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| <b>Committee:</b>   | <b>Date:</b>                             |
| Planning and Transportation   | 18 March 2019                            |
| <b>Subject:</b><br>Seal House 1 Swan Lane London EC4R 3TN<br>Demolition of the existing building and construction of a basement, ground plus 11 storey building for office use (Class B1) (16,084sq.m GIA), retail use (Class A1/A3) at ground (314sq.m GIA), restaurant use (Class A3) at 11th floor level (708sq.m GIA), a publicly accessible terrace at 12th floor roof level (744sq.m) and public realm improvement works together with ancillary parking, servicing and plant and all necessary enabling works. | <b>Public</b>                            |
| <b>Ward:</b> Bridge And Bridge Without  | <b>For Decision</b>                      |
| <b>Registered No:</b> 18/01178/FULMAJ   | <b>Registered on:</b><br>2 November 2018 |
| <b>Conservation Area:</b>   | <b>Listed Building:</b> No               |

### Summary

Full planning permission is sought for the redevelopment of the Site for:

"Demolition of the existing building and construction of a basement, ground plus 11 storey building for office use (Class B1), retail use (Class A1/A3) at ground, restaurant use (Class A3) at 11th floor level, a publicly accessible terrace at 12th floor roof level and public realm improvement works together with ancillary parking, servicing and plant and all necessary enabling works."

The proposal accords with the strategic objective to ensure that the City maintains its position as the world's leading international financial and business centre.

The proposed retail floorspace accords with Local Plan Policy DM1.5 which encourages a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for businesses, workers and residents.

The proposal would obscure a small narrow extent of river in views from the Monument viewing gallery, which would represent a departure from policy and amounts to less than substantial harm. It is considered that the proposed scheme offers such significant wider and inclusive public benefits which outweigh the less than substantial harm to the view from the Monument. In particular, the provision of a large free to access public roof garden with

generous opening hours offering exceptional views of London in a high quality economically and socially inclusive space is considered to represent a valuable and unique new asset for the City and London as a whole, for its workers, residents and visitors.

The scheme would make optimal use of the capacity of a site with high levels of public transport accessibility and would be car free, with the exception of two disabled car parking spaces. 266 long stay cycle parking spaces, 70 short stay cycle parking facilities, and associated facilities would be provided.

The development has been assessed in respect of flood risk and the Environment Agency have confirmed that they have no objection to the scheme.

The scheme would provide significant benefits through the CIL and S106 for improvements to the public realm, housing and other local facilities and measures. The payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general payment there would be site specific measures sought in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.

In this case whilst the development represents a departure from policy and amounts to less than substantial harm, it is considered that the proposed scheme offers such significant wider and inclusive public benefits which outweigh the less than substantial harm. It is therefore considered that the proposed development is acceptable as a whole and planning permission should be granted as set out in the recommendation and the schedules attached.

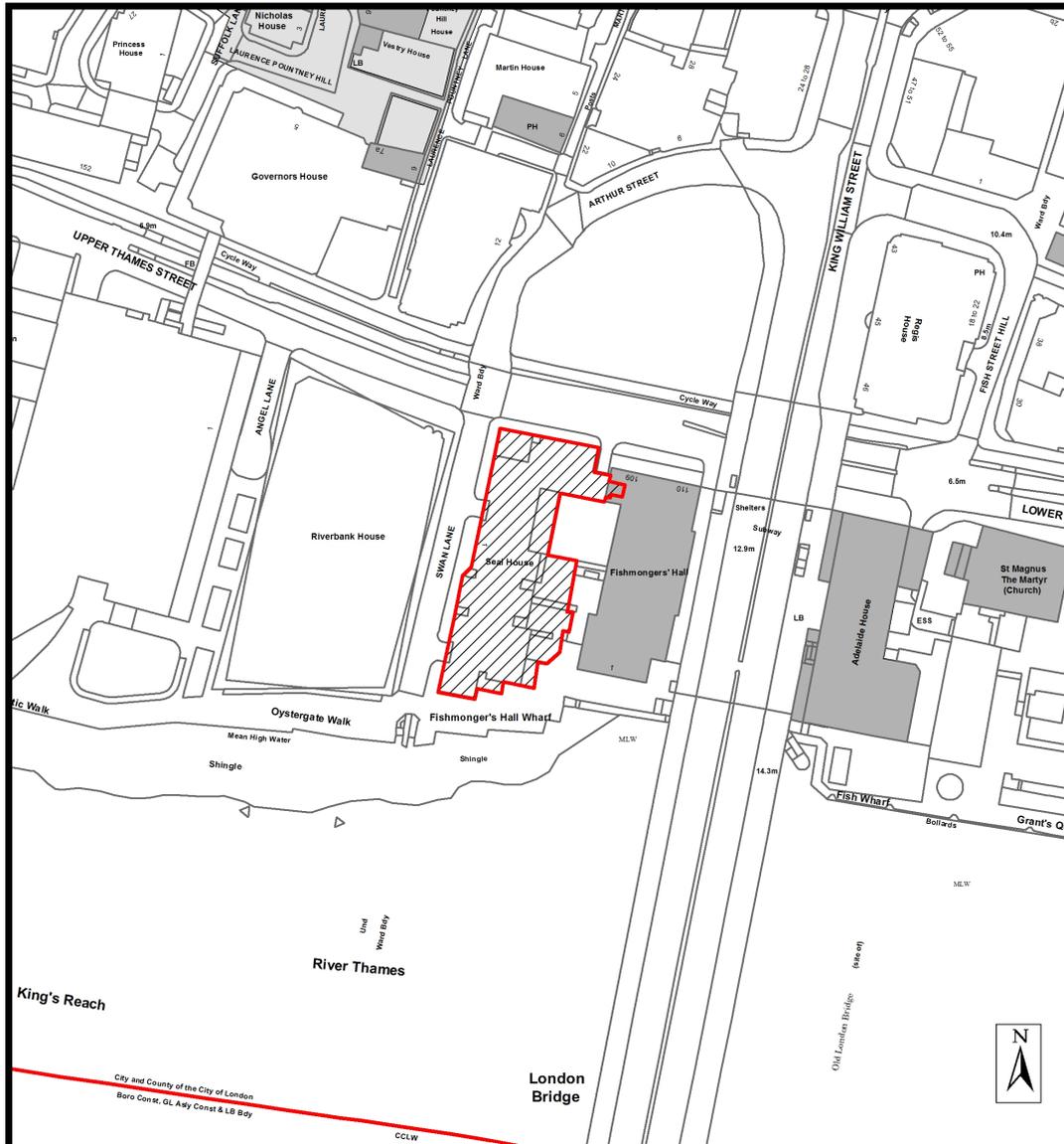
### **Recommendation**

(a) The application be referred to the Mayor of London 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 permission be GRANTED for the above proposal in accordance with the details set out in the attached schedule, the planning obligations and other agreements being entered into in respect of those matters set out in the report, the decision notice not to be issued until such obligations have been executed;

(c) That your officers be instructed to negotiate and execute obligations in respect of those matters set out in the report under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

# Site Location Plan



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ADDRESS:

Seal House, 1 Swan Lane

CASE No.

18/01178/FULMAJ

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



DEPARTMENT OF THE BUILT ENVIRONMENT



## **Main Report**

### **Site Location and Current Buildings**

1. The Site is 0.214 hectares in area and comprises the building known as Seal House, 1 Swan Lane, and a small section of the external courtyard and North Wing of Fishmonger's Hall, which is Grade II\* listed and a Scheduled Monument. It is bounded by Upper Thames Street to the north, Fishmonger's Hall and its courtyard to the east, the Riverside Walk to the south and Swan Lane to the west.
2. Seal House provides 8,507sq.m GIA office accommodation on the upper floors with ancillary parking and plant on the ground floor. The existing building dates from 1978 and formed part of a development constructed on the site of former warehouses and medieval lanes which included the Riverbank House Site. The building steps down from 7 storeys plus plant on the west side of the site to 6 storeys plus plant towards Fishmongers' Hall. The Upper Thames Street frontage is connected to the North Wing of Fishmongers' Hall at levels 1 to 7 of the Hall by a recessed linking structure above a vehicular access into the courtyard between the buildings which provides ancillary accommodation for the Fishmongers. The Upper Thames Street frontage accommodates a staircase which used to lead to a City Walkway pedestrian bridge that crossed to 33 King William Street on the northern side of Upper Thames Street before it was demolished as part of the redevelopment of that site, completed in December 2017.
3. The site is impacted by a number of planning policy designations. It is located within the Thames Policy Area, and sits within Landmark Viewing Corridors and Landmark Lateral Assessment Areas in the LVMF Protected Vista 5A.2 from Greenwich Park to St Paul's Cathedral and Protected Vista 6A.2 from Blackheath Point. It also sits within the Landmark Background Assessment Area in the Protected Vista 4A.1 from Primrose Hill to St Paul's and the City's locally protected view from the Monument towards the River Thames (View 3 from the Monument gallery).
4. The existing building is not listed and is not located within a conservation area. However, a small portion of the Fishmonger's Hall, comprising the northernmost portion of the west facade, a small area of the North Wing and a small portion of the courtyard of the building also forms part of the site. The site has been identified as having high archaeological potential.
5. The site is located within Flood Zone 3a (land assessed as having a 1% or greater annual probability of fluvial flooding (1 in 100 return period of greater) or 0.5% or greater annual probability of sea flooding (1 in 200 return period or greater).
6. The site has excellent transport links with a Public Transport Accessibility Level (PTAL) rating of 6b. It is close to Monument (220m), Cannon Street (350m), Bank (500m), and London Bridge (900m) London Underground Stations, which are served by a combination of the Circle, District, Northern, Jubilee, Waterloo & City Lines and the Docklands

Light Railway (DLR). Cannon Street and London Bridge also provide National Rail services, as does Fenchurch Street (900m) to the north east. The site also benefits from excellent access to bus services, and is located near two Santander Cycle Docking Stations, with the nearest being located 180m to the east, along Lower Thames Street (which comprises 24 docks). Additionally, a docking station (comprising of 22 docks) is located along Monument Street approximately 280m northeast. Public transport accessibility is expected to increase further with future public transport improvements including London Underground Station improvements and the introduction of Crossrail which is expected to increase rail capacity, improve journey times and relieve congestion.

7. Vehicle access and cycle parking access is currently from Swan Lane. This serves an existing under-croft parking and delivery area which includes 10 demarcated parking spaces, two of which are used to accommodate 39 cycle parking spaces. The courtyard of the Fishmonger's Hall is accessible through Seal House via the existing vehicle access, although this access is not currently used, and all traffic associated with that building accesses the courtyard directly from Upper Thames Street. There is a set of louvred doors to the southern end of Swan Lane which access the Seal House plant area only.
8. Pedestrians currently access Seal House from Swan Lane

### **Planning history**

9. On 22<sup>nd</sup> April 2008 Planning and Transportation Committee refused planning permission for:  
*Erection of single building incorporating 19,051sq.m (GEA) of B1 office accommodation and demolition of elevated pedestrian crossing together with associated parking servicing and plant (11 Storeys). (application reference 07/00712/FULL).*
10. This application was refused for two reasons:
  - The proposed building would have adversely affected the setting of the Scheduled Ancient Monument and Grade II\* listed Fishmongers' Hall due to its excessive height in relationship to it, diminishing its presence and scale in river prospects and views from London Bridge and from the east; and
  - The impact of the proposal on the view from the Monument. The proposed building would have resulted in a substantial reduction in the appreciation of the south-west view including the river, Cannon Street railway bridge and the river's westward continuity.
11. On 24<sup>th</sup> March 2009 Planning and Transportation granted planning permission for:  
*Erection of a single building incorporating 18,339sq.m (GEA) of B1 office uses, 118sq.m (GEA) of A1/A2/A3/A4 retail uses and demolition of elevated pedestrian crossing together with associated parking, servicing and plant (11 storeys 50.65m AOD). (application reference 08/01044/FULMAJ).*

12. The proposed building had been designed to respond to the previous grounds for refusal. The proposal did not have a significant impact on the view of the river from the Monument. The proposed building would have been significantly larger than Fishmongers Hall but it was considered that it would not reduce the grandeur and scale of it.
13. These decisions are expired but remain material considerations.

## **Proposal**

14. Full planning permission is sought for the redevelopment of the Site for:  
*“demolition of the existing building and construction of a basement, ground plus 11 storey building for office use (Class B1), retail use (Class A1/A3) at ground, restaurant use (Class A3) at 11th floor level, a publicly accessible terrace at 12th floor roof level and public realm improvement works together with ancillary parking, servicing and plant and all necessary enabling works.”*
15. The proposed building comprises basement, ground plus 11 storeys and will reach a maximum height of 51.183m AOD. At ground floor level, an office lobby accessed from Upper Thames Street would provide entry to office floorspace located at floors 1 to 10. Retail (A1/A3) floorspace would be located at ground floor level accessed from the Riverside Walk. A publicly accessible roof terrace would be located on the roof of the building. A restaurant (A3) is proposed at 11th floor level. Separate entrances for the terrace and the restaurant would be provided at ground floor level from the Riverside Walk. Vehicle access to servicing/loading area would be provided from Swan Lane, with ground floor access to cycling facilities located within the basement provided from Upper Thames Street east of the office entrance.
16. The proposed building would be predominately clad in glass and granite. The building mass is articulated, mediating between the large-scale modern commercial developments to the west of the Site and the proportions of Fishmongers’ Hall.
17. The existing link building situated over the Fishmongers Hall north vehicle entrance would be replaced by a smaller three storey (above ground) link building containing plant for the proposed development. Dark bronze gates would control vehicular access to the Fishmongers courtyard beyond. The three storeys above would be clad in a screen of carved stone modules, mounted with the feature crest of the Fishmongers and incorporating a vertical green wall, providing a more defined entrance to their courtyard and screening large horizontal louvres shielding the plant spaces behind.

## **Office floorspace**

18. The proposed scheme would provide a total of 16,084sq.m (GIA) of office floorspace (Class B1). The main office reception would be accessed from Upper Thames Street. Office floors would be accessed via five scenic lifts along the west side of the reception. Alongside the

five passenger lifts there would be a goods lift, firefighting lift, stair, landlord services and the primary WC's. There would be a compact satellite core to the north east providing a second escape stair, landlord services and additional WC's.

19. Double height fully glazed winter gardens would be located at alternate floors at the south east stepped-back corner of the building, providing amenity space and bringing an element of landscaping into the building. Outdoor amenity space for office workers would be provided with large terraces at levels 9 and 10 to the south and north of the building respectively.

#### Publicly accessible rooftop garden

20. At the top of the building a publicly accessible terrace and landscaped garden would be provided at 12th floor roof level accessed from a dedicated ground floor public entrance off the Riverside Walk. The Site is situated at a prominent point on the north bank of the Thames, enabling the provision of spectacular uninterrupted views towards Tower Bridge to the east, Southwark Cathedral and Borough to the south, and St Paul's Cathedral and the Eastern Cluster to the north. The terrace has been designed to capitalise on these views.
21. The ground floor public lobby would provide space for an appropriate level of security screening and population counting, and provision of on-site information. From the lobby a lift would take visitors up to an 11th floor public terrace. The 11th floor terrace would be open to the elements on its south face, but would be fully undercover and provide an early glimpse of the panorama of the Thames. From there members of the public can access the roof terrace and garden via the staircase or platform lift. The terrace would accommodate up to 200 members of the public at any one time.
22. The public roof garden would be open all year round, seven days a week, from 10am to 7pm or dusk, whichever is later (and closed on Christmas Day, Boxing Day and New Year's Day).
23. Hard and soft landscaping is proposed including a range of planting, pathways, greenery, seats, benches and a small servery counter. The landscaping would be split into two areas, with south and north sections linked but with distinctly separate characters defined by the landscape design. Where roof spaces cannot be accessed for practical reasons, such as being the location of plant, the surfaces would be greened where possible to provide visual amenity for visitors and in views from surrounding buildings, and to enhance the biodiversity of the Site.
24. The glass balustrades surrounding the roof terrace would be approximately 1200mm in height to remain below the threshold level set by LVMF views, and will be set back from the edge of the building for security purposes.

### Restaurant (A3) floorspace

25. A 708sq.m restaurant would be provided at level 11 with capacity for approximately 180 people (160 diners and 20 at the bar). Visitors would take the passenger lift from the ground floor restaurant lobby to the 11th floor covered terrace, where a dedicated entrance to the restaurant would be provided.

### Retail/restaurant (A1/A3) floorspace

26. A total of 314sq.m (GIA) of flexible retail/restaurant floorspace is proposed at ground floor level on the southern elevation of the building fronting onto the Riverside Walk, with some ancillary floorspace provided within the basement.

### Basement, ancillary servicing, plant, refuse and parking

27. The basement level depth varies in order to minimise impacts on potential archaeological remains and to avoid the existing Thames Water sewer running under the Site.
28. Cycle parking and associated amenities would be provided at the shallower basement level to the north of the Site. A total of 266 cycle parking spaces would be provided, accompanied by associated facilities including 27 showers and 266 lockers, split approximately 50/50 between male and female facilities. This includes 2 cargo or hand cycle spaces, and a separate accessible WC and shower room. Direct access would be provided to the cycle parking facilities via a dedicated entrance from Upper Thames Street to the east of the office entrance, with stairs and accompanying cycle rails leading down to basement level.
29. The majority of the deeper basement level to the south would be occupied by the building's mechanical and electrical plant. Refuse storage would be located in the centre of the basement, adjacent to the goods lift. The remaining space in the southeast of the basement would be allocated for retail/restaurant use, with a connection to the unit at ground floor level. Two passenger lifts serve the office levels, accompanied by one goods and one firefighting lift.

### Inclusive access

30. All entrances provide level access into the building and internal spaces are designed to be suitable for use by people with disabilities. The viewing terrace on the roof and covered terrace and restaurant on level 11 will be fully accessible. Two car parking spaces will be provided for drivers with disabilities and it is anticipated the cargo cycle spaces in the basement can also be used for hand cycles, with step free access provided via the goods lift in the service yard which goes to the lowest level of the basement, from which a hydraulic platform provides access up to the cycle hub level.

## Interventions to the Scheduled Monument and listed building

31. It is proposed to demolish the existing 1970s link to Fishmongers' Hall and replace it with a new link building. This involves works to the North Wing of the Fishmongers' Hall – the openings formed during the construction of the proposed building would be blocked up with matching masonry at floors 1 to 7 of the Hall.

## Public realm

32. Limited public realm works are required other than the making good of land within the Fishmongers' Hall courtyard, around the building, the formation of steps and inclusive ramp at the south of the building and new trees. The proposed trees have been positioned to ensure that a maintenance vehicle can access the flood defence.
33. The proposed extent of public realm surrounding the building would be 1507.4sq.m, which is an increase of 259sq.m compared to the approved scheme.

## Consultations

34. The views of other City of London departments have been taken into account in considering the scheme and detailed matters will be covered under conditions and the Section 106 agreement. These include matters relating to environmental controls such as noise, fume extract and ventilation, controls during construction activities, and security matters.
35. The GLA states that:

*'The application is generally acceptable in strategic planning terms however the application does not comply with the London Plan for the reasons set out below:*

### *Principle of development*

*Noting London Plan and draft London Plan policies regarding strategic uses within the CAZ, the proposed uplift in office floorspace and provision of a publicly accessible roof terrace on the site is supported and the ensures the full optimisation of this well-located site. The City must secure the viewing platform to be free of charge to the public and restrictive booking policies should be avoided.*

### *Urban design*

*Subject to confirmation that the proposed development does not compromise the Protected Vista from Primrose Hill to St Pauls the proposed design is acceptable in strategic planning terms.*

### *Sustainable development*

*The applicant must provide further details on the proposed energy strategy and sustainable drainage proposals to demonstrate London Plan compliance.*

### Transport

*The applicant must address transport issues with respect to; short stay cycle parking and car parking provision. The Council must secure Travel plans, delivery and servicing plans, a construction logistics plan through conditions.*

36. TfL have stated that:

*In summary, some further information is required from the applicant before the proposal can be fully supported. This includes additional London Underground Impact Assessment, short term cycle parking provision and clarification on the formalisation of five car parking spaces at Fishmongers Hall.*

37. In response to the memo prepared by WSP in response to TfL's comments TfL have stated that:

#### Car and Cycle Parking

*In regards to car parking provision at this site, TfL welcomes the reduction in spaces from ten to five.*

#### Public Transport

*TfL notes that the TA has been updated to include an assessment of underground trips per station, line and direction of travel. This is welcomed as it demonstrates the impact of the development clearly and effectively. The assessment shows that the development will generate relatively low numbers of trips for this mode of transport, therefore does not cause any significant concerns for either TfL Rail or London Underground.*

#### Healthy Streets

*It is welcomed that the applicant has updated the TA to include a Healthy Streets Assessment of the site. The assessment concludes that the proposals would result in a higher 'Healthy Street' score – from 73 to 77 - than the current site.*

#### Construction and Servicing and Freight

*TfL notes that final CMPs, CLPs and DSMP will be secured through condition. Due to the sites location adjoining TLRN, TfL should be consulted on the CMP, CLP and DSMP.*

38. Historic England have commented in relation to the scheduled monument of Fishmongers Hall as follows:

*The project at Seal House will affect the scheduled monument of Fishmongers Hall (monument number LO 34), and scheduled monument consent will be required for the works of demolition. I have been engaged in pre-application discussions with the applicant and have been reassured that no harm will come to the monument from the demolition. I have received detailed information as part of an application for scheduled monument consent to enable me to review this, and on this basis, consent has now been granted, subject to conditions.*

*The new development will encroach into the setting of Fishmongers Hall, however, the setting is already very busy, and the current proposal is an improvement on the previously consented scheme from the point of the setting of Fishmongers Hall. Therefore, I have no concerns about the impact of the proposed scheme.*

39. The Environment Agency originally objected on the basis that the applicant had failed to demonstrate the risks to the tidal defences have been fully understood and how the development will ensure it is safe for its lifetime and will not increase the risk of flooding. Following the submission of amendments, the Environment Agency have withdrawn their objection.

40. The Lead Local Flood Authority and Thames Water have requested conditions

41. The City Heritage Society have commented as follows:

*We have some concern about the increased height of the proposed building compared with the existing though the restrained treatment of the proposed building is welcome.*

*Regarding the South elevation the three columns of the proposed ground floor appear somewhat uncomfortable. Unless there is some significant structural implication, we consider that four equally spaced columns would be an improvement. Similarly, on the East facade, though this will be seen from a limited area, nonetheless the introduction of the shaped support seems perverse.*

*Regarding the North facade the proposed treatment of the Fishmonger Hall plant area is we believe unsuitable. The introduction of hydroponic planting into this urban townscape is inappropriate. The scalloped detailing of the facade is curious and does not relate either to the classical facade of the hall or to the restrained modern facade of Seal House. The huge stone crest of the Company over what appear to be very basic industrial gates is odd. If such a crest is to be incorporated, then in our view the gates should also have some magnificence. This link we feel needs rethinking.*

42. The Port of London Authority have commented as follows:

*The PLA has no objection in principle to the proposed development, but does have the following observations to make:*

*The application has been accompanied by a 'Transport Assessment' (October 2018) and 'Framework Travel Plan' (October 2018) (in addition to the Planning Statement and D&A Statement and sustainability report). Much has been made regarding the importance of promoting sustainable travel (which would accord with the provisions set out within the National Planning Policy Framework), and it is pleasing to see that the River Bus Service has been included within both documents as an existing alternative public transport mode. However, there is little reference to the promotion of river based transport as part of the Travel Plan's objectives and targets. The PLA, through its Thames Vision, seeks to increase the number of passenger trips on the River (reaching 20 million commuter*

*and tourist trips every year by 2035). This also supports the Mayor's Transport Strategy (2018), which outlines a number of specific measures to be taken by Transport for London (TfL) and other stakeholders to help boost the number of river trips.*

*In light of this, the PLA requests that further emphasis be given to the promotion of River Bus use and that information on the following be included within a revised Travel Plan to be submitted via condition to the planning decision (should planning permission be forthcoming):*

- 1) Provision of targets for river bus use;*
- 2) Measures to encourage river bus use;*
- 3) Timetables for the River Bus stops in proximity to the site.*

### **Policy Context**

43. The development plan consists of the London Plan and the Local Plan. The draft Local Plan is at consultation stage, and while it is a material consideration it has limited weight.
44. The Mayor of London has prepared a draft new London Plan which is a material consideration to be taken into account. The London Plan, draft London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report. Relatively little weight should be afforded to the Draft London Plan.
45. There is relevant supplementary planning guidance in respect of the City of London's protected Views SPD of January 2012, Thames Strategy SPD of June 2015 and the Planning Obligations SPD. There is relevant Mayoral supplementary planning guidance in respect of Sustainable Design and Construction, London View Management Framework, Accessible London, Control of Dust and Emissions during Construction and Demolition, and Use of Planning Obligations in the funding of Crossrail and the Mayoral CIL.
46. Government Guidance is contained in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

### **Considerations**

47. The Corporation, in determining the planning application has the following main statutory duties to perform:-  
  
To have regard to the provisions of the development plan, so far as material to the application, any local finance considerations so far as material to the application, and other material considerations. (Section 70(2) Town & Country Planning Act 1990);  
To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004);
48. 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...’.

49. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

### **Principal Issues**

50. The principal issues in considering this application are:
  - The economic benefits of the scheme;
  - Impact on retail and the public realm;
  - 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 of the proposals on the views from the Monument;
  - Servicing, Transport and impact on public highways;
  - The impact of the proposal on nearby buildings and spaces, including environmental impacts such as wind microclimate, energy and sustainability; and
  - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.

### **Economic Issues and Need for the Development**

51. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating ?45 billion in economic output (as measured by Gross Value Added), equivalent to 13% of London's output and 3% of total UK output. The City is a significant and growing centre of employment, providing employment for over 450,000 people.
52. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can still provide a significant competitive advantage.
53. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides

a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs).

54. The National Planning Policy Framework establishes a presumption in favour of sustainable development and places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
55. The City of London lies within the Central Activities Zone (CAZ), which is London's geographic, economic and administrative core and contains London's largest concentration of financial and business services. The London Plan 2016 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy 2.10). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and policies 2.11 and 4.3 provide for exemptions from mixed use development in the City in order to achieve this aim.
56. The London Plan projects future employment growth across London, projecting an increase in City employment of 151,000 between 2011 and 2036, a growth of 35.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
57. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
58. The proposed development would provide 16,084sq.m GIA of B1(a) office floorspace (an increase of 7576.5sq.m GIA), further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ. The development would accommodate approximately 1531 office workers.
59. The proposed development includes large floor plates, which maximise internal usable areas, which addresses the needs of international business in accordance with Local Plan policy DM1.2.

### **Provision of office accommodation**

60. The provision of a substantial office building in this location meets the aims of policy CS7 in delivering 16,084sq.m of office floorspace, which is an additional 7576.5sq.m.
61. The proposed development would add a substantial amount of B1 office floorspace to the City's office stock, which is supported in accordance with Local Plan Policy CS1. This additional floorspace will make a significant contribution towards meeting the Local Plan's overall office floorspace targets to 2026 and the draft Local Plan's targets to 2036.

### **Provision of retail accommodation**

62. The site is not within a designated Principal Shopping Centre (PSC) or Retail Link as defined in Local Plan policy DM20.1. Elsewhere in the City, Local Plan policy DM20.3 seeks to maintain existing retail uses and promote active frontage. Local Plan policy CS9 promotes office-led commercial development along the river, encouraging a mix of appropriate commercial uses, including retail.
63. In total, 1022sq.m of retail floorspace (Class A1 or A3) is proposed, Flexible retail use (Class A1 or A3) is proposed at ground floor (314sq.m) providing an active frontage on the riverfront, and a restaurant (Class A3) is proposed on the 11<sup>th</sup> floor. This is welcomed as there is no retail provision in the existing building and this part of the City currently lacks retail provision and active frontages.
64. The retail units would help to enliven the public realm, particularly welcome on the river front, and would be of benefit to workers, residents and visitors. The proposal would comply with Local Plan policy DM20.3, which supports retail outside of the PSCs where it would help form an active frontage, provide amenity to City workers, residents and visitors and enhance vibrancy.

### **Bulk and Massing**

65. The site falls within the Landmark Viewing Corridors and Landmark Assessment Areas in LVMF Protected Views View 5A.2 (Greenwich Park) and 6A.1 (Blackheath), both views focus on St Paul's Cathedral. The site falls within the Landmark Background Assessment Area of the LVMF view of St Pauls from Primrose Hill (4A.1). As a result of these three view constraints the overall height of the scheme rises to a height of 51.183m to fall beneath the view thresholds.
66. The massing of the building has been designed not only to respect strategic London wide views but also to appropriately respond to its immediate setting. In particular to respect the setting of the listed Fishmongers Hall and the prevailing building heights of other riverfront buildings. The height of the building is considered acceptable.
67. The footprint of the building broadly mirror's the existing building though the south western corner is set back 6m from the existing

building line to maximize public realm on the riverfront. The south eastern corner is set back to create a recessive breathing space to Fishmongers Hall as well as minimizing the visual intrusion into the view from the Monument.

### **Design Approach**

68. The design approach is intended to deliver a new architectural statement on this important riverside location with sufficient gravitas to hold its own whilst respecting and not visually overwhelming the neighbouring listed Fishmongers hall. It is intended to echo the architectural characteristics and materials of riverfront buildings.
69. In this respect, the robust deep masonry grid of granite and precast concrete columns and beams creates a structural facade befitting the riverfront setting. The cast iron columns are reminiscent of those on the Thames warehouse buildings and are appropriate to a riverfront setting. The use of a bold red colour for the columns enlivens the riverfront and is appropriate alongside the striking yellow angled soffits of the neighbouring Riverbank House.
70. The glazing line is generously recessed back from the masonry grid providing an appropriate level of visual depth and modelling especially in oblique views and in views from the river walk.
71. The use of granite on the masonry grid echoes the use of the stone on the lower levels of Fishmongers Hall and Rennie's London Bridge. The robust quality of the granite is synonymous with the riverfront and the river walls.
72. The recessed upper three storeys of the building feature loggias and projecting briese soleil with a strong horizontal emphasis and a simpler glazed elevation along with painted circular steel columns which create an appropriate visual termination to the building. The design of these upper storeys combined with the double height recessed lower two storeys supported by red cast iron columns results in a well-proportioned facade with a base, middle and top. The glass balustrade to the roof garden appropriately advertises this public terrace in surrounding views.
73. A link building is proposed on Upper Thames Street providing one of the formal entrances to the Fishmongers' Hall. The ground floor of this link comprises dark bronze gates allowing vehicular access with a four-storey concave curved granite screen incorporating a large crest of the Fishmongers. The upper levels will also include vertical greening which will assist in softening the hard townscape of lower Thames Street and create a visual relief between the Fishmongers Hall and Seal House. The louvres on the south elevation of the link will be conditioned to be architecturally integrated in to the facade design.
74. In comparison with the inactive, windowless masonry wall of the existing building on the riverwalk, the scheme provides active glazed restaurant frontages to the south and south east fronting the river walk greatly enlivening the public realm which will substantially enhance the

vibrancy and character of the public realm. Such an addition complements the restaurant and bar uses on Watermark Place and the private restaurant on Riverbank House, which incrementally are transforming the riverfront into a vibrant and active area for workers, residents and visitors.

75. In addition, the dedicated ground floor entrance to the free roof garden will be prominently located on the south-west corner, incorporated within a glazed facade which will be an important focal point for the public to access the public roof garden and its dedicated lift.
76. The scheme involves pulling the building line on the south western part of the building back to create a more generous public realm on the riverfront, optimizing the riverfront setting, the views and the south facing sunny aspect to deliver public realm of the highest quality.
77. The west elevation fronting on to Swan Lane incorporates the vehicular delivery entrance, fire escapes and electrical substation. The glazed scenic lifts at ground floor level, the glazed office reception wrapping around and the glazed entrance reception to the roof garden will introduce an appropriate degree of visual interest to Swan Lane.
78. The east elevation fronting the courtyard will be enlivened by the return glazed elevation of the ground floor restaurant and the historic fishing boat displays with the masonry grid facades continuing around and supported by a dynamic angled column.
79. A key public benefit of the scheme will be the provision of a free to visit roof garden providing spectacular 360 degree views of the City and its landmarks. The roof terrace provides a riverside terrace offering exceptional river views and a more enclosed terrace surrounded by planting which will offer a quieter reflective space. The landscaping is well considered and includes abundant soft landscaping and greenery. The landscaping has been designed with reference to the development of the English garden and will evolve through the seasons.
80. The wider public benefit of the public roof garden to mitigate the less than substantial harm caused by the minor diminishment in the views from the Monument is discussed in proceeding paragraphs.
81. The roof level plant is screened from upper level views by horizontal louvres resulting in an appropriate visual termination to the building.

### **Public Realm**

82. Local Plan Core Strategic Policy CS9 seeks to improve access to the river and riverside walk from the rest of the City and to improve the vibrancy of the riverside by encouraging a mix of appropriate commercial uses. The site is located along the riverside walkway to the west of London Bridge, but the current building does not have an active frontage onto the riverside walk or contribute to enhancement of the public realm. As set out in the City of London Riverside Walk Enhancement Strategy, riverfront redevelopment projects provide good opportunities to enhance the Riverside Walk.

83. The scheme offers a greatly improved public realm on the riverfront with more generous sized riverside terrace enlivened by a new riverfront retail unit and the reception to the roof garden. Areas of tables and chairs will complement the vibrancy of the riverside terrace. The proposals would encourage more people to use the space, in accordance with Policy CS9 and the Thames Strategy SPD.

#### **London Views Management Framework**

84. The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. It explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views. The LVMF provides Mayoral Supplementary Planning Guidance (SPG) on the management of 27 strategically important views designated in the London Plan. It elaborates on the policy approach set out in London Plan policies 7.10, 7.11 and 7.12 and came into effect on 16 March 2012. London Plan policy requires that development should not cause adverse impacts on World Heritage Sites or their settings and that new development should not harm and where possible should make a positive contribution to the characteristics and composition of strategic views and their landmark elements. The impact of the proposal on the relevant LVMF views will be discussed in turn:

#### **Primrose Hill to St Paul's Cathedral (View 4A.1)**

85. This view offers good views of St Paul's Cathedral. The proposal is located in the Background Wider Setting Consultation Area behind St Paul's in this view. The threshold height within this Consultation Area is 52.1m AOD. The development, which rises to 51.4m AOD will fall below this threshold.
86. The proposal is considered to accord with the guidance for this view. The proposal does not compromise St Paul's Cathedral or its Western Towers being recognisable.

#### **Greenwich Park to St Paul's Cathedral (View 5A.2)**

87. The proposal lies in the foreground of the Cathedral in this view and straddles the Landmark Viewing Corridor and the Wider Setting Consultation Area. The threshold height of both at this point is 51.324m AOD. The development rises up to (and does not breach) this is 51.324m AOD height.
88. The proposal is considered to accord with the guidance for this view (para 144 and 145) of the LVMF) in the manner in which the proposal, by virtue of its modest height does not harm the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers or harming the visual relationship between Tower Bridge, the Monument and St Paul's Cathedral as important landmarks.

### Blackheath Point to St Paul's (View 6A)

89. This view offers views of the dome and western towers of the Cathedral, the former silhouetted against the sky, enabling clear recognition and appreciation of the landmark. The proposal lies in the foreground of the Cathedral in this view and straddles the Landmark Viewing Corridor and the Wider Setting Consultation Area. The threshold height of both at this point is 51.183m AOD. The development rises up to (and does not breach) this 51.183m AOD height.
90. The proposal is considered to accord with the guidance for this view (para 154 and 155 of the LVMF) as it is sympathetic to the composition and character of the view and does not diminish the appreciation or the viewer's ability to recognise and appreciate the western towers of St Paul's Cathedral.

### London Bridge (View 11A)

91. This view focuses on St Paul's Cathedral and other landmarks such as Cannon Street Station Towers and the Old Bailey. The proposed development will be seen at the far right of the view, a significant distance away from St Paul's Cathedral at the centre of the view.
92. The proposal will appear as a convincing new riverside frontage, with its vertical proportions creating a better relationship with its neighbours including Fishmongers Hall and creating a more coherent riverfront from Cannon Street Station to London Bridge.
93. The proposal is considered to accord with the guidance for this view (para 195 and 196 of the LVMF) in the manner in which it does not block or impair views of landmarks including St Paul's Cathedral and avoids an overtly horizontal emphasis with the upper storeys creating a more interesting skyline.

### Tower Bridge (View 10a)

94. The view from the north bastion of Tower Bridge focuses on the Tower of London but also includes other landmarks such as St Pauls cathedral and the Monument. In this view, the proposal will be largely concealed in the distance behind London Bridge. Its modest height and location means that it will not harm the appreciation of these key landmarks or other landmarks in this view.
95. The proposal is considered to accord with the guidance for this view (para 183 to 187) in the LVMF in the manner in which the proposal does not harm an appreciation of the scale and geography of London and does not affect the visual relationship between the Monument and Tower Bridge. In addition, the Outstanding Universal Value of the Tower of London World Heritage Site will not be harmed.

### Other LVMF views

96. By virtue of its comparatively modest height, the proposal will be concealed or have a negligible impact on other LVMF views in particular the River Prospects from the Thames and riverfront.

### **Other Local Views (non LVMF)**

97. Given the prominent riverfront location of the scheme, the proposal has been assessed from a number of other local viewpoints.
98. The proposal will appear as a well-mannered neighbour to Fishmongers Hall from the southern bank of the river, relating appropriately to the scale and height of development along the riverfront. In particular its vertical emphasis and convincing facade proportions will assist in visually unifying the stretch of riverfront buildings between Cannon Street Station and London Bridge as a coherent river frontage.
99. A prominent view of the scheme is afforded from King William Street, on the bridge over Upper Thames Street. In this view, the scheme will be seen as a coherent backdrop to the Fishmongers Hall. The more restrained nature of the design of this east elevation of the building with shallow modelling of the facade will offer an appropriately subdued backdrop to the listed Fishmongers Hall which is not considered to visually overwhelm the Hall.
100. In the views along Upper Thames Street and adjoining streets, the proposal will appear appropriate in scale and height with convincing facade proportions and modelling introducing a better sense of vertical emphasis, contrasting appropriately with the more horizontal emphasis of Riverbank House to the west. In particular the red coloured cast iron columns will introduce bold colour to this area, complementing the dynamic yellow of the angled soffits of Riverbank House.

### **Monument Views**

101. The key consideration of the proposal is the impact on the views from and of the Monument. In particular, whether the wider public benefits offered by the scheme outweighs the less than substantial harm caused by the proposal obscuring a small narrow extent of river in views from the Monument viewing gallery.
102. The Monument was built between 1671 and 1677 to commemorate the Great Fire of London is both a listed building and a scheduled ancient monument. It is an important historical vantage point with extensive views over London and attracts over 200,000 visitors per year to its viewing gallery.
103. The protected views from the gallery comprise of 5 view cones and the immediate street blocks around the Monument. Core Strategic Policy CS13 (Protected Views) of the City of London Local Plan (January 2015) seeks to protect and enhance significant local views of and from the Monument.

104. The proposal affects view Three (South West to London Bridge and Cannon Street Railway Bridge). The River Thames is identified as a key feature in this View.
105. The proposal will obscure a small section of river which is currently visible above the existing Seal House and to the right of Cannon Street Railway Bridge. The southern section of Cannon Bridge Railway bridge as it lands on the south bank will also be concealed. However, the City of London protected Views? SPD does not identify this bridge as a Historic Landmark (Section 6).
106. The concealment of this small stretch of river is of concern and is considered to cause a degree of harm to the appreciation of a key feature in the view. In this respect, the proposal does not comply with policy CS13. However, given the small and narrow stretch of river concealed and the fact that the vast majority of the River Thames remains visible in this view, the degree of harm is considered less than substantial. Despite this lesser degree of harm, even such an impact would normally be unacceptable in the absence of significant wider benefit to outweigh the harm. This report sets out the case that significant wider public benefits are provided by the new public roof terrace which is considered to outweigh the harm in this instance. The previous scheme for this site which was required to be set back to preserve views of this stretch of river offered no such public roof garden and the resultant public benefit.
107. The wider public benefit of this scheme in terms of mitigating the erosion of the view from the Monument needs to be considered with reference to the relative contrasting value of both the Monument viewing gallery and the proposed roof garden as unique spaces in their own right in securing wider public benefit. The roof garden would allow up to 200 members of the public at any given time in a generous expanse of public realm as opposed to the very limited capacity of the Monument which can only accommodate 33 people at any given time.
108. The Monument viewing gallery is accessed through a relatively strenuous and very confined spiral staircase of 311 steps. This historical quality undoubtedly gives the Monument an atmospheric, evocative, memorable and historically distinctive character. These qualities partly explain the enduring popularity of the monument to visitors to London.
109. The convoluted access to the viewing gallery though means that significant groups in society are excluded from accessing the viewing gallery such as wheelchair users, people with limited mobility, elderly people and very young children. In this respect the Monument viewing gallery is far from being an inclusive experience for all.
110. The proposed roof garden on Seal House will be fully inclusive with stair and lift access with a generous area for all users. In addition, the roof garden will include seating to enable those who are uncomfortable standing for long periods to dwell and reflect on the view resulting in a more comfortable experience. The Monument viewing gallery does not

have capacity to offer these features. In addition, toilet facilities are provided to the roof garden.

111. The viewing experience on the Monument viewing gallery is somewhat constrained. Though the experience is memorable and historically of huge significance it is a somewhat uncomfortable experience with the visitors squeezing past each other on a narrow circular platform of the gallery. In addition, the view is appreciated through taught diamond mesh and the supporting framework, though of an accomplished bespoke design is a necessary permanent safety feature.
112. The proposed public roof garden will offer one of the most exceptional views in London. A 360 degree view of key London landmarks including St Pauls Cathedral, The Monument, Wren Churches, Tower Bridge, The Thames and its bridges, The Shard, Southwark Cathedral, Tate Modern and the City cluster of tall buildings and further afield. In addition, its location in a part of the City with strict height thresholds because of protected views will mean it is very unlikely that there will be any new developments obscuring the views as well as being one of the City roofs receiving most sunlight, from dawn to dusk due to its aspect and lack of overshadowing. It will be the only public roof garden on the riverside in the City and one of the few in London. This will mean it is likely to be one of the most successful and enduring public roof gardens in London.
113. The roof garden has the potential to substantially complement the business City, offering a new public space for workers during the day, particularly lunchtime as well as a destination after work hours. The ability to deliver new public realm, such as pocket parks at ground level in the City is severely constrained and innovative provision of new public spaces at higher levels on buildings is important to deliver new areas to dwell to accommodate the rapid forecast growth of the City's working population. In addition, as a weekend venue it will offer a unique roof garden for visitors, enlivening the City during the weekend as a vibrant 7-day City.
114. Access is via a dedicated lift located on a prominent fully glazed corner on the riverside walk with direct lift access to the 11th floor with the final access to the roof terrace via a staircase and access lift. The access arrangements are legible and clear to all.
115. In addition, the roof terrace offers unobstructed views of the top third of the Monument including the column, viewing area and the flaming orb. Given the height restrictions due to view constraints there is little possibility of this view being obscured in the future. Therefore, in all probability this view will retain a future enduring quality.
116. The Monument closes at dusk whereas the public roof terrace will be open from 10am up to 7pm or dusk, whichever is later, allowing more workers and visitors access to appreciate the views beyond the shorter opening times available at the Monument. In addition, the Monument has an admission charge (justifiable given the costs involved in maintaining an historical monument) whilst the public roof terrace will

be free to access. In this respect, the roof garden offers a more economically inclusive option for workers, residents and visitors.

117. The Monument is primarily a tourist (often international) and visitor destination whereas the roof garden proposed will be used by workers, residents and Londoners. The viewing experience therefore appeals to very different audiences.
118. In addition, despite the fact that the scheme obscures a small narrow strip of river from the Monument, the view from the public roof garden affords extensive un-interrupted views of the Thames from Rotherhithe to Cannon Street Railway bridge. In this respect the roof terrace offers an enhanced and expansive view of the Thames than the one afforded from the Monument.
119. The Monument, its viewing gallery and the views afforded from it is of London wide importance and its historical and architectural significance is unquestionable. City of London policies and guidance seek to protect and enhance views of and from the Monument and its setting and the obscuring of the narrow strip of river is contrary to this policy. Given the small and narrow size of the river obscured with the vast majority of the river in this view cone remaining, the degree of harm is considered less than substantial. Within this context, paragraph 196 of the NPPF requires the harm to be weighed against the public benefits of the proposals.
120. It is considered that the proposed scheme offers such significant wider and inclusive public benefits which outweigh the less than substantial harm to the view from the Monument. In particular, the provision of a large free to access public roof garden with generous opening hours offering exceptional views of London in a high quality economically and socially inclusive space is considered to represent a valuable and unique new asset for the City and London as a whole, for its workers, residents and visitors. It will serve as a catalyst for the regeneration of the riverfront, encouraging enhanced use of the riverside, encouraging new A uses to create a more vibrant riverfront befitting of its key role in the City.
121. In addition, the scheme in its entirety represents a significant improvement to the previous planning permission resulting from vibrant uses on the riverfront, a larger area of public realm and a high level restaurant as well as a more respectful design approach befitting its sensitive location on the riverfront and adjoining the Fishmongers Hall.

### **St. Paul's Cathedral and the Tower of London World Heritage Site**

122. The proposal would not harm views of or the setting or significance of St. Paul's Cathedral. The proposal falls outside the St Pauls Heights policy area and falls below the threshold height of three Protected Vistas focussing on the Cathedral (Greenwich, 5A.2; Primrose Hill ,4A.1 and Blackheath , 6A.1. In addition, the proposal is not considered to harm views of the Cathedral from LVMF assessment point 11A on London Bridge. The impact on these views are assessed in preceding

paragraphs on the LVMF. The proposal will not adversely affect key views of the Cathedral or harm the setting or significance of the St. Paul's Conservation Area.

123. A significant benefit of the scheme is the public roof garden which will be free to visit and will afford impressive views of the dome, drum and upper part of the Cathedral against almost wholly open sky. This will add another impressive viewpoint to view the Cathedral from an elevated public space in the City.
124. In addition, the proposal by reason of its relative distance and modest height will be concealed or have a negligible impact in key identified views of the Tower of London World Heritage Site, either in the LVMF or the views identified in the Tower of London Local Setting Study. The site lies outside the Tower of London World Heritage Site Local Setting Area. In this respect the Outstanding Universal Value of the World Heritage Site will not be harmed.

### **Impact on significance and setting of listed buildings**

125. The impact of the proposal on surrounding listed buildings have been assessed and no harm to their setting was found. In particular, a number of listed buildings are located in close proximity of the site. These will be discussed in turn:

#### **Fishmongers Hall**

126. This Grade 2\* listed building (which is also a Scheduled Ancient Monument lies immediately to the east of the site its setting is directly affected by the proposal. Historic England have granted Scheduled Monument Consent.
127. Planning permission was refused on 22nd April 2008 (07/00712/FULL) for a previous re-development scheme on the grounds of the impact of the height of the scheme on the setting of the listed Fishmongers Hall. Historic England (then English Heritage) objected to the scheme on these grounds. Subsequently the scheme was amended with reduced massing facing Fishmongers Hall and received planning permission.
128. Historic England have not objected to the current scheme on the grounds of the setting on the listed Fishmongers Hall and indeed argue that the current proposal is an improvement on the previously consented scheme.
129. The scheme is of a height and massing which is not considered to visually overpower the listed building, especially given the height of other buildings framing the riverfront to the west. The design approach of a restrained but convincingly proportioned and modelled masonry grid is considered to be a well-mannered and neighbourly architectural approach respectful of the special significance of the Fishmongers Hall.
130. The building line, lighter more subservient upper storeys, vertical emphasis and the corner set back adjoining Fishmongers Hall are all carefully considered responses in order to relate satisfactorily to the setting of the Hall. In addition, the shallower facade modelling of the

east elevation provides an appropriately subdued backdrop to the Hall in views from the east.

131. Therefore, the proposal is not considered to harm the setting and special architectural or historic interest of the listed fishmongers Hall.

#### Adelaide House

132. This Grade 2 listed building lies on the opposite side of London Bridge to the east of the site. The proposed development will appear in key views of Adelaide House from the south, east and west.
133. In these views the proposal will appear as an appropriately scaled riverfront building of a restrained but refined vertical proportion and will enhance the riverside setting of Adelaide House. The proposal will therefore not harm the setting or the special architectural and historic interest of the building.

#### Other Listed Buildings

134. Given its prominent riverside setting, the proposal will appear in key views of a number of riverfront listed buildings. These include the towers of Cannon Street Station, Billingsgate House and Custom House and glimpses of St Magnus the Martyr.
135. The impact of the proposal on all of these listed buildings (and others in the vicinity) has been assessed and it is considered to be of an appropriate height, massing and design which would not harm the setting or special architectural or historical interest of these listed buildings.

#### **Impact on the significance of conservation areas within the City of London**

136. The site is not within or directly adjoining a Conservation area. Though there are a number of conservation Areas in this part of the City.
137. The nearest to the site is Laurence Pountney Hill Conservation Area which lies to the north-west. This Conservation Area (the smallest in the City) is an enclave of rare C17th, C18th and C19th Century buildings in a fine grain of lanes and alleys. The proposed development will be generally concealed from views within the Conservation Area and where seen will be of an appropriate height in relation to the buildings along Upper Thames Street.
138. In terms of the impact on Bank Conservation Area, Eastcheap Conservation Area and Queen Street Conservation Area, the proposal is almost wholly concealed from views by other buildings in the foreground and the proposal would not harm the setting or views in to or out of these Conservation Areas

#### **Other Conservation Areas**

139. The impact of the scheme on other Conservation Area is considered minimal.

140. However, given the riverfront location, the development affects views out of and the setting of Borough High Street Conservation Area in the London Borough of Southwark. In particular it will be visible as a prominent river front building from the south bank and London Bridge. In these views, the scheme is considered to be of an appropriate height, massing and design which successfully visually unifies the riverfront between Cannon Bridge Station and London Bridge and will not harm views out of and the setting of this Conservation area.

### **Undesignated Heritage Assets**

141. The Thames and its foreshore along with the river walls and riverside walkway are considered to be undesignated heritage assets in terms of their historical and townscape significance. The new roof garden will open up unique and extensive views of the river and enhance the appreciation of this undesignated heritage asset.

### **Urban Greening**

142. An intensive green roof (590sq.m) is proposed, which would encompass the main part of the building. This has been designed to encourage biodiversity and would include wildflowers, grasses, flowering shrubs and perennials, of which plants would be selected that attract pollinators and produce seed heads to attract birds. Options for greening over the plant area of the roof are not feasible due the ventilation requirements of the plant.
143. The roof terrace landscape has been designed with reference to the development of the English garden. It would include two distinctive spaces: an 'enclosed terrace', which would be a tranquil enclosed garden, and an 'infinity terrace', which would be a vibrant terrace overlooking the Thames. The southern end of the roof terrace would predominately be a hard landscape decked area in order to accommodate the space as a public viewing terrace. The garden would provide some planting beds, seats and benches to allow the public to enjoy the space and include panoramic views of St Paul's Cathedral, the City Cluster and the Shard. The additional terraces on the 9th and 10th floors would provide valuable outdoor space for the adjacent office accommodation.
144. The north facade of the link building with nearby Fishmongers Hall would include a hydroponic green living wall (65sq.m) at the upper levels. It is proposed that a total of three existing trees would be removed from the site, one Katsura tree located between the existing Seal House and the Fishmongers' Hall and two small Magnolia trees. Two new trees would be planted on the Riverwalk and further planting of small trees is proposed on the office terraces.
145. An internal 'Winter Garden' is proposed on the south-east corner of the site between the proposed building and adjacent Fishmongers' Hall next to the entrance to the ground floor retail unit. The spaces would provide break out green areas for occupiers of the offices with views of the Thames and would help activate the spaces along the riverfront.

Proposals for greening on and around the development are welcome and accord with Local Plan policies DM10.2, DM10.3 and DM19.2.

146. The draft London Plan sets a target Urban Greening Factor (UGF) as a metric for measuring the contribution of proposed greening of the urban environment.
147. The UGF for this application has been calculated as 0.29, which falls marginally short of the City's proposed target UGF score of 0.3 as a minimum. The applicant has explored options to achieve the additional 25sq.m of greening required to achieve a UGF of 0.3 and it would be possible to introduce some greening between the site and Fishmongers Hall. This would be secured as part of the landscaping scheme by condition.

### **Transport, Servicing, Parking and Impact on Public Highways**

#### **Servicing Arrangements**

148. Two loading bays are proposed in a servicing area accessed from Swan Lane. Swept path analysis submitted with the application demonstrates that Heavy Goods Vehicles (HGVs) would be able to enter and exit the loading area in a forward gear. The provision of two loading bays is considered sufficient for a development of this size.
149. To align with the forthcoming Transport Strategy and City Plan 2036 all office deliveries to the site would be delivered through a consolidation centre. Deliveries during the morning, lunchtime and evening pedestrian peaks (07:00 to 10:00, 12:00 to 14:00 and 16:00 to 19:00) would be precluded.
150. It is anticipated that the proposed development would result in approximately 24 daily servicing trips.

#### **Cycle Parking**

151. The draft London Plan requires the provision of 247 long stay cycle parking spaces and 70 short stay cycle parking spaces.
152. 266 long stay cycle parking spaces (provided in double stands, 15 folding bicycle lockers and two larger spaces for hand cycles/cargo cycles) are proposed in the basement. The provision of space for adapted cycles is welcomed.
153. 70 short stay cycle parking spaces are to be provided. 27 of the spaces would be provided within the basement cycle parking area. 52 spaces are proposed in various locations within the development curtilage at ground level. The provision of changing facilities is important in encouraging the uptake of active travel and more broadly to facilitate healthy lifestyles for people working in the City.
154. The provision of 27 showers (including one accessible shower) for the 266 cycle parking spaces, provided in the changing facilities adjacent to the cycle parking, meets the recommended ratio in the draft London Plan of one shower for every ten cycle spaces. Lockers are shown in

the changing areas and the applicant's transport consultant, WSP, has confirmed that a locker would be provided for each cycle space. A condition is recommended requiring the provision of 266 lockers

#### Framework Travel Plan

155. The submitted Framework Travel Plan is largely acceptable. The applicant has been encouraged to provide a more ambitious target in relation to cycle parking occupancy and the Port of London Authority (PLA) have requested that the use of river boats is encouraged through the Travel Plan. Both requests will be reflected in the final Travel Plan secured by condition.

#### Car Parking

156. The development is car free, with the exception of two disabled parking spaces proposed in the servicing area. The provision of disabled parking spaces is welcomed.
157. Five car parking spaces are shown within the Fishmonger's Hall courtyard, for the use of the Fishmongers. City Transportation have objected to this provision. At present a total of ten under-croft parking spaces (of which two spaces are used for cycle parking) are available for the use of the Fishmongers. The proposals include the re-provision of five of these spaces and not an increase in the number of spaces and this is accepted.

#### Waste Management

158. The Cleansing Team have confirmed that the waste storage and collection facilities comply with their requirements and are acceptable. A waste compactor is not proposed, which means that there would be no skip vehicles accessing the site. It has, therefore, been agreed that a headroom clearance of 4.5m is acceptable in this case.

#### S278

159. Through the S106 agreement, a S278 agreement would be secured for improvements to the highway and Riverside Walkway surrounding the development.

#### **Environmental impact of proposal on surrounding area**

#### Wind Microclimate

160. The proposed development would have a relatively minor impact on the wind conditions on the site.
161. The areas on the riverfront, close to the building and the public roof garden entrance where people would sit and dwell would remain suitable for sitting, and would generally improve. Conditions close to the river wall would deteriorate from standing to leisure walking but given that this is not an area where people would sit this is considered to be acceptable.

162. Conditions on London Bridge adjacent to the access to Adelaide House would deteriorate from standing to leisure walking. The predominant use of this area is business walking of pedestrians moving along London Bridge and it is therefore considered that these conditions are acceptable.
163. An assessment of wind conditions has been carried out for the public roof garden, restaurant terrace and office terraces. Here, wind conditions would be suitable for the usage of the spaces throughout the year, with calmer conditions in the summer period.

### **Flood risk**

#### **Sequential test**

164. The proposed uses fall within the 'Less Vulnerable' category and are therefore suitable for this location within flood zone 3a.

#### **Flood defences**

165. Local Plan policy DM18.3 requires that 'Development must protect the integrity and effectiveness of structures intended to minimise flood risk and where appropriate enhance their effectiveness'.
166. The Environment Agency originally objected to the application due to the proximity of the proposed building and its basement to the flood defence wall. In response to this objection the application was amended to pull the building away from the flood defence wall at its closest point, and the Environment Agency have now withdrawn their objection.

#### **Flood resilience**

167. Local Plan policy DM18.1 states that 'Flood resistant and resilient designs, which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged'. The City of London Strategic Flood Risk Assessment provides guidance regarding flood resistance and resilience measures including the recommendation to locate electrical, gas, telephone and digital/IT equipment and systems above flood levels to ensure speedy recovery after a flood.
168. It is proposed that a UKPN substation is located on the ground floor within the flood zone. This substation would serve more than one building and it is therefore proposed that all electrical equipment is located 350mm above the flood level.

#### **Flood evacuation**

169. The Environment Agency have confirmed that as Local Authority, the City is the competent authority on matters of evacuation or rescue. The basement would include restaurant space (connected to the restaurant at ground floor level), cycle parking and associated facilities and plant. Plans have been submitted showing a safe egress route from the basement and flood prone areas of the ground floor. The applicant has confirmed that a call point would be provided in close proximity to the stairs to alert management that someone is in need of assistance and

they would then be assisted up the stairs. A food evacuation plan would be secured by condition.

### SuDs

170. It is proposed that the roof would discharge to the River Thames directly and areas at ground level would drain either unrestricted to the River Thames or to the combined sewer at greenfield runoff rate, with attenuation provided as necessary.
171. The Lead Local Flood Authority has reviewed the Flood Risk Assessment and Outline Drainage Strategy and recommended conditions.

### Biodiversity

172. The Preliminary Ecological Assessment, prepared by WSP, assesses the impact of the proposed development on protected and notable species, specifically bats and birds.
173. The roof of the existing building has suitable nesting habitat for some bird species of conservation concern, including the Black Redstart, and the climbing plants in the courtyard between the existing building and Fishmongers Hall are also of value. A condition is recommended requiring that the demolition of the building is undertaken outside the bird nesting season (March-July) to avoid damaging or destroying nests and young. If demolition is required within this season, it is recommended that the roof and courtyard are checked by a suitably experienced ecologist to determine whether breeding birds are present before demolition commences. If an active nest is found structures would be left in situ until the young have fledged.
174. The Preliminary Ecological Assessment explains that whilst there are no mature trees on site to provide roost features for bats the plant room structure on the roof of the existing building exhibits features which are suitable for supporting roosting bats, as it has large vents which may provide potential roosting space for bats as well as consistently warm conditions suitable for a maternity roost. The River Thames provides foraging habitat and increases the potential for the existing building to support a roosting site.
175. An internal inspection of the roof plant room has been carried out to determine whether this space is used by bats. No evidence was found of roosting bats. The plant room has, therefore, been downgraded from low-moderate potential for roosting bats to negligible.
176. It is recommended that that biodiversity enhancements are included as part of the development, such as bird and bat boxes on the roof and invertebrate hotels on the roof to indirectly support bird and bat populations (including the declining House Sparrow). Additionally, sensitive/low UV lighting around the site would help to reduce the impact of the development on bats that use the River Thames for foraging and commuting.

## **Environmental Impacts**

### **Energy consumption**

177. London Plan policy requires major development to achieve a 35% improvement in carbon emissions over part L of the Building Regulations 2013. Emerging London Plan policy is moving to a zero-carbon target for non-domestic buildings from 2019 to contribute to the ambition of a zero-carbon City by 2050.
178. The submitted Energy Statement, prepared by WSP, demonstrates that this development has been designed to achieve a 20.8% reduction in carbon emissions compared with the 2013 Building Regulations requirements. This would be achieved through energy efficiency measures and the use of Air Source Heat Pumps (ASHP). WSP have explained that the use of ASHP instead of CHP would be more carbon efficient during the buildings operation and would have a reduced impact on local air quality. This has been recognised by the GLA and new carbon factors are being introduced to drive the use of electric systems.
179. The submitted Energy Strategy indicates that further carbon improvements could result from the use of Water Source Heat Pumps (WSHP) and that 'the use of WSHP is feasible for the proposed development and could be investigated further in later design'.
180. It is recommended that the Energy Strategy is revisited by condition to ensure that all possible opportunities to improve the carbon performance of the building are considered. Any shortfall would be offset through a carbon offsetting contribution through the S106 agreement.

### **BREEAM**

181. The submitted Sustainability Statement, prepared by WSP, demonstrates that the proposed development has been designed to achieve a BREEAM rating of 'Excellent' against the BREEAM New Construction 2014 rating scheme. The BRE published the BREEAM New Construction 2018 criteria in March 2018 and this rating should be used for all major planning application submitted after that date. Maximum credits should be sought for the City's priorities, which are energy, water, pollution and materials
182. It is recommended that the City's standard condition is imposed that requires a post construction BREEAM (2018) assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating).

### Air Quality

183. The submitted Air Quality Assessment demonstrates that the proposed development should not have any significant impacts on air quality. The conclusions of the assessment are accepted.

### Noise and Vibration

184. In City redevelopment 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 to be approved by condition.
185. This would require the submission of a Construction Logistics Plan (CLP) to manage all freight vehicle movements to and from the site and, a Construction Management Plan (CMP) that includes a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects attributable to the development.
186. Noise levels from mechanical plant in the completed development would need to comply by condition with the City of London's standard requirement that there would be no increase in background noise levels.

### Archaeology

187. The site is in an area of significant archaeological potential and one of the few remaining waterfront sites where remains of quays and building structures from the Roman to post medieval period have survived. An Historic Environment Assessment has been submitted with the application which sets out the archaeological potential and impact of the proposed development.
188. There is high potential for survival of the 3rd century Roman riverside wall which is a non-designated heritage asset. The predicted line of the river wall runs across the north west part of this site and if found to be surviving here, it would be protected, and construction impact avoided. The application includes options for foundation proposals to accommodate the river wall if it is found to survive. Remains of the Roman river wall have been recorded and protected at Riverbank House to the west and have also been recorded below the southern pavements of Lower and Upper Thames Streets.
189. There is high potential for survival of waterfront timber and masonry quay structures dating from the 12th to the 17th centuries and associated waterfront buildings. This is significant evidence of the successive building out into the river and historic extension of the land area. There is high potential for evidence of the pre-historic and later Thames foreshore.
190. The existing building does not have a basement as when the building was constructed the basement area from previous buildings on the site was backfilled with modern material. The earlier basement construction

and existing building foundations will have disturbed archaeological remains, leaving localised areas of survival.

191. Archaeological recording and excavation was carried out in 1974 on a limited area of the site, prior to construction of the existing building. The results of this work indicate the potential, significance and depth of remains on the site.
192. The proposed building would have a basement floor and new foundations. It is intended, subject to further testing, that some of the existing foundations would be re-used. The proposed basement slab would be at different levels and there would be an impact where the new slab, pile cap and piled foundations would be below the previous basement levels.
193. Archaeological evaluation is proposed which would confirm the findings of the archaeological assessment, provide more information on archaeological survival, disturbance by modern construction. A Written Scheme of Investigation for the evaluation work has been submitted and the work will help to design an appropriate programme of archaeological work, to minimise disturbance to remains and to ensure protection of the Roman river wall. Preliminary investigation has been carried out and this will inform the evaluation which will be carried out when access to the relevant areas is possible.
194. Conditions are recommended to cover archaeological evaluation, a programme of archaeological work and foundation design.

#### **Planning Obligations and Community Infrastructure Levy**

195. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City's environment and facilities. It would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
196. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
197. From 1<sup>st</sup> April 2019 Mayoral CIL 2 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). CIL contributions and City of London Planning obligations are set out below.

### Mayoral CIL and planning obligations

| <b>Liability in accordance with the Mayor of London's policies</b> | <b>Contribution</b> | <b>Forwarded to the Mayor</b> | <b>City's charge for administration and monitoring</b> |
|--|---------------------|-------------------------------|--|
| <b>Total liability in accordance with the MCIL2</b>                | £2,006,337          | £1,926,084                    | £80,253  |

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

### City CIL and S106 Planning Obligations

| <b>Liability in accordance with the City of London's policies</b>       | <b>Contribution</b> | <b>Available for allocation</b> | <b>Retained for administration and monitoring</b> |
|---|---------------------|---------------------------------|---|
| City CIL  | <b>£760,890</b>     | <b>£722,846</b>                 | <b>£38,045</b>                                    |
| City Planning Obligation<br>Affordable Housing                          | <b>£202,904</b>     | <b>£200,875</b>                 | <b>£2,029</b>                                     |
| City Planning Obligation<br>Local, Training, Skills and Job Brokerage   | <b>£30,436</b>      | <b>£30,131</b>                  | <b>£304</b>                                       |
| Carbon Reduction Shortfall (as designed) Estimate*                      | <b>£138,762</b>     | <b>£138,762</b>                 | <b>£0</b>   |
| Section 278 Design and Evaluation                                       | <b>£50,000</b>      | <b>£50,000</b>                  | <b>£0</b>   |
| City Planning Obligation Monitoring Charge                              | <b>£2,500</b>       | <b>£0</b>                       | <b>£2,500</b>                                     |
| <b>Total liability in accordance with the City of London's policies</b> | <b>£1,132,992</b>   | <b>£1,091,226</b>               | <b>£41,766</b>                                    |

\*carbon shortfall to be confirmed on completion subject to carbon reduction of the as built development.

### City's Planning Obligations

198. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in

planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways obligations
- Delivery and Servicing Management Plan
- Consolidation centre – office deliveries
- Travel Plan
- Local Training, Skills and Job Brokerage Strategy (Construction)
- Local Procurement
- Carbon Offsetting
- Utility Connections
- Public Access/ Riverside Walk?
- Section 278 Agreement
- Roof Garden Access and Management
- TfL S278 Agreement

199. It is recommended that the Chief Planning Officer be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

#### Monitoring and Administrative Costs

200. 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.

201. 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

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

#### Conclusions

203. The proposal accords with the strategic objective to ensure that the City maintains its position as the world's leading international financial and business centre.

204. The proposed retail floorspace accords with Local Plan Policy DM1.5 which encourages a mix of commercial uses within office developments

which contribute to the City's economy and character and provide support services for businesses, workers and residents.

205. The proposal would obscure a small narrow extent of river in views from the Monument viewing gallery, which would represent a departure from policy and amounts to less than substantial harm. It is considered that the proposed scheme offers such significant wider and inclusive public benefits which outweigh the less than substantial harm to the view from the Monument. In particular, the provision of a large free to access public roof garden with generous opening hours offering exceptional views of London in a high quality economically and socially inclusive space is considered to represent a valuable and unique new asset for the City and London as a whole, for its workers, residents and visitors.
206. The scheme would make optimal use of the capacity of a site with high levels of public transport accessibility and would be car free, with the exception of two disabled car parking spaces. 266 long stay cycle parking spaces, 70 short stay cycle parking facilities, and associated facilities would be provided.
207. The scheme would provide significant benefits through the CIL and S106 for improvements to the public realm, housing and other local facilities and measures. The payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general payment there would be site specific measures sought in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.
208. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
209. In this case whilst the development represents a departure from policy and amounts to less than substantial harm, it is considered that the proposed scheme offers such significant wider and inclusive public benefits which outweigh the less than substantial harm. It is therefore considered that the proposed development is acceptable as a whole and planning permission should be granted as set out in the recommendation and the schedules attached.



Background papers:

Internal

Memo, Air Quality Officer, 28<sup>th</sup> November 2018

Memo, Environmental Health Officer, 29<sup>th</sup> November 2018

Memo, Environmental Health Officer, 15<sup>th</sup> February 2019

External

Email, Thames Water, 21<sup>st</sup> November 2018

Letter, City Heritage Society, 25<sup>th</sup> November 2018

Email, Port of London Authority, 4<sup>th</sup> December 2018

Letter, Environment Agency, 6<sup>th</sup> December 2018

Letter, Historic England, 9<sup>th</sup> January 2019

Letter, Environment Agency, 8<sup>th</sup> February 2019

Letter, Environment Agency, 4<sup>th</sup> March 2019

Email, TfL, 5<sup>th</sup> March 2019

Drawings

*Existing*

EPA-SEH-05-1-100 P00

EPA-SEH-05-1-101 P01

EPA-SEH-05-1-102 P01

EPA-SEH-05-1-103 P01

EPA-SEH-05-1-104 P01

EPA-SEH-05-1-105 P01

EPA-SEH-05-1-106 P00

EPA-SEH-05-1-107 P00

EPA-SEH-05-1-120 P00

EPA-SEH-05-1-121 P00

EPA-SEH-05-2-106 P00

EPA-SEH-05-2-101 P00

EPA-SEH-05-2-102 P00

EPA-SEH-05-2-103 P00

EPA-SEH-05-2-104 P00

*Proposed*

EPA-SEH-05-1-299 P07

EPA- SEH-05-1-300 P11

EPA- SEH-05-1-301 P07

EPA- SEH-05-1-302 P06

EPA- SEH-05-1-303 P04

EPA- SEH-05-1-305 P04

EPA- SEH-05-1-306 P04

EPA- SEH-05-1-307 P02

EPA- SEH-05-1-308 P02

EPA- SEH-05-1-309 P04

EPA- SEH-05-1-310 P04

EPA- SEH-05-1-311 P05

EPA- SEH-05-1-312 P07

EPA- SEH-05-1-320 P01

EPA- SEH-05-1-321 P01

EPA- SEH -05-2-300 P06

EPA- SEH-05-2-301 P06

EPA- SEH-05-2-302 P06

EPA- SEH-05-2-303 P06

EPA-SEH-05-3-300 P06

EPA-SEH-05-3-301 P06

EPA-SEH-05-5-001 P02

EPA-SEH-05-5-002 P01

EPA-SEH-05-5-003 P02

EPA-SEH-05-5-004 P01

EPA-SEH-05-1-311 P06

EPA-SHE-05-1-312 P08

## Documents

Air Quality Assessment, WSP, October 2018

Preliminary Ecological Assessment, WSP, October 2018

Bat Inspection, WSP, October 2018

Energy Statement, WSP, October 2018

Flood Risk Assessment and Outline Drainage Strategy, WSP, October 2018

Preliminary Risk Assessment – Ground Conditions, WSP, October 2018

Wind Microclimate Assessment, WSP, October 2018

Outline Construction Logistics Plan, October 2018

Statement of Community Involvement, Four, October 2018

Sustainability Statement, WSP, October 2018

Tree Constraints Impact Assessment and Tree Protection Method Statement,  
B.J. Unwin Forestry Consultancy, October 2018

Acoustic Planning Report, WSP, October 2018

Planning Statement, DP9, October 2018

Waste Management Strategy, WSP, October 2018

Transport Assessment, WSP, October 2018

Framework Travel Plan, WSP, October 2018

Heritage Assessment, Eric Parry Architects, October 2018

Townscape and Visual Impact Assessment, Ettwein Bridges, October 2018

Historic Environment Assessment, MOLA October 2018; Window Sample  
Investigation, MOLA, 13.12.2018

Draft Construction Management Plan, R.P.M, 29<sup>th</sup> October 2018

Landscape Statement, Todd Longstaffe-Gowan, 31<sup>st</sup> October 2018

Air Quality Consultation Response Comments, WSP, 7<sup>th</sup> December 2018

Environment Agency Consultee Response Follow-up, WSP, 10<sup>th</sup> January  
2019

Design and Access Statement, Eric Parry Architect, February 2019

## **Appendix A**

### **London Plan Policies**

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

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

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

Policy 2.18 Protect, promote, expand and manage the extent and quality of and access to London's network of green infrastructure.

Policy 3.1 Protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

Policy 3.16 Protection and enhancement of social infrastructure - additional and enhanced social infrastructure provision to meet the needs of a growing and diverse population.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

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

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

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

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

Policy 7.6 Buildings and structures should:

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

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

Policy 7.7 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 would meet the criteria set out in this policy and, incorporate publicly accessible areas on the upper floors, where appropriate.

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

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

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

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

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

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

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

## Relevant Local Plan Policies

### ***CS1 Provide additional offices***

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

#### ***DM1.1 Protection of office accommodation***

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

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

#### ***DM1.5 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.

### ***CS2 Facilitate utilities infrastructure***

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

#### ***DM2.1 Infrastructure provision***

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

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

### ***DM3.1 Self-containment in mixed uses***

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

### ***DM3.4 Traffic management***

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and

highways security measures, including addressing the management of service vehicles, by:

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

#### ***CS4 Seek planning contributions***

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

#### ***CS9 Meet challenges of Thames/Riverside***

To ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding.

#### ***CS10 Promote high quality environment***

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

#### ***DM10.1 New development***

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;

- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

### ***DM10.2 Design of green roofs and walls***

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

### ***DM10.3 Roof gardens and terraces***

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

### ***DM10.4 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.

### ***CS12 Conserve or enhance heritage assets***

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

#### ***DM12.3 Listed buildings***

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

#### ***DM12.4 Archaeology***

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an

archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

### ***CS13 Protect/enhance significant views***

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

### ***CS14 Tall buildings in suitable places***

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

### ***CS15 Creation of sustainable development***

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

### ***DM15.1 Sustainability requirements***

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

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

### ***DM15.2 Energy and CO2 emissions***

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

### ***DM15.3 Low and zero carbon technologies***

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

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

#### ***DM15.4 Offsetting carbon emissions***

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

#### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

#### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

### ***DM15.7 Noise and light pollution***

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

### ***CS16 Improving transport and travel***

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

### ***DM16.1 Transport impacts of development***

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

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

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

### ***DM16.2 Pedestrian movement***

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

### ***DM16.3 Cycle parking***

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

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

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

#### ***DM16.4 Encouraging active travel***

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

#### ***DM16.5 Parking and servicing standards***

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

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

### ***CS17 Minimising and managing waste***

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

#### ***DM17.1 Provision for waste***

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

#### ***DM17.2 Designing out construction waste***

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

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

### ***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.

### ***CS19 Improve open space and biodiversity***

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

#### ***DM19.1 Additional open space***

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

### ***CS20 Improve retail facilities***

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

#### ***DM20.4 Retail unit sizes***

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

## SCHEDULE

APPLICATION: 18/01178/FULMAJ

**Seal House 1 Swan Lane London**

**Demolition of the existing building and construction of a basement, ground plus 11 storey building for office use (Class B1) (16,084sq.m GIA), retail use (Class A1/A3) at ground (314sq.m GIA), restaurant use (Class A3) at 11th floor level (708sq.m GIA), a publicly accessible terrace at 12th floor roof level (744sq.m) and public realm improvement works together with ancillary parking, servicing and plant and all necessary enabling 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 No demolition shall take place until a survey of the existing river wall has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency to establish the structural integrity and stability of the river wall. The scope and the details of the survey shall be agreed with the local planning authority prior to its commencement and the survey shall include any necessary intrusive investigation & testing and movement monitoring.  
REASON: To establish the condition of the existing river wall and inform the need for remedial works to the wall and the detailed design for construction close to the flood defence / river wall in accordance with the following policy of the Local Plan: CS19.
- 3 Prior to the erection of any part of the new building within 10 metres of the river wall a scheme for remedial works to the river wall including a program for the remedial works must be submitted to and approved in writing by the local planning authority in consultation with the Environment Agency. The development must only proceed in accordance with the approved scheme.  
REASON: To ensure that the life expectancy of the flood defences forming part of the site is no less than that of the proposed development and to protect the site and the adjoining land from tidal flooding in accordance with the following policy of the Local Plan: CS19.
- 4 Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM

Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction

- 5 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. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 6 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall 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. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 7 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.
- 8 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.
- 9 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.  
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.  
Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.  
REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this

condition are incorporated into the development before the design is too advanced to make changes.

- 10 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. 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.

- 11 Before any construction works hereby permitted are begun a detailed assessment of further measures to improve carbon dioxide emissions savings and the BREEAM rating shall be submitted to and approved in writing by the local planning authority.

REASON: To minimise carbon emissions and provide a sustainable development in accordance with the following policy of the Local Plan: DM15.1, DM15.3. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 12 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: green roofs, rainwater pipework, design for water treatment, flow control devices, design for system exceedance, design for ongoing maintenance; all surface water shall discharge directly to the Thames, should this not be possible for limited areas, flow rates shall be restricted to no greater than three times the greenfield runoff rate for that area to discharge to the combined sewer with Thames Water's consent, 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 the relevant permits for discharging to the Thames have been acquired from the Port of London Authority and the Environment Agency.

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.

- 13 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.  
REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage 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.<https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.
- 14 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.  
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 15 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) A Lifetime Maintenance Plan for the SuDS system to include:

- A full description of how the system would work, its aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

- 16 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
  - (b) details of the proposed new facade(s) including typical details of the fenestration and entrances;
  - (c) details of a typical bay of the development;
  - (d) typical details of stonework;(e) details of ground floor elevations;
  - (f) details of the ground floor office entrance(s);
  - (g) details of the flank wall(s) of the proposed new building;
  - (h) details of windows and external joinery;
  - (j) details of soffits, hand rails and balustrades;
  - (k) details of all alterations to the existing facade;
  - (l) details of junctions with adjoining premises;
  - (m) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level
  - (n) details of the integration of cleaning equipment, cradles and the garaging thereof;
  - (o) details of plant and ductwork to serve the A1, A3 and A4 uses;
  - (p) details of ventilation and air-conditioning for the A1, A3, A4 uses;
  - (q) details of all ground level surfaces including materials to be used;
  - (r) details of walkway surfaces including materials to be used;
  - (s) details of external surfaces within the site boundary including hard and soft landscaping;
  - (t) measures to be taken during the period of demolition and construction for the protection of the trees to be retained and details of any pruning of the trees;
  - (u) details of the arrangements for the provision of refuse storage and collection facilities within the curtilage of the site to serve each part of the development.
  - (v) details of the ground floor entrance including signage and glazing for the public roof garden
  - (w) details of external lighting to the facade, public realm and public roof garden
- 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.

- 17 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.
- 18 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.  
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
- 19 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.
- 20 (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.

- 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 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.
- 22 An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the approved Travel Plan (or any amended Travel Plan that may be approved from time to time by the Local Planning Authority) for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period.  
REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.
- 23 Prior to the occupation of any part of the building a Flood Evacuation Plan for the building shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.  
REASON: In the interests of public safety in accordance with the following policy of the Local Plan: DM18.1.
- 24 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with

details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.  
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.

- 25 No cooking shall take place within any Class A1, A3, A4 or A5 unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.  
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
- 26 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.  
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
- 27 Details of a Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.  
REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.
- 28 A post construction BREEAM (2018) assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree, for example BREEAM 2014 'Excellent' provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' BREEAM 2018 rating and this is explained through an addendum) shall be submitted as soon as practicable after practical completion.  
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

- 29 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.
- 30 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 266 long stay spaces and 70 short stay 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.
- 31 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 27 showers and 266 lockers 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.
- 32 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.  
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.
- 33 No live or recorded music that can be heard outside the premises shall be played.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 34 Except as may otherwise be approved in writing by the Local Planning Authority, no development shall be carried out in advance of the building lines as shown on the deposited plans.  
REASON: To ensure compliance with the proposed building lines and site boundaries in accordance with the following policies of the Local Plan: DM16.1, DM16.2.
- 35 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: 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
- 36 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.  
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 37 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip loading area as shown on the approved drawings.  
REASON: To ensure satisfactory servicing facilities in accordance with the following policy of the Local Plan: DM16.5.
- 38 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety
- 39 Unless otherwise approved by the LPA there must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.

- 40 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.
- 41 Unless otherwise agreed in writing with the Local Planning Authority, archaeological evaluation shall be carried out in accordance with the Written Scheme of Investigation for an Archaeological Evaluation, MOLA, dated 29 October 2018.  
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.
- 42 The designated car parking spaces for use by people with disabilities shall be provided and marked out prior to first occupation of any part of the building, and maintained for the life of the development.  
REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5
- 43 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: Dwg nos. EPA-SEH-05-1-299 P07, EPA- SEH-05-1-300 P11, EPA- SEH-05-1-301 P07, EPA- SEH-05-1-302 P06, EPA- SEH-05-1-303 P04, EPA- SEH-05-1-305 P04, EPA- SEH-05-1-306 P04, EPA- SEH-05-1-307 P02, EPA- SEH-05-1-308 P02, EPA- SEH-05-1-309 P04, EPA- SEH-05-1-310 P04, EPA- SEH-05-1-311 P05, EPA- SEH-05-1-312 P07, EPA- SEH-05-1-320 P01, EPA- SEH-05-1-321 P01, EPA- SEH -05-2-300 P06, EPA- SEH-05-2-301 P06, EPA- SEH-05-2-302 P06, EPA- SEH-05-2-303 P06, EPA-SEH-05-3-300 P06, EPA-SEH-05-3-301 P06, EPA-SEH-05-5-001 P02, EPA-SEH-05-5-002 P01, EPA-SEH-05-5-003 P02, EPA-SEH-05-5-004 P01, EPA-SEH-05-1-311 P06 and EPA-SHE-05-1-312 P08, and Written Scheme of Investigation for an Archaeological Evaluation, MOLA, dated 29 October 2018  
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 With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water, we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.  
<https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>.

- 3 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

- 4 The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets

to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the

necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk).

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes>.

- 5 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to

be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.

- 6 You are advised that when submitted the details to satisfy the landscaping condition you will be expected to achieve the Urban Greening Factor of 0.3 or above.
- 7 The hoarding line should be set out in the Construction Management Plan and should seek to achieve a minimum separation of 5m from the landward face of the flood defence wall.