

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

### Summary

This report deals with two related planning applications:

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

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

(Application ref: 20/00235/FULL)

#### Application A:

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

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

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

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

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

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

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

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

#### Application B: 1 Paul's Walk:

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

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

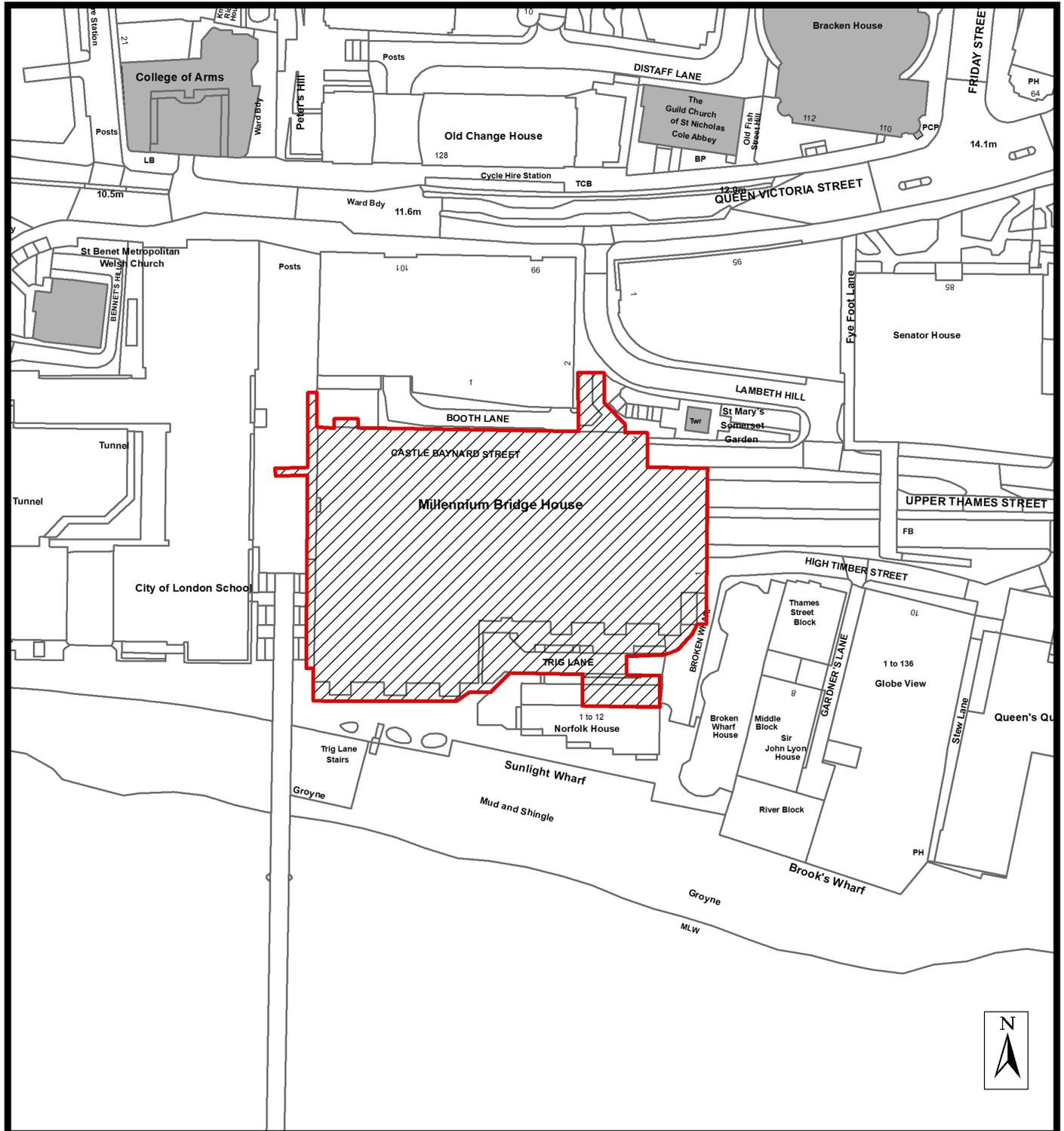
## **Recommendation**

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

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

That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in 'Planning Obligations' under Section 106 and any necessary agreements under Section 278 of the Highways Act 1980.

# Site Location Plan



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ADDRESS:  
Millennium Bridge House

CASE No.  
20/00214/FULMAJ

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



Existing view from Southbank



Proposed view from Southbank



## **Main Report**

### **Introduction**

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

### **Sites and Surroundings**

#### **Application A: Millennium Bridge House**

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

#### **Application B: 1 Paul's Walk**

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

### **Relevant Planning History**

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

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

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

## **Proposals**

### **Application A: Millennium Bridge House**

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

## Application B: 1 Paul's Walk

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

## Consultations

### Pre-Application Consultation

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

### Application Consultation

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

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

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

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

### **Policy Context**

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

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

### **Considerations**

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

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

### Principal Issues to be Considered

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

### Proposed Uses

#### Office Accommodation

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

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

#### Retail and Flexible Retail / Office Uses

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

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

### Roof Terraces

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

### Design

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

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

#### Proposed Alterations and Extensions to the Building

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

#### Mass, Bulk and Height

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

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

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

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

#### Design and Materials

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

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

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

#### Application B: 1 Paul's Walk

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

#### **London Views Management Framework (LVMF)**

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

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

#### River Prospect Views

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

#### Townscape Views

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

### Setting and Views of St Paul's Cathedral

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

### St Paul's Heights

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

infringe by up to 5.78m, and the front atrium roof, which infringes by up to 1.94m. These elements would be removed as part of the proposal.

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

#### Monument Views

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

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

### Other Views

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

### Public Realm

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

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

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

### **Urban Greening and Biodiversity**

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

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

### **Residential Amenity**

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

### **Impact of Proposed Roof Terraces**

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

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

### Overlooking

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

### Daylight and Sunlight

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

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

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

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

#### Daylight and Sunlight Assessment

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

#### City of London Boys' School

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

#### Broken Wharf House

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

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

### Norfolk House

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

### Daylight and Sunlight Conclusions

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

### Light Pollution

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

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

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

### **Archaeology**

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

### **Inclusive Design and Access**

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

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

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

## **Servicing Arrangements**

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

## **Cycling**

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

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

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

#### Public Transport

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

#### Section 278 Agreement

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

#### Wind Microclimate

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

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

### **Sustainable Drainage Systems**

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

### **Circular Economy**

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

## **Energy Consumption**

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

## **BREEAM**

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

## **Air Quality**

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

## **Noise and Vibration**

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

## **Flood Risk**

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

## **Community Infrastructure Levy (CIL) and Planning Obligations**

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

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

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

Mayoral CIL2

<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>MCIL2 payable</b>	£976,075	£937,032	£39,043

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

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations
- Local Procurement Strategy

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

180. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

181. The scope of the s278 agreement may include, but is not limited to, improvements to the surrounding footway/carriageway on Paul's Walk, Peter's Hill and Lambeth Hill.

#### Monitoring and Administrative Costs

182. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

183. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

#### Site Specific Mitigation

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

#### Conclusion

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

#### Application A

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

#### Application B

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

## **Background Papers**

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

#### Internal

Memo 23.03.20 Department of Markets and Consumer Protection

#### External

Letter 24.02.2020 Gerald Eve

Historic Environment Assessment June 2020 MOLA

Acoustic Report 14.02.2020 Gerald Eve

Pedestrian Level Wind Microclimate Assessment March 2020 RWDI

Daylight and Sunlight Assessment Feb 2020 Point 2

Design and Access Statement 21.02.2020 Piercy and Co

Planning Statement 21.02.2020 Gerald Eve

Transport Assessment and Outline Delivery Servicing Management Plan Feb 2020 WYG

Statement of Community Involvement February 2020

Email 20.04.20 Thames Water

Letter 21.04.20 London Borough of Southwark

Letter 12.06.20 Gerald Eve Consultation response

Letter 29.06.20 Historic England

#### Public Consultation Comments:

Letter 20.03.20 Alan Roach (Benbow House Residents Ltd.)

Email 21.03.20 Mr Rudi Schembri

Email 28.03.20 Michelle Lovric

Email 28.03.20 Lady S M Chantler

Email 30.03.20 Sir Cyril Chantler

Email 31.03.20 Gary List

Email 31.03.20 Kyriacos Kyriacou

Email 02.04.20 Guy Whittaker

Letter 02.04.20 Vali Mahlouji

Email 04.04.20 Dr Colin Brewer

Email 05.04.20 Pam and Roger Stubbs

Email 05.04.20 Maxine Darwin

Email 05.04.20 Thomas See

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

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

Internal

External

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

Public Consultation Comments:

Email 01.06.20 M A Lowndes  
Email 01.04.20 and 18.06.20 Thomas See

## **Appendix A**

### **Relevant London Plan Policies**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

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

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

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

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

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

Policy 7.6 Buildings and structures should:

a be of the highest architectural quality

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Relevant GLA Supplementary Planning Guidance (SPG):**

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

**Relevant Draft City Plan 2036 Policies**

S1 Healthy and Inclusive City

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL7 Sports and recreation

S3 Housing

HS3 Residential environment

S4 Offices

OF1 Office development

OF2 Protection of existing office floorspace

S5 Retailing

RE3 Ground floor retail provision elsewhere in the City

S6 Culture, Visitors and the Night-Time economy

CV4 Evening and night-time economy

S8 Design

DE1 Sustainability standards

DE2 New development

DE3 Public Realm

DE4 Pedestrian permeability

DE5 Terraces and Viewing Galleries

DE6 Shopfronts

DE8 Daylight and sunlight

DE9 Lighting

S9 Vehicular Transport and Servicing

VT1 The impacts of development on transport

VT2 Freight and Servicing

VT3 Vehicle parking

S10 Active travel and healthy streets

AT1 Pedestrian movement

AT2 Active travel including cycling

AT3 Cycle parking

S11 Historic Environment

HE2 Ancient monuments and archaeology

S13 Protected Views

S14 Open spaces and green infrastructure

OS2 City greening

OS3 Biodiversity

OS4 Trees

S15 Climate Resilience and Flood Risk

CR1 Overheating and Urban Heat Island Effect

CR2 Flood Risk

CR3 Sustainable drainage systems

CR4 Flood protection and flood defences

S16 Circular economy and waste

CE1 Zero waste city

CE2 Sustainable waste transport

S17 Thames Policy Area

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

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

## Relevant Local Plan Policies

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

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

### ***DM1.5 Mixed uses in commercial areas***

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

### ***CS3 Ensure security from crime/terrorism***

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

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

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

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

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

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

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

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

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

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

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

### ***DM10.4 Environmental enhancement***

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

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

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

#### ***DM10.7 Daylight and sunlight***

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

#### ***DM10.8 Access and inclusive design***

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

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

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

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

### ***DM12.1 Change affecting heritage assets***

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### ***CS18 Minimise flood risk***

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

### ***DM18.1 Development in Flood Risk Area***

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

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

#### ***DM18.2 Sustainable drainage systems***

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

#### ***DM18.3 Flood protection and climate***

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

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

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

## SCHEDULE

APPLICATION: 20/00214/FULMAJ

### Millennium Bridge House 2 Lambeth Hill London

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

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.  
REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1 and emerging policies HL2 and VT1 of the Draft City

Plan 2036 These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 3 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3 and emerging policies HL2 and HL3 of the Draft City Plan 2036. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

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

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

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

commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

- 6 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1 and emerging policies HL2 and VT1 of the Draft City Plan 2036. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

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

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

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

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

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

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

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

- 10 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

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

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

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and emerging policies SE1, DE2, DE6 and HE1 of the Draft City Plan 2036.

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

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

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

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

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

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
  - A full description of how the system would work, 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 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

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

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan:  
CS15, DM15.1, DM15.2, and emerging policy DE1 of the Draft City Plan 2036.

- 14 No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.  
Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk).
- 15 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 413 long stay spaces and 54 short stay cycle parking spaces . All doors on the access to the parking area shall be automated, push button or pressure pad operated. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3, and emerging policy AT3 of the Draft City Plan 2036.
- 16 Changing facilities and 42 showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 17 The proposed roof terraces at level 5 and 6 shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning

Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

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

scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7, and emerging policy HL3 of the Draft City Plan 2036.

- 23 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
- (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
- (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
- REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3 and emerging policies HL3 and HS3 of the Draft City Plan 2036.
- 24 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
- REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 25 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.
- REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and

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

- 26 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3 and emerging policies HL3 and HS3 of the Draft City Plan 2036.

- 27 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

- 28 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and any associated measures to reduce the potential for glare. All works pursuant to this consent shall be carried out in accordance with the approved details.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, and emerging policy DE2 of the Draft City Plan 2036.

- 29 The development shall provide:
- 27,275 sq.m of office floorspace (Class B1);
  - 1,776 sq.m of flexible office/retail floorspace (Class B1/A1/A3/A4);
  - 2,432 sq.m of retail floorspace (Class A1/A3/A4);
  - 375sqm of publicly accessible roof terrace

- 30 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: Proposed Basement Plan

13585-A-B00-03-099-A

Proposed Ground Floor Plan 13585-A-L00-03-100-B

Proposed First Floor Plan 13585-A-L01-03-101-B

Proposed Second Floor Plan 13585-A-L02-03-102-B

Proposed Third Floor Plan 13585-A-L03-03-103-A

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

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

## INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:
  - detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;
  - a full pre application advice service has been offered;
  - where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
- 2 This listed building consent is granted having regard to listed building considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.
- 3 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.

4 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:

(a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.

(b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.

(c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Declaration, alteration and discontinuance of City and Riverside Walkways.

(g) The provision of City Walkway drainage facilities and maintenance arrangements thereof.

(h) Connections to the local sewerage and surface water system.

(i) Carriageway crossovers.

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

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

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

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;
- provision for window cleaning (internal and external) to be carried out safely.

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

(g) Use of the premises for public entertainment.

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

(i) The detailed layout of public conveniences.

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

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

(l) Methods of odour control.