

# GREATER LONDON AUTHORITY

## Development, Enterprise and Environment

**Catherine Linford**  
City of London Corporation  
Guildhall, PO Box 270  
London EC2P 2EJ

**Our ref:** GLA/1936c/01  
**Your ref:** 18/01178/FULMAJ  
**Date:** 25 February 2019

Dear Catherine Linford

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**  
**Seal House, Swan Lane**  
**LPA reference: 18/01178/FULMAJ**

I refer to the copy of the above planning application, which was received from you on 21 December 2018. On 25 February 2019, the Deputy Mayor considered a report on this proposal, reference GLA/1936c/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

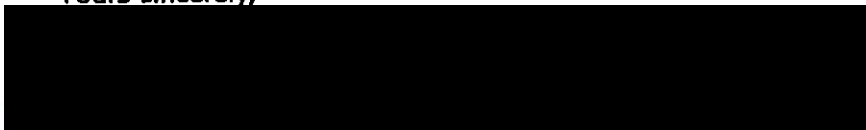
The Deputy Mayor considers that the application complies with the London Plan, for the reasons set out in paragraph of the above-mentioned report; and, pursuant to Article 5(2) of the Order, the Mayor does not need to be consulted again. Your Council may therefore proceed to determine the application without further reference to the GLA.

The Deputy Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph of the above-mentioned report; but that the possible remedies set out in paragraph 40 of this report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Amy Tempest, e-mail: AmyTempest@TfL.gov.uk , telephone: 020 3054 4558.

Yours sincerely,



**Juliemma McLoughlin**  
Chief Planner

cc Unmesh Desai, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Alex Williams, TfL  
Tom Hawkley, DP9 Ltd, 100 Pall Mall, London SW1Y 5NQ

**Seal House, Swan Lane****25 February 2019****in the City of London****planning application no.18/01178/FULMAJ****Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**The proposal**

Demolition of the existing building and redevelopment of the site to provide an intensified office provision, ground floor retail space, restaurant space and a public accessible roof terrace. The proposed development would be 12-storeys in height.

**The applicant**

The applicant is **Sellar Property Group**, and the architect is **Eric Parry Architects**.

**Strategic issues**

**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 this site is supported and ensures the full optimisation of this well-located site. The City of London Corporation must secure the viewing platform to be free of charge to the public and restrictive booking policies should be avoided (paragraphs 14-18).

**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 (paragraphs 19-27).

**Sustainable development:** The applicant must provide further details on the proposed energy strategy and sustainable drainage proposals to demonstrate London Plan compliance (paragraphs 28-31).

**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 plans and should also be secured through condition (paragraphs 32-39).

**Recommendation**

That the City of London Corporation be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 40 of this report; but that the possible remedies set out in the same paragraph of this report could address these deficiencies.

## Context

1 On 21 December 2018 the Mayor of London received documents from the City of London notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the City with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Category of the Schedule to the Order 2008:

- 1.1C. 1(a) *"Development which comprises or includes the erection of a building of more than 25 metres high and is adjacent to the River Thames."*

3 Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Corporation to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The 0.2-hectare site is located on the north bank of the River Thames, between London Bridge and Cannon Street Station rail bridge. It is bounded by Upper Thames Street to the north, Fishmongers' Hall (a Grade II\* listed building) to the east, Swan Lane to the west and the River Thames to the south. Swan Lane, a remnant from the medieval street pattern, is a narrow gently sloping street that links Upper Thames Street to the Riverside Walk. The surrounding area is characterised by large office buildings of assorted age and architectural style.

6 The site is located on Upper Thames Street (A3211), which is part of the Transport for London road network, and is less than 200 metres from Cannon Street (A4), which is part of the strategic road network. The site is well served by buses, with route 344 running along Upper Thames Street; a further three routes serving Cannon Street; and four bus routes on King William Street. Cannon Street Station is within walking distance and provides access to National Rail services as well as District and Circle Line Underground services. Bank and Monument Underground stations are both within walking distance and provide access to the Central, Circle, District, Northern and Waterloo & City Lines as well as the Docklands Light Railway. The site has a public transport accessibility level of 6b, the best possible score on a scale of 0 to 6.

## Details of the proposal

7 Demolition of the existing building and redevelopment of the site to provide an intensified office provision, ground floor retail space, restaurant space and a public accessible roof terrace. The proposed development would be 12-storeys in height.

## Case history

8 On 16 April 2008 the then Mayor considered an application (GLA reference PDU/1936) for the erection of an 11-storey building to provide 19,951 sq.m. of office accommodation (B1) and the demolition of an elevated pedestrian crossing together with associated parking, servicing and plant. This application was refused by the City Corporation because of the proposal's impact on

views from The Monument and the impact on its setting and the Grade II\* listed building, Fishmongers Hall.

9 In 2009 the then Mayor considered a new application (GLA reference PDU/1936a) which was a redesign of the previously refused scheme and was for the erection of an 11-storey building comprising 18,339 sq.m. of office accommodation (B1), 118 sq.m. of retail floorspace and the demolition of the elevated pedestrian crossing together with associated parking, servicing and plant. The application was granted permission by the City Corporation on 27 May 2010 (LPA reference 08/01044/FULMAJ).

10 In April 2015 the then Deputy Mayor, acting under delegated authority, considered an application (GLA reference D&P/1936b/01) which was submitted in order to renew the 2009 permission, which had not been implemented at that point. The application was broadly supported, although the applicant was asked to review potential improvements to the Thames Path, provide further information in relation to urban design, climate change mitigation and adaptation, and address several outstanding transport matters.

11 In January 2018 a pre-application meeting was held between the GLA and applicant where it was concluded that the principle of the proposed office and restaurant use (with a publicly accessible roof terrace) was broadly acceptable in strategic planning terms. Concerns in respect to design, transport, and sustainable development were raised.

## **Strategic planning issues and relevant policies and guidance**

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the (2015) City of London Local Plan and the 2015 London Plan (Consolidated with Alterations since 2011).

13 The following are relevant material considerations:

- The revised National Planning Policy Framework and National Planning Practice Guidance.
- Draft London Plan (consultation draft December 2017 and Minor Suggested Changes published August 2018), which should be taken into account on the basis explained in the NPPF.
- London View Management Framework SPG (2012)
  
- Economic development *London Plan; the Mayor's Economic Development Strategy; Employment Action Plan*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Historic Environment *London Plan;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; The Mayor's Environment Strategy; and;*
- Transport *London Plan; the Mayor's Transport Strategy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG.*

## **Principle of development**

14 The site falls within the Central Activity Zone (CAZ). The strategic issues associated with this designation are considered below.

## Central Activities Zone

15 London Plan Policies 2.10 and 2.11 and draft London Plan Policies SD4 and SD5 seek to enhance the CAZ's internationally significant office functions recognising the strength of both the cultural and leisure offers of the area. These policies require that proposals support the nationally significant strategic functions of the CAZ by responding to local conditions. Schemes should optimise office floorspace, support the provision of visitor infrastructure and include a mix of uses including housing. The proposal seeks to optimise the existing office provision of 8,507 sq.m by increasing the provision at the site to 16,084 sq.m. This would support London's economic capacity and is thus in accordance with the objectives outlined above.

## Office

16 London Plan Policy 4.2 and draft London Plan Policy E1 and SD5 require that existing viable office floorspace within the CAZ is retained. These policies seek to develop and promote the unique conglomeration of dynamic clusters of specialist activities such as those found within the CAZ. The proposals result in a net increase in office floorspace equivalent to 7,284 sq.m. Policy E1 of the draft London plan projects a 59% increase in office employment growth in the period between 2016-2041 (equivalent to 367,700 jobs). These proposals seek to optimise an existing office site to maximise the offer of the location. This net increase in office floorspace will positively contribute to the anticipated growth in the long-term.

## Public viewing platform

17 Draft London Plan Policy D8 requires that publicly-accessible areas are incorporated into tall buildings particularly where the buildings would be more prominent. Given the locational value offered by this site, the presence of a fully accessible public viewing platform within the proposals is wholly supported. The river frontage and views offered across the London skyline offers significant public value representing an appreciable asset to future users of the site. The applicant has confirmed the intention to ensure that the roof terrace is genuinely publicly accessible. The City of London Corporation should ensure that public accessibility is secured as part of any s106 agreement, ensuring that it is free of charge and that no unnecessarily restrictive booking policies will be implemented.

## Principle conclusion

18 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 this site is supported and ensures the full optimisation of this well-located site. The City of London Corporation must secure the viewing platform to be free of charge to the public and restrictive booking policies should be avoided.

## **Urban design**

19 London Plan Policies 7.1 and 7.4 and draft London Plan Policies D1 and D2 both require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The proposed building would occupy a prominent site on Swan Lane on the River Thames frontage being visible in linear views along London Bridge. The building is proposed to comprise a ground plus 11-storey development with a publicly accessible viewing platform. The building will have entrances located on Upper Thames Street and Swan Lane with the ground floor restaurant also being accessible off the south façade facing the River Thames. The generous ground floor glazing which would front the River Thames would provide an active and attractive frontage onto the river walk helping to activate this currently quiet area.

## London View Management Framework

20 London Plan Policy 7.11 and draft London Plan Policy HC4 require that developments are assessed for their impact on designated views requiring that proposals preserve the appreciation of the protected vista. The buildings, landmarks or urban landscapes these viewing corridors protect are of significant aesthetic, historic and cultural value and the greatest weight is placed on maintaining those strategically significant views. Where proposals compromise these views they should be refused. The scheme is located in the protected vistas 5A.2 from Greenwich Park to St. Pauls Cathedral and 6A.2 from Blackheath Point which set a threshold height of 51.4 metres AOD. The scheme is demonstrated to have an above ordinance data (AOD) height of 51.4 metres which does not breach that threshold height. Given this the proposals will not prejudice views to St. Pauls from Greenwich Park or the Blackheath Point view and are thus acceptable in that regard. It is noted, however, that the proposed development sits on the threshold and thus it is critical that the proposed heights are not exceeded. The site is also located within Landmark Background Assessment Area in Protected Vista 4A.1, from Primrose Hill to St. Pauls where the consultation threshold is 52.1 metres AOD. This view has not been provided within the TVIA and must be provided prior to the Mayor's decision making stage to allow an assessment of the schemes impact to be undertaken.

21 The applicant is encouraged to maintain the ongoing dialogue with the City of London officers regarding local views.

## Setting of the Grade II\* listed Fishmongers Hall

22 London Plan Policy 7.8 and draft London Plan Policy HC1 seek to protect the historic environment by ensuring that development proposals conserve the significance of any heritage asset. Development proposals are required to be sympathetic to the assets significance and appreciation within their surroundings. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

23 The existing development on site is attached to the Grade II\* Listed Fishmongers Hall (Listing number: 1359203) at the northern edge of the plot. The existing situation fails to have sufficient regard to the heritage value of the Fishmongers Hall and serves to reduce the appreciation of this asset. The proposal seeks to significantly improve the existing situation by pulling back from the heritage asset and instating a substantial separation distance. Given the above the proposals are in accordance with the heritage policies and guidance outlined above.

## Height and massing

24 The proposed development would occupy a prominent site being visible in linear views along London Bridge to the South and benefitting from significant River Thames frontage. The building is comparable the development it neighbours to the west in terms of height which serves to rationalise the currently stepped rooflines along this part of the Thames providing for greater uniformity along the River's edge. The applicant has included a generous setback to the upper storeys, which ensures that the visual impact of the development is minimised particularly when viewed from the south. As such the proposals would not detract from the visual amenities or legibility of the surrounding urban landscape. The overall height and massing of the scheme is accepted in strategic design terms.

### Elevational treatment and commercial frontages

25 With respect to the architectural approach, the applicant is advancing a scheme which proposes a simple treatment for the building with the use of pre-cast granite beams and glazing for the central body of the structure. The ground floor will benefit from generous glazing which ensures activation to the areas surrounding the buildings base, particularly facing the river. The proposed material palette does not present any strategic design concerns and is thus supported.

26 Policy SD4 at point H of the draft London Plan seeks to enhance the attractiveness of the CAZ through improvements to the public realm. Policy T2 of the draft London Plan seeks to secure healthy streets to enhance and promote the efficient functioning of the city. The principles contained within these policies are evidenced in the scheme with generous areas of public realm around the base of the building which creates a functional area of public realm at the river's edge.

### Urban Design conclusion

27 The overall height and massing of the scheme is broadly acceptable in strategic design terms. In this case, having regard to the submitted plans and visualisations, and the characteristics of the urban setting, officers are satisfied that the proposal would not cause harm to the setting of the Grade II\* Listed Fishmongers Hall. Further information, however, is required with regard to assessing the potential impact on the Landmark Background Assessment Area in Protected Vista 4A.1 from Primrose Hill to St. Pauls.

## **Sustainable development**

28 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures) and, renewable technologies (comprising Air Source Heat Pumps). The approach proposed would achieve a 21% carbon dioxide reduction. Whilst the principles of the energy strategy are supported, the applicant must explore the potential for additional measures to maximise carbon dioxide reductions, having regard for the strategic targets set out in London Plan Policy 5.2 and Policy SI2 of the draft London Plan. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.

### Flood risk

29 The site is located in Flood Zone 3, in an area benefitting from River Thames tidal defences. London Plan Policy 5.12 and draft London Plan Policy SI12 both seek to ensure that the flood risk is minimised and mitigated, and that residual risk is addressed. The approach to flood risk management for the proposed development partly complies with London. Flood resilience measures should be considered to aid recovery following a breach of flood defences.

30 London Plan Policy 5.13 and draft London Plan Policy SI13 require that proposals aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy. Further details on how SuDS measures can be included in the landscape (such as tree pits) should be provided. Further consideration should be given to water harvesting and reuse, in particular from the available green roofs.

31 London Plan Policy 5.15 and draft London Plan Policy SI5 require that development proposals minimise the use of mains water in line with the Optional Requirement of the Building Regulations for residential development or for commercial development achieve at least the



BREEAM excellent standard. The proposals do not meet the water consumption targets of these policies. This should be addressed.

## **Transport**

### Trip generation

32 A further breakdown of the proposed trip generation by station, line and direction of travel is provided, so that the impacts of this development on the network can be understood.

### Cycle parking

33 Cycle parking should be provided to be in line with the draft London Plan standards, contained within Table 10.2. Cycle parking design should be in accordance with London Cycle Design Standards (LCDS). The applicant is proposing 266 cycle parking spaces which would be provided within the basement. This quantum is compliant with draft London Plan standards. The applicant should provide 80 short-stay cycle parking spaces. Short-stay cycle parking spaces should be located within the public realm, be easily accessible, well-located and secure.

### Vehicle parking

34 London Plan Policy 6.13 and draft London Plan Policy T6 require developments to provide the appropriate level of car parking provision. The applicant is proposing a car-free development but is seeking to formalise and retain 5 existing car parking spaces. Further evidence is required to justify the retention of these existing spaces.

### Healthy streets

35 In accordance draft London Plan policy T2. Way-finding signage (Legible London) should be included within the landscaping plans for the site and delivered through the section 278 agreement. Pedestrian comfort analysis for the site suggests that both the footways and crossing will be able to accommodate existing and future pedestrian demand.

### Travel planning, construction and servicing

36 In accordance with London Plan policies 6.3 and 6.14 and draft London Plan Policy T4, a final Construction Logistics Plan (CLP), Delivery and Servicing Management Plan (DSMP) and Travel Plan must be secured as part of any permission.

### Transport infrastructure and Crossrail

37 Any planning permission must be subject to conditions to safeguard London Underground infrastructure.

38 The site is in the Central London charging area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (March 2016). Based on the submitted details with respect to the uplift in chargeable B1 floorspace, TfL estimates that a section 106 contribution of £1,127,812 should be secured towards the delivery of Crossrail. City of London should confirm the actual sum payable, net of any CIL credit.

### Transport conclusion

39 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 plans and should also be secured through condition.

## **Local planning authority's position**

40 The City of London is currently assessing the application, and is still to identify a target committee date.

## **Legal considerations**

41 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Financial considerations**

42 There are no financial considerations at this stage.

## **Conclusion**

43 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 this site is supported and 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 plans and should also be secured through condition.

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for further information, contact GLA Planning Unit (Development & Projects Team):

**Julietta McLoughlin, Assistant Director – Planning**

020 7983 4271 email [Julietta.McLoughlin@London.gov.uk](mailto:Julietta.McLoughlin@London.gov.uk)

**John Finlayson, Head of Development Management**

020 7084 2632 email [John.Finlayson@London.gov.uk](mailto:John.Finlayson@London.gov.uk)

**Matt Christie, Team Leader - Development Management**

020 7983 4409 email [Matt.Christie@London.gov.uk](mailto:Matt.Christie@London.gov.uk)

**Connaire O’Sullivan, Strategic Planner, Case Officer**

020 7983 6589 email [Connaire.OSullivan@London.gov.uk](mailto:Connaire.OSullivan@London.gov.uk)

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Historic England

LONDON OFFICE

Mr Tom Hawkley  
DP9 Ltd.  
100 Pall Mall  
London  
SW1Y 5NQ

Direct Dial: 020 7973 3738

Our ref: S00206531

10 December 2018

Dear Mr Hawkley

**Ancient Monuments and Archaeological Areas Act 1979 (as amended); Section 2  
control of works  
Application for Scheduled Monument Consent**

**FISHMONGER'S HALL , LONDON BRIDGE, LONDON , EC4R 9EL  
Scheduled Monument No: SM LO 34, HA 1002058  
Our ref: S00206531  
Application on behalf of Sellar**

1. I am directed by the Secretary of State for Digital, Culture, Media & Sport to advise you of the decision regarding your application for Scheduled Monument Consent received 7 November 2018 in respect of proposed works at the above scheduled monument concerning the careful separation of Seal House from Fishmongers Hall. The works were detailed in the following documentation submitted by you:

design and access statement  
heritage statement  
historic environment assessment  
outline construction logistics plan  
draft construction management plan  
site location plan  
Existing, demolition and proposed drawings

2. In accordance with paragraph 3(2) of Schedule 1 to the 1979 Act, the Secretary of State is obliged to afford you, and any other person to whom it appears to the Secretary of State expedient to afford it, an opportunity of appearing before and being heard by a person appointed for that purpose. This opportunity was offered to you by Historic England and you have declined it.

3. The Secretary of State is also required by the Act to consult with the Historic Buildings and Monuments Commission for England (Historic England) before deciding whether or not to grant Scheduled Monument Consent. Historic England considers the effect of the proposed works upon the monument to be the effects of the works on the setting of the monument have also been assessed and are not considered to be an



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
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overriding factor in this instance.

I can confirm that the Secretary of State is agreeable for the works to proceed providing the conditions set out below are adhered to, and that accordingly Scheduled Monument Consent is hereby granted under section 2 of the 1979 Act for the works described in paragraph 1 above, subject to the following conditions:

- (a) The works to which this consent relates shall be carried out to the satisfaction of the Secretary of State, who will be advised by Historic England. At least 1 weeks' notice in writing of the commencement of work shall be given to Jane Sidell, Historic England, Cannon Bridge House, 25 Dowgate Hill, London jane.sidell@historicengland.org.uk in order that an Historic England representative can inspect and advise on the works and their effect in compliance with this consent.
- (b) All scaffolding and other access arrangements must not be tied into Fishmongers' Hall unless there are pre-existing tie positions which may be reused.
- (c) No hot works are permitted in contact with the fabric of Fishmongers' Hall.
- (d) During demolition and construction, the adjacent fabric of Fishmongers' Hall will be protected and monitored to ensure no damage occurs. Should an incident occur, Historic England is to be notified immediately.
- (e) Making good will be carried out in accordance with the submitted documentation and undertaken to the highest standards.
- (f) Details of the door blocking as seen from the interior of Fishmongers' hall should be submitted to Historic England for approval.
- (g) Following completion of the scheme as relating to Fishmongers' Hall, a short illustrated report on the project shall be submitted to Historic England.

4. By virtue of section 4 of the 1979 Act, if no works to which this consent relates are executed or started within the period of five years beginning with the date on which this consent was granted (being the date of this letter), this consent shall cease to have effect at the end of that period (unless a shorter time period is set by a specific condition above).

5. This letter does not convey any approval or consent required under any enactment, bye law, order or regulation other than section 2 of the Ancient Monuments and



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Archaeological Areas Act 1979.

6. Your attention is drawn to the provisions of section 55 of the 1979 Act under which any person who is aggrieved by the decision given in this letter may challenge its validity by an application made to the High Court within six weeks from the date when the decision is given. The grounds upon which an application may be made to the Court are (1) that the decision is not within the powers of the Act (that is, the Secretary of State has exceeded the relevant powers) or (2) that any of the relevant requirements have not been complied with and the applicant's interests have been substantially prejudiced by the failure to comply. The "relevant requirements" are defined in section 55 of the 1979 Act: they are the requirements of that Act and the Tribunals and Inquiries Act 1971 and the requirements of any regulations or rules made under those Acts.

Yours sincerely



**Jane Sidell**

Inspector of Ancient Monuments

E-mail: [jane.sidell@HistoricEngland.org.uk](mailto:jane.sidell@HistoricEngland.org.uk)

For and on behalf of the Secretary of State for Digital, Culture, Media and Sport

cc Ms Kathryn Stubbs



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**From:** [Linford, Catherine](#)  
**To:** [Adiel, William](#)  
**Subject:** FW: Seal House - parking  
**Date:** 05 March 2019 15:57:38

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**From:** Tempest Amy <[AmyTempest@tfl.gov.uk](mailto:AmyTempest@tfl.gov.uk)>  
**Sent:** 04 March 2019 16:21  
**To:** Linford, Catherine <[Catherine.Linford@cityoflondon.gov.uk](mailto:Catherine.Linford@cityoflondon.gov.uk)>  
**Subject:** RE: Seal House - parking

Hi Catherine,

Thank you for the below information.

1. **Car and Cycle Parking**

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

2. **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.

3. **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.

4. **Construction and 7. 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.

**Kind Regards,**

**Amy Tempest – TfL Spatial Planning**  
T: 020 3054 4558, Auto: 84558

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**From:** Linford, Catherine [<mailto:Catherine.Linford@cityoflondon.gov.uk>]  
**Sent:** 01 March 2019 16:45  
**To:** Tempest Amy; Mackay, Kieran  
**Subject:** FW: Seal House - parking

Dear Kieran and Amy,

Please find below the applicant's justification for the car parking.

Best wishes,  
Catherine

**Catherine Linford**  
Senior Planning Officer  
Department of the Built Environment  
City of London

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**From:** Tom Hawkley <[tom.hawkley@dp9.co.uk](mailto:tom.hawkley@dp9.co.uk)>  
**Sent:** 01 March 2019 16:40  
**To:** Linford, Catherine <[Catherine.Linford@cityoflondon.gov.uk](mailto:Catherine.Linford@cityoflondon.gov.uk)>  
**Cc:** Chris Beard <[chris.beard@dp9.co.uk](mailto:chris.beard@dp9.co.uk)>  
**Subject:** RE: Seal House - parking

Catherine,

The provision of 5no car parking spaces was requested and agreed with the Freeholder ("The Fishmongers") during the design development phase. The scheme was ultimately signed off by the Freeholder in July 2018. It is worth noting that the Freeholder's request was to provide 10no of car parking spaces, however the Applicant has managed to reduce the provision to 5no in total. The Lease grants the Freeholder rights of access and use of the garage area located in Seal House also shown hatched purple on the attached plan ("Certificate of Title"). The location of the car parking spaces is directed by the Lease and cannot be altered. The Fishmonger's courtyard is fully utilised during the day, therefore a request was made by the Freeholder to retain a few of the car parking spaces in their current location.

Kind regards,

**Tom Hawkley**

Senior Planner

direct: 020 7004 1752

mobile: [REDACTED]

e-mail: [tom.hawkley@dp9.co.uk](mailto:tom.hawkley@dp9.co.uk)

**DP9 Ltd**

100 Pall Mall

London

SW1Y 5NQ

telephone: 020 7004 1700 facsimile: 020 7004 1790 website: [www.dp9.co.uk](http://www.dp9.co.uk)

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**From:** Linford, Catherine [<mailto:Catherine.Linford@cityoflondon.gov.uk>]  
**Sent:** 28 February 2019 12:15  
**To:** Tom Hawkley <[tom.hawkley@dp9.co.uk](mailto:tom.hawkley@dp9.co.uk)>  
**Subject:** Seal House - parking

Hi Tom,

I have spoken to David about the five parking spaces that are being re-provided for the Fishmongers. To respond to the GLA's letter please could you explain:

- Why these spaces are needed.
- Why they cannot be located in another part of the courtyard, ie outside the application site.

Best wishes,  
Catherine



**Catherine Linford**

Senior Planning Officer  
Department of the Built Environment  
City of London  
020 7332 1352  
[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

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# City Heritage Society

*Please reply to:-*

*Tel.* [REDACTED]  
*e-mail* [REDACTED]

25 11 2018

City of London, Department of Planning & Transportation  
The Guildhall,  
London EC2 P2EJ

Dear Sirs,

**SEAL HOUSE, SWAN LANE, LONDON EC4R 3TN**

**Planning Application No. 18/01178/FUL MAJ**

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 façade, though this will be seen from a limited area, nonetheless the introduction of the “v” shaped support seems perverse.

Regarding the North façade 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 façade of the hall or to the restrained modern façade 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.

Yours Faithfully

*Peter Luscombe*

Peter Luscombe. [City Heritage Society Chairman]



Catherine Linford  
Corporation Of London  
Development Plan  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2018/129472/03-L01  
**Your ref:** 18/01178/FULMAJ  
**Date:** 04 March 2019

Dear Catherine,

**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.**

**Seal House, 1 Swan Lane, London EC4R 3TN**

Documents reviewed

- *Proposed Floor Plan Basement, EPA-SHE-05-1-299 (P07)*
- *Proposed Floor Plan Ground Floor, EPA-SHE-05-1-300 (P11)*
- *Draft Construction Management Plan, dated 29 October 2019*

We have reviewed the additional amended plans submitted following our previous comments and we are now in a position to **remove our objection**.

We support the setback of the basement to a minimum 10 metres from landward face of tidal flood defence as shown in '*Proposed Floor Plan Basement -1, EPA-SHE-05-1-299 revision P07*' and we support the same setback of the ground floor public realm plans to reduce pinch points as shown in '*Proposed Floor Plan Ground Floor, EPA-SHE-05-1-300 revision P11*'.

Cont/d..



INVESTOR IN PEOPLE



## Advice to LPA

### Flood risk

Although the site is located within Flood Zone 3 and is protected to a very high standard by the Thames Tidal flood defences up to a 1 in 1000 (0.1%) chance in any year flood event, our latest flood modelling shows that the site would be at risk if there was to be a breach in the defences or they were to be overtopped.

This proposal does **not** have a safe means of access and/or egress in the event of flooding from all new buildings to an area wholly outside the floodplain, however, safe refuge within the higher floors of the development has been suggested. You are the competent authority on matters of evacuation or rescue, and therefore should assess the adequacy of the evacuation arrangements. You should consult your emergency planners as you make this assessment.

If you are not satisfied with the emergency access/egress or refuge, then we would recommend you refuse the application on the grounds of safety during a flood event, as users would be exposed to flood hazards within buildings and on access/egress routes.

To improve flood resilience, we recommend that, where feasible, finished floor levels are set above the 2100 breach flood level, which is 5.75m AOD.

### Access during construction

The draft Construction Management Plan shows from the construction logistics plan, that access will be maintained at between 2.4-6.1m from landward face of flood defence to proposed hoarding. The distance should be no less than that specified however it would be preferable for there to be 5 metre access space all round where possible.

### Flood Risk Activity Permit

In line with the Environmental Permitting Regulations, the proposed works are within 16m of the furthest landward extent of a tidal flood defence, meaning the applicant will require an environmental permit in the form of a Flood Risk Activity Permit (FRAP) prior to the commencement of works. In particular any impacts the proposed works could have on the integrity of the flood defences will need to be determined. The London Plan (draft 2017) & City of London Local Plan (Jan 2015) Policy DM18.3 also require development to protect the integrity and effectiveness of flood defences.

To obtain a FRAP a detailed scheme will need to be submitted that demonstrates the integrity of the existing flood defence structures will be protected throughout development. The applicant must ensure that there is a continuous, fit for purpose flood defence line at the statutory level. Such a scheme could be a detailed method statement which includes all aspects of demolition/construction and the full sequencing of proposed works to demonstrate that these will not adversely affect the flood defence structure. This should also include ground investigation to determine the location of any possible buried elements of the flood defence including but not limited to tie rods and ground anchors.

Thank you again for consulting us. If you have any queries regarding our response please get in touch at [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk).

Yours sincerely,

**Mr Matthew Pearce**  
**Planning Advisor**

Telephone: 0207 714 0992

E-mail: [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk)

Address: Environment Agency, 3<sup>rd</sup> Floor, 2 Marsham Street, London, SW1P 4DF