

Background Papers

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

Internal

External

Letter 03.03.20 Gerald Eve

Design and Access Statement February 2020 Piercy and Co

Planning Statement 21.02.20 Gerald Eve

Public Consultation Comments:

Email 01.06.20 M A Lowndes

Email 05.04.20, 18.06.20 and
30/06/2020

Thomas See (For and on behalf of
Norfolk House Residents Limited)

[REDACTED]

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

Dear Mr Devlia and Mr Chipperfield

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

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

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

Regards
Thomas See

Mobile:

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

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

1. Introduction.

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

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

2. Design.

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

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

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

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

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

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

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

4. Equally convenient rights of way and road safety.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11. Norfolk House Podium.

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

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

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

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

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

Yours faithfully,
T See

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

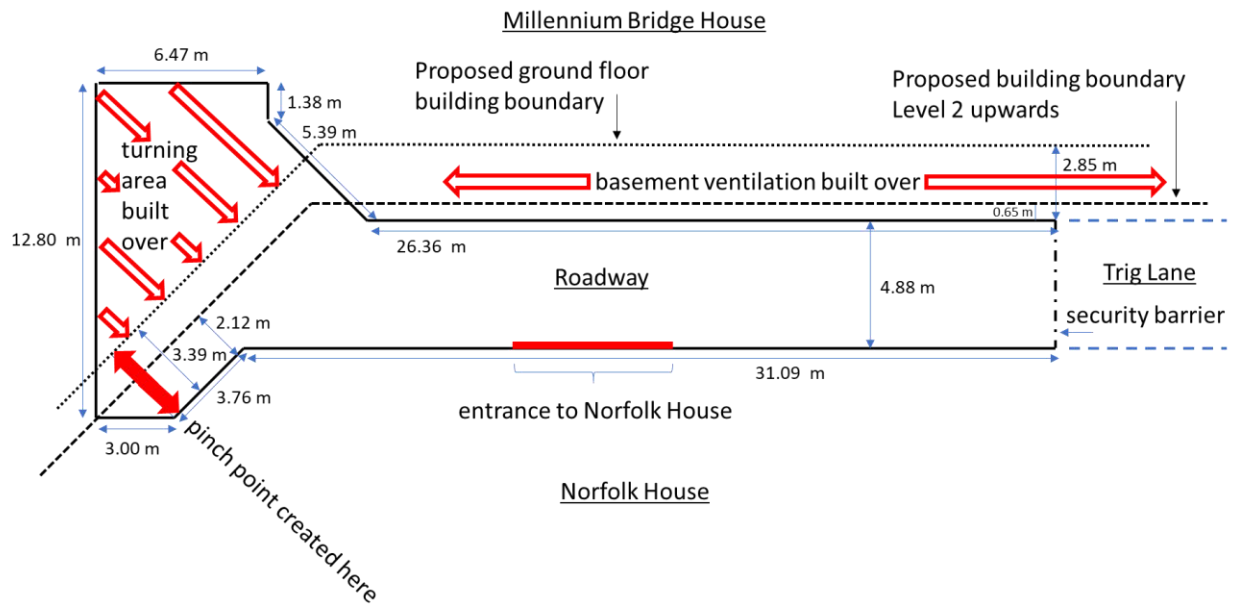
W J J Warmoes, Flat 1;
R Ellison, Flat 2;
C M See and T See, Flat 3;
D M Kearns and R A Hawkins, Flat 4;
A M Crowley and K B Mulhern, Flat 5;
A J P Gilchrist and R A M Gilchrist, Flat 6;
P Atkinson and N Farrow, Flat 7;
A Roste, Flat 8;
J M Read and P G Read, Flat 9;
V Smith and P Brewer, Flat 10;
S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

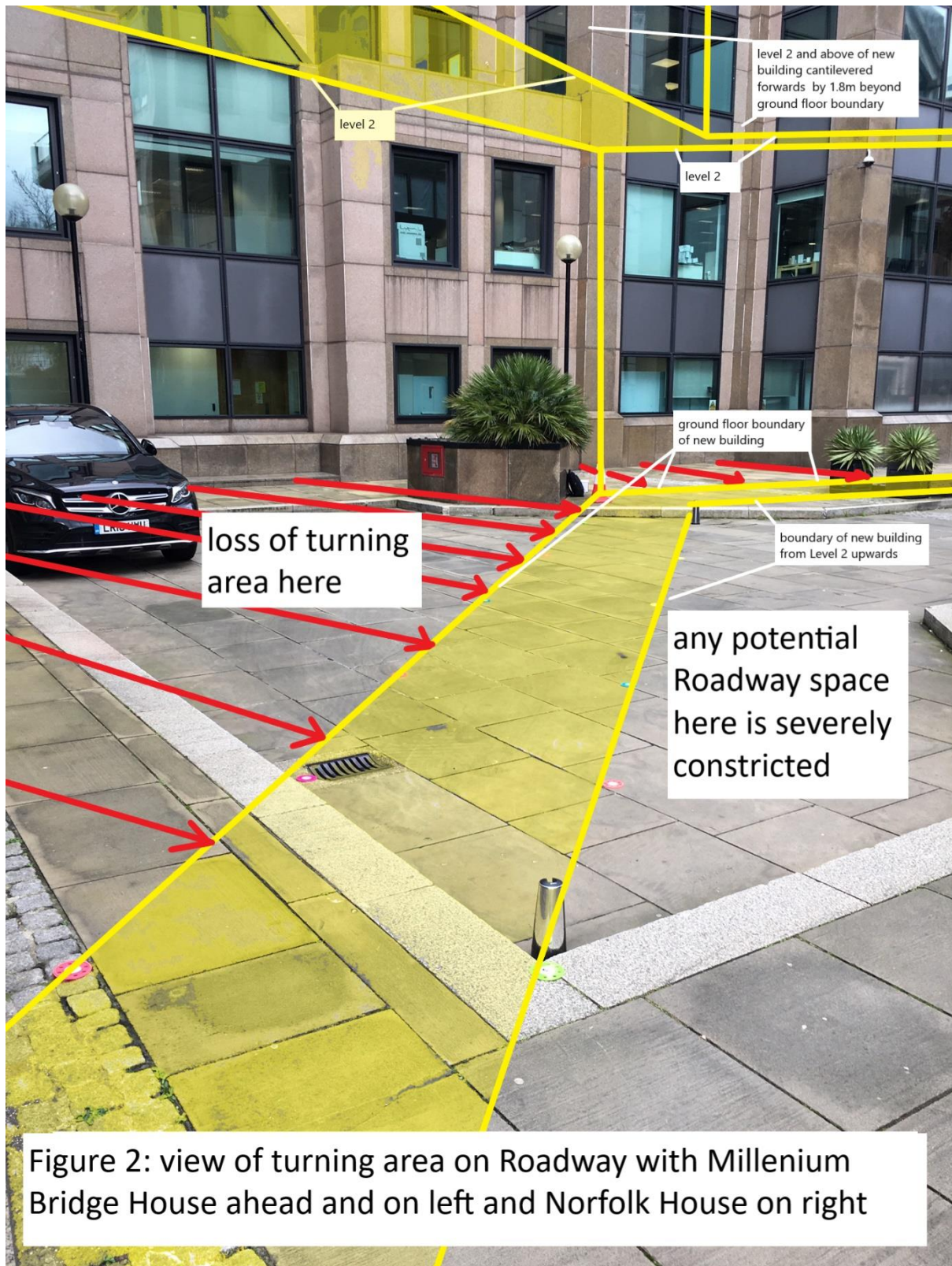
Postal address:
Norfolk House
Trig Lane
London
EC4V 3QQ

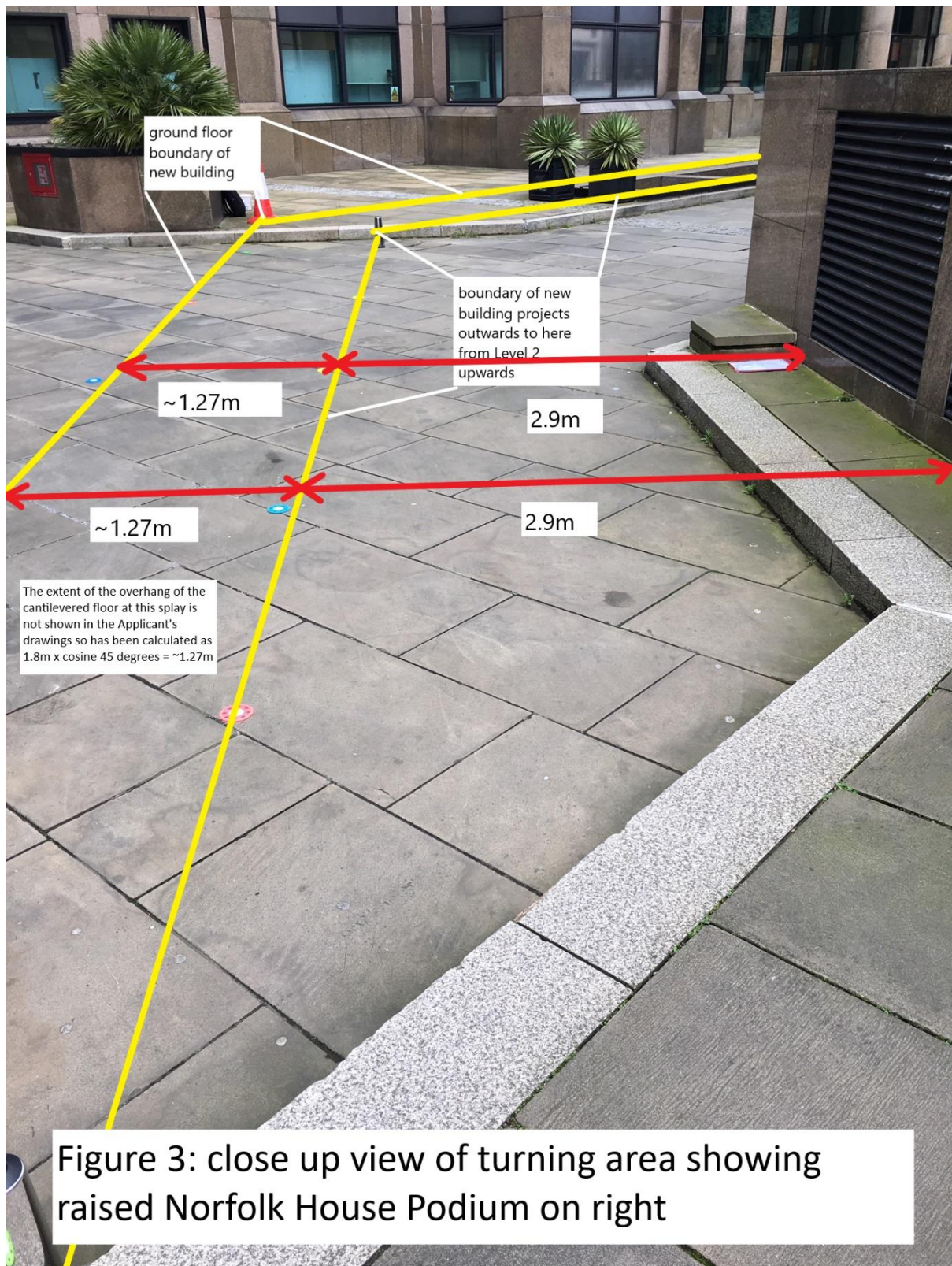
Attachments:

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

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









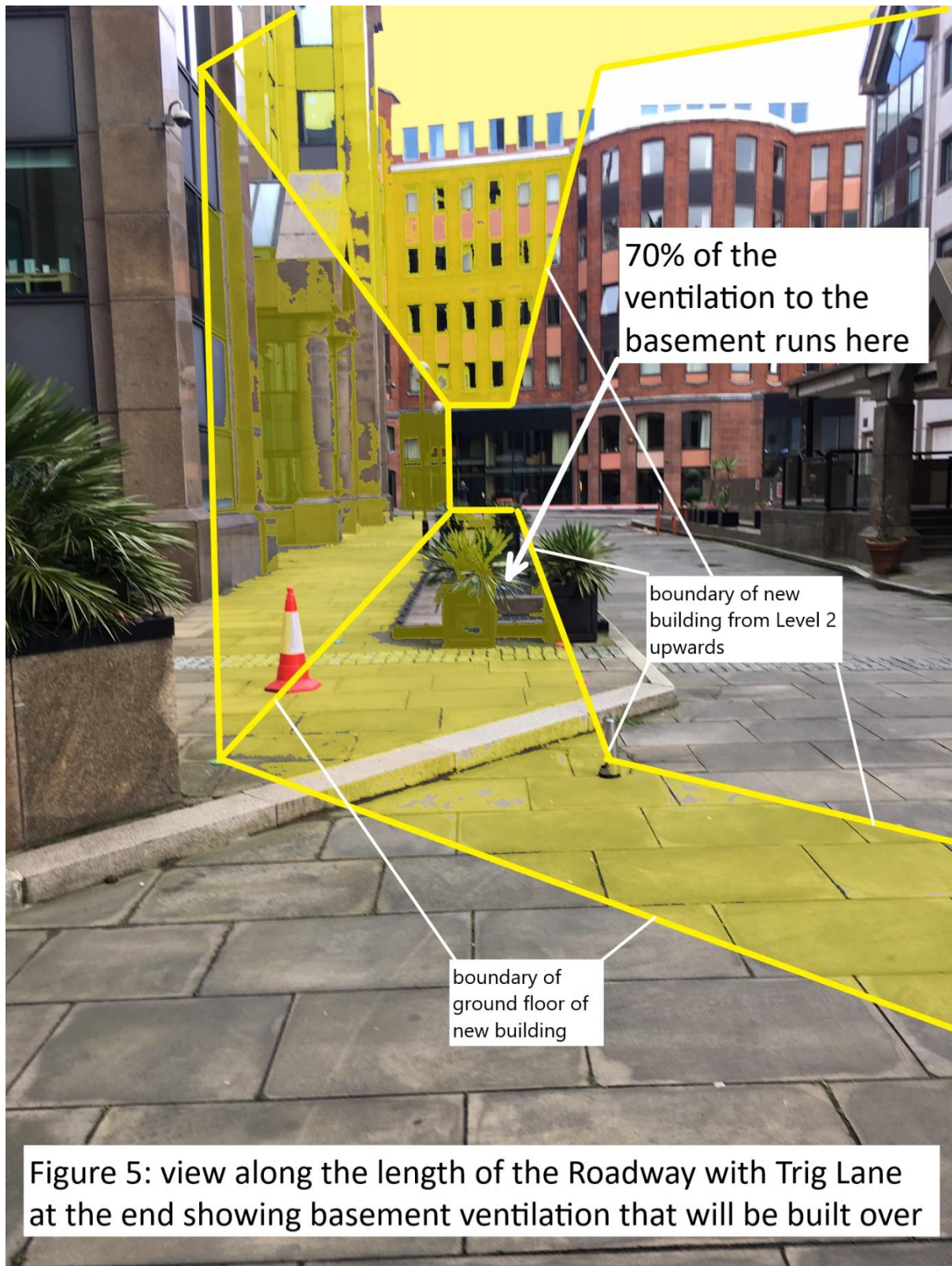


Figure 5: view along the length of the Roadway with Trig Lane at the end showing basement ventilation that will be built over

Roger Hawkins and Thomas See

2nd April 2020

By email

Dear Mr Hawkins and Mr See

Re: (ROL00379) Millennium Bridge House and Norfolk House

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

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

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

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

Accuracy of technical information

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

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

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

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

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

More detailed analysis of Point 2 report

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

General points

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

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

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

Comments on individual paragraphs

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Summing up

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

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

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

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



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

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

Yours sincerely

Lance J Harris

cc: Justin Cullen

Yours sincerely

[Insert author's name]

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

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

Dear Rob

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

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

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

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

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

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

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

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

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

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

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

Kind regards

Michael Lowndes | Urban Planning

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

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

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

Dear Mr Chipperfield

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

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

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

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

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

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

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

Yours faithfully

T See

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

W J J Warmoes, Flat 1;

R Ellison, Flat 2;

C M See and T See, Flat 3;

D M Kearns and R A Hawkins, Flat 4;

A M Crowley and K B Mulhern, Flat 5;

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

P Atkinson and N Farrow, Flat 7;

A Roste, Flat 8;

J M Read and P G Read, Flat 9;

V Smith and P Brewer, Flat 10;

S M G Braddell, Flat 11;

S N Tanoto, Flat 12.

Postal address:

Norfolk House

Trig Lane

London

EC4V 3QQ

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

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

Dear Mr Chipperfield,

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

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

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

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

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

Yours faithfully,
T See

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

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

Postal address:
Norfolk House
Trig Lane
London
EC4V 3QQ

Attachments:

NGL 731070
NGL 801549

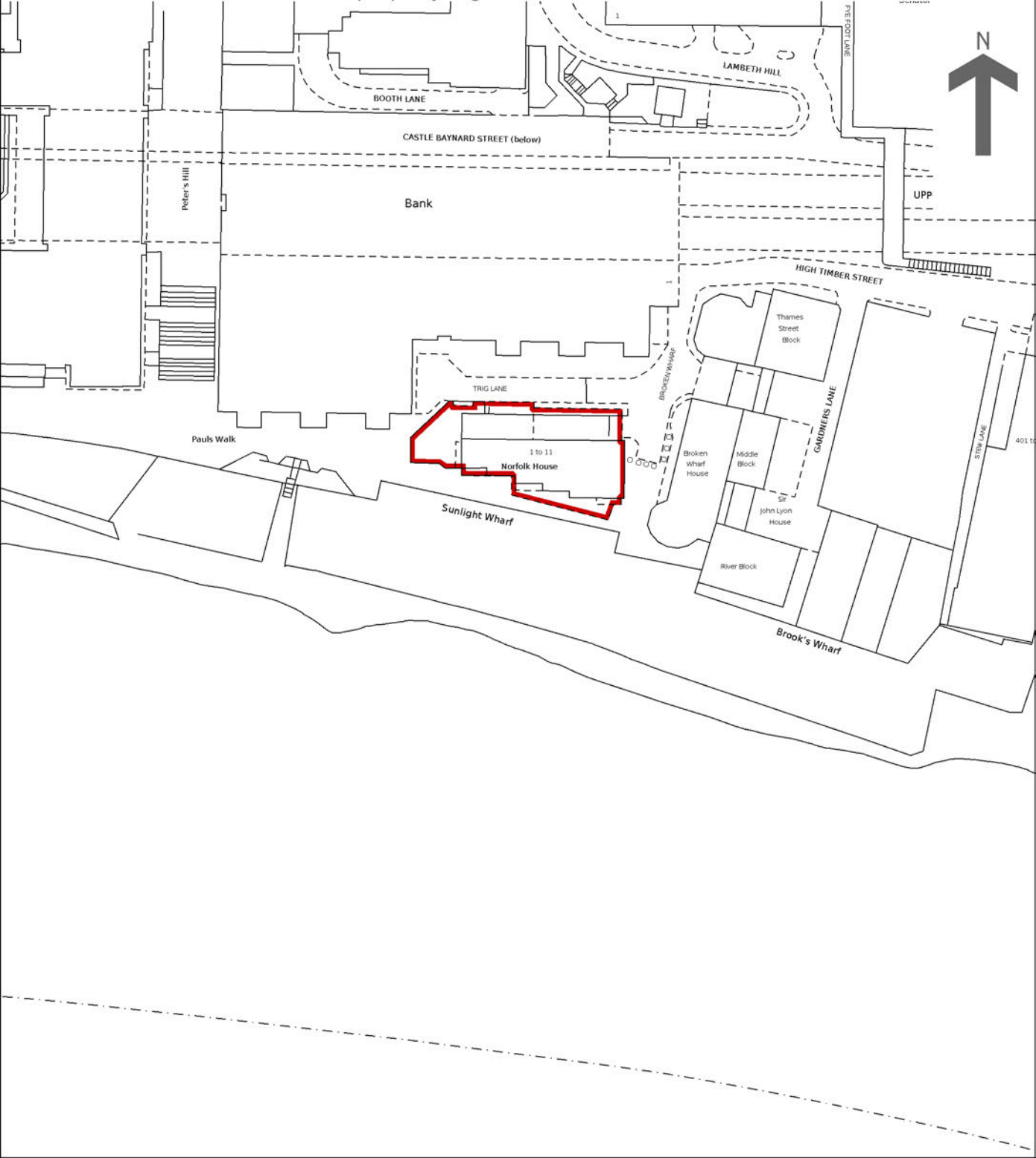
HM Land Registry

Current title plan

Title number **NGL731070**
Ordnance Survey map reference **TQ3280NW**
Scale **1:1250**
Administrative area **City of London**



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



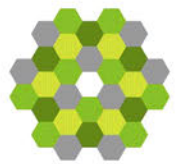
This is a print of the view of the title plan obtained from HM Land Registry showing the state of the title plan on 25 February 2020 at 16:14:33. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this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

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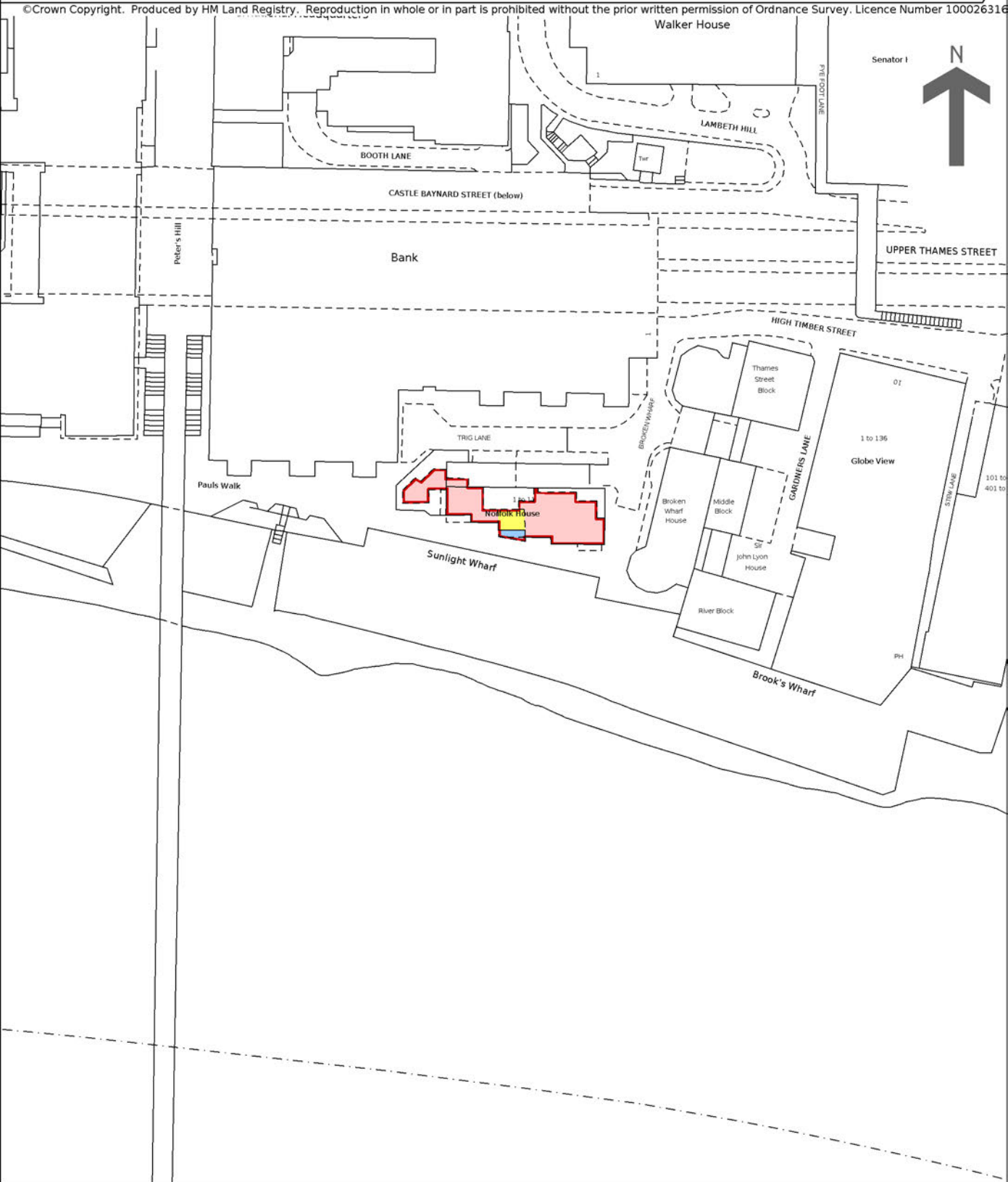
HM Land Registry

Current title plan

Title number **NGL801549**
Ordnance Survey map reference **TQ3280NW**
Scale **1:1250**
Administrative area **City of London**



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FAO: Rob Chipperfield

12 June 2020

Our ref: JNR/LLJ/U0009872

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

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

Dear Rob

Millennium Bridge House – Consultation Responses

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

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

Norfolk House Residents Limited

Engagement with NHRL

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

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

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

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

Design Matters

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

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

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

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

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

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

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

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

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

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

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

Trig Lane

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

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

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

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

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

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

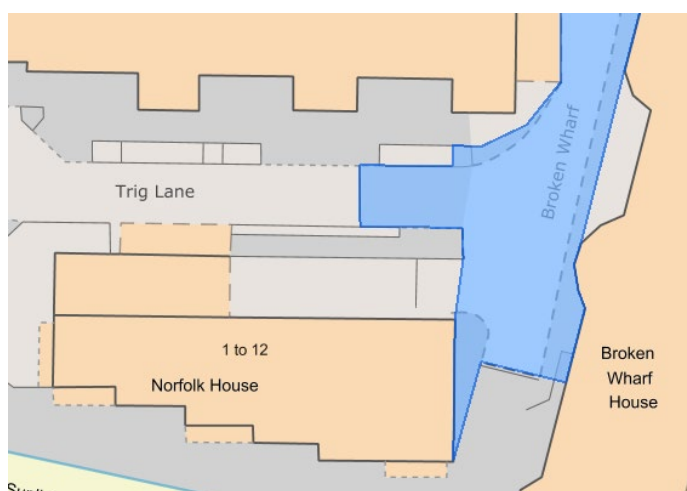


Figure 1 – Public Highway Boundary to Trig Lane

Fire Access

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

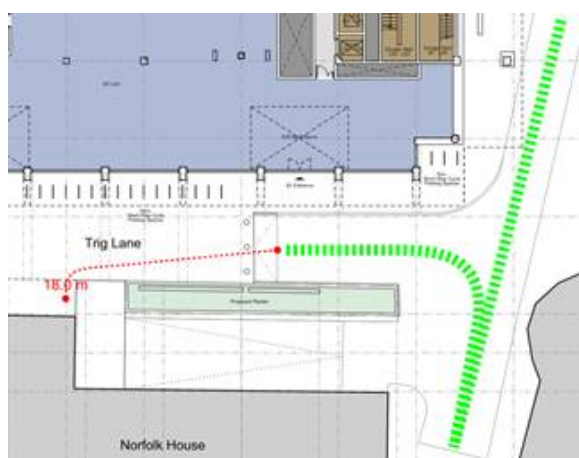


Figure 2 – Fire Access Arrangement to Norfolk House

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

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

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

Ventilation of the Basement

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

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

Alterations to Building Line of Millennium Bridge House

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

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

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

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

Daylight/Sunlight

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

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

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

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

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

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

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

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

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

Wind and Microclimate

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

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

Noise

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

Deliveries and Servicing

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

Light Pollution, Privacy and Overlooking

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

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

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

Restaurant Podium and Terrace

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

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

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

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

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

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

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

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

Benbow House

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

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

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

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

Concluding Remarks

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

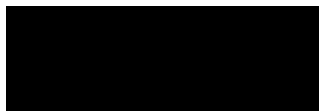
In order to be able to provide these, commercial uplift in value needs to be commensurate with the level of benefits secured. This site is incredibly constrained in terms of intensifying the use of the building. The proposed design has been the subject of extensive pre-application engagement with the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

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

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

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

Yours faithfully,



Gerald Eve LLP

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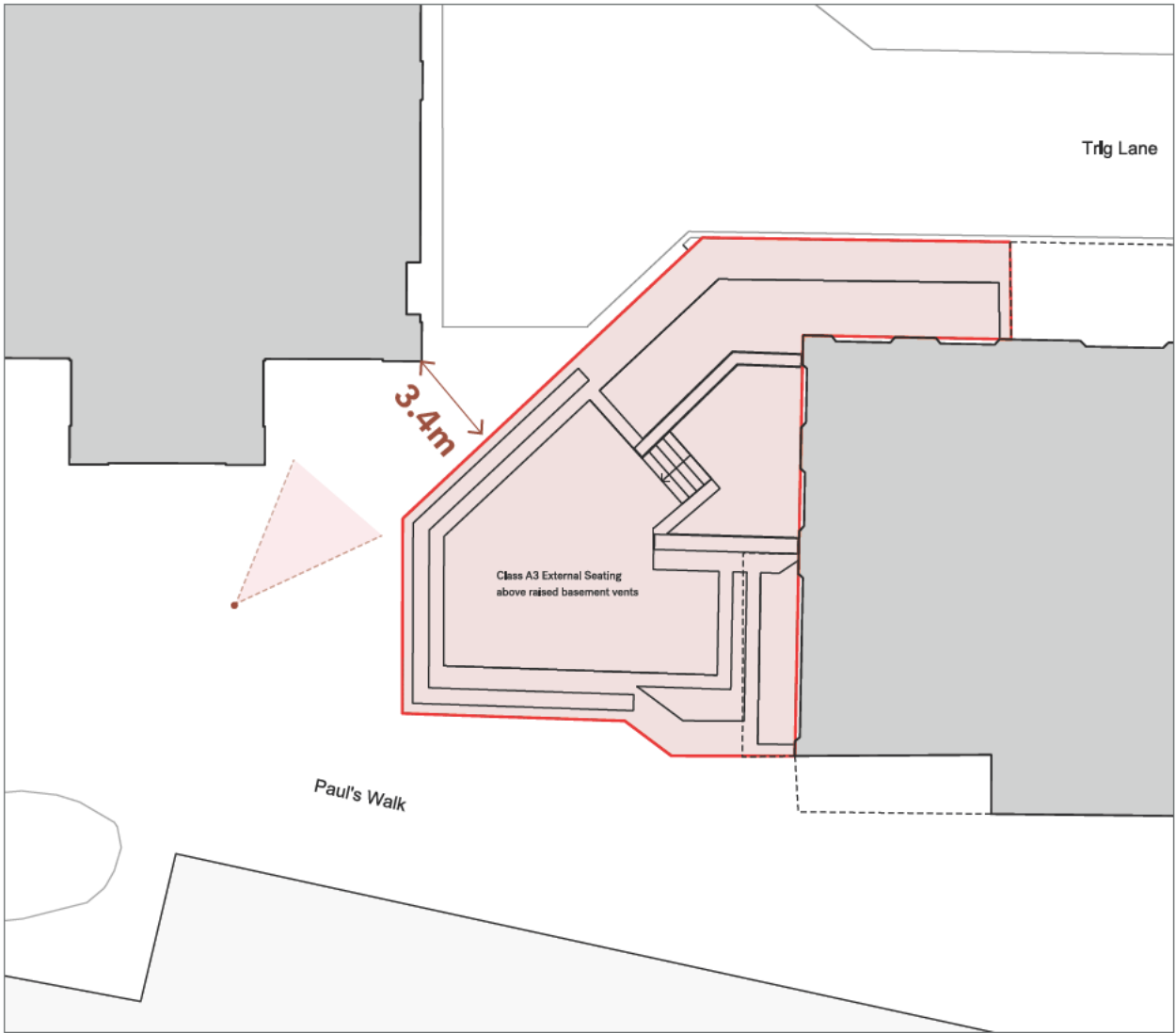
Encl.

Piercy & Company Design Response

Point 2 Surveyors Response to Anstey Horne

MILLENNIUM BRIDGE HOUSE:

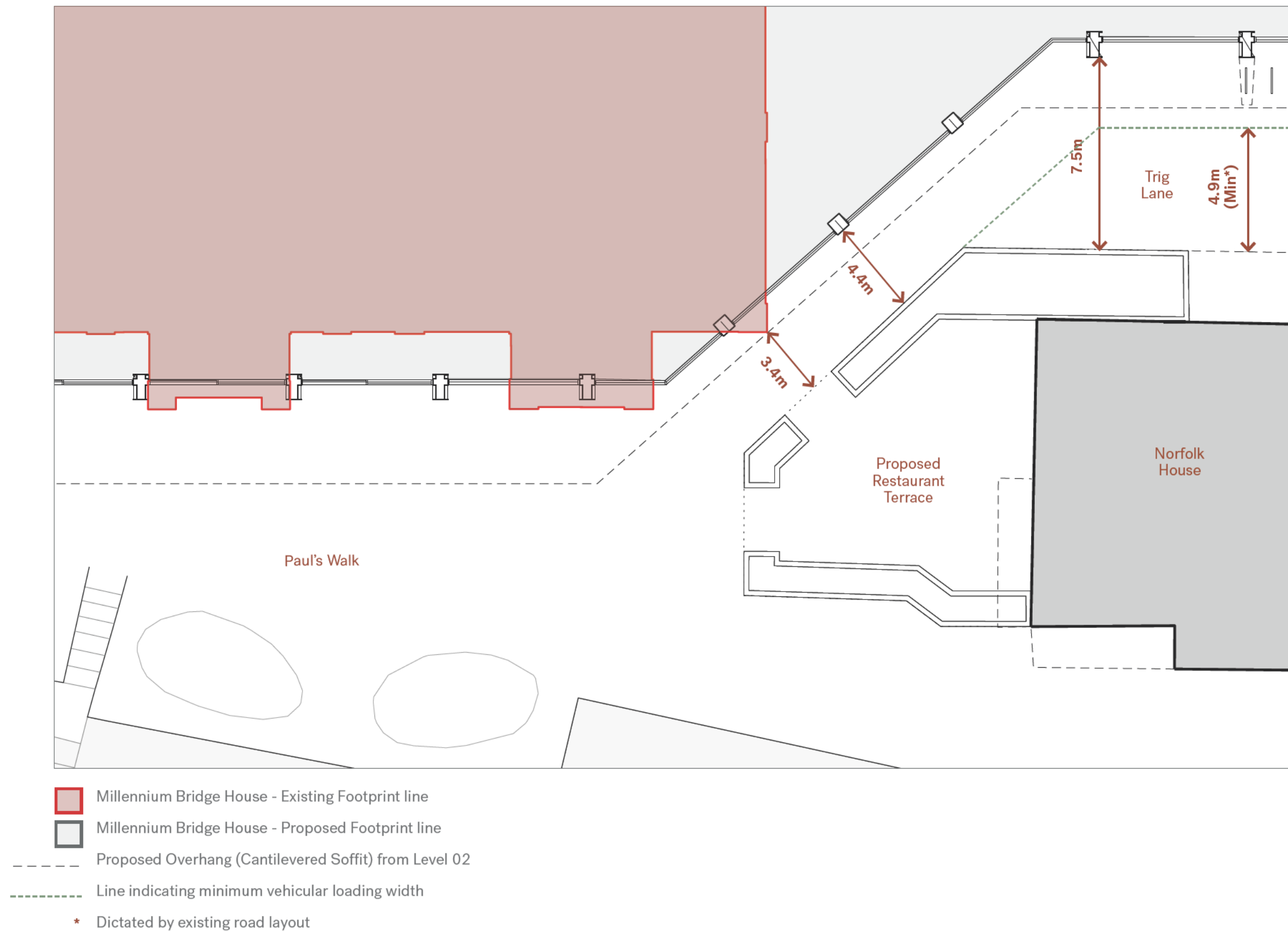
NORFOLK HOUSE OBJECTION
SUPPLEMENTARY INFORMATION



Existing plan



Existing view from Paul's Walk to Trig Lane





Proposed view to Trig Lane



Existing street condition on Trig Lane

Location of louvers



17 SLINGSBY PLACE
LONDON | WC2E 9AB

Rob Chipperfield
City of London Corporation
Department of the Built Environment – Planning
PO Box 270
Guildhall
London
EC2P 2EJ

27th April 2020

Dear Rob,

RE: MILLENNIUM BRIDGE HOUSE AND NORFOLK HOUSE – RESPONSE TO PLANNING OBJECTION FROM NHRL/ ANSTEY HORNE

We have reviewed a copy of the planning objection that has been received from Norfolk House Residents Limited (“NHRL”). Appended to their objection is a letter from Anstey Horne (“AH”) which is essentially a critique of the Daylight & Sunlight report produced by Point 2.

We find the commentary prepared by AH misguided and inaccurate. AH repeatedly make erroneous assertions with the objective of creating some false impression that Point 2 have either sought to downplay or worse, dismiss the effects to Norfolk House.

We will deal with the more substantial points in greater detail later in this letter, but I initially highlight so of the inaccurate reporting in AH’s report. AH repeatedly refer to us *‘disregarding rooms such as bedrooms and kitchens’*. No such attempts have been made at any stage within our report. We have openly reported on the effect to every single room and window and indeed report at great length on the effects to the kitchens and so it is factually incorrect to say have disregarded such spaces. These rooms actually receive more discussion than the living rooms.

Further, we note on page 4, paragraph 2 of the AH letter it is stated *‘Paragraph 3.8 (of the Point 2 report) suggests that because we dealing with a dense location and the majority of affected rooms are bedrooms and kitchens, the impacts are not that significant or important.’*

No such claim exists anywhere within the report. What paragraph 3.8 of our report actually says is;

‘As you would expect, the existing VSC values to the windows in the rear of the building are indicative of what one would expect in a very dense urban environment such as this. They are typically half of the 27% target which is a consequence of the close proximity of Norfolk House to the development site. Norfolk House has clearly been designed with this in mind as the secondary uses such as bedrooms and kitchens have intentionally been located to the rear of the building, where there are lower levels of daylight by comparison to the main accommodation, where the primary aspect is south facing’.

On page 5 of the AH letter, paragraph 3 which provides a commentary on the Point 2 report paragraph 3.9, AH have stated that *“Point 2 explain that where existing light values are very low”*. Paragraph 3 goes on to refer to Point 2 describing the existing VSC values as *“extremely low VSC values”*.

We have never described the existing VSC values as either ‘very low’ or ‘extremely low’. Given the repetitive use of this language throughout the letter, we consider AH are unreasonably seeking to undermine our analysis and discredit our thorough assessment of the situation.

What we actually say at paragraph 3.9;

‘Where windows have low existing values, small absolute changes in VSC are somewhat disproportionately represented as a percentage alteration. Subsequently, small reductions in VSC exceed the 0.8 reduction factor test. In our experience, it is fairly common to see this component of the VSC test exceeded when developing sites in very dense locations and therefore the same can be expected here. This point is expressly recognised in the introduction to the BRE Guidelines at paragraph 1.6 which states A simple review of our report demonstrates no such language or suggestion has been made’.

Page 6, paragraph 6, AH claim that our presentation of the VSC results for Norfolk House is misleading. They state *‘Point 2 refer to only 11 out of 53 windows tested not satisfy the VSC test, but that is a bit misleading as to the severity of the change....’*.

Again, this is factually incorrect. We expressly state the effects to the windows at paragraph 4.33;

*‘42 of the 53 windows included within our analysis will adhere to the BRE Guidelines for VSC. **The remaining 11 windows experience percentage alterations between 22% and 60% and are highlighted dark blue in Figure 4 below’.***

They go on to say, *“Point 2 refer to what they seem to consider to be exceptionally low VSC values ranging from 11 to 14%”*.

What we actually say at paragraph 4.33 is;

“The windows that experience the largest alterations in VSC are located on the ground and 1st floors. These windows have lower levels of VSC in the existing condition (11% and 14%) due to their proximity to the existing site buildings’.

The above are just a few of the many examples we could cite of the misguided and incorrect nature of their critique. It is an attempt to distort our presentation of the results which are both factual and informed by our extensive professional experience of advising on sites within the City and across central London. I stand completely behind all of the conclusions within our report.

As I mentioned above, our report comprehensively addresses the majority of the points within the AH letter. Our submitted report thoroughly and accurately assesses the impacts on Norfolk House, so we do not seek to repeat our results in this letter. But in response to the AH critique I would however take this opportunity to provide more substantive responses on the following topics.

Accuracy of analysis

I note that AH have inspected Norfolk House and have concluded that any variations in room layouts by comparison to the floorplan information we have obtained is *'probably not such that would significantly affect the technical results and therefore any conclusions arising from it'*.

Double/Triple aspect Living rooms (Page 2, point 1 of AH letter)

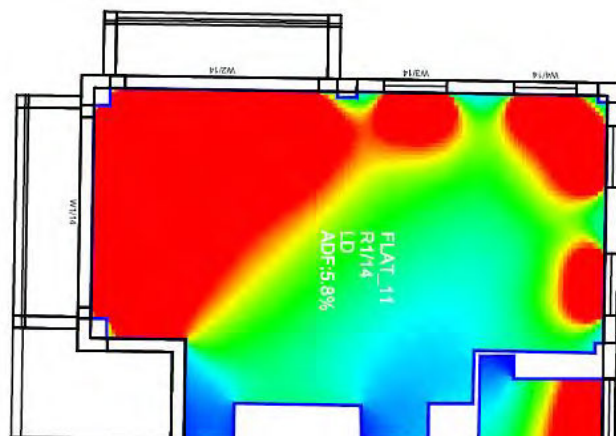
The point of objection appears to relate to paragraphs 3.6 and 3.7 of our report. AH state that it is incorrect to suggest that the north facing windows serving dual/triple aspect LKD's are not the main source of light to rooms.

There are two rooms that fall within this category; R1/14 which relates to Flat 11 and R9/11 which relates to Flat 1.

I disagree with AH criticism of our conclusion for the following reasons.

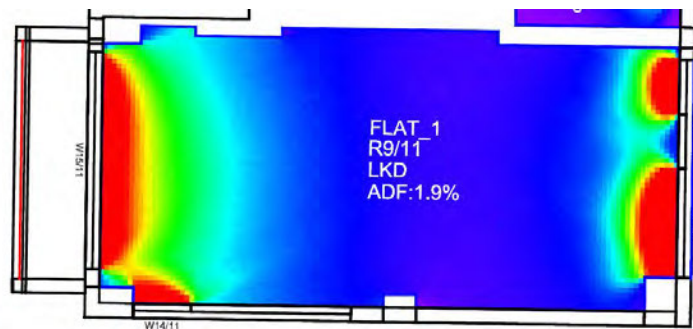
Flat 11

1. There are six windows serving the LKD. The south facing window overlooking the River Thames is a full height, full width window measuring 4.5m x 3m. There is a second, equally sized windows that faces west. The north facing windows are 1.45m x 1.41m.
2. The existing VSC value for the south and west facing windows are significantly higher than the north facing windows. This fact, coupled with the larger window dimensions clearly dictates that the south facing window provides more daylight than the north facing windows.
3. The radiance plot below clearly demonstrates that much higher daylight factors are received through the river facing windows by comparison to the north facing windows. This is demonstrated by the brighter colours. The south facing windows are on the left of the image whereas the north facing windows are on the right.



Flat 1

1. The south facing window overlooking the River Thames is a full height, full width window measuring 4.5m x 2.275m. The north facing windows are 1.1m x 1.41m and 2.2m x 1.4m.
2. The existing VSC value for the south facing window is higher than the north facing windows.
3. The radiance plot below clearly demonstrates that daylight penetrates much further into the room through the river facing windows by comparison to the north facing windows.



It therefore seems clear to me that the south facing windows are the primary source of light and so I do not accept AH's suggestion otherwise.

AH also suggest that it would be appropriate to undertake more analysis which assumes an entirely hypothetical situation whereby an occupant may or may not at some point in the future erect partitioning within the flat, thereby creating two smaller, less desirable spaces. I consider this suggestion wholly inappropriate for the following reasons;

1. Almost all modern urban residential apartments are designed to be open plan and so converting this large multi-aspect room into two inferior quality single aspect rooms is counterintuitive.
2. It would limit the area of the flat that can take benefit of the enviable views over the Thames towards the Tate Modern, The Shard and beyond.
3. The approach isn't in line with the BRE Guideline
4. I have never undertaken multiple assessments of multi-aspect rooms such as and there is no reasons to do so here, particularly given 1-3 above.
5. We could provide extensive evidence to demonstrate that AH do not produce planning reports on this basis and so it is unreasonable to suggest the Applicant should deviate from standard practice.

Daylight to bedrooms and kitchens (multiple references but in particular page 3, (2) and page 4, (1))

On page 3, AH '*quite accept*' that daylight to bedrooms and kitchen are less important than main living rooms but state that they must not be disregarded. We quite agree which is why we have reported on the effect to every single room that has a window facing towards the application site. At no stage does the language within the report suggest they should be disregarded; we have simply stated the general view of practitioners and planning officials is that daylight to living rooms is more useful and therefore important, which AH expressly acknowledge themselves.

They go on to say that the bedroom and kitchen windows already have '*compromised daylight*' and '*warrant careful consideration*'. Again, we quite agree which is why the Applicant has gone to the lengths of instructing more sophisticated and costly Radiance analysis to provide Officers with a more detailed and holistic understanding of the effect to these rooms than can be gleaned from BRE measures alone.

Notwithstanding the above, it remains the case that with the exception of one ground floor studio, the main living accommodation is predominantly south facing to take benefit of the views of the Thames and the uninterrupted access of daylight and sunlight the windows provide. The main source of light to the primary living accommodation in Norfolk House will therefore be unaffected by the development. There are effects to bedrooms and kitchens which have been reported on in detail in our report. Like any development in the City or central London, those localised effects are a matter of planning balance that must be weighed up with the significant benefits this development will bring.

Page 6, Paragraph 5

This AH are commenting on the results for Broken Wharf as opposed to Norfolk House and therefore this section of their letter should be ignored.

Use of Radiance

AH correctly point out that our assessment leads with the VSC and NSL tests described in the BRE Guidelines. They then assert that we '*have attempted to justify the transgression arising out of the key recommended BRE tests by reference to use of Radiance software and average daylight factors.*'

That is simply not correct. We expressly state at paragraph 3.12

'To supplement the BRE tests, we have undertaken detailed radiance based assessments to provide a more holistic understanding of both the reduction in light to each room facing the Site but also, and in our opinion more importantly, the quantum of retained daylight that the rooms will be left with.'

Radiance is not an attempt to justify the effects. Whether the effects are acceptable is a wider planning judgement to be taken by Officers and the Planning Committee. The analysis has been undertaken to furnish decision makers with greater detail on the effects and importantly, the areas of the rooms where the light loss is likely to be experienced.

We have used Radiance analysis on multiple projects in the City and across London and so it hasn't been specifically deployed for the current application; it is a more sophisticated technology and one generally welcomed by planning officials. Indeed, during our Pre-App meetings, Officers found the Radiance study a useful tool to assess the effect to Norfolk House and so it is completely inappropriate for AH to simply dismiss it because it suits their client to do so.

Furthermore, it seems somewhat paradoxical for AH to state in the 'General Observations' section of their letter that '*there are a number (of windows) facing north towards Millennium Bridge House, some with already compromised light conditions, that (sic) warrant careful consideration*' but then seek to dismiss us doing exactly as they request - *warrant careful consideration*. Radiance analysis is a significantly more sophisticated means for Officers to assess the effect to the building and so surely this additional analysis is providing the careful consideration they demand?

The paradoxical nature of AH commentary on Radiance is not limited to the above. They state;

‘One might justify use of the ADF test if one could show that good ADF levels would prevail in affected buildings after the proposed development had been built.’

We are not seeking to use Radiance to *‘justify that good ADF levels would prevail’* in the way that AH suggest would be appropriate, notwithstanding that the analysis actually demonstrates this to be the case for all of the rooms that meet their respective ADF requirement in the existing condition. AH repeatedly and incorrectly suggest that we are making *‘arguments’* to defend the effects.

Quite the opposite.

Our report clearly acknowledges that there is a reduction in daylight to three kitchens that currently achieve values below the 2% recommendation and the studio. The report is open and transparent on this point. However, the benefit Radiance offers over conventional BRE analysis is that it facilitates a more informed judgment to be made around whether that reduction is a) within an important part of the room(s) (which we do not believe to be the case) and b) whether that change will materially worsen the amenity of the rooms.

We have been able to source photos for three of the four rooms mentioned above and so we have an understanding of how these spaces are configured and most likely used. It is our professional judgement that whilst there is some light loss to these rooms, that loss would not fundamentally alter how the space is used albeit there would be some reduction in amenity. That change must therefore be judged against the benefits the application scheme brings.

Design of Norfolk House and MBH (page 5 (3) and 9 (1))

AH state that our report *‘criticises’* the design of Norfolk House and its relationship with MBH and that it *‘overly-burdens our client in terms of what they can do to MBH’*.

We do not make this suggestion. The Gerald Eve response deals with this point in greater detail, but for clarity, what our report says at paragraph 3.8 is;

As you would expect, the existing VSC values to the windows in the rear of the building are indicative of what one would expect in a very dense urban environment such as this. They are typically half of the 27% target which is a consequence of the close proximity of Norfolk House to the development site. Norfolk House has clearly been designed with this in mind as the secondary uses such as bedrooms and kitchens have intentionally been located to the rear of the building, where there are lower levels of daylight by comparison to the main accommodation, where the primary aspect is south facing’.

And in conclusion, we state at paragraph 5.3;

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

I trust this letter addresses the points raised within the AH letter. If Officers would like to discuss this with me, then I am only too happy to arrange a time to speak with them.

Yours Sincerely

A large black rectangular redaction box covering the signature area.

Nick Lane
Senior Director

For and on behalf of Point 2

**BELTANE- MILLENIUM BRIDGE HOUSE
STATEMENT OF COMMUNITY INVOLVEMENT
19 FEBRUARY**

TABLE OF CONTENTS

1.	SECTION 1: INTRODUCTION	2
2.	SECTION 2: EXECUTIVE SUMMARY	3
3.	SECTION 3: CONSULTATION OBJECTIVES	4
4.	SECTION 4: CONSULTATION ACTIVITIES AND FEEDBACK.....	5
5.	SECTION 5: RESPONSE TO FEEDBACK	7
6.	SECTION 6: CONCLUSION.....	8
7.	SECTION 7: APPENDICES.....	9



1. SECTION 1: INTRODUCTION

1.1 This Statement of Community Involvement (SCI) has been prepared by London Communications Agency (LCA) on behalf of AG Beltane MBH B.V., which will hence forth be known as ‘the Applicant’. It accompanies a full planning application that has been submitted to the City of London Corporation for the refurbishment of Millennium Bridge House (‘the Site’).

1.2 The Application is for the following proposed development:

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

1.3 This SCI demonstrates that a thorough approach has been taken to consultation with local stakeholders and political stakeholders, alongside on-going engagement with planning officers. This approach focused on targeted consultation with key site neighbours and ward councillors, to ensure that those within close proximity to the site have had a chance to communicate directly with the Applicant and project team and give feedback.

1.4 This document outlines the context for the site, as well as the consultation strategy, the activities and engagement that has taken place with stakeholders and analyses the feedback received.

1.5 The Applicant has been supported by a core team, including planning consultants, Gerald Eve; architects, Piercy & Co; historic buildings consultants, Donald Insall Associates; and landscape architects, Andy Sturgeon Garden Design (the “Project Team”).

1.6 The consultation activities that have taken place are in accordance with the City of London’s own Statement of Community Involvement (2016) and also reflect the principles for consultation in the Localism Act (2011) and in the National Planning Policy Framework (2019).



2. SECTION 2: EXECUTIVE SUMMARY

2.1 Millennium Bridge House is to undergo significant refurbishment, to extend and modernise the building adjacent to the Millennium Bridge on the north side of the River Thames.

2.2 A programme of engagement with the local community and key stakeholders took place throughout 2019 and into 2020, which has helped shape the planning application that will be submitted.

2.3 This programme focused on targeted consultation with key site neighbours and ward councillors, to ensure that those within close proximity of the site have had a chance to communicate directly with the Applicant and project team and give feedback.

2.4 Letters were distributed to 672 residential and businesses addresses within the immediate vicinity of the site, offering meetings with the project team. This includes letters to:

- Key City of London elected representatives and officers;
- Heritage bodies concerned with local assets such as the Sir Christopher Wren-designed St Mary's Somerset Church and St Paul's;
- Local tenant and residents' associations and amenity societies; and,
- Key site neighbours and businesses.

2.5 A number of meetings were held as a result, including with:

- Cllr Mooney, Queenshithe ward (17 December 2019)
- Norfolk House Residents Limited (14 January 2020)
- City of London School (23 January 2020)

2.6 In addition, the project team has committed to providing an update to be included as part of the Queenhithe ward newsletter, which will be issued in March. The update will include a brief summary of the proposals, as well as details of the validation number for people to view the plans in full online via the City of London Corporation's planning portal.



3. SECTION 3: CONSULTATION OBJECTIVES

3.1 The objectives of this consultation are set out below:

- To carry out a targeted programme of engagement with neighbouring residents, businesses and local amenity groups, offering one-to-one meetings with the project team to discuss the plans and provide feedback;
- To ensure the Applicant and senior consultants have engaged directly with key stakeholders and neighbours, reflecting the team's commitment to consultation and understanding people's views;
- To explain clearly the aims behind the proposals and how the development would benefit those living and working within the immediate vicinity of the site;
- To understand the issues of importance to neighbouring residents and businesses before submission of the application;
- To work closely with the City of London Corporation to ensure key officers and councillors are aware of the proposed development, key consultation activities and outcomes.



4. SECTION 4: CONSULTATION ACTIVITIES AND FEEDBACK

4.1 The pre-application consultation programme has seen engagement with neighbouring residents, businesses and local amenity groups in order to inform them about the proposals and provide them with a chance to give their feedback.

4.2 This engagement ran alongside an ongoing programme of meetings with City of London planning officers, led by Gerald Eve.

4.3 The consultation was promoted via letters posted to 672 local addresses within a 400m radius of the proposed site. This area and approach was agreed with CoL officers.

4.4 In addition, the project team emailed the following organisations directly to offer meetings:

- Queenhithe Ward Club
- Queen's Quay Residents' Association
- St Paul's Cathedral
- The City Property Association
- The Twentieth Century Society

4.5 This activity resulted in the following meetings taking place and outlined below is a summary of these sessions and the feedback received:

Meeting and attendees	Date	Summary of feedback
Norfolk House Residents Limited <ul style="list-style-type: none">• Cllr Brian Mooney – City of London• Robin Ellison – Norfolk House Residents Limited (“NHRL”)• Roger Hawkins – NHRL• Thomas See – NHRL• Jonathan Chenery – Beltane• Claire Brinson – Beltane• Stuart Piercy – P&Co• Henry Humphreys – P&Co• Conor Maguire – P&Co• Jeremy Randall – GE• Liam Lawson Jones – GE	14 Jan 2020	<ul style="list-style-type: none">• Residents were generally supportive of the scheme in terms of what is being proposed, noting that there would be a much cleaner finish to the façade and that Trig Lane is unsightly and is dead space.• There was concern over the daylight/sunlight impact to the properties.• It was also queried whether the replacement inclinators could be located within the building due to its impact on St Paul's.• There were queries as to whether the replacement inclinators could be located within the building due to its impact on St Paul's.
City of London Boys School <ul style="list-style-type: none">• Charles Griffiths, City of London School (CLS)• Richard Brooks, CLBS• John Hawson, CLBS• Duncan Roe – Beltane• Conor Maguire, P&CO• Liam Lawson Jones, GE	23 Jan 2020	<ul style="list-style-type: none">• Overall, it was felt that proposals would be beneficial to the area.• In relation to the steps and removal of the HSBC gates, it was felt that this would limit lingering on the approach to the bridge and create a better pedestrian environment.• Some concern was expressed about the potential loss of views from the library as a result of the cantilever.• It was noted that the School would prefer for the public terrace to be “less public” and would prefer a more “semi public/private” offer.



		<ul style="list-style-type: none">• There was concern that the use of the roof terrace could cause disturbance to students.
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- 4.5** The project team also met with St Paul's Restaurant Limited on 13 February to discuss the proposed works to the terrace at Norfolk House.
- 4.6** In addition, emails were also exchanged with Oliver Caroe, Surveyor of the Fabric to St Paul's. Although a meeting could not be arranged, the project team issued a copy of the materials that had been presented to local groups in December 2019 and remains open to setting up separate meetings as necessary.



5. SECTION 5: RESPONSE TO FEEDBACK

5.1 Provided below is the Applicant's response to the main issues and concerns that were raised during the programme of meetings set out in Section 4.

Query	Response
<p><i>Comment from meeting with Norfolk House Residents Limited:</i></p> <p>It was queried whether the replacement inclinator could be located within the building due to its impact on St Paul's.</p>	<p>The team noted that the location and positioning of the inclinator has been subject to substantial discussions with Planning and Design officers at the City of London Corporation. It was concluded that this was the most appropriate location for the inclinator.</p>
<p><i>Comment from meeting with Norfolk House Residents Limited:</i></p> <p>It was suggested that the height of the paving adjacent to the River Thames on Paul's Walk could be raised in order to improve views.</p>	<p>The applicant has looked at this, however it would require significant change well beyond what is within its ownership and is therefore considered unfeasible.</p>



6. SECTION 6: CONCLUSION

- 6.1** This SCI sets out how the Applicant has engaged with neighbouring residents and business, as well as local amenity groups, to seek their views on the proposals for Millennium Bridge House.
- 6.2** Through its engagement, the Applicant has provided these key stakeholders with a chance to comment on the plans ahead of the submission of a planning application.
- 6.3** Key meetings have taken place with adjacent site neighbours, including residents of Norfolk House and the City of London school, as well as with key elected representatives.
- 6.4** By participating in the consultation process the local community has been able to communicate directly with the Applicant and project team, and contribute their views and feedback into the design process.
- 6.5** The Applicant is committed to continuing a positive and regular dialogue with local communities throughout the planning process.



7. SECTION 7: APPENDICES

- **Appendix A: Stakeholder letters**



BELTANE
ASSET MANAGEMENT

4 December 2019

Dear Neighbour,

I wanted to write to let you know that Beltane Asset Management are planning to undertake a major refurbishment of Millennium Bridge House, the office building adjacent to the Millennium Bridge on the north side of the river Thames. We are currently working to develop proposals in order to substantially refurbish, extend and modernise the building and improve the surrounding public areas.

As one of our neighbours, we wanted to offer you the opportunity to meet us and learn more about our proposed designs, led by renowned architects Piercy & Company. You will have the opportunity to ask questions and provide us with feedback before we submit a planning application to the City of London Corporation early next year.

If you would like to take us up on this offer please contact my colleague, Declan Bennett of London Communications Agency, on db@londoncommunications.co.uk or 020 7291 1504, ideally by Friday 20 December.

With best wishes,

Claire Brinson
Beltane Asset Management LLP

Beltane Asset Management LLP

Telephone +44 (0)203 146 7773

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- **Appendix B: Mailing area**

