engineering Team- 29 applications.
- Marriage Act applications to carry out a technical assessment for the premises prior to a Licence being issued- 18 applications.
- Fire Risk Assessments- 2 applications
- Sustainable Urban Drainage System (SuDS)- providing the technical advice and assessment for major planning applications- 24 applications.
- Demolition Notices-7.

22. The fundamental Review took considerable amount of management time but had little effect to the running of the building control elements of the division, however it had a significant effects on the Engineering Team where a number of Projects had to be “paused” and the teams workload reallocated to projects not effected by the Fundamental Review. (Bridge House Estate projects). The team were also busy with the tenders for our two bridge inspection contracts and finalised the appointments for a six-year period. The new contracts were awarded to the respective existing incumbents following an extensive, competitive European Contract process and will provide a continuity for the inspection programme. The team were also heavily involved producing a revised Bridge replacement Strategy for the five river crossings to inform the Bridge House Estates task and Finish group review.

23. The Engineering team also successfully awarded the Contract for re-waterproofing London Bridge and the associated replacement of Bridge bearings and dealing with a delayed start, negotiating TfL requirements so works could commence at the end of this reporting period.
24. With the proposed relocation of the Museum of London to Smithfield's, the engineering team have been working on the waterproofing on a number of bridges around Smithfield and Snow Hill, as well as carrying out investigations to the bridge at Lynsey Street.
25. Income for Building Control in the year 2019/20 increased on the previous year, and continues the slow recovery from the effects of 2016. Two large projects submitting their applications in April 2019, (6-8 Bishopsgate and 1 Leadenhall), and the division secured all the fit-out works for the completed buildings at 100 Liverpool Street, The Scalpel and 22 Bishopsgate.
26. The number of applications and income are not the only measure of the workload for the division. Large developments have extended contract periods which spread work and fees over several years. With the fees being taken in stages the fee associated with the initial application provides a better measure of the work carried out by the office at any time. Table five shows fee generation from applications between 2012 to 2020. Again, this shows that income from applications is increasing.

Table 5



27. Fees and charges for Building Regulation work are governed by The Building (Local Authority Charges) Regulations 2010 and the City are required to approve a Building Regulation Charges Scheme. In 2010 the charges scheme was approved and has been reviewed annually to ensure the principles of the Regulations, to ensure full cost recovery of the service, was being maintained. The scheme was amended in March 2018, and in March 2020 a further report was submitted to your committee recommending a new charges scheme, for commencement from April 2020. This proposal was agreed and has been implemented from the 6th April 2020.

28. As requested by the Committee, an annual report will be submitted for review to ensure the fees are set at an appropriate rate to ensure cost recovery.

Major Projects that Completed in 2019/20

29. A number of the Building Control team's major projects completed in 2019/20 and these included:

- 52-54 Lime Street (The Scalpel)
- 60-70 St Marys Axe.
- 1 Bartholomew Lane

30. The Bank Station Project completed tunnelling below the Mansion House and the Engineering team have been working with The Keeper of the House and London Underground, to advise the City Surveyor and understand why the settlement was greater than expected, undertake repairs during the summer closure and working towards final inspections and reinstatement of the stain glass window next year, The Thames Tideway project has been very busy with the tunnel just reaching their Blackfriars Site and considerable work to ensure protection of the BHE Bridges as well as approvals for the complicated float out of the new Fleet Culvert and protecting the rest of the City's infrastructure in this area.

Environmental Resilience team

31. The Environmental Resilience Team has secured Environment Agency funding to develop a strategy to assist with implementation of the Thames Estuary 2100 Plan in the City. Work on this Riverside Strategy is underway with input from a range of external bodies and officers from across the City Corporation.

32. The team has developed resources to help reduce the risk of flooding in the City including flood risk briefing notes for a number of riverside sites, a register of ownership and state of repair data for flood risk structures and awareness raising material to help fulfil our duties under the Flood and Water Management Act 2010.

33. Recognising that resilience to climate change is a key objective for the City's future, the team has been instrumental identifying the primary risks for the Square Mile and commissioning work to develop an Adaptive Pathways approach to reducing these risks.

Staff

34. The District Surveyors Division has a team of 31, 24 within Building Control team, 5 within the engineering team, and the District Surveyor. In addition, the Environmental Resilience team has 2 posts which are officers, seconded into the team, as specialists in this field. The Building Control team has a number of officers of various seniority and specialisms to reflect the work we do. These include structural engineers, chartered surveyors, a fire engineer, and services

engineers. On the 30th April 2020, our specialist drainage engineer retired. Training has been provided to all team members on this subject, so our intention is not to replace this specialist. All members of the engineering team are civil engineers.

35. The development of staff remains a high priority to ensure they can provide an excellent and competent service.
36. Building Control in August 2019 started its first professional Building Control Apprentice, on a four-year University based training programme, with a second apprentice now appointed who will join the division this summer. This will provide resilience to the Division, where recruitment can be extremely difficult.
37. We continue to actively seek out potential clients and win new work, with discussion continuing with major developers and land-owners, such as British land. Pre application agreements have been signed regarding 1-2 Broadgate, 2-3 Finsbury Avenue, Custom House, 55 and 70 Gracechurch Street, and the application for moving the Museum of London to Smithfield's has recently been submitted. We are also providing early advice to the Courts Project team.
38. We are optimistic for the future and continue to market the service at every opportunity.
39. The London District Surveyors Association (LDSA) represents the heads of Building Control in the 33 London authorities. The District Surveyor office continues to support the work of the LDSA and is represented on all its major committees, including its executive committee. Gordon Roy, the District Surveyor and Environmental Resilience Director has been elected as Junior Vice President of the association and will have his Presidential year in 2022.
40. To help steer both the regulatory format and technical standards, staff participate in full consultation with government and have been involved with the industry committees and working parties following the Hackitt enquiry regarding fire safety. This has also required our engineers, to work with the fire engineers at Edinburgh University to examine new construction techniques particularly around the use of timber in buildings.
41. Close working with the London Fire Brigade ensures a coordinated response on fire related issues is fed back to clients, and we continue to have regular discussions with their fire engineering team.
42. Regular reviews of our workload and performance are carried out and reviewed in the light of regular customer surveys.
43. Performance standards are measured by means of Key Performance Indicators which indicated in table six, KPI's 2020.

Table 6

	LBC1	5 week apps 90% within 19 working days			LBC2	8 week apps 90% within 26 working days			LBC3	Completion Certificates Issued 85% within 10 working days		
		Apps.	Success	%		Apps.	Success	%		Final Inspections	Success	%
2019/2020												
Apr		6	6	100%		6	5	83%		12	12	100%
May		5	5	100%		6	5	83%		7	7	100%
Jun		2	2	100%		9	9	100%		11	11	100%
Jul		4	4	100%		8	8	100%		12	12	100%
Aug		4	4	100%		11	10	91%		12	12	100%
Sept		7	7	100%		4	4	100%		15	15	100%
Oct		4	4	100%		4	4	100%		17	17	100%
Nov		4	4	100%		5	5	100%		15	15	100%
Dec		5	5	100%		10	10	100%		8	8	100%
Jan		4	3	75%		12	10	83%		33	33	100%
Feb		8	8	100%		9	8	89%		12	12	100%
Mar		13	12	92%		11	10	91%		11	11	100%
YEAR TOTAL		66	64	97%		95	88	93%		165	165	100%

44. The Building Control division operate a Quality Management System which was externally audited in August 2019 and received re-accreditation. This re-accreditation of the Building Control Quality Management System means that the division has been providing an accredited management system, continuously for 26 years.

45. The District Surveyor's office uses the Building Control module of CAPS Uniform software to record all applications and records. This is the same software that the Planning department use for their purposes. The use of a common system enables easy abstraction of information for building searches and shared information. The software was part of the corporate IDOX/M3 replacement programme which has been postponed but we are hopeful that this will resume shortly.

Highlights

46. The LABC London Building Excellence Awards 2020 were due to be held at the Guildhall on the 1st May 2020 but have been unfortunately postponed. There were 2 City of London projects nominated for an award. They included 1 Bartholomew Lane, and Kaleidoscope at Farringdon.

Conclusion

47. This report describes the background of building control, the engineering team and the environmental resilience team within the City of London and the work of the District Surveyor's office over the last year and looks positively forward to the challenges ahead.

Appendices

- Appendix A- Proposed Building Regulation changes and the Building Safety Bill.

Gordon Roy

District Surveyor & Environmental Resilience Director

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1.0 Introduction

1.1 In the summer of 2019, the government published proposals for reforming the building safety system. The proposals were driven by the recommendation of Dame Judith Hackitt's 'Building a Safer Future' report into building and fire safety, following the Grenfell Tower tragedy. On 2nd April 2020 the MHCLG published its response to the consultation which sets out the Government's proposals for a reformed building safety system, covering the performance of all buildings, as well as the management of fire and structural safety in new and existing buildings in scope. These proposals will be included in a new Building Safety Bill later this year.

Key recommendations

2.0 The Building Safety Regulator

2.1 Currently an applicant can choose which Building Control Body will act as the regulator to check compliance with Building Regulations, through the design and construction stages. A Building Control Body could be the Local Authority Building Control or a private registered Approved Inspector. Approved Inspectors are regulated by the Construction Industry Council Approved Inspector Register and are independent from the council.

2.2 Within her report Dame Judith Hackitt highlighted flaws in this appointment system as it could lead to an overall reduction in compliance with building standards as Building Control Bodies competed for market share and income

2.3 In January, the government announced their intention to establish for England a new, national Building Safety Regulator (BSR) within the HSE and has already implemented this in shadow form. The Government will remove the ability of the developer to choose which building control body oversees the construction or refurbishment of in-scope buildings.

2.4 Under the new regime, the BSR will take the role of the Building Control Body and be legally responsible for regulating in-scope buildings in respect of the Building Regulations. The BSR will be supported by local regulators:

'The skills, expertise and capacity of local authority building control will provide the main support for the new regulator complemented by Approved Inspectors where required. Approved Inspectors may also develop separate consultancy services to support duty-holders. Safeguards will ensure there are no conflicts of interest.'

2.5 The BSR will be able to issue 'stop', 'compliance' or 'improvement' notices and breach of any of these will be a criminal offence. The BSR will replace the Building Regulations Advisory Committee with a new oversight structure.

3.0 Buildings in scope and duty holders

3.1 All multi-occupied residential buildings of 18 metres or more in height or six storeys (whichever is reached first) will be in scope of the new regulatory regime.

The regime is likely to be extend to other premises in due course, based on emerging risk evidence.

3.2 A gateway system will apply to all in scope buildings and any construction project will have to meet the regulatory requirements of each gateway before work can take place for that stage.

3.3 A system of duty-holders, who have clear responsibilities at each stage of the building's lifecycle will be created. During design and construction these will be as identified by the CDM regulations and can be an individual or organisation. There will be an independent review every five years to assess its effectiveness. The BSR will establish a national register of buildings in scope. The new regime will also apply to existing occupied in-scope buildings through a transition period that starts with the highest risk buildings first

3.4 The following gateways will be adopted

Gateway 1: Before planning permission is granted, fire safety issues which impact on planning should be considered, including emergency fire vehicle access to a building and whether there are adequate water supplies in the event of a fire. To aid the local planning authority in their decision as to whether to grant planning permission, the developer will be required to submit a Fire Statement setting out fire safety considerations specific to the development with their planning application.

Gateway 2: Before commencement of work on site, the applicant will be required to submit key information to the Building Safety Regulator demonstrating how they are complying with building regulations through the submission of full plans, the construction control plan, fire and emergency file, and other supporting documentation that will help the assessment team determine whether the application meets the building regulations requirements and that the duty-holder has sufficiently demonstrated that they are managing building safety risks.

Gateway 3: Before occupation of the building at the final completion certificate stage under the building regulations. Again, the Building Safety Regulator will provide the building control function working with local regulators. At this stage, the applicant will be required to submit to the Building Safety Regulator information on the final, as-built building. This will include:

- updated as-built plans indicating any agreed variations since Gateway 2.
- a complete construction control plan.
- an updated fire and emergency file.

4.0 Construction products

4.1 A UK wide Construction Products Regulator will be set up responsible for market surveillance and oversight of local enforcement action (and national enforcement when appropriate), maintaining a national complaints system and supporting local Trading Standards. It will also provide technical advice and support to the industry and Government. In addition, a Construction Products Standards Committee (CPSC) will be formed comprised of technical experts and academics to advise the Secretary

of State on product standards, the effectiveness and accuracy of current tests and ways to improve the testing regime.

5.0 Competence

5.1 The government will introduce a consistent approach to assuring competence across LABC and Approved Inspectors. To oversee the longer-term development of competence frameworks, the Government will establish a new industry-led committee hosted by the BSR to continue the momentum of the industry's Competence Steering Group.

5.2 The BSR will oversee the performance of all Building Control Bodies and will have powers to intervene in cases where services are failing to meet standards. A unified professional structure and standards will be developed for building control – under a single oversight body covering both local authority staff and Approved Inspectors. It is likely that there will be mandatory competence standards not only for the Building Control Bodies but for the individuals working within Building Control; perhaps with a 'license to practice.'

5.3 The legislative framework for the building control profession will be included in the Bill with practical details about the administration of the profession developed by the BSR or a body designated by the BSR in discussion with building control professionals, bodies and their representatives.

6.0 Buildings in occupation, the Building Registration Certificate and safety case

6.1 For each building in scope the BSR will issue a Building Registration Certificate (BRC) – without it the building cannot be occupied.

6.2 The Accountable Person – the new duty holder for occupation, will be responsible for applying for and meeting the conditions of the BRC following the passage of Gateway 3. If appropriate this could be partial occupation. The Accountable Person will be the individual, partnership or corporate body with the legal right to receive funds through service charges or rents from building residents. The Accountable Person will be required to appoint a competent Building Safety Manager, approved by the BSR.

6.3 The Building Safety Manager will be required to:

- Keep the safety case up to date to show they understand the fire and structural risks in their buildings and are mitigating and managing them
- Store this information in the golden thread
- Update the safety case in light of any refurbishment (landlord or resident) and notify the BSR before work starts (including where a Competent Person is used)
- Engage with residents in the safe management of their building through a Resident Engagement Strategy – including complaints procedures
- Report into a mandatory occurrence reporting regime.

7.0. Updates to Approved Document B

7.1 Following the Government's consultation on Approved Document B, on the 26th May 2020, they published an update to Approved Document B that includes increased fire safety measures in high rise flats. Currently sprinklers are required in residential buildings with a floor over 30m (approx. 10/11storeys). New measures include requiring sprinkler systems and introducing the provision of wayfinding signage in all new high-rise flats over 11 metres tall (approx. 3/4 storeys). These new requirements will come into effect from the 26th November 2020. The Government also consulted on a requirement for evacuation alert systems and is working with the National Fire Chiefs Council on a series of tests of new technology in this area, with a view to including guidance in a later update to Approved Document B. The Government has published a plan for the full technical review of Approved Document B and is now beginning to commission the required research for this crucial fundamental review.

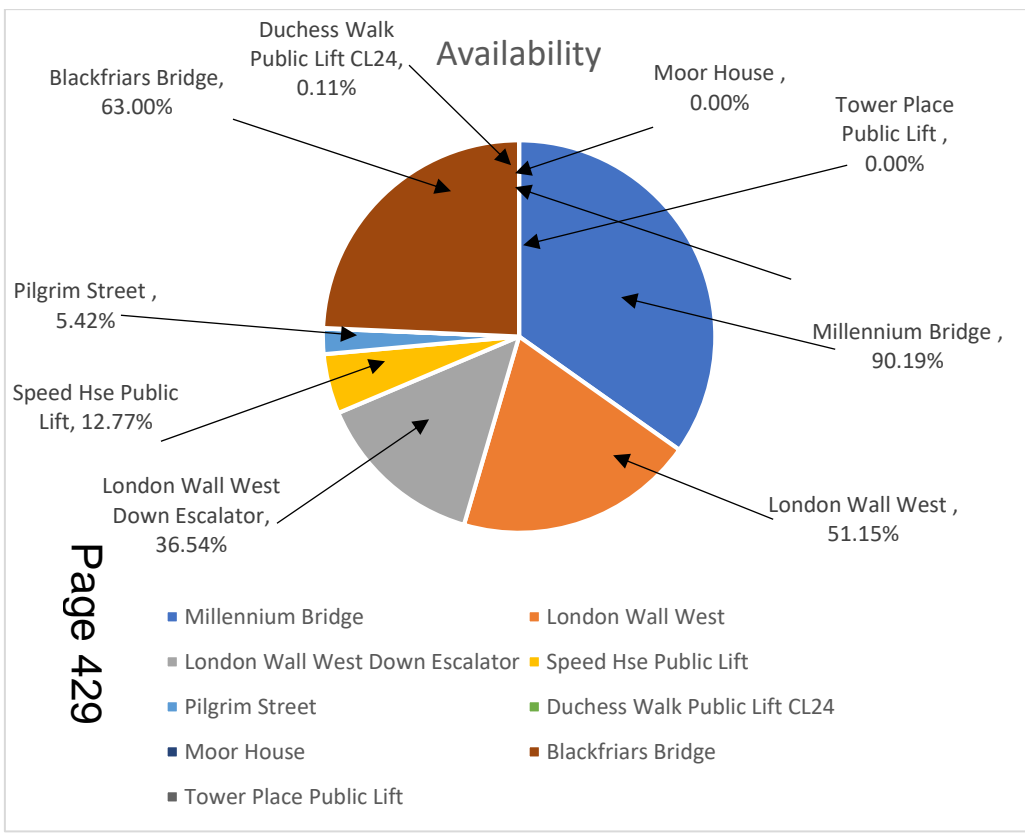
8.0 Links

[‘Building a Safer Future’](#) consultation, setting out our plans for bringing about the biggest change in building safety for a generation. The consultation, published June 2019, sought views on proposals for a radically new building and fire safety system based on the

[Independent Review of Building Regulations and Fire Safety](#). Dame Judith Hackitt's review and recommendations on the Building Regulations and Fire Safety

[New measures to improve building safety standards](#) the formation of a new, national Building Safety Regulator

PLANNING AND TRANSPORTATION COMMITTEE REPORT 06/06/2020 – 26/06/2020



Code	Name	Time OOS	Availability
0916	Glass South Tower SC6459244	0 00:00	100%
0945	London Wall Up Escalator SC6458959	0 00:00	100%
7730	Wood Street Public Lift SC6458970	0 00:00	100%
7921	Little Britain SC6458967	0 00:00	100%
7963	London Wall East SC6458964	0 00:00	100%
7997	33 King Williams Street SC6462850	0 00:00	100%
7999	Tower Place Scenic Lift SC6458963	0 00:00	100%
0978	Atlantic House SC6458966	0 10:01	98.01%
0929	Millennium Bridge Inclinator SC6459245	2 01:25	90.19%
7964	Blackfriars Bridge	7 21:00	63.00%
7960	London Wall West SC6458965	10 06:12	51.15%
0944	London Wall Down Escalator SC6458958	13 07:50	36.54%
7345	Speed House Public Lift SC6459146	8 07:38	12.77%
0976	Pilgrim Street SC6459146	19 20:41	5.42%
0924	Duchess Walk Public Lift CL24	20 23:25	0.11%
7740	Moor House SC6458968	20 23:59	0.00%
7998	Tower Place Public Lift SC6458962	20 23:59	0.00%

Points to Note:

- There are 17 Public Lifts/Escalators in the City of London estate. The report below contains details of the 9 - public escalator/lifts that were out of service more than 95% of the time.
- The report was created on 26th June 2020 and subsequently since this time the public lifts or escalators may have experienced further breakdowns which will be conveyed in the next report.

PLANNING AND TRANSPORTATION COMMITTEE REPORT 06/06/2020 – 26/06/2020

Location	Status as of 26/06/2020	% of time in service Between 06/06/2020 and 26/06/2020	Number of times reported Between 06/06/2020 and 26/06/2020	Period of time Not in Use Between 06/06/2020 and 26/06/2020	Comments Where the service is less than 95%
Pilgrim Street SC6458969	In service	5.42%	1	455 hours	Lift has been brought back into service post a refurbishment project.
Millennium Bridge Inclinators SC6459245	In service	90.19%	1	47 hours	Lift out of service at the end of the reporting period due to vandalism to the doors. Repair is underway and expected return to service is week commencing the 29 th June 2020.
London Wall Down Escalator SC6458958	Out of service	0%	0	480 hours	Escalator out of service due to the delivery of a major project being delivered to the UP escalator, the down escalator is being used as stairs whilst this project is underway. Return to service expected week commencing the 29 th June 2020.
London Wall UP Escalator	Out of service	0%	0	480 hours	Escalator out of service due to the delivery of a major project. Return to service expected week commencing the 29 th June 2020.
London Wall West SC6458965	In service	51.15%%	1	235 hours	Lift brought back into service mid-way through reporting period following the delivery of a minor project.

PLANNING AND TRANSPORTATION COMMITTEE REPORT 06/06/2020 – 26/06/2020

Moor House SC6458968	In service	0%	1	480 hours	Lift has had a mini project delivered during the reporting period, lift now confirmed as in service.
Duchess Walk SC6462323	In Service	52.38%	1	230 hours	Lift brought back into service following works to rectify water ingress and bi-annual engineering inspection.
Blackfriars Bridge SC6462771	In service	63%	1	180 hours	Please note that lift is switch off at night due to being vandalised, so whilst this currently takes place the lift will always show a period of being out of service.
Spiced House Public Lift SC6459146	Out of Service	12.77%	1	419 hours	Lift out of service due to a failed electrical MCB switch. Issue being addressed by the highway's teams as the problem is from the Highwalk. Lift out of service at the end of the reporting period.
Tower Place Public Lift	In Service	0%	1	480 hours	Lift has had a mini project delivered during the reporting period, lift now confirmed as in service.

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Committee(s)	Dated:
Planning and Transportation	14 th July 2020
Subject: Delegated decisions of the Chief Planning Officer and Development Director	Public
Report of: Chief Planning Officer and Development Director	For Information

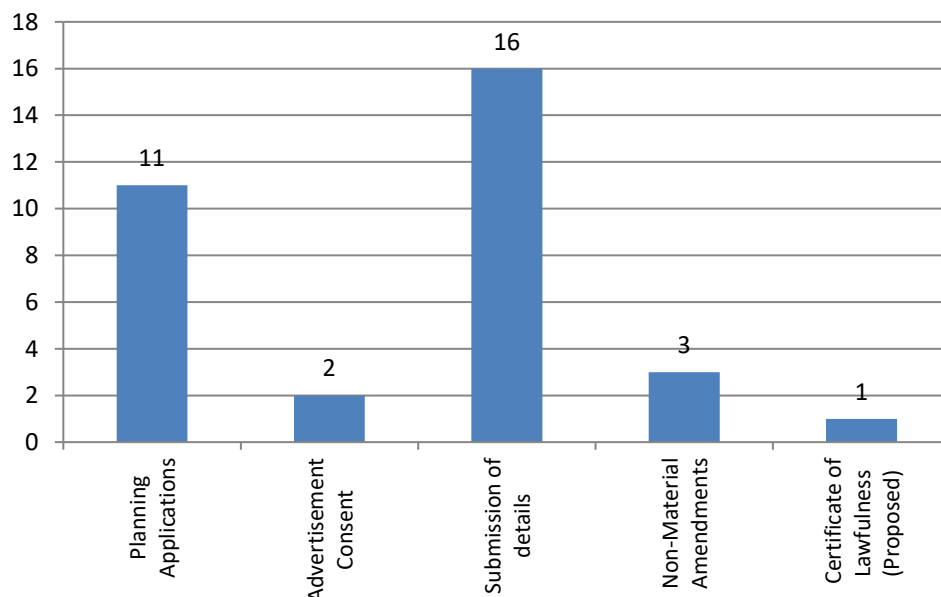
Summary

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 Thirty-three (33) matters have been dealt with under delegated powers.

Sixteen (16) relate to conditions of previously approved schemes. Three (3) applications for Non-Material Amendments and Two (2) applications for Advertisement Consent of which One(1) was refused. Eleven (11) full applications which, including Three (3) Change of Use and 340sq.m floorspace created.

Breakdown of applications dealt with under delegated powers



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	Applicant/ Agent	Decision & Date of Decision
19/00795/FULL Bishopsgate	123 Middlesex Street London E1 7JF	Refurbishment, alterations and extensions to the property including works to provide a roof level extension and terrace, enlarging an existing residential dwelling; works to the rear elevation of the building including the provision of balconies and extensions into the existing lightwell; provision of new shopfront to an existing ground floor retail (Class A1) unit and rear ground floor extension creating an accessible entrance from Catherine Wheel Alley into the retail unit and repair and alterations to front and rear facades.	Zefilix Ltd	Approved 09.06.2020
20/00275/FULL Bishopsgate	1 Finsbury Avenue London EC2M 2PF	Addition of louvres at 3rd floor level of the inner stair core reveal and the addition of safety barriers at ground floor level adjacent to entrance doors.	Bluebutton Properties UK Limited	Approved 23.06.2020
20/00318/PODC Bishopsgate	100 Liverpool Street & 8 - 12 Broadgate London EC2M 2RH	Submission of the Delivery and Serving Management Plan pursuant to Schedule 3 Paragraph 9.1 of the Section 106 Agreement dated 31 October 2016 (Planning Application Reference 15/01387/FULEIA as amended by 17/00276/FULL).	Bluebutton Properties UK Ltd	Approved 23.06.2020

20/00319/PODC Bishopsgate	100 Liverpool Street & 8 - 12 Broadgate London EC2M 2RH	Submission of the Interim Travel Plan pursuant to Schedule 3 Paragraph 8.1 of the Section 106 Agreement dated 31 October 2016 (Planning Application Reference 15/01387/FULEIA as amended by 17/00276/FULL).	Bluebutton Properties UK Ltd	Approved 09.06.2020
20/00331/ADVT Bishopsgate	Outside 1 Exchange Square London EC2A 2JN	Installation and display of an internally illuminated advertisement display panel measuring 1.34m wide by 2.37m high at a height above ground of 0.2m by a bus shelter on the Bishopsgate pavement east of Exchange House.	JCDecaux	Refused 09.06.2020
20/00345/FULL Bishopsgate	9 Devonshire Square London EC2M 4YF	Installation of temporary louvres to windows at 2nd floor level on the eastern facade of 9 Devonshire Square.	Cogent BC	Approved 16.06.2020
20/00348/FULL Bishopsgate	100 Liverpool Street & 8-12 Broadgate London EC2M 2RH	Change of use of first floor unit U-17 from shop (Class A1) to flexible use for either a shop (Class A1) or office (Class B1) use (303sq.m) and alteration to existing louvre on external facade.	Bluebutton Properties UK Limited	Approved 16.06.2020
20/00372/MDC Bishopsgate	100 Bishopsgate London EC2N 4JL	Submission of BREEAM Certificates pursuant to condition 40 of planning permission dated 30th March 2012 (12/00129/FULL).	GVA	Approved 25.06.2020

20/00362/CLOPD Bread Street	O/S BT Centre Newgate Street London EC1A 7AJ	Application for Certificate of Lawful Development for the installation of a Parcel Post Box for Royal Mail	Royal Mail Group	Grant Certificate of Lawful Development 18.06.2020
20/00376/NMA Broad Street	85 London Wall London EC2M 7AD	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 19/00861/FULL dated 24th October 2019 to amend the approved plans to allow: i) Modification of two doors that lead onto the new terrace to increase their width and raise the opening; ii) Extension of existing lift overrun by approximately 350mm to facilitate the insertion of a new lift to the roof terrace; and iii) Insertion of new door from main stair core to ensure compliance with fire safety regulations.	Santander (CF Trustee) Ltd	Approved 23.06.2020
20/00110/FULL Castle Baynard	97 Fleet Street London EC4Y 1DH	Replacement of aluminium glazed shopfront with a wood framed shopfront.	SSD Studio	Approved 18.06.2020
20/00111/ADVT Castle Baynard	97 Fleet Street London EC4Y 1DH	Installation and display of: (i) three externally illuminated fascia signs measuring 0.35m high by 2m wide at a height above ground of 3.24m; and (ii) one internally illuminated barbers pole measuring 0.77m high by 0.18m wide at a height above ground of 2.75m.	SSD Studio	Approved 18.06.2020

20/00355/MDC Candlewick	68 King William Street London EC4N 7HR	Details of the access arrangements for the cycle parking shall be submitted to and approved in writing by the Local Planning Authority pursuant to condition 14 of planning permission 19/00607/FULL dated 5 September 2019.	King William St Limited	Approved 16.06.2020
20/00172/FULL Cheap	St Lawrence Jewry Next Guildhall Church Guildhall Yard London EC2V 5AA	Works to conserve and restore St. Lawrence Jewry Church including alterations to the ventilation "chimney" above the Vicarage flat, alteration to the Nave eaves and parapet on the north side, external stone cleaning and re-pointing, construction of one additional lead downpipe and hopper on the north elevation and new external bell frame housing on south-west flat roof.	Julian Harrap Architects LLP	Approved 09.06.2020
19/01305/PODC Coleman Street	21 Moorfields, Land Bounded By Moorfields, Fore Street Avenue, Moor Lane & Union Street London EC2P 2HT	Submission of the Utility Connection Requirements Report and the Draft Services Connection Programme pursuant to Schedule 3 Paragraph 13.1.1 and 13.1.2 of the Section 106 Agreement dated 04 May 2018 (Planning Application Reference 17/01095/FULEIA).	Avison Young	Approved 11.06.2020
20/00052/FULL Coleman Street	Basildon House 7 - 11 Moorgate London EC2R 6AF	Change of use at part ground floor level from office (Class B1) use to flexible office (Class B1) or non-residential institution (Class D1) Use. (340sq.m GIA)	7 Moorgate SARL	Approved 23.06.2020

20/00339/FULL Coleman Street	64 Moorgate London EC2M 5TB	Use of part of the ground floor and part of the basement for flexible use for either shop (Class A1) or deposit taker (Class A2) or restaurant (Class A3) (425sq.m).	Lloyds Bank PLC	Approved 09.06.2020
20/00343/FULL Coleman Street	City Point 1 Ropemaker Street London EC2Y 9AW	Temporary use of part of City Point Plaza as an open-air market for four days per week and associated outdoor seating arrangements for a temporary period between 3rd August 2020 and 4th October 2020.	Wavegrange Ltd	Approved 18.06.2020
20/00353/MDC Coleman Street	Salisbury House 31 Finsbury Circus London EC2M 5SQ	Details of an external plant noise assessment pursuant to condition 1 of planning permission 19/01247/FULL dated 7th April 2020.	Workspace	Approved 16.06.2020
20/00369/LDC Coleman Street	Chartered Accountants Hall Moorgate Place London EC2R 6EA	Details of the junctions between the new and retained parquet flooring pursuant to condition 3 (a) of listed building consent 20/00113/LBC dated 24.03.20.	Institute of Chartered Accountants In England And Wales	Approved 23.06.2020
20/00437/PODC Coleman Street	55 Moorgate London EC2R 6PA	Submission of details of the Interim Travel Plan pursuant to Schedule 4 Paragraph 9.1 of the Section 106 Agreement dated 11 October 2017 (Planning Application Reference 16/00405/FULMAJ, as amended by 18/01345/FULL).	Metrovest Moorgate S.a.r.l.	Approved 23.06.2020

20/00438/PODC Coleman Street	55 Moorgate London EC2R 6PA	Submission of details of the Delivery & Servicing Management Plan pursuant to Schedule 4 Paragraph 10.1 of the Section 106 Agreement dated 11 October 2017 (Planning Application Reference 16/00405/FULMAJ, as amended by 18/01345/FULL).	Metrovest Moorgate S.a.r.l.	Approved 23.06.2020
20/00336/MDC Cordwainer	1 Bow Churchyard London EC4M 9DQ	Submission of particulars and samples of the proposed glazing pursuant to condition 3 (a) of planning permission 19/00944/FULL dated 17.12.19.	Aviva Life and Pensions UK Limited	Approved 25.06.2020
19/00498/PODC Farringdon Within	16 Old Bailey London EC4M 7EG	Submission of the Local Procurement Strategy and the Local Training Skill & Job Brokerage Strategy pursuant to Schedule 3 Paragraphs 2.1 and 3.2 of the Section 106 Agreement dated 08 October 2018 (Planning Application Reference 18/00137/FULL).	Capital Treasure Investments Ltd	Approved 09.06.2020
19/00499/PODC 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	Submission of details of the Retail Management Strategy (for Units 1-7), pursuant to Schedule 2, Clause 14 of the Section 106 Agreement dated 29 May 2013 related to planning permission 12/00256/FULEIA (as varied by: 14/00432/FULMAJ, 15/00417/FULMAJ, 16/00164/FULL and 16/00165/FULMAJ).	Capital Treasure Investments Ltd	Approved 11.06.2020

19/00959/NMA Farringdon Within	54-58 Bartholomew Close London EC1A 7HP	Application for a non- material amendment to planning permission 16/01017/FULL to enable alterations to the layout of the extract plant at roof level.	Barts Close Office Limited	Approved 11.06.2020
20/00164/PODC Farringdon Within	Land Bounded By Charterhouse Street, Lindsey Street, Long Lane And Hayne Street London EC1	Submission of assessment of the carbon dioxide emissions of the completed development pursuant to Schedule 3 Paragraph 10 of the Section 106 Agreement dated 07 December 2015 (Planning Application Reference 13/00605/FULEIA).	Crossrail Ltd.	Approved 09.06.2020
20/00189/PODC Farringdon Within	Land Bounded By Charterhouse Street, Lindsey Street, Long Lane And Hayne Street London EC1	Submission of the Interim Travel Plan pursuant to Schedule 3 Paragraph 8.1 of the Section 106 Agreement dated 07 December 2015 (Planning Application Reference 13/00605/FULEIA).	Crossrail Ltd.	Approved 11.06.2020
20/00423/PODC Lime Street	3 St Helen's Place London EC3A 6AB	Submission of Delivery and Servicing Management Plan pursuant to Schedule 3 Paragraph 8.1 of the Section 106 Agreement dated 08 October 2019 (Planning Application Reference 18/01336/FULMAJ).	The Leathersellers' Company	Approved 23.06.2020
20/00427/NMA Lime Street	1A Whittington Avenue London EC3V 1LE	Non-material amendment under section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission dated 31/03/2020 (app. no. 20/00050/FULL) to	Landmark Holdings Group Limited	Approved 25.06.2020

		vary condition 7 to allow for minor changes to the internal layout.		
20/00356/FULL Portsoken	St Botolph Without Aldgate High Street London EC3N 1AB	Relocation of the Naomi Blake sculpture 'Sanctuary' to the northern Churchyard.	St Botolph Without Aldgate	Approved 18.06.2020
19/01051/FULMAJ Tower	41 Tower Hill London EC3N 4SG	Refurbishment of the existing building and extensions to create additional office (Class B1) floorspace. Change of use from office (Class B1) to flexible office, retail, financial services, restaurant, (Class B1/A1/A2/A3) at part ground floor and part basement level with entrance improvements and alterations to shopfront. Associated plant and cycle parking. Relocation of existing retail kiosk at ground floor level.	CMSREUK Tower Hill Propco Limited	Approved 09.06.2020
20/00322/PODC Tower	76 - 86 Fenchurch Street, 1 - 7 Northumberland Alley & 1 & 1A Carlisle Avenue London EC3N 2ES	Submission of the Delivery and Servicing Management Plan pursuant to Schedule 3 Paragraph 9.1 of the Section 106 Agreement dated 11 November 2014 (Planning Application Reference 08/00824/FULMAJ as amended by 15/00702/FULMAJ).	Partners Group Fenchurch IC Limited(Guernsey)	Approved 09.06.2020

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Committee(s)	Dated:
Planning and Transportation	14 th July 2020
Subject: Valid planning applications received by Department of the Built Environment	Public
Report of: Chief Planning Officer and Development Director	For Information

Summary

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

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

Details of Valid Applications

Application Number & Ward	Address	Proposal	Date of Validation	Applicant/ Agent
20/00271/FULL Aldersgate	The Turret, John Wesley Highwalk, Barbican, London, EC1A 4LA	Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows. The proposals include the rescission of part of the City Walkway.	17/03/2020	City of London
20/00267/FULL Bassishaw	88 Wood Street, London, EC2V 7DA	Change of use of part of ground floor from Class B1 to Class A1 (shop), change of use of part of ground floor from Class B1 to flexible either Class D2 (gym) or Class B1 (office), change of use of part of ground floor from	13/03/2020	Star Winner Enterprises Limited

		Class A1 to flexible either Class B1 (office) or Class A1 (shop), creation of new ground floor entrance from Wood Street, installation of additional cycle parking, and associated external alterations and landscaping (705sq.m).		
20/00373/FULL Bishopsgate	8 Devonshire Row, London, EC2M 4RH,	Installation of an extract duct on the rear wall of the building.	06/05/2020	Humble Grape Group LTD
20/00361/FULL Broad Street	New Broad Street House , 35 New Broad Street, London, EC2M 1NH	Retention of an existing roller shutter and installation of a new roller shutter to the service exits on the rear elevation.	05/05/2020	Base Build Services Ltd
20/00265/FULL Castle Baynard	5 Pemberton Row, London, EC4A 3BA	The replacement of existing front steps	13/03/2020	Mr Andrew Weisz
20/00311/FULMAJ Cheap	81 Newgate Street, London, EC1A 7AJ	Part refurbishment and part demolition, excavation and redevelopment involving the erection of an additional four storeys to provide a ground plus 13 storey building with publicly accessible route through the site, incorporating gym and swimming pool (Use Class D2) at basement levels, gym and flexible floor area	01/04/2020	NG Devco Limited

		uses (Use Classes A1-A5, B1, D2) at basement level, retail (A1-A5) at ground floor level with access to offices and rooftop restaurant and public viewing gallery, office accommodation (Use Class B1a) from levels 1-13, roof top restaurant (Use Class A3) and publicly and privately accessible roof terraces, landscaping and other associated works.		
20/00325/FULEIA Coleman Street	101 Moorgate, London, EC2M 6SL	<p>Erection of a new building for office (Class B1) and retail/cafe (Class A1/A3) uses comprising part basement, ground, mezzanine and eight upper floors plus rooftop plant enclosure and roof terrace. Creation of new public thoroughfare.</p> <p>(The total proposed floor area of the building is 10,162sq.m GEA, comprising 9,867sq.m of office floorspace and 295sq.m of retail (Class A1) floorspace.)</p> <p>This application is accompanied by an Environmental Impact Assessment</p>	08/04/2020	Aviva Life and Pensions

		which is available for inspection with the planning application. Copies of the Update to the EIA may be obtained from Savills, 33 Margaret Street, London W1G 0JD at a cost of 120GBP.		
20/00366/FULL Coleman Street	Retail Unit 7 , 1 Ropemaker Street, London, EC2Y 9AW	Change of use of ground floor lobby and basement from nightclub (sui generis) to flexible medical clinic/gym use (sui generis) and associated works, including relocating the entrance door (1,235sq.m).	07/05/2020	Wavegrange Ltd
20/00302/FULL Cripplegate	Barbican Arts And Conference Centre , Silk Street, London, EC2Y 8DS	Removal of three sets of automated sliding doors and replacement with three pairs automated swing doors to existing openings, facing the Lakeside Terrace.	25/03/2020	City of London Corporation
20/00258/FULL Farringdon Within	8 - 10 Half Moon Court, London, EC1A 7HE	Application under S.73 of the Town and Country Planning Act 1990 (as amended) to allow variation of conditions 2 and 9 of planning permission 09/00800/FULL dated 18/02/10 to make minor material amendments to the external	10/03/2020	HDG Ltd

		appearance of the building.		
20/00299/FULL Farringdon Within	The Penthouse, Amen Lodge, Warwick Lane, London, EC4M 7BY	Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 7 (approved drawings) of planning permission 17/00612/FULL dated 15.10.2019 to enable minor material amendments to the approved scheme, including (i) changes to the fenestration on the west elevation at sixth floor level; (ii) increase in the height of the roof by 0.4m at the south east corner of the building; (iii) the installation of a rooftop plant enclosure.	30/03/2020	Mr Motasim Abdellatif
20/00201/FULL Farringdon Within	33 Black Friars Lane, London, EC4V 6EP	Alterations to ground floor elevations, including the removal and revised door openings, new louvred gate, new canopy, external lighting and alterations to existing glazing.	29/04/2020	E&A Securities
20/00371/FULMAJ Farringdon Within	150 Aldersgate Street, 3-4 Bartholomew Place, London, EC1A	(i) Demolition of roof top plant enclosure, rear service ramp and removal of cladding to facilitate the refurbishment,	01/05/2020	Arindel Properties Limited

		<p>recladding and extension of the existing Office (Class B1(a)) building at 150 Aldersgate Street to create a basement, ground plus nine storey building, including rear and roof top extensions, infill extensions to the rear courtyard (ground plus two storeys) to link with 3-4 Bartholomew Place;</p> <p>(ii) a part change of use at ground floor from Office (Class B1) to Cafe (Class A1) (41sq.m GIA);</p> <p>(iii) erection of a new building Office (Class B1(a)) at 3-4 Bartholomew Place comprised of basement, ground plus three storeys;</p> <p>(iv) the amalgamation of the two buildings;</p> <p>(v) the creation of new accessible and inaccessible terraces, green roofs, hard and soft landscaping, and creation of external courtyards;</p> <p>(vi) upgrade works to Braidwood Passage, including new lighting; and</p> <p>(vii) reconfiguration of the loading bay and associated works.</p>		
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20/00320/FULL Farringdon Without	40 Holborn Viaduct, London, EC1N 2PB	Alterations to the Charterhouse Street elevation at ground floor level to provide a secondary entrance and entrance canopy; and installation of glazing on the north-eastern corner with Shoe Lane.	06/04/2020	HV Freehold Sarl
20/00288/FULL Langbourn	20 Gracechurch Street, London, EC3V 0BG	Alterations at 4th floor level to provide 5 sets of doors in place of glazing and the creation of a terrace with structures on existing flat roof.	28/04/2020	Aviva Investors
20/00377/FULL Tower	76-78 Fenchurch Street, 1-7 Northumberland Alley, 1&1A Carlisle Avenue, London, EC3N 2ES	Use of part lower ground and part ground floors as a gym (Class D2) in lieu of the approved retail (Class A1-A3) uses.	07/05/2020	Partners Group Fenchurch IC Limited (Guernsey)

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