

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	12 May 2015
<b>Subject:</b> 100 Liverpool Street & 8-12 Broadgate London EC2M 2RH Refurbishment and extension of the existing building including retention of building's structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide commercial office (B1) accommodation and flexible commercial floorspace comprising additional office (B1), retail (A1/A2/A3), and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building. (Total 68,303sq.m GEA).	<b>Public</b>
<b>Ward:</b> Bishopsgate	<b>For Decision</b>
<b>Registered No:</b> 14/01285/FULEIA	<b>Registered on:</b> 7 January 2015
<b>Conservation Area:</b> No	<b>Listed Building:</b> No

### Summary

The site is part of the Broadgate Estate. To the north of the site is 5 Broadgate which is currently under construction.

It comprises two buildings known as 100 Liverpool Street and 8-12 Broadgate. They were built in the late 1980's as part of Phase 3 of the Broadgate development. The buildings were designed as separate offices with individual entrances accessed from Liverpool Street and Broadgate Circle. The buildings were later amalgamated to operate as a single building and are currently occupied by UBS Ltd. The site is immediately adjacent to the proposed eastern entrance of the Crossrail station on Liverpool Street

The proposal, which is accompanied by an Environmental Statement, seeks to refurbish and extend the existing building for office, retail and leisure use. The building's structural frame, basement and foundations would be retained. A single building would be constructed with a new facade. The new building would comprise of basement, lower ground, ground, ten upper floors with roof top plant. The highest part of the building would be 66.9m AOD.

The site is subject to a Certificate of Immunity from listing which was issued on 17th January 2013 under the Planning (Listed Buildings and Conservation Areas) Act 1990. The issuing of the certificate confirms the Secretary of State does not intend to list the building for a period of 5 years.

One objection has been received from The Twentieth Century Society. They consider that the remaining Foggo/Arup designed work which remain at Broadgate to be among the best of their type and period.

The Mayor of London has been consulted and has issued a Stage One response which is supportive but there are outstanding strategic planning issues that will need to be resolved before the application is referred back at Stage Two.

The scheme would provide an employment led mixed use development which would support the economic policies of the London Plan, and Local Plan. The development would benefit from the proximity of the Crossrail line now under construction.

The proposed building is considered to enhance the street scene compared to the existing building. It would have a strong sense of architectural integrity compared to with the existing fragmented facades.

The proposals are considered not to have a detrimental impact on the settings of listed buildings, and conservation areas in the vicinity.

It is concluded that the proposal overall is to be welcomed subject to conditions and to a Section 106 and CIL agreement being entered into to cover the matters set out in the report.

## **Recommendation**

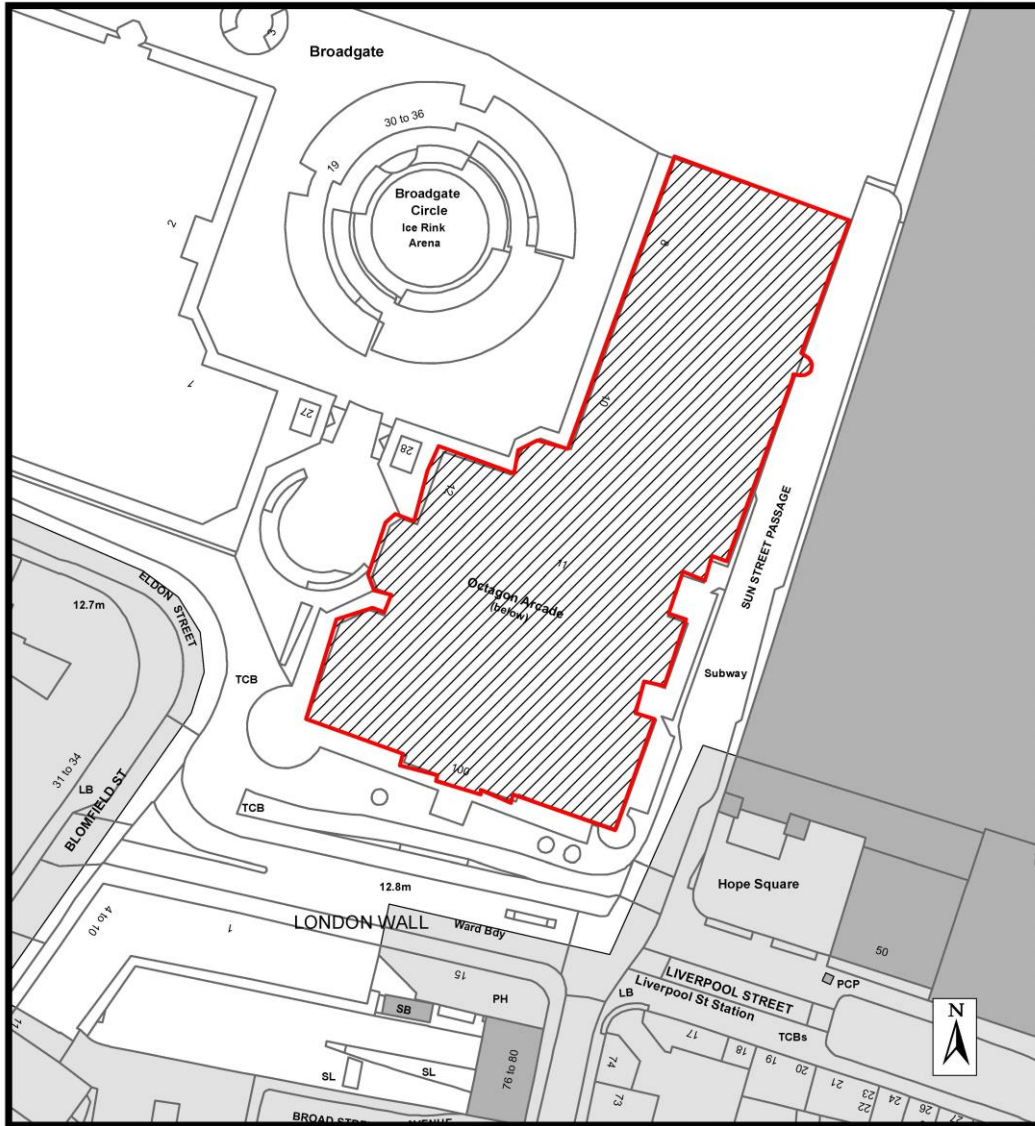
(1) That you authorise the Chief Planning Officer to determine the above application for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) the Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);

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

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

# Site Location Plan



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ADDRESS:  
100 Liverpool Street and 8-12 Broadgate

CASE No.  
14/01285/FULEIA

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



DEPARTMENT OF THE BUILT ENVIRONMENT



Existing view from Liverpool Street looking north-west



Existing view from junction of Finsbury Circus and Blomfield Street looking north-east

Case No.14/01285/FULEIA 100 Liverpool Street and 8-12 Broadgate



Existing view from Broadgate Circle looking south-east

Case No.14/01285/FULEIA 100 Liverpool Street and 8-12 Broadgate

## **Main Report**

### **Site**

1. The site is part of the Broadgate Estate and is situated immediately to the east of Liverpool Street station and Sun Street Passage and to the north of Liverpool Street. To the west of the site is Broadgate Circle and Eldon Street and immediately to the north of the site is 5 Broadgate which is currently under construction and will be completed in 2016.
2. The site is 0.89 hectares. It comprises two buildings known as 100 Liverpool Street and 8-12 Broadgate. They were built in the late 1980's as part of Phase 3 of the Broadgate development. The buildings were designed as separate offices with individual entrances accessed from Liverpool Street and Broadgate Circle. The buildings were later amalgamated to operate as a single building and are currently occupied by UBS Ltd.
3. The existing buildings have basement, lower ground, ground and seven upper storeys (52.89 AOD).
4. The existing buildings provide 51,408sq.m (GEA) of office (Class B1) floorspace and 526sq.m of retail (Class A1 and A3) floorspace comprised of five units at lower ground and ground floor level.
5. The site is not within a conservation area. There are conservation areas close to the site, Finsbury Circus to the west, New Broad Street to the south and Bishopsgate to the east. Listed buildings in the vicinity include Liverpool Street Station (Grade II) adjacent to the site to the east, the Great Eastern Hotel (Grade II) to the east, 76-80 Old Broad Street to the south, Park House and Garden House (Grade II) to the south west and St Mary Moorfields (Grade II) to the west.
6. The site partly lies in the background of Protected View 9A.1, King Henry VIII's Mound, of the Mayor's London View Management Framework (LVMF).
7. The site is adjacent to the proposed eastern entrance of the Crossrail station on Liverpool Street

### **Relevant Planning History**

8. The site is subject to a Certificate of Immunity from listing, issued on 17<sup>th</sup> January 2013 under the Planning (Listed Buildings and Conservation Areas) Act 1990. The certificate confirms the Secretary of State does not intend to list the building for a period of 5 years.

### **Proposals**

9. The proposal seeks to refurbish and extend the existing buildings. The buildings' structural frame, basement and foundations would be retained. A single building would be constructed with a new facade. The new building would comprise of basement, lower ground, ground, ten upper floors with roof top plant. The highest part of the building would be 66.9m AOD.

10. The proposed floorspace of the building would be 68,303sq.m of which 61,476sq.m would be offices (Class B1). The retail (Class A1/A2/A3) floorspace would be 1505sq.m. A total of 5,322sq.m of floorspace would be flexible commercial floorspace comprising additional office (Class B1), retail (Class A1/A2/A3), and leisure (Class D2) uses at lower ground, ground and first floor levels and flexible office (Class B1)/restaurant (Class A3) use at ninth floor level. The maximum floorspace by use is estimated as 65,996sq.m office (Class B1), 4,958sq.m shop (Class A1), 3,167sq.m financial and professional services (Class A2), 5,036sq.m restaurant (Class A3) and 2,147sq.m leisure (Class D2). [All floorspace figures GEA].
11. The proposal includes the provision of car and cycle parking, alterations to the facilities associated with the bus station, hard and soft landscaping, roof terraces at 6<sup>th</sup>, 7<sup>th</sup>, 8<sup>th</sup>, 9<sup>th</sup> and 10<sup>th</sup> floor levels.

### **Consultations**

12. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with by condition and the Section 106 agreement.
13. The Mayor of London supports the land use principles and design. He raises points which he wanted addressed before the application is referred back to him at the stage two referral. These issues are connection to the Citigen network, cycle access, bus station facilities and fire escapes. These issues will be addressed by the applicants.
14. Crossrail confirm that *“the implications of the Crossrail proposals for the application have been considered and the detailed design of the proposed development needs to take account of the construction of Crossrail”*. They require a condition and informative which are included on the schedule.
15. Natural England advises that the proposal is unlikely to affect any statutorily protected sites or landscapes and refers to its Standing Advice.
16. The Department of Communities & Local Government has no comments to make on the application.
17. Thames Water has made detailed comments on waste water and water supply infrastructure capacity, surface water drainage and sewers. They state that *“the existing water supply infrastructure has insufficient capacity to meet the additional demands of the proposed development”* and recommend a condition to determine whether the water supply infrastructure has sufficient capacity to cope with additional demand. Further conditions and informatives are included on the schedule.
18. English Heritage advises that they do not wish to comment on this proposal.
19. The Royal Borough of Kensington and Chelsea have no objection to the proposal.

20. The City of Westminster does not wish to comment on the proposal.
21. The London Borough of Islington has no objection on townscape grounds. They do however state that the, 'Delivery and Servicing Plan and Framework Construction Logistics Plan appended to the Transport Assessment do not illustrate vehicular routes to and from the site'. They request to be consulted on any plans relating to demolition, construction, delivery and servicing. Consultation with the London Borough of Islington has been added to the relevant conditions.
22. The London Borough of Tower Hamlets has no objection to the proposal. They have raised some points regarding the EIA which have been addressed by the applicants.
23. Transport for London was consulted and raised no objection. They have requested conditions that are included on the schedule.
24. Network Rail was consulted and raised no objection. Conditions and informatives are included on the schedule.
25. The Twentieth Century Society object to the scheme. They state, "*The proposed 'refurbishment' of the site will result in a new building that is completely unrecognizable in its current form. Only the existing building's structural frame will remain, and three additional floors are proposed, together with the construction of a new facade. As such the new scheme will result in the loss of the existing building. The Twentieth Century Society continues to consider the remaining Foggo/Arup designed work which still stands at Broadgate – including 8-12 Broadgate and 100 Liverpool Street to be among the best of their type and period. We support the view of English Heritage's designation team that these buildings are listable grade II, despite the demolition and re-development of Nos 4-6 Broadgate..... We still consider these buildings to represent an architectural, artistic and place-making achievement of a very high order. For the reasons outlined above, we strongly object to the proposed re-development of 8-12 Broadgate and 100 Liverpool Street*". These issues are considered later in this report.

### **Policy Context**

26. The development plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
27. There is relevant City of London and GLA supplementary planning guidance in respect of Planning Obligations, Sustainable Design and Construction, London Views Management Framework.
28. Government Guidance is contained in the National Planning Policy Framework (NPPF). Chapter 12 of the NPPF sets out key policy considerations for applications relating to designated and non-designated heritage assets. Other relevant guidance is provided by English Heritage including the documents Conservation Principles, and The Setting of Heritage assets, Building in Context (EH/CABE) and the PPS5 Practice Guide in respect of the setting of heritage assets.



## **Environmental Impact Assessment**

29. This application is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
30. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from member of the public about environmental issues.
31. In considering the planning application account has to be taken of the environmental information including the Environmental Statement, the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
32. The Environmental Statement is available in the Members' Room, along with the application, drawings and the representations received in respect of the application.

## **Considerations**

33. The Corporation, in determining the planning application has the following main statutory duties to perform:-
  - to have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
  - to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
  - In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990). In this case the duty is to the desirability of preserving the setting of listed buildings and;
  - For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area and its setting (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);
  - to have regard to the purpose of conserving biodiversity as required by Section 40 of the Natural Environment and Rural Communities Act 2006;

34. The principal issues in considering this application are:
- The extent to which the proposals comply with Government policy advice (NPPF);
  - The extent to which the proposals comply with the relevant policies of the Development Plan;
  - The impact of the proposal on designated and non-designated heritage assets;
  - The impact on the nearby buildings and spaces, including daylight/sunlight and amenity.

#### Economic Development Issues

35. London's status as a world city is founded to a substantial degree on its concentration of international service activities and, most noticeably, by the clustering of financial and business services in the City of London.
36. The importance that is attached to the maintenance and enhancement of the City's role as one of the world's leading financial and business centres is reflected in the policies of the London Plan and Local Plan.
37. The building would provide high quality office accommodation to meet the demands of the City's major commercial occupiers. The proposed building would provide high quality office accommodation and a minimum 20% increase in office space over that which currently exists on the site. This increase will make a contribution to the City's overall target to increase the City's office stock by 1.5sq.m between 2011 and 2026 to meet the long term economic and employment growth.
38. The existing building would be stripped back to its structural frame, the existing cores re-configured and a new facade installed to provide a high quality, modern and flexible mixed use commercial building.
39. Increasing the office and retail floorspace would complement the core business function of the City. The site is ideally located to benefit from the proximity of the Crossrail network currently under construction. Enhanced and extended office accommodation in this location would complement the core business function of the City by taking advantage of the substantial public transport improvements created by Crossrail, which would accord with Local Plan policy CS5, North of the City Key City Places strategy.

#### Retail and Other Uses

40. The retail (Class A1/A2/A3) floorspace would be 1505sq.m. A total of 5,322sq.m of floorspace would be flexible commercial floorspace comprising additional office (Class B1), retail (Class A1/A2/A3), and leisure (Class D2) uses at lower ground, ground and first floor levels and flexible office (Class B1)/restaurant (Class A3) use at ninth floor level. [All floorspace figures GEA].

41. The refurbishment of the building would impact on the Octagon Arcade, which is within the Liverpool Street Principal Shopping Centre (PSC). As part of the scheme four retail units (526sq.m) within the PSC would be lost, and replaced by 2 new units of a similar size. An entrance to the office development would be placed within the retail frontage breaking its continuous nature.
42. Whilst policy CS20.1 in the Local Plan looks to concentrate retail development within the existing PSCs and resist the loss of existing retail units it is considered that the redevelopment would not have a significant impact on the PSC. Retail floorspace, exceeding the amount lost, would be provided within the arcade, onto Broadgate Circle and on the east and west corners of the building on the Liverpool Street frontage. The character of the PSC would be improved by removing two kiosks that clutter the arcade. This would improve the quality of the PSC for pedestrians heading into and out of Liverpool Street Station.
43. Additional retail units onto Liverpool Street and Broadgate would help to create active frontages as encouraged in Policy DM20.3 and improve the vibrancy of the surrounding area.
44. The applicant is seeking flexible use restaurant (Class A3)/office (Class B1) at 9<sup>th</sup> floor level. This would provide the flexibility for a restaurant at the top of the building.

#### Underground Railway and Crossrail

45. The proposal would not affect the construction or operation of Crossrail or the other Underground railways around the site.

#### Design

46. In design and townscape terms the proposal needs to be assessed in terms of its impact on the distinctive urban quality of the Broadgate Estate and its wider impact in terms of its footprint, height, bulk and architectural approach.
47. The existing building was constructed in 1988 by Arup Associates and comprises of a brown granite clad building. Although, successful in its time, the building appears architecturally dated, tired and fragmented. The retention of the building on architectural grounds is not considered justified. A Certificate of Immunity from listing was granted for the building in January 2013 which precludes the Secretary of State from listing the buildings for a period of five years. The proposal seeks to retain the existing structural frame of the building while extending it upwards and re cladding it.

## Public Realm

48. The building forms part of the Broadgate Estate which was built pursuant to a Masterplan in the 1980's and combined extensive public spaces framed by large office buildings. The City of London in its determination of the 5 Broadgate re-development (10/00904/FULEIA) in 2010 identified the Broadgate Estate as an undesignated heritage asset by reason of its plan form. The enduring legacy of the original Masterplan lies in the inter-relationship of public spaces between the buildings and the considered location of public art and sculpture rather than the design quality of most of its buildings. In particular there is a relationship between the principal spaces of Broadgate Circle, Finsbury Avenue Square, Exchange Square and the Octagon which are car free, and the network of pedestrian routes which link these spaces and interconnect with the surrounding areas. This specific characteristic of the plan form of the Estate and the design of the spaces, which is not inherently dependent on the architectural design of the buildings framing these spaces, is considered to merit its recognition as an undesignated heritage asset.
49. A Heritage Asset is a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).
50. The proposed development essentially follows the line of the existing building and would not harm the plan form of the Broadgate Estate. Raising the height of the western Octagon Mall entrance would open up views of the Fulcrum sculpture, a key way-finding element of the plan layout of the Estate. It is considered that the undesignated heritage asset of Broadgate would not be harmed by the proposal.

## Height and Bulk

51. The scheme rises to 12 storeys (some 66.9m AOD at its highest point). This is some 14.8m higher than the existing building which rises to 52.89m AOD. The proposed building steps down to 8 storeys on Liverpool Street and 7 storeys to Broadgate Circle.
52. The height of the development is acceptable within the context of the Broadgate development and surrounding townscape. The development relates satisfactorily to the scale of other developments on the Broadgate Estate including both 5 Broadgate (83.5m AOD inclusive of the roof top cooling towers) and Exchange House (75m AOD) immediately to its north. The building is significantly lower than both of these buildings.

53. In addition, on a local townscape level, the stepped profile of the upper storeys of the building significantly reduces the bulk and height of the building in surrounding street level views. The stepped recessed upper storeys results in a building of appropriate height and visual impact in views along Liverpool Street and Blomfield Street and relates satisfactorily to the heights of other nearby buildings on both streets.
54. The stepped profile also ensures that the daylight and sunlight to Broadgate Circle is protected to ensure the high quality of this public open space is preserved. The height and bulk does not detract from the distinctive and successful layout of public spaces in this part of the Broadgate Estate. The scheme does not compromise the character of the other parts of the public realm of streets and spaces around the development.

#### Architectural Approach

55. The restrained design approach is convincing with a sinuous form of a curved glazed facade and curved corners and recessed concave elements. The result is a building with architectural integrity, especially when compared to the existing fragmented and fussy facades. The concave building line appears particularly convincing as an elegant form on Liverpool Street as well as contributing to framing the Fulcrum sculpture on the west elevation. The gentle concave curve of the building relates convincingly with the circular form of Broadgate Circle.
56. The proportion of the building is convincing with a strong base, principal facade and recessive upper storeys and plant storeys. The glazed facade is enlivened by bronze coloured aluminium projecting fins contributing to a degree of modelling and detailing and reinforcing the sinuous form of the building and an appreciation of the concave facades and curved corners. The recessed horizontal channels are set between each storey's glazed panels to providing visual interest and emphasising the curved external form of the proposed development.
57. The perforated aluminium screen at first floor level helps to reduce the scale of the double height columns and provides a transition from the retail units on the lower storeys and the office uses above and provides a degree of hierarchy to the elevation. The roof terraces would have glazed balusters to respect the architectural integrity of the building.
58. The ground and first floor levels would have extensive retail uses enhancing the building's contribution to a vibrant public realm.
59. The plant storeys are faced in angled bronze coloured aluminium fins, a subtle version of the main facade cladding and one which ensures the visual integrity of the building. The roof of the plant storey is louvered to conceal the plant from elevated views. The Building Maintenance Units are discreetly located at roof level and would not harm the building's appearance.

60. The stepped profile of the roof storeys results in extensive landscaped terraces on the upper levels which would be available to tenants as well as the possibility of the large 9<sup>th</sup> floor terrace being available for public use as part of a restaurant. The landscaping of the terraces is intended to reflect the curved form of the building. A dedicated lift would be provided.
61. The architectural approach is considered acceptable in design, detailing and materials.

#### Twentieth Century Society

62. The Twentieth Century Society has objected on the grounds that they consider the existing building deserving of listing and that it should be retained because of its architectural, artistic and place-making contribution.
63. A Certificate of Immunity from listing was granted for the building in January 2013 which precludes the Secretary of State from listing the buildings for a period of five years. This report considers that the replacement building is of a convincing and high quality design and acceptable in design and planning grounds.

#### Setting of Listed Buildings

64. The proposal would affect the setting of a number of surrounding listed buildings. The development is adjacent to the Grade II listed Liverpool Street Station. The height and scale of the development is considered appropriate to the setting of the station especially given the scale of other buildings on the Broadgate Estate. The restrained simple design of the facades creates an appropriate backdrop to the listed station and its two western towers.
65. The building would form a backdrop to the Grade II listed 76-80 Old Broad Street, Grade I listed St Botolph without Bishopsgate Church and its Grade II listed Church Hall. The proposal would not harm the setting of these buildings which are currently appreciated against a backdrop of large scale commercial buildings.
66. A number of listed buildings are located in Finsbury Circus. These include the Grade II\* listed Britannic House and Grade II listed Park House, London Wall Buildings and Salisbury House. The development would be largely concealed in views of these listed buildings and their setting would not be compromised.
67. 1 Finsbury Avenue is a Grade II listed building within the Broadgate Estate and is located to the west of the site. The proposal would not harm the setting of this listed building and it would be largely concealed behind 5 Broadgate.

### Setting of Conservation Areas

68. Although not in a Conservation Area, the development is located in close proximity to a number of Conservation Areas including Finsbury Circus, New Broad Street and Bishopsgate to its west, south and east. Key views within these Conservation Areas have been assessed. The proposal would be visible from a number of vantage points within these Conservation Areas but it is not considered to harm these views especially given the scale of the other developments within Broadgate which are a prominent backdrop in these views.

### London View Management Framework

69. The London View Management Framework (LVMF) provides a London wide policy framework to protect and manage strategically important views of London and its major landmarks. The northern half of the site lies within the Wider Setting Consultation Area (Background) of the Richmond Park Protected Vista.
70. The maximum height of the proposed development is 66.9m AOD. This exceeds the consultation threshold plane by up to 14.8m and therefore triggers consultation in accordance with the LVMF and the Secretary of State's Directions. The appropriate London Boroughs have been consulted. None of the boroughs has commented.
71. The proposal would affect the Protected Vista from King Henry VIII's mound in Richmond Park (LVMF view 9A.1) which has a single assessment point. The view is focussed almost solely on St Paul's Cathedral, some 10 miles to the east. The principal test for any proposal that exceeds the threshold plane of the Landmark Background Assessment Area of this Protected Vista is that it should preserve or enhance the viewer's ability to recognise and appreciate the dome of the Cathedral and it is essential that development in the background of the view is subordinate to the Cathedral and that the clear sky background profile of the upper part of the dome remains.
72. The proposal at 66.9m high would exceed the threshold of the Landmark Background Assessment Area (which is 52.1m). The proposal would be visible in the backdrop of St Paul's Cathedral to the right of the drum and dome. However, the development would not intrude upon the gap between it and the dome and drum, would not harm the ability to recognise and appreciate the Cathedral and its setting would not be compromised. In this view, the proposal would be of a similar height and bulk as other Broadgate developments in this view (such as 5 Broadgate).
73. The proposal does not fall within any other Protected Vistas. The proposal would be concealed from view in other LVMF Assessment points, such as the Waterloo Bridge view (15B.1) where it would be obscured from view by the tree canopy along Victoria Embankment and other developments in the foreground.
74. The GLA has confirmed that the proposal would accord with the London Plan and LVMF.

### Daylight, Sunlight and Overshadowing

75. The Environmental Statement assesses the potential impacts in daylight and sunlight to neighbouring buildings including the public house at 15 Liverpool Street which contains an ancillary residential unit using the British Research Establishment (BRE) guidelines.
76. To assess the surrounding properties, the BRE guidelines provide two main methods for assessing daylight: Vertical Sky Component (VSC) which measures daylight received on the external plane of windows (27% VSC is the ideal target figure); No Sky Line (NSL) which seeks to ensure that 80% of a room would have a view of the sky.
77. For the assessment of sunlight Annual Probable Sunlight Hours (APSH) is used (if a window point can receive at least 25% APSH, then the room should still receive enough daylight).
78. The impact on 15 Liverpool Street is considered minor. All the windows would meet the BRE guidelines in regards to VSC. However, in regards to NSL two (15%) out of the thirteen rooms assessed would meet the BRE guidelines. Eight rooms would experience alterations between 20 to 29.9% and three rooms would experience alterations beyond 40%. However, all the affected rooms have low existing daylight distributions, equating to less than 40% of the rooms space. In such circumstances any alteration would result in a disproportionate percentage change resulting in a transgression from BRE guidelines.
79. The internal subdivision and room use is not known within the property which is commercial and could be changed.
80. All the windows at 15 Liverpool Street would meet the BRE guidelines in regards to sunlight (APSH).
81. Given that the majority of the percentage alterations in regards to NSL are between 20-30% based on assumed internal layouts and that there is full compliance in regards to VSC, the effect on daylight is considered to be of minor significance on what is a commercial property.

### Sustainability & Energy

82. The applicants have submitted an Energy Strategy including a BREEAM New construction 2014 pre-assessment and a Sustainability Statement.
83. The refurbishment and extension of the building provides the opportunity to improve its energy performance over the Building Regulations compliant baseline. Passive design measures, such as the improvements to the building envelope, energy efficient lighting and controls and specification of energy efficient plant would be incorporated. The connection of the development into a district heating network would currently not be possible but the opportunity for a future connection would be provided. It is proposed to install 450sq.m. of Photovoltaic panels on the roof of the building.



84. The projected reduction in carbon emissions of the development as a whole compared to the existing building would be 50%.
85. The refurbishment element of this development is considered to be acceptable since it achieves a BREEAM design stage rating of “Excellent” and an overall improvement in carbon emissions compared with the existing building whilst retaining major structural elements.
86. The new built extension of the scheme would exceed the threshold for extensions to be considered as a new built element under the Building Regulations, and therefore has been modelled separately with the result that it would achieve a 24.18% improvement over the 2013 Building Regulations, including the PV panel installation contributing 7.5%. Overall, this would result in a shortfall of 10.82% carbon emissions savings. This falls short of the London Plan target of a 35% improvement over 2013 Building Regulations.
87. The GLA have commented that the proposed carbon dioxide savings fall short of the target in London Plan Policy 5.2. They recommend that the applicant should prioritise connection to the Citigen network in order to further reduce the development’s carbon emission, unless it is clearly demonstrated that this is not a viable option.
88. Assuming that the maximum on-site carbon emission reduction has been achieved, the shortfall will need to be offset either by implementation of carbon reduction measures elsewhere or through payment of a carbon offsetting contribution as part of the section 106 agreement.
89. The sustainability statement addresses climate change adaptation and sustainable design of the development, in particular energy efficiency, sustainable materials, conserving water resources, sustainable drainage, waste management, pollution, green roof terraces, urban greening and biodiversity. Sustainable drainage systems are proposed but not specified and details are requested by condition. The proposed range of climate change adaptation and sustainable design measures is considered to be acceptable, subject to improvements to the urban greening, e.g. on roofs and terraces.

#### Wind Microclimate

90. The potential wind effects of the development have been considered using the Lawson Comfort Criteria. The criteria define a range of pedestrian activities from sitting; through to more transient activities such as crossing the road, and for each activity define a threshold wind speed and frequency of occurrence beyond which the wind environment would be unsuitable for each activity. The criteria are classified as ‘Sitting’, ‘Entrance Doors’, ‘Pedestrian Standing’, ‘Leisure Walking’, ‘Business Walking’ and ‘Roads and Car Parks’.
91. The proposed development has a similar massing to the existing building. The design of the facade would be changed but the overall wind microclimate around the site is likely to be similar to the existing building.

92. The results of the study show that the overall effect of the development in the windiest season would be negligible with the majority of the area around the site suitable for 'Standing/Entrance'. Four small areas to the north, east and west of the site are classified as 'Leisure Walking'.
93. The report concludes the wind effects around the site would be suitable for the stated activity. No mitigation measures would be required.

#### Transport, Servicing & Parking

94. The site records the highest possible Public Transport Accessibility Level (PTAL) of 6b.
95. The existing site has basement servicing via the existing gyratory under Broadgate, accessed via a ramp off Broad Lane. This ramp also gives access to 33 car parking spaces and 110 cycle parking spaces associated with the development.
96. It is proposed to reduce the existing car parking spaces as part of the refurbishment, to 2 disabled persons parking bays. Cycle parking would increase to either 695 spaces (maximum office scheme) or 687 spaces (maximum retail scheme), which is in line with the current standards set out in the London Plan.
97. Cycling facilities are being provided directly below the cycle parking area with a shower provision of 1:10 and locker provision of 1:1.
98. The cycle parking area is proposed to be accessed at grade rather than via the gyratory as currently exists. This is an improvement as it is safer and more inclusive for cyclists to avoid the servicing areas. Transport for London has raised concerns about the cycle parking entrance being accessed via the bus station. A condition has been added to the schedule at the request of Transport for London regarding this issue.
99. The site is set back within a permissive path and there are no areas which require projection licences, and no stopping up of highway. There are a number of improvements proposed for the privately owned land between the site and the footway; this includes the removal of areas of the existing stairs to provide level access to the 100 Liverpool Street site. The Environmental Enhancement team are involved in these works, and these are welcomed by the City as they would improve accessibility and permeability.
100. The removal of the bridge link at ground floor within the existing building would improve visibility through the mall area. The removal of the existing kiosks in the centre of the mall would improve pedestrian capacity as well as visibility.
101. There would be a potential net hourly increase of 1,159 pedestrians in the AM peak, however the upgraded public realm associated with the development, the Crossrail entrance, and the mall improvements would mean that there is sufficient space to accommodate this increase.
102. The servicing for the site would be via the Broadgate Gyratory, which is accessed via Broad Lane (a private road leading from Sun Street), and this would be the same arrangement as the existing building.

103. There are currently two bays which can accommodate 10m rigid vehicles, and an additional bay for a transit van would be provided where there is currently a waste compactor which is being moved. There is also capacity for an 8m vehicle bay. A total of four bays would be available for servicing.
104. The draft Delivery and Servicing Plan (DSP) states that all vehicles arriving at the site would be pre-booked, as is required under the current operation of the Broadgate Gyratory. There are further aims to consolidate all office deliveries across the Broadgate Estate and the City welcomes this approach.
105. The DSP states that retail deliveries would not be permitted between the hours of 8am and 12pm, so that the peak demand for the office can be sufficiently accommodated. This is welcomed, and based on the maximum office area, it is calculated that the number of vehicles per day for the office use would be 123. Even though the vehicles would be prebooked, 10% of deliveries should be able to be accommodated in the peak hour, meaning that 12.3 vehicles would arrive in that hour. As each bay can accommodate 4 vehicles per hour, the four available bays should provide sufficient capacity for the servicing requirements of the proposed building.

#### Bus Station facilities

106. The proposed development includes the relocation and reconfiguration of the existing bus drivers' toilets and bus station office. These facilities currently block the escape routes along the eastern edge of the existing building. The facilities would be slightly larger than existing and have been positioned so people are not forced to enter the nearby bus lanes. The provision of these facilities is included in the Section 106 agreement.

#### Stopping up/Dedication of land as public highway

107. No stopping up or dedication of land as public highway is required for this development.

#### Access

108. The development would achieve a good level of inclusive design with step free circulation and level entrances. Two of the three office entrances would be revolving doors with adjacent power assisted pass doors. Sliding doors would be provided at the Octagon Mall office entrance. Level access would be provided to the retail units.
109. Two parking spaces for sole use by people with disabilities are provided in the basement within easy reach of lift access to all floors of the development.

#### Archaeology

110. The site is in an area of archaeological potential outside the City wall in the area of the Upper Walbrook valley and to the north of the post medieval burial ground associated with Bethlem Hospital.

111. An archaeological assessment has been submitted with the application. This sets out the archaeological potential of the site which has been affected by construction of the existing building basement. Archaeological recording was carried out on the site prior to construction of the existing building and to the south which revealed remains of the Walbrook river channel, burials and structures relating to the Bethlem burial ground. The potential for archaeological survival is considered to be low over most of the site. There is higher potential on the east of the site where there is no existing basement, where no development is proposed.
112. The proposed scheme would have an archaeological impact where excavation would take place below the basement slab. The existing foundations would be reused, with the addition of new piles on the southern perimeter in an area where archaeological potential is uncertain.
113. Conditions are attached to record any surviving archaeological remains and to cover foundation design.

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

114. Under Section 106 of the Town & Country Planning Act 1990 an agreement or planning obligation can be made between parties, usually the developer and the local authority, or a unilateral undertaking can be submitted by a prospective developer:
  - restricting the development or use of land in any specified way;
  - requiring specified operations or activities to be carried out in, on or under or over the land;
  - requiring the land to be used in any specified way; or
  - requiring a sum or sums to be paid to the authority on a specified date or dates or periodically.
115. Planning obligation arrangements were modified by the Community Infrastructure Levy Regulations 2010 as amended ('the CIL Regulations'). The Regulations introduce statutory restrictions on the use of planning obligations to clarify their proper purpose, and make provision for planning obligations to work alongside any Community Infrastructure Levy ('CIL') arrangements which local planning authorities may elect to adopt.
116. Regulation 122 states that it is unlawful for a planning obligation to constitute a reason to grant planning permission when determining a planning application if the obligation does not meet all the following tests:
  - necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development

117. Regulation 123 states that a planning obligation may not constitute a reason to grant planning permission to the extent that it provides funding for infrastructure included in the regulation "Regulation 123" list as the type of infrastructure on what CIL will be spent on.
118. The National Planning Policy Framework (March 2012) stated that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. The policy repeated the tests set out above and states that where planning obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. (NPPF paragraphs 203-206).

### **Mayoral Community Infrastructure Levy (CIL)**

119. London Plan Policy 8.3 requires the Mayoral CIL to be paid by developers to help fund strategically important infrastructure, initially focussing on Crossrail until 2019. The Mayor has set a charge of £50 per sq.m and this applies to all development over 100sq.m (GIA). Development for social housing, education related development, health related development and development for charities for charitable purposes are either exempt or are charged at a nil rate.

### **Mayoral Planning Obligations**

120. Since April 2010 the Mayor of London has sought contributions towards the cost of funding Crossrail through the negotiation of planning obligations in accordance with London Plan Policy 6.5. Mayoral planning obligations are payable by developers according to an indicative level of charges for specific uses set out in the Mayoral SPG (April 2013): offices (£140 per sq.m net gain in GIA floorspace), retail (£90) and hotels (£61) provided there is a net gain of 500sq.m.
121. Developments liable for both Mayoral CIL and Mayoral planning obligations payments for Crossrail will not be double charged. The Mayor will treat the CIL liability as a credit towards Mayoral planning obligation contribution. Therefore the Mayoral planning obligation liability can be reduced by the Mayoral CIL.
122. At the time of preparing this report the Mayoral CIL has been calculated to be £896,150. The full Mayoral planning obligation has been calculated to be £2,425,270. This would be reduced to £1,529,120 after deduction of the Mayoral CIL. It should be noted that these figures may be subject to change should there be a variation in the proposed uses and in the CIL liability at the point of payment and should therefore only be taken as indicative at this point.

123. Under the CIL regulations the City Corporation is able to retain 4% of the Mayoral CIL income as an administration fee; the remainder will be forwarded to the Mayor of London. The whole of the Mayoral planning obligation received will be forwarded to the Mayor. However, the developer will also be liable to pay an additional £3,500 Mayoral administration and monitoring charge to the City Corporation. The total contributions due in accordance with the Mayoral CIL and Mayoral planning obligation policies are summarised below:

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution £</b>	<b>Forwarded to the Mayor £</b>	<b>Retained by City Corporation £</b>
Mayoral Community Infrastructure Levy payable	896,150	860,304	35,846
Mayoral planning obligation net liability*	1,529,120	1,529,120	Nil
Mayoral planning obligation administration and monitoring charge	3,500	Nil	3,500
<b>Total liability in accordance with the Mayor of London's policies</b>	<b>£2,428,770</b>	<b>£2,389,424</b>	<b>£39,346</b>

\*Net liability is on the basis of the CIL charge remaining as reported and could be subject to variation.

### **City CIL**

124. The City introduced its CIL on 1<sup>st</sup> July 2014 and will be chargeable in addition to the Mayoral CIL and Mayoral planning obligations. CIL will be charged at a rate of £75 per sqm for offices and retail uses. At the time of preparing this report the City CIL has been calculated to be £1,344,225. It should be noted that these figures may be subject to change should there be a variation in the CIL liability at the point of payment and should therefore only be taken as indicative figures at this point.

125. Under the CIL regulations the City Corporation is able to retain 5% of the CIL income as an administration fee. The contributions collected will be used to fund the infrastructure required to meet the requirements of the City's Development Plan.

### **City S106 Planning Obligations**

126. On 1 July 2014 the City's Supplementary Planning Document on Planning Obligations was adopted. City Planning Obligations would be payable by developers in accordance with the Planning Obligations SPD on new commercial developments where there is a net increase of 500sq.m or more of Gross Internal Area. The policy seeks contributions towards Affordable Housing (£20 per sq.m), Local Training, Skills and Job Brokerage (£3 per sq.m) and Carbon Offsetting (£60 per tonne of carbon offset).
127. The section 106 agreement would normally follow the agreement template available on the City of London website.
128. In this case the proposed net increase in floorspace would be 17,923sq.m. On the basis of the figure indicated in the Supplementary Planning Document, the planning obligation figure would be £412,229. It is the City's practice that all financial contributions be index-linked with reference to the appropriate index from the date of adoption of the City's SPD to the date planning permission was granted.
129. The applicant has agreed a breakdown which accords with the Supplementary Planning Document as follows:

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution £</b>	<b>Available for Allocation £</b>	<b>Retained for Administration and Monitoring £</b>
City Community Infrastructure Levy	1,344,225	1,277,014	67,211
City Planning Obligation Affordable Housing	358,460	354,875	3,585
City Planning Obligation Local, Training, Skills and Job Brokerage	53,769	53,231	538
City Planning Obligation Monitoring Charge	1,500	Nil	1,500
<b>Total liability in accordance with the City of London's policies</b>	<b>£1,757,954</b>	<b>£1,685,120</b>	<b>£72,834</b>

130. I have set out below the details that I am recommending concerning the planning obligations. All of the proposals are considered to be necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the above tests contained in the CIL Regulations and in government policy. I would also request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

#### Affordable Housing Contribution

131. The Affordable Housing contribution will be used for the purpose of off-site provision of affordable housing in suitable locations in or near to the City of London in accordance with the London Plan. The applicant will be required to pay this contribution on or before the implementation of the planning permission.

#### Local Training, Skills and Job Brokerage Contribution

132. The Local Training, Skills and Job Brokerage contribution will be applied to the provision of training and skills initiatives, including job brokerage, in the City or City fringes. The Developer will be required to pay this contribution on or before the implementation of planning permission.

#### Highway Reparation and other Highways obligations

133. The cost of any reparation works required as a result of the development will be the responsibility of the Developer.
134. Prior to implementation and based on the City's standard draft, the developer will be obligated to enter into an agreement under Section 278 of the Highways Act 1980 to meet the cost of highway works that are necessary to meet the burden placed on the highway network by the development.

#### Delivery and Servicing Management Plan

135. The London Borough of Islington has requested that they be consulted on the submission of the Delivery and Servicing Management Plan. The developer would be required to submit for approval a plan prior to occupation. In the event of any breach of the Management Plan, the developer will be required to resubmit a revised document, and should the developer default on this requirement, the City will be given the ability to provide a replacement plan. The operation of the Delivery and Servicing Management Plan will be subject to an annual review.

#### Travel Plan

136. The developer would be required to submit both interim and full Travel Plans prior to occupation and six months after occupation respectively. The obligations in relation to this shall apply for the life of the building



### Local Training, Skills and Job Brokerage Strategy

137. The applicant will be required to submit for approval details of the Local Training, Skills and Job Brokerage Strategy in line with the aims of the City Corporation's Employment Charter for Construction. This Charter aims to maximise job opportunities in the City for residents of the City fringes and offer employment and training opportunities to local people wishing to begin a career in construction. The Strategy will be submitted in two stages: one to be submitted prior to the First Preparatory Operation Date in respect of the Preparatory Operations; the second to be submitted prior to Implementation in respect of the Main Contract Works Package.

### Local Procurement

138. The applicant will be required to submit for approval a Local Procurement Strategy prior to commencement of demolition. The Local Procurement Strategy shall include details of: initiatives to identify local procurement opportunities relating to the construction of the development; initiatives to reach a 10% target for local procurement, from small to medium sized enterprises in the City and City fringes; the timings and arrangements for the implementation of such initiatives; and suitable mechanisms for the monitoring of the effectiveness of such initiatives e.g. a local procurement tracker can be used to capture this information.
139. The developer will be required at the 6 month stage, or half way through the project (whichever is earliest), to report to the City of London Corporation's Economic Development Office on their performance against the 10% local procurement target.
140. The Economic Development Officer is able to provide information and guidance to the Developer its Contractor and Sub-Contractors. The Developer is encouraged to liaise with the Economic Development Officer at the earliest stage in the development process in order that the strategy can be submitted prior to implementation

### Carbon Offsetting

141. The London Plan sets a target for major developments to achieve an overall carbon dioxide emission reduction of 40% from 2013-2016, through the use of on-site renewable energy generation. The submitted energy statement demonstrates that the development is designed to achieve a 24% reduction in carbon emissions when compared with the London Plan target of 35% improvement over the 2013 building regulations.
142. A detailed post construction assessment will be required. If the assessment demonstrates that the target of 40% is not met on site the applicant will be required to meet the shortfall through cash in lieu contribution. The contribution will be secured through the section 106 agreement at an initial cost of £60 per tonne of carbon to be offset, calculated over a 30 year period. The financial contribution for carbon off-setting will be required on Completion prior to occupation of the development.

### Utility Connections

143. The development will require connection to a range of utility infrastructure. Early engagement by the applicant about utilities infrastructure provision will allow for proper co-ordination and planning of all works required to install the utility infrastructure, particularly under public highway, so as to minimise disruption to highway users. A s106 covenant will therefore require the submission of draft and final programmes for ordering and completing service connections from utility providers in order that the City's comments can be taken into account, and will require that all connections are carried out in accordance with the programme. Details of the utility connection requirements of the Development including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the Development will also be required.

### Monitoring and Administrative Costs

144. A 10 year repayment period would be required where by any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
145. The applicant will pay the City of London's legal costs incurred in the negotiation and execution of the legal agreement and the City Planning Officer's administration costs in respect of the same. 1% of the total contribution and £250 for non-financial obligations (secured under the City's SPG) will be allocated to the monitoring of the agreement.
146. Separate additional administration and monitoring fees will be applied in relation to the Crossrail Contribution.

### Site Specific Mitigation

147. The City Corporation will principally seek to mitigate the impact of development and provide necessary infrastructure through the use of CIL but, in some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms.
148. The proposed development includes the relocation and reconfiguration of the existing bus driver toilets and bus station office. It is proposed for the toilets to be moved a short distance northwest and for the bus station office to be moved further south west, with both being integrated within the overall form of the refurbished building. Provision of the bus driver facilities will be secured through the section 106 agreement. Other matters which may require mitigation are still yet to be fully scoped.

## **Conclusions**

149. The proposal supports the strategic objective of the Corporation to promote the City as the leading international financial and business centre. It would provide an employment led mixed use development which supports the economic policies of the London Plan and LDF Core Strategy and would provide an increase in high quality floor space.
150. The proposal is in substantial compliance with the development plan policies that relate to it and in particular it supports the objective of promoting the City as the leading international financial and business centre.
151. The proposed building is considered to make a more positive contribution to the street scene than the existing building. It would result in a building with a strong sense of architectural integrity when compared with the existing fragmented facades.
152. The proposals do not have a detrimental impact on the setting of listed buildings, Conservation Areas and non-designated heritage assets in the vicinity or LVMF views.
153. It is concluded that the proposal is acceptable subject to conditions and to a Section 106 agreement being entered into to cover the matters set out in the report.

## **Background Papers**

### Internal

Memo Environmental Health Officer 6/3/2015

### External

Email - National Planning Casework Unit 19/1/2015

Letter - Natural England 26/1/2015

Letter - The Royal Borough of Kensington and Chelsea 26/1/2015

Planning Statement - December 2014

Retail Statement - December 2014

Sustainability Statement - December 2014

Statement of Community Involvement - December 2014

Transport Assessment - December 2014

Energy Strategy - December 2014

Design & Access Statement - December 2014

Environmental Statement Non-Technical Summary - December 2014

Environmental Statement Volume I Main Environmental Statement - December 2014

Environmental Statement Volume II Townscape, Built Heritage and Visual Impact Assessment - December 2014

Environmental Statement Volume III Environmental Statement Appendices - December 2014

Existing Plans: 1000 Rev B, 1001 Rev C, 1002 Rev C, 1003 Rev C, 1004 Rev B, 1005 Rev B, 1006 Rev B, 1007 Rev B, 1008 Rev B, 1009 Rev B, 1010 Rev B, 1500 Rev B, 1501 Rev B, 1502 Rev B, 1503 Rev B, 1550 Rev B, 1551 Rev B, 1552 Rev B, 1553 Rev B.

Email - DP9 2/2/2015, 26/2/2015, 1/4/2015

Email - Crossrail 30/1/2015

Email - Thames Water 2/2/2015 & 2/4/2015

Letter - GLA 30/1/2015

Letter - Transport for London 10/2/2015

Letter - Twentieth Century Society 13/2/2015

Letter - London Borough of Tower Hamlets 18/2/2015

Letter - London Borough of Islington 5/3/2015

Letter - City of Westminster 9/2/2015

Letter with officers' report - Mayor of London 27/2/2015

Email - Network Rail 20/2/2015

Letter - Hopkins Architects 3/2/2015

Energy Performance Assessment – Chapman BDSSP 25/2/2015

Email - Transport for London 11/3/2015 & 23/4/2015

Letter – English Heritage 3/3/2015

## **Appendix A**

### **London Plan Policies**

The London Plan is part of the development plan for the City. As such the London Plan is a material consideration to which the City of London Corporation must have regard in exercising its development control powers.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy 7.6 Buildings and structures should:

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

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

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets

and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

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

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

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



## Relevant Local Plan Policies

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

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

### ***CS5 Meet challenges facing North of City***

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

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

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

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

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

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

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

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

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

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

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

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

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

### ***CS22 Maximise community facilities***

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

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

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

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

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

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

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

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

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

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

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

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

in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

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

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

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

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

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

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

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

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

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

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
  - a) road dangers;
  - b) pedestrian environment and movement;
  - c) cycling infrastructure provision;
  - d) public transport;
  - e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

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

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

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

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

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

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

and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

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

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

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

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

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

#### ***DM20.1 Principal shopping centres***

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:
  - a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;

- b) the contribution the unit makes to the function and character of the PSC;
- c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

### ***DM22.1 Social and community facilities***

1. To resist the loss of social and community facilities unless:
  - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
  - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
  - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.
3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:
  - a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
  - b) in locations which are convenient to the communities they serve;
  - c) in or near identified residential areas, providing their amenity is safeguarded;
  - d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.



***CS1 Provide additional offices***

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

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

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

## SCHEDULE

APPLICATION: 14/01285/FULEIA

**100 Liverpool Street & 8-12 Broadgate London EC2M 2RH**

**Refurbishment and extension of the existing building including retention of building's structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide commercial office (B1) accommodation and flexible commercial floorspace comprising additional office (B1), retail (A1/A2/A3), and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building. (Total 68,303sq.m GEA).**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.  
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 3 None of the development hereby permitted shall be commenced until a method statement has been submitted to, and approved in writing, by the Local Planning Authority to include arrangements to secure that, during any period when concurrent construction is taking place of both the permitted development and of the Crossrail structures and tunnels in or adjacent to the site of the approved development, the construction of the Crossrail structures and tunnels is not impeded.  
REASON: To ensure that the development does not prejudice construction of Crossrail and to protect the amenity of occupiers of the proposed building in accordance with the following policies of the Local Plan: CS5, DM16.1.
- 4 No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning

authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground water utility infrastructure.

- 5 No Development (excluding (a) demolition works, (b) excavation, (c) archaeological works, (d) site surveys, (e) site preparation, (f) environmental preparatory works, (g) the erection of fencing to enclose the Development or any part of the Development, (h) the laying out of roads for construction purposes, (i) the erection of site buildings for construction purposes, (j) contamination tests, (k) remediation or trial pits, (l) works of decontamination remediation) should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

REASON: To ensure that below ground utilities infrastructure is protected in accordance with the following policy of the Local Plan: DM2.1.

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

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

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

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 8 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment

Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the local planning authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the following policy the Local Plan: DM15.8

- 9 An air quality assessment shall be submitted to and approved in writing by the Local Planning Authority prior to development taking place.  
REASON: In order to positively address local air quality, particularly nitrogen dioxide and particulates PM10 in accordance with the City of London Air Quality Strategy 2011 and the following policy of the Local Plan: DM15.6.
- 10 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site deconstruction of the existing buildings has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London, Crossrail and the London Borough of Islington). The development shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).  
REASON: To ensure that deconstruction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14 and the following policy of the Local Plan: DM15.6, DM16.1.
- 11 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site construction of the development has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London, Crossrail and the London Borough of Islington). The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved

amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).

REASON: To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1.

- 12 Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used demonstrating that there is adequate sound proofing to both airborne and structure borne noise transmission between the Class A use and the surrounding offices in the building. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.  
REASON: To protect the amenities of commercial occupiers in the building in accordance with the following policy of the Local Plan: DM15.7.
- 13 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority specifying the kitchen extract arrangements, materials and construction methods to be used to avoid noise penetration to the upper floors from the Class A use. The details approved must be implemented before the Class A use commences and so maintained thereafter.  
REASON: To protect the amenities of commercial occupiers in the building in accordance with the following policy of the Local Plan: DM15.7.
- 14 No cooking shall take place within any Class A1 or A3 unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Any works that would materially affect the external appearance of the building will require a separate planning permission.  
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3..
- 15 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the nearest window or facade of the nearest premises.  
The measurements and assessments shall be made in accordance with B.S. 4142. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(b) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.  
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 16 Before any new plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound, in accordance with a scheme to be agreed in writing with the Local Planning Authority.  
REASON: In order to protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 17 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.  
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1.
- 18 Unless otherwise approved by the Local Planning Authority the generator exhaust pipework should terminate at least 1m above the highest roof level of the development.  
REASON: To improve or maintain local air quality, particularly nitrogen dioxide and particulates PM10 in accordance with the City of London Air Quality Strategy 2011 in accordance with the following policy of the Core Strategy: CS15.
- 19 No later than six months prior to the occupation of any part of the building, a Building Evacuation Management Strategy shall be submitted and approved in writing by the Local Planning Authority in consultation with Transport for London. This Strategy shall include details on how emergency exits into the bus station area to the east of the site shall be controlled and managed to ensure the safety of building occupants and users of the bus station, along with details of any physical measures such as barriers, signage, lighting and warnings within the bus station that the strategy may identify as being necessary. Prior to first occupation of any part of the building the approved strategy shall subsequently be formalised through a Memorandum of Understanding between the applicant and TfL. Any use of the building's emergency exits shall subsequently only be in accordance with the Memorandum of Understanding or any subsequent agreed variations to it.

REASON: In the interests of public safety in accordance with the following policies of the Local Plan: CS3, DM16.2.

- 20 Notwithstanding the details shown in the approved plans, details of cycle access to the site from Liverpool Street and Old Broad Street shall be approved in writing by the Local Planning Authority in consultation with Transport for London prior to the relevant works taking place. The details and should consider options for access to be achieved into the cycle store from Sun Street Passage and/or Liverpool Street and any works identified by these approved details shall be implemented prior to the first occupation of any part of the building.  
REASON: In the interests of public safety in accordance with the following policies of the Local Plan; CS3, DM16.2.
- 21 The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:
- provide details on all structures;
  - accommodate the location of the existing London Underground structures and tunnels;
  - accommodate ground movement arising from the construction thereof;
  - and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.
- The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.  
REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2011 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
- 22 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.  
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

- 23 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.  
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: DM15.1.
- 24 Before any construction works hereby permitted are begun details of sustainable drainage systems shall be submitted to and approved in writing by the local planning authority.  
REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policies of the Local Plan: DM15.1, DM15.5.
- 25 Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.  
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 26 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
  - (b) details of the proposed new facade(s) including typical details of the fenestration entrances;
  - (c) details of the ground floor office and retail entrances;
  - (d) details of a typical bay of the development;
  - (e) details of soffits, hand rails and balustrades;
  - (f) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level
  - (g) details of all ground level surfaces including materials to be use
  - (h) details of external surfaces within the site boundary including hard and soft landscaping;
  - (i) details of the provision within the facades for the inclusion of street lighting.



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

- 27 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any works hereby permitted are begun.  
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.
- 28 No live or recorded music shall be played that it can be heard outside the premises or other premises in the building.  
REASON: To safeguard the amenity of the adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 29 Provision shall be made for disabled people to obtain access to the offices and to each retail unit via their respective principal entrances without the need to negotiate steps and shall be maintained for the life of the building.  
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.
- 30 The pass door shown adjacent to or near to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.  
REASON: In order to ensure that people with mobility disabilities are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.
- 31 The two car parking spaces shall be provided on the site for use by people with disabilities in accordance with the requirements of the London Plan and the space(s) shall be marked out accordingly and maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking.  
REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.

- 32 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.  
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.
- 33 No doors or gates shall open over the public highway.  
REASON: In the interests of public safety
- 34 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.  
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 35 All servicing must take place within the internal servicing area. No deliveries must be made from the public highway.  
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 36 The approved loading and unloading areas shall be available at all times for use throughout the life of the building for the occupiers thereof and visitors thereto.  
REASON: To ensure that satisfactory servicing facilities are maintained in accordance with the following policy of the Local Plan: DM16.5.
- 37 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 687 pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 38 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

- 39 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: 2000 Rev B, 2098 Rev C, 2099 Rev D, 2100 Rev E, 2101 Rev D, 2102 Rev C, 2103 Rev B, 2104 Rev B, 2105 Rev B, 2106 Rev B, 2107 Rev B, 2108 Rev B, 2109 Rev B, 2110 Rev B, 2111 Rev B, 2112 Rev B, 2330 Rev B, 2370 Rev B, 2450 Rev B, 2500 Rev B, 2501 Rev B, 2502 Rev B, 2503 Rev B, 2550 Rev B, 2551 Rev B, 2552 Rev B, 2553 Rev B, 2558 Rev B, 2559 Rev B, 2560 Rev B.
- REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## INFORMATIVES

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

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

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

- 2 Crossrail is very likely to have monitoring equipment both on the inside of the building and on its external facades. The equipment is installed under the Crossrail Act 2008 and records ground movements (measured automatically or manually) and is essential for the control of ground settlement impact on buildings during Crossrail's works. Prior to commencement of works on the premises please contact the Crossrail Helpdesk ([helpdesk@crossrail.co.uk](mailto:helpdesk@crossrail.co.uk) - Tel: 0345 602 3813) as soon as possible to obtain details of any monitoring equipment installed in order to ensure that your works do not interfere with Crossrail's monitoring equipment.

- 3 Waste Comments  
Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can

gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.

Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing [wwqriskmanagement@thameswater.co.uk](mailto:wwqriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality). Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

#### Supplementary Comments

Comment on Environmental Statement Volume 1 Part 1 Paragraph 4.100: The Thames Tideway Tunnel does not provide additional capacity to accommodate for future development. It provides protection to the environment from existing discharges from the combined sewer system.

- 4 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.

- 5 Network Rail advises that:

The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not:

- encroach onto Network Rail land;
- affect the safety, operation or integrity of the company's railway and its infrastructure;
- undermine its support zone;
- damage the company's infrastructure;
- place additional load on cuttings;
- adversely affect any railway land or structure;
- over-sail or encroach upon the air-space of any Network Rail land;

-cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future.

6 Network Rail advises that:

Future maintenance

The development must ensure that any future maintenance can be conducted solely on the applicant's land. The applicant must ensure that any construction and any subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land and air-space, and therefore all/any building should be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary. The reason for the 2m (3m for overhead lines and third rail) stand off requirement is to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to facilitate works. The applicant / resident would need to receive approval for such works from the Network Rail Asset Protection Engineer, the applicant / resident would need to submit the request at least 20 weeks before any works were due to commence on site and they would be liable for all costs (e.g. all possession costs, all site safety costs, all asset protection presence costs). However, Network Rail is not required to grant permission for any third party access to its land. No structure/building should be built hard-against Network Rail's boundary as in this case there is an even higher probability of access to Network Rail land being required to undertake any construction / maintenance works. Equally any structure/building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams' ability to maintain our boundary fencing and boundary treatments.

Drainage

No Storm/surface water or effluent should be discharged from the site or operations on the site into Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed near/within 10 - 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the

development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

#### Plant & Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

#### Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

#### Piling

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

#### Fencing

In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

#### Lighting

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling

arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

#### Noise and Vibration

The potential for any noise/ vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which holds relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.

#### Landscaping

Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details of the landscaping to be known and approved to ensure it does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. Lists of trees that are permitted and those that are not permitted are provided below and these should be added to any tree planting conditions:

Permitted: Birch (*Betula*), Crab Apple (*Malus Sylvestris*), Field Maple (*Acer Campestre*), Bird Cherry (*Prunus Padus*), Wild Pear (*Pyrs Communis*), Fir Trees - Pines (*Pinus*), Hawthorne (*Cretaegus*), Mountain Ash - Whitebeams (*Sorbus*), False Acacia (*Robinia*), Willow Shrubs (Shrubby *Salix*), Thuja Plicatat "Zebrina"

Not Permitted: Alder (*Alnus Glutinosa*), Aspen - Poplar (*Populus*), Beech (*Fagus Sylvatica*), Wild Cherry (*Prunus Avium*), Hornbeam (*Carpinus Betulus*), Small-leaved Lime (*Tilia Cordata*), Oak (*Quercus*), Willows (*Salix Willow*), Sycamore - Norway Maple (*Acer*), Horse Chestnut (*Aesculus Hippocastanum*), Sweet Chestnut (*Castanea Sativa*), London Plane (*Platanus Hispanica*).

#### Vehicle Incursion

Where a proposal calls for hard standing area / parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion

barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

As the site is adjacent to Network Rail's operational railway infrastructure, Network Rail strongly recommends the developer contacts [AssetProtectionAnglia@networkrail.co.uk](mailto:AssetProtectionAnglia@networkrail.co.uk) prior to any works commencing on site. Network Rail strongly recommends the developer agrees an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website at [www.networkrail.co.uk/asp/1538.aspx](http://www.networkrail.co.uk/asp/1538.aspx)

- 7 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:
- (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.
  - (b) Installation of engine generators using fuel oil.
  - (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site and compliance with the Construction (Design and Management) Regulations 2007; the Environmental Services Department should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.
  - (d) Alterations to the drainage and sanitary arrangements.
  - (e) The requirements of the Health and Safety at Work etc. Act 1974 and the other relevant statutory enactments (including the Offices, Shops and Railway Premises Act 1963); in particular:
    - the identification, encapsulation and removal of asbestos in accordance with a planned programme;
    - provision for window cleaning (internal and external) to be carried out safely.
  - (f) The use of premises for the storage, handling, preparation or sale of food.
  - (g) Use of the premises for public entertainment.
  - (h) Approvals relating to the storage and collection of wastes.
  - (i) The detailed layout of public conveniences.
  - (j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.



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

(l) Methods of odour control.

8 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

#### Noise and Dust

(a) The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b) Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk), via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c) Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d) Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department.

#### Air Quality

(e) Compliance with the Clean Air Act 1993  
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires

chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

#### Boilers and CHP plant

(f) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO<sub>x</sub> emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2011.

(g) All gas Combined Heat and Power plant should be low NO<sub>x</sub> technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2011.

(h) When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i) Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

#### Standby Generators

(j) Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k) There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

#### Cooling Towers

(l) Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

9 The provisions of Part 3, Class E, of Schedule 2 to the Town & Country Planning (General Permitted Development) Order 1995 will permit changes of use between office (B1), retail (A1/A2/A3), and leisure (D2) uses in the areas shown on the approved drawings for a period of ten years from the date of this permission.

10 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, City Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

11 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.

12 The Department of the Built Environment (Highways and Streetworks Team) must be consulted on the following matters which require specific approval:

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

(b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City.

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

(d) Means of escape and constructional details under the Building Regulations and London Building Acts (District Surveyor).

- 13 The Directorate of the Built Environment should be consulted on:
- (a) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".
  - (b) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window cill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). You are advised that highway projection licenses do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. In such cases please also contact the Corporate Property Officer, City Surveyor's Department.
  - (c) Permanent Highway Stopping-Up Orders, dedication of land for highway purposes, declaration, diversion and stopping up of City and Riverside Walkways.
  - (d) The display of any advertisement material on the premises which may be subject to the City of London Corporation's Byelaws.
- 14 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:
- (a) Fire precautions and certification:  
  
London Fire Brigade, Fire Prevention Branch  
5-6 City Forum  
City Road  
London EC1N 2NY
  - (b) Public houses, wine bars, etc.  
  
City of London Corporation  
Trading Standards and Veterinary Service  
PO Box 270  
Guildhall  
London EC2P 2EJ
  - (c) Employment agencies:

Employment Agencies Licensing Office  
Department of Employment  
Exchange House  
60 Exchange Road  
Watford, Herts WD1 7HH

(d) Inflammable materials (e.g., petroleum)

London Fire Brigade, Petroleum Department  
5-6 City Forum  
City Road  
London EC1N 2NY

(e) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships  
Transport for London  
Windsor House  
42-50 Victoria Street  
London, SW1H 0TL

(f) Works in proximity to the line of the Crossrail project:

Cross London Rail Links Limited  
Portland House  
Bressenden Place  
London, SW1E 5BH

(g) Works affecting railway operational land and structures:

Planning Surveyor  
Railtrack  
355 Euston Road  
London NW1 3AG

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**GREATER LONDON AUTHORITY**

**Development, Enterprise and Environment**

**Michael Blamires**  
Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London  
EC2M 2RH

Our ref: D&P/3489/HS  
Your ref: 14/01285/FULEIA  
Date: 27 February 2015

**PLN**  
27 FEB 2015

Dear Mr Blamires,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008  
100 Liverpool Street & 8-12 Broadgate, London EC2M 2RH  
Local planning authority reference: 14/01285/FULEIA**

I refer to the copy of the above planning application, which was received from you on 23 January 2015. On 26 February 2015, the Mayor considered a report on this proposal, reference D&P/3489/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that whilst the application is generally acceptable in strategic planning terms, the application does not yet comply with the London Plan, for the reasons set out in paragraph 73 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution. If your Council resolves to refuse permission it need not refer the application back to the Mayor.



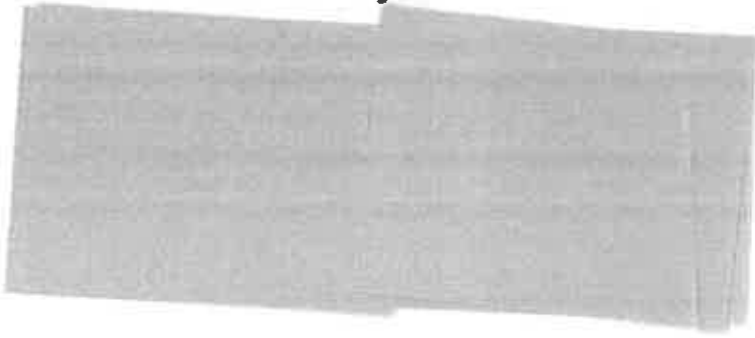
Please note that the Transport for London case officer for this application is Mark Day,  
mark.day@tfl.gov.uk, 0203 054 7025.

Yours sincerely,

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**Colin Wilson**  
Senior Manager- Development & Projects

cc

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GREATERLONDONAUTHORITY

planning report D&P/3489/01

26 February 2015

**100 Liverpool Street & 8-12 Broadgate, London**  
in the City of London

planning application no. 14/01285/FULEIA

PLN

27 FEB 2015

**Strategic planning application stage 1 referral**

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

**The proposal**

Refurbishment and extension of existing building to provide a ten storey office-led mixed use development with commercial office (B1), retail (A1/A2/A3) and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at ninth floor level with associated works, parking, landscaping and alterations to facilities associated with the bus station.

**The applicant**

The applicant is **Bluebutton Properties UK Limited** and the agent is **DP9 Limited**. The architect is **Hopkins Architects**.

**Strategic issues**

The principle of the office redevelopment is supported. However, there are a number of outstanding strategic planning issues relating to the **principle of development, climate change and transport** that should be resolved before the application is referred back to the Mayor.

**Recommendation**

That the City of London Corporation be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 73 of this report; but that the possible remedies set out in the same paragraph could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

**Context**

1 On 23 January 2015 the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 5 March 2015 to provide the Council with a statement





setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 4 of the Schedule to the Order 2008:

*Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO.*

3 Once the City Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

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

### **Site description**

5 The 0.89 hectare application site is part of the Broadgate Estate and is situated immediately to the east of London Liverpool Street station and Sun Street passage, and to the north of Liverpool Street. To the west of the site is the Broadgate Circle and Eldon Street and immediately to the north of the site is 5 Broadgate which is currently under construction and will form the Estate's newest office building once completed in 2016.

6 The site comprises two buildings which were built in the 1980's and designed as separate offices with individual entrances accessed both off Liverpool Street and Broadgate Circle. The buildings were later amalgamated to form one building, known as 100 Liverpool Street and 8-12 Broadgate that is now occupied by UBS Ltd.

7 100 Liverpool Street and 8-12 Broadgate is a seven storey office block which has some retail use at lower ground floor level. The Octagon Mall cuts through the middle of 100 Liverpool Street and forms a key link between Broadgate and London Liverpool Street station. A large portion of the retail use at the lower ground floor of 8-12 Broadgate is owned by Network Rail, so is a large part of the ground and first floor levels that is also leased to London Bus Services Limited for use as part of the bus station for Liverpool Street station. These Network Rail owned areas cover at least two thirds of the footprint of the office building above.

8 The application site lies within the Central Activities Zone (CAZ) as identified in the London Plan and Liverpool Street is designated in the London Plan as being part of a CAZ frontage. The Liverpool Street and Octagon Mall area is also identified in the City's Local Plan as one of the five Principal Shopping Centres (PSC) in the City.

9 The application site is not within a conservation area but a number of conservation areas are located in the vicinity. The site also partly lies in the background of Protected View 9A.1 of the Mayor's London View Management Framework (LVMF).

10 The site is highly accessible by public transport, being immediately adjacent to Liverpool Street station where national rail and underground services on the Central, Metropolitan, Circle and Hammersmith & City lines can be accessed, as well as 17 bus routes. Docklands Light Railway and Waterloo & City line services are within walking distance at Bank station, as are Northern line services and additional national rail services and bus routes at Moorgate station. From 2018, Crossrail services will also stop at Liverpool Street, with an entrance into the Crossrail station being located immediately south of the site on Liverpool Street itself. As such, the site records the

highest possible Public Transport Accessibility Level (PTAL) of 6b. 200 metres to the east of the site is the A10, Bishopsgate, which is part of the Transport for London Road Network (TLRN). There are however no cycle hire docking stations immediately adjacent to the site, the nearest being approximately 250 metres away to the south.

## Details of the proposal

11 The proposal seeks to refurbish and extend the existing building, including the retention of the building's structural frame, the construction of a new facade and the provision of three additional floors and rooftop plant to provide a ten storey office-led mixed use development over 13 floors with:

- commercial office (B1) accommodation, and
- flexible commercial floorspace, comprising additional office (B1), retail (A1/A2/A3) and leisure (D2) uses at lower ground, ground and first floor levels, flexible office (B1)/restaurant (A3) use at ninth floor level.

12 The application also includes the provision of car and cycle parking, alterations to the facilities associated with the bus station, hard and soft landscaping and roof terraces, and other associated works.

13 The proposed scheme will provide a total floor area of 66,689 sq.m. (GIA) which also represents an uplift in floor area of 17,923 sq.m. (GIA). The maximum floorspace by Use has been estimated as follows:

	Existing sq.m. (GIA)	Proposed sq.m. (GIA)
Office (B1)	48,240	64,484
Retail (A1)	526	4,752
Retail (A2)		3,041
Retail (A3)		4,881
Leisure (D2)	0	1,371

Table 1: Maximum floorspace by Use (GIA)

14 The existing building on the site currently employs approximately 3,300 employees. The proposed development will be able to accommodate in the region of 6,045 to 6,338 employees.

## Case history

15 The case has no strategic planning history.

## Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Central Activities Zone *London Plan*
- Offices *London Plan*
- Mix of uses *London Plan*

- Urban design *London Plan; Shaping Neighbourhoods: Character and Context Draft SPG*
- Strategic views *London Plan; London View Management Framework SPG*
- Inclusive access *London Plan; Accessible London: Achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG*
- Transport and parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy and Crossrail SPG.*

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London Local Plan 2015 and the 2017 London Plan (with 2013 Alterations).

18 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Policy Guidance
- The draft Further Alterations to the London Plan - 'intend to publish' version as submitted to the Secretary of State (December 2014)
- The City of London Planning Obligations SPD (April 2014)
- The City of London Office Use SPD (January 2015)

## **Principle of development**

### Office redevelopment in the Central Activities Zone (CAZ)

19 As set out in paragraph 8, the application site lies within the Central Activities Zone as identified in the London Plan. London Plan Policy 2.11 establishes the strategic functions of the CAZ and supports office and mixed use development in the area. London Plan Policy 4.2, in particular, gives strategic support to renewal and modernisation of existing office stock in viable locations to improve its quality and flexibility.

20 The proposed development seeks to achieve a comprehensive refurbishment and modernisation of the office space at the site and proposes to increase the existing office floorspace area to a maximum of 16,244 sq.m.(GIA) of new office space.

21 The proposed comprehensive renewal of this CAZ office site will support London's function as one of the world's most attractive and competitive business locations and is supported in principle in accordance with London Plan Policies 2.11 and 4.2.

### Mix of uses, including housing

22 London Plan Policy 4.3 promotes mixed use development, including housing, to support increases in office floorspace. As set out in Table 1 above, the net increase in office floorspace proposed by the applicant could increase to a maximum of 16,244 sq.m (GIA). As also stated in London Plan Policy 4.3, where an increase in office floorspace is proposed and where this increase is above a justified local threshold, which is 500 sq.m. in the City of London, as a general principal, applicants should be required to provide housing and other uses on-site or nearby to create mixed use neighbourhoods. Whilst a mix of flexible retail and leisure uses (A1/A2/A3 and D2) is included in the proposed scheme, the proposal makes no provision for housing on-site.

23 Within the CAZ and the City of London, the London Plan approach allows for a degree of flexibility with respect to the provision of mixed uses and provision of housing and exempts the City from providing mixed uses on-site, if it compromises broader objectives such as sustaining important clusters of business activity. Under such circumstances, and as discussed at pre-application stage, contributions to off-site affordable housing are sought as a planning obligation.

24 Based on the characteristics of the proposed scheme, the absence of housing on-site is accepted on the basis of the broader principle of sustaining the important cluster of business activity in the City. However, a suitable financial contribution for off-site affordable housing is required and should be secured through the section 106. The Council's section 106 Heads of Terms should therefore include a contribution towards the provision of off-site affordable housing in accordance with the City Corporation's Planning Obligations SPG Tariff Calculation.

#### **Retail and leisure floorspace**

25 As mentioned in paragraph 8, part of the application site is located within a CAZ frontage where London Plan Policies 2.11 and 4.7 support the enhancement and expansion of retail capacity. Liverpool Street is also identified in the City of London's Local Plan as a Principal Shopping Centre (PSC) where new retail development should be focused.

26 In addition to the maximum of 16,244 sq.m (GIA) of office space, the applicant proposes to provide approximately 6,592 sq.m. (GIA) of flexible office, retail and leisure uses (Class B1/A1/A2/A3/D2), representing an uplift of approximately 6,066 sq.m. (GIA) compared to the existing retail floorspace on the site. As the final occupier for the office accommodation is still to be identified, flexibility for a range of uses is requested to respond to the future occupier's demand as well as those of the market.

27 Whilst the majority of new retail floorspace proposed lies just outside, or immediately adjoins the PSC and is therefore regarded as edge of centre in sequential terms, given that it will form an extension to the CAZ frontage and will offer active linkages between Octagon Mall and the wider Liverpool Street Principle Shopping Centre, the proposed town centre uses do not raise any strategic issues and are acceptable in principle subject to local policies.

#### **Summary**

28 GLA officers support the principle of the development and the mix of uses proposed, but a suitable financial contribution for off-site affordable housing should be secured to make the proposed scheme acceptable in policy terms.

#### **Urban design**

29 Good design is central to all objectives of the London Plan. The proposal has been discussed at pre-planning application stage and is generally well thought out.

30 However, the applicant was asked at pre-application stage to explore the possibility of improving the quality and legibility of the north-south route along the eastern edge of the site. In response to this, the applicant has given a number of reasons to demonstrate that the improvement of the route was not achievable. Given the lack of north-south permeability in this area, GLA officers are disappointed that the opportunity to improve the quality and legibility of this route has not been maximised by the applicant. However, given that the land is not in the applicant's ownership, the complexities of having to re-arrange the bus station, and the provision of an indirect north-south route through the development itself, the proposal is broadly acceptable.

31 Other aspects such as the proposed building's design, such as its scale and massing, materials and appearance do not raise any strategic issues, and is generally supported.

#### **Strategic views**

32 As mentioned in paragraph 9, the application site is partially located within the background of the Protected Vista from King Henry's VIII's Mound, Richmond to St Paul's Cathedral (LVMF view 9A.1). The applicant was required at pre-application stage to carry out a full visual impact assessment to depict the degree to which the proposed development would be visible in the view.

33 The photographs submitted by the applicant and the outline of the proposed development against the view show that a small section of the scheme would exceed the threshold plane of the Protected Vista and would therefore have some visual presence in the background of the Protected Vista.

34 However, as the proposed development will preserve the viewer's ability to recognise and appreciate the dome of the Cathedral from King Henry VIII's Mound as required in the guidance within the Mayor's London View Management Framework SPG, the impact on the view is considered acceptable.

35 The applicant was also asked at pre-application stage to assess the impact of the proposed development on the composition of the view in the downstream River Prospect from Waterloo Bridge (LVMF 15B.1). The verified views submitted with the application confirm that the proposal would have no visual impact on LVMF 15B.1.

36 Based on the above and in line with London Plan Policy 7.12, GLA officers are satisfied with the proposal in terms of views.

#### **Inclusive Design**

37 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. Inclusive design principles if embedded into the development and design process from the outset help to ensure that everyone, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

38 The design of the building and the public realm is therefore crucial to how inclusive the development is for many people. The Design and Access Statement includes measures which demonstrate that office entrances, circulation, signage and sanitary accommodation have been thought through to improve access for disabled office users and visitors within the building. These measures should be secured by condition.

39 The proposal to remove the existing steps around the building on the exterior of 100 Liverpool Street to provide level access to the office and retail shop units would be very welcomed by the GLA, if it can be achieved.

40 In accordance with London Plan Policy 7.2, the proposal broadly responds to the principles of inclusive design throughout.

## **Climate change**

### **Climate change adaptation**

41 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. These include sustainable urban drainage systems such as tanked storage, rainwater harvesting, a grey water system to address surface water run-off and save water, in addition to the inclusion of living roofs and native species planting. These measures should be secured by condition.

### **Climate change mitigation**

42 The carbon emissions and savings at each step of the energy hierarchy have been presented against a Part L 2010 baseline. As the application was submitted after the 5th of July 2014 the emissions and savings should be presented under Part L 2013 in line with latest guidance that can be found here:

[http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final\\_2.pdf](http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final_2.pdf)

### **Energy efficiency standards**

43 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting.

44 The applicant should provide details of the energy efficiency measures that will be adopted, including performance specifications for the heating and cooling systems.

45 The applicant has stated that a solar irradiation study has been carried out investigating window glazing ratios. The applicant should clearly state the facade scenario chosen, including evidence on how the demand for cooling will be minimised through passive design in line with Policy 5.9.

46 The development is estimated to achieve a reduction of 84 tonnes per annum (18%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. The applicant should provide BRUKL worksheets for the development (including efficiency measures alone) to support the savings claimed.

### **District heating**

47 The applicant has identified that the Citigen heat network is in the vicinity of the development and stated that initial discussions about a possible connection is likely to be unviable. The applicant should provide evidence of any correspondence with the Citigen network operator to support this and to demonstrate that all opportunities for connection have been thoroughly considered. The viability of connection should be assessed on a Whole Life Cost (WLC) basis as described in the GLA energy assessment guidance that can be found here:

[http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final\\_2.pdf](http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final_2.pdf). The applicant should also include information on the distance to the nearest Citigen access point.

48 The applicant has, however, provided a commitment to ensure that the development is designed to allow for future connection to a district heating network should one become available.

Given the limited basement space, information on the heating system layout should be provided to demonstrate how this will be achieved in practice (e.g. space for heat exchangers in the energy centre).

49 The applicant is currently proposing to install a site heat network. However, the applicant should confirm that all non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all building uses on the site should be provided. Further information on the floor area and location of the energy centre should be provided.

#### Combined Heat and Power

50 The applicant has investigated the feasibility of CHP. However, due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

#### Renewable energy technologies

51 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 450 sq.m. of Photovoltaic (PV) panels on the roof of the building. The applicant has determined that this is the maximum available PV array due to plant and neighbouring buildings and has carried out an analysis to determine the PV output. The applicant should confirm whether the TAS model included for shading from the neighbouring buildings and plant located on the roof of the development.

52 A roof layout has been included detailing the proposed PV arrangement.

53 A reduction in regulated CO<sub>2</sub> emissions of 29 tonnes per annum (7%) will be achieved through this third element of the energy hierarchy.

#### Summary

54 A reduction of 112 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 24%.

55 The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should prioritise connection to the Citigen network in order to further reduce the development's carbon emissions, unless it is clearly demonstrated that this is not a viable option (see comments above).

### **Transport**

#### Access and bus station facilities

56 Access for cars and service vehicles remains unchanged, with vehicles accessing from the north via Broad Lane. At present, cyclists share this route and this results in potential conflicts between cyclists and service vehicles, as the geometry of the service area means that service vehicles have to reverse long distances. As such, it is proposed to relocate cycle parking from the basement to the ground floor, with access into this area from Sun Street Passage. Sun Street Passage is covered by no entry restrictions for all vehicles except local buses and as such the expectation is that cyclists would dismount and walk the final few metres into the parking area.

57 However, TfL accepts that this is inconvenient and some cyclists may not obey these restrictions, which would have safety implications for the operation of the bus station. At the same

time, the final design of the part of Liverpool Street to the south of the application site is currently not known. As such, details of cycle access should be secured as a pre-commencement condition. To allow for as much flexibility as possible in designing this final state, TfL would strongly encourage the applicant to make passive provision for access into the cycle parking area from the south, adjacent to the building's main entrance. This may require some alteration to the number and size of doors between this building core and the cycle parking area as per the guidance recently released as part of TfL's London Cycle Design Standards.

58 Pedestrian access will be from Liverpool Street and from Broadgate Circle, with no general pedestrian access into the bus station area. However, two fire escapes are shown exiting from the building into the bus standing on the western side of the bus station. TfL strongly feel that continued provision of emergency exits into a bus station is inappropriate particularly given that there is no public access into its western side. The applicant has not demonstrated that all reasonable alternative building layouts have been explored to enable these fire escapes to be relocated. To inform this process, TfL would also expect an indication of the number of people expected to use each exit and the amount of space needed for their safe congregation. Assuming that process is exhausted, TfL would in any event expect a management strategy for evacuation of the building to be provided to ensure that conflicts between pedestrians and buses and impacts on bus services in the area are minimised.

59 It is proposed to relocate the bus driver toilets a short distance to the north-west within this development. This would have the benefit of making them more private as well as allowing for a wider footway to be provided in their current location. The bus station offices are also proposed to move to the south-west of the existing offices. Although TfL had asked the applicant to investigate incorporating a toilet for bus station staff into them, this is not shown on drawings. Conditions requiring detailed design of the toilets and office space to be agreed prior to commencement are required on any consent.

#### Car and cycle parking

60 Car parking is proposed to reduce from 33 spaces provided at present to two blue badge spaces. This level of provision is sufficient and welcomed.

61 It is also proposed to provide additional cycle parking above the minimum standards set out in the Further Alterations to the London Plan (FALP), access to which is discussed in more detail above. Given constraints on the size of the cycle parking area this is proposed as a mixture of different types, including lockers for folding bikes. This mixture of cycle parking types seems reasonable given data collected by TfL on the use of folding bikes in central London and the installation of lockers, showers and drying areas linked to the number of cycle parking spaces is welcomed. However, TfL would want to avoid setting a precedent on cycle parking type for future applications and as such it is requested that the use of lockers versus more traditional cycle parking is monitored specifically through the travel plan and that this data is subsequently shared to help inform future cycle parking guidance.

#### Walking and public realm

62 An entrance to Liverpool Street Crossrail station will be located immediately to the south of the proposed development on Liverpool Street. The applicant is in discussions with Crossrail and the City in relation to the final design of the public realm in this location and there are also ongoing discussions between TfL and the City over the final designs. Although the design for Liverpool Street is yet to be finalised, it would be useful to quantify the amount of footway space that is required to accommodate station flows, background demand and demand associated with this development to help inform any designs that may be produced. Nonetheless, as mentioned in



the inclusive design section of this report, the proposals to remove the steps outside the existing building wherever possible in order to maximise available footway space would be very welcomed, although it is acknowledged that some will need to remain due to issues with levels.

#### Trip generation

63 Although the development will generate a number of trips across the various public transport modes, TfL does not consider that any specific public transport mitigation will be required, beyond the Crossrail contribution referred to below.

#### Travel plan

64 A framework travel plan has been submitted with the application and is of a good quality. This travel plan should be secured through the Section 106 agreement for the site.

#### Construction

65 Similarly, a delivery and servicing plan has been submitted and is of a good quality. However, this should be secured by condition so that a more detailed plan can be approved once the mix of uses and occupiers are known. The commitment to targets and monitoring of the plan is welcomed.

66 A framework construction logistics plan (CLP) has been submitted as part of the application and sets out the principles of the construction methodology. Whilst this is welcomed and contains a number of measures that are seen as being positive, it is relatively generic at this stage. As such, a condition requiring a detailed CLP to be submitted and agreed by the City, Crossrail and TfL prior to any works on site should be submitted. It is also noted that the CLP does not appear to propose any construction access via the bus station. If this is the case, and construction can be managed from outside this area, this is welcomed. Suitable conditions will also need to be placed on any consent to protect London Underground infrastructure around the site.

#### Section 106 and Community Infrastructure Levy

67 The City of London adopted its Community Infrastructure Levy (CIL) charging schedule in July 2014. A full charging schedule is available from the Council, but both office and retail uses are charged at £75 per square metre. The Regulation 123 list identifies that this levy can be spent on 'transport improvements'.

68 In addition, in accordance with London Plan Policy 8.3 the Mayor commenced CIL charging for developments on 1st April 2012. Within the City of London, the charge is £50 per square metre. The site is also in the area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (April 2013). In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and this should be reflected in the wording of the section 106 agreement. The charge under the SPG that should be secured through the section 106 is the maximum £2,425,270. TfL can however provide some suggested wording for inclusion into the section 106 agreement given the flexible nature of some of the floorspace proposed.

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

69 It is understood that the applicant has had pre-application meetings with officers at the City Corporation and that the Council's officers are supportive of the development.

## **Legal considerations**

70 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application.

71 There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Financial considerations**

72 There are no financial considerations at this stage.

## **Conclusion**

73 London Plan policies on the principle of development, urban and inclusive design, climate change and transport are relevant to this application. Whilst the application is supported in principle, there are outstanding strategic planning issues that will need to be resolved before the application is referred back at stage 2. Further discussion is required regarding the following issues:

- **Principle of development:** The principle of the office redevelopment is supported in strategic terms. However, financial contributions for off-site affordable housing are required on the net increase in office floorspace in line with London Plan Policy 4.3 and local policy.
- **Urban design:** The proposal is broadly acceptable and is generally supported. GLA officers are also satisfied with the proposal in terms of tall building and views.
- **Inclusive design:** The proposal broadly responds to the principles of inclusive design. The proposal to remove the Liverpool Street steps would be very welcomed, where possible.
- **Climate change:** The proposed carbon dioxide savings fall short of the target in London Plan Policy 5.2. The applicant should prioritise connection to the Citigen network in order to further reduce the development's carbon emissions, unless it is clearly demonstrated that this is not a viable option. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.
- **Transport:** The outstanding matters set out by Transport for London above need to be resolved in order to demonstrate full compliance with relevant London Plan policies.

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

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**TWENTIETH  
CENTURY  
SOCIETY**



Mr Michael Blamires  
Case Officer, Department of the Built Environment  
City of London  
PO Box 270  
Gulldhall, London EC2P 2EJ

Via email: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

13 February 2015

**ACKNOWLEDGED**  
Our ref: 10 04 04

Dear Mr Blamires

100 Liverpool Street and 8-12 Broadgate London EC2M 2RH  
Application ref: 14/01285

Thank you for consulting the Twentieth Century Society on the above planning application. The Society wishes to object to the proposals for the reasons outlined below.

#### Background

The Twentieth Century Society has taken a close interest in Broadgate since 2010 when we initiated the high profile campaign to resist demolition, strongly supported by English Heritage. English Heritage recommended that the whole of Broadgate phases 1-4 be listed at Grade II\* in 2011 for its more than special architectural and historic interest. This recommendation was rejected by the Secretary of State and a Certificate of Immunity from Listing was issued for Nos 3,4 and 6 Broadgate. Since that time, Nos 4 and 6 have been demolished, the replacement building No 5 Broadgate is under construction and works to alter Broadgate Circle are currently underway.

When Nos 8-12 and 100 Liverpool Street were assessed for a further COI in 2012, the buildings were not eligible for listing as they were less than 30 years old and at that time, not under immediate threat. English Heritage specifically did not recommend granting a COI, and instead advised that the buildings should be fully assessed for designation at grade II when they would become eligible for listing in July 2015. This recommendation was turned down by the Secretary of State and a COI was issued in 2013.

#### Proposals

The proposed 'refurbishment' of the above site will result in a new building that is completely unrecognizable in its current form. Only the existing building's structural frame will remain, and three additional floors are proposed, together with the construction of a new façade. As such the new scheme will result in the loss of the existing building.

#### Significance

The Twentieth Century Society continues to consider the remaining Foggo/Arup designed work which still stands at Broadgate - including 8-12 Broadgate and 100 Liverpool Street to be among the best of

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their type and period. We support the view of English Heritage's designation team that these buildings are listable at grade II, despite the demolition and re-development of Nos 4-6 Broadgate: "We remain convinced... that the surviving elements of Broadgate phases 1-4 are still of clear special architectural and historic interest – ie that all the buildings and structures subject to the present application... are worthy of listing at Grade II (EH Advice Report 12 December 2012, p 3). The views of English Heritage designation team about the high quality of the original scheme are well documented and I enclose a copy of their Advice Report for ease of reference.

We still consider these buildings to represent an architectural, artistic and place-making achievement of a very high order. For the reasons outlined above, we strongly object to the proposed re-development of 8-12 and 100 Liverpool Street.

I trust our comments are useful to you in your consideration of the proposals. Please do not hesitate to contact me at this office if you have any queries.

Yours sincerely,



**Henretta Billings**  
**Senior Conservation Adviser**  
**Twentieth Century Society**

**Remit:** The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

## Case Name: Broadgate

## Case Number: 473883

### Background

We have been asked to consider granting a Certificate of Immunity from listing for a group of buildings and structures associated with Broadgate Square, comprising Nos. 1-2 and 8-12 Broadgate, No. 100 Liverpool Street, the Octagon, Octagon Arcade and the sculpture 'Fulcrum', the Broadgate Circle, and Broadgate Square itself with the sculpture 'Leaping Hare on Crescent and Bell' and the associated paving and landscaping.

### Asset(s) under Assessment

Facts about the asset(s) can be found in the Annex(es) to this report.

Annex	List Entry Number	Name	Heritage Category	EH Recommendation
1	N/A	Broadgate phases 1-4 (excluding No. 3 and site of Nos. 4 and 6 Broadgate)	Listing	Do not add to List

### Visits

Date	Visit Type
02 December 2010	Full inspection
09 March 2011	External only
17 March 2011	Partial inspection
14 March 2011	Partial inspection
25 September 2012	External only

### Context

In June of last year, English Heritage recommended that the whole of Broadgate phases 1-4 be listed at Grade II\* for its more than special architectural and historic interest, and that the Certificate of Immunity (COI) application lodged in November 2010 for Nos. 3, 4 and 6 Broadgate be refused. The grounds of our recommendation – set out in detail in our Advice Report of 3 June 2011 – included both the high architectural quality of the buildings themselves and their integration within a highly consistent programme of landscaping and spatial planning, one so strongly unified as to make this part of the Broadgate complex read as a single designed entity. Other relevant factors included the quality of the artworks on the estate (these again carefully woven into the overall scheme), the buildings' group value with the Grade II-listed buildings at Liverpool Street Station, and the historic significance of the Broadgate project in relation to the mid-1980s financial boom. In the decision letter, issued on 15 June, the Secretary of State rejected this recommendation, and instead granted the applicants' request for a COI on Nos. 3, 4 and 6 Broadgate and their associated landscaping and sculpture.

Since that time Nos. 4 and 6 have been demolished, and work has begun on a new building by Make Architects, to be known as No. 5 Broadgate; the associated sculptures 'Go Between' and 'Ganapathi and Devi' have been removed for relocation elsewhere on the site. No. 3 Broadgate still stands.

The present application relates to all those portions of Broadgate phases 1-4 not covered by the existing COI. It follows a planning application for various alterations and renovations to the Broadgate Circle; English Heritage's National Planning team (London) was consulted on this application and raised no objection to the proposals, permission for which was granted in August 2012.

## Assessment

### CONSULTATION

Consultation letters were sent to the site owners, the applicant, to the principal tenants including UBS, to the City of London as the local authority and to the Twentieth Century Society.

The responses received from DP9 (on behalf of British Land, the principal owner of the site) and from Prof Robert Tavernor (on behalf of UBS) are essentially identical to those submitted in the course of the previous assessment, and the points raised therein are addressed in the Appendix to our earlier advice report. A letter dated 19 October 2012 from Nigel Webb, Head of Development at British Land, reiterates the latter's assertion that 'the buildings [of Broadgate phases 1-4] are not listable at any grade', and requests that a COI be issued to 'remove uncertainty' and allow the owners 'to properly consider how Broadgate can continue to evolve'. A further response from DP9 dated 3 August 2012 made a number of detailed factual points concerning, for example, the nomenclature of individual buildings; these have, where appropriate, been incorporated into the History and Details sections.

The City of London's response, in the form of an email dated 9 August 2012 from Kathryn Stubbs, Assistant Historic Environment Director, reiterated the point that 'the grid of granite which is a major and characteristic feature of the elevational treatment was introduced on the insistence of the City... against the architects' strong wish', and thus 'weakened the design and its context'. This point too is addressed in our previous advice. We accept that, in using granite rather than steel as a facing material, Peter Foggo was obeying the City's wishes rather than his own. But accepting constraints of this kind is something that architects have to do a great deal of the time, and the designs they produce are not necessarily weakened as a result. The treatment of the granite facings at Broadgate is, we contend, extremely successful, and vital to the aesthetic quality of the scheme as a whole. Nor did Foggo discard his rationalist principles in employing this material: the granite screens are not mere decoration, but function very effectively as brise-soleil, and as a result Broadgate has an additional interest as a pioneer of energy efficiency in office buildings.

We informally consulted staff at Tate Britain and Modern about the significance of the sculpture, in particular Richard Serra's 'Fulcrum'. Tate's response confirmed that 'Fulcrum' is clearly an important piece, a rare example of Serra's large-scale work in the UK, and aesthetically inseparable from the site for which it was designed.

### DISCUSSION

Many of the considerations that influenced our earlier recommendation remain in force. About four-fifths of the Foggo/Arup designed work still stands, including Nos. 1-2, 3 and 8-12 Broadgate, 100 Liverpool Street and the Broadgate Circle. The architecture and landscaping are still among the best of their type and period, and the subtle interrelation between the Broadgate Circle's travertine and concrete amphitheatre and the granite-clad office blocks of Broadgate Square endures, despite the loss of the latter's north side. No. 100 Liverpool Street, the most striking individual building of the group, maintains its strong relationship with the railway terminus alongside. Richard Serra's 'Fulcrum', the biggest and most compelling of the artworks, still serves as a powerful symbolic hinge-point for the complex, as well as possessing great artistic interest as one of the UK's few large-scale works by this major international sculptor. Broadgate phases 1-4 still represents an architectural, artistic and place-making achievement of a very high order, and remains one of the principal monuments to the world of deregulated high finance that helps to define the significance of the 1980s in British culture.

It must be recognised, however, that the recent demolitions have taken a toll on the visual and spatial integrity of the complex. The destruction of Nos. 4 and 6 means the loss of one entire side of Broadgate Square, and with it the sense of consistency and uniformity in the external envelope that was so crucial to the effect of the whole. The present assessment must consider Broadgate in its current state; but it is worth noting that the replacement building, No. 5 Broadgate, will contrast strongly with its neighbours in scale and materials, and will cut across the central north-south axis that was a key feature of the original masterplan. In their original locations, the sculptures 'Go Between' and 'Ganapathi and Devi' gave further definition to this axis, and their removal (albeit for relocation elsewhere on the estate) further erodes the spatial as well as the artistic qualities of the scheme.

As the Principles of Selection (March 2010) make clear, 'buildings of less than 30 years old are normally listed only if they are of outstanding quality and under threat'. The 'outstanding quality' clause is usually read

as meaning Grade II\* or Grade I, while 'threat' is taken to include substantial demolition or alteration that would materially affect the special interest of the building. At the time of our initial recommendation the threat to the complex was clear, and we considered that Broadgate phases 1-4, in its intact and relatively unaltered state, was manifestly of outstanding quality. At the time of the current assessment, Broadgate is still less than 30 years old, but the two necessary criteria for designation in this circumstance – threat and outstanding interest – no longer apply. As noted above, the recent demolition of Nos. 4 and 6 inevitably vitiates the 'outstanding' interest of the original ensemble; furthermore, and crucially, the alterations currently proposed to the Circle do not amount to a substantive threat, either to this structure or to the site as a whole. Indeed, the complex is extremely well looked after, and its short-term future at least seems secure. We understand, for example, that there are no proposals for demolition or removal of any more sculpture; and although we cannot pre-judge how any future applications might be viewed by the City of London, the latter is on record as having regarded Nos. 4 and 6 Broadgate, prior to their demolition, as buildings of heritage merit (i.e. as non-designated heritage assets, in the language of the NPPF).

We remain convinced, however, that the surviving elements of Broadgate phases 1-4 are still of clear special architectural and historic interest – i.e. that all the buildings and structures subject to the present application, as well as the surviving No. 3 (currently the subject of a COI), are worthy of listing at Grade II, with Richard Serra's sculpture 'Fulcrum' meriting the higher Grade II\* for its outstanding artistic interest. However, under the 30-year rule, no part of the complex is eligible for listing until July 2015, given the absence of threat and the Grade II level of interest of the buildings. English Heritage's own guidance on COI applications states that 'in cases where the application is refused, the building is normally listed' – i.e. if the building is not listed, a COI application will not normally be refused. The present buildings are not yet eligible for listing, being less than 30 years old and under no immediate threat; they will, however, become eligible for listing in July 2015, approximately halfway through the 5-year period if a COI were issued now. Certificates of Immunity are important tools for clarity and certainty, and English Heritage is committed to providing this certainty wherever possible. However, this is an exceptional case and to grant a COI now would preclude a full assessment and listing over a period during which we anticipate that designation at Grade II (with Grade II\* or even Grade I for the Serra sculpture) will be warranted. We therefore recommend that none of the buildings is listed at this time, but that the site is not issued with a COI, thus allowing for a designation assessment as soon as they become eligible in July 2015.

## CONCLUSION

We recommend that the application for a Certificate of Immunity be refused.

## REASONS FOR DESIGNATION DECISION

The remaining parts of Broadgate phases 1-4 are not yet eligible for listing, but it is nevertheless recommended that the COI application be refused. The principal reasons for this are as follows:

- \* 30-year rule: these buildings and structures are all less than 30 years old, and none is under threat; but they are nevertheless (for reasons set out above and below) of clear special interest, and will become eligible for listing in July 2015;
- \* Architecture: a series of buildings – the majority still surviving despite the demolition of Nos. 4 and 6 – which are the result of a successful collaboration between a leading firm - under the direction of a highly distinguished architect - and a significant developer; they are built of high-quality materials to a design that combines lively but ordered detailing with an assured handling of form, and historical resonance with a Modernist integrity and honesty;
- \* Planning: an acknowledged masterpiece of place-making and urbanism combining formal grandeur with picturesque incident, and successfully integrating a new urban quarter with the surrounding streetscape – qualities which largely survive in spite of the recent demolitions;
- \* Landscaping: a scheme which, despite recent losses, remains of great consistency, serving to tie together the various buildings and spaces and to reinforce the overarching identity of the estate;
- \* Artworks: two works by leading contemporary sculptors, including one – Richard Serra's 'Fulcrum' – of particular significance as a rare UK work by a major international figure;
- \* Influence: a seminal work of the period, one of the most highly-praised and successful developments of the 1980s office boom and one which exerted a powerful influence over later projects of this type;
- \* History: the best scheme of its type and date, embodying the financial deregulation of this period and a new approach to urban development;
- \* Group value: the development grew out of the listing and subsequent redevelopment of the adjacent Liverpool Street station (Grade II), with which it has a close formal relationship as well as historic resonance.



**Countersigning comments:**

Agreed. We have given this case a great deal of careful consideration being mindful of our previous recommendation to list at Grade II\*, which was not accepted by the Secretary of State, but also the subsequent demolition of Nos. 4 & 6 Broadgate such that the complex is no longer complete. We fully accept that given this loss the remainder of the complex is no longer all of Grade II\* merit. We are, however, firmly of the belief that the complex remains of special architectural interest and as such are not recommending the issue of a COI. Equally we are not able to recommend listing at this time given the 30-year rule tests of 'threat' and 'outstanding quality' are not met in this case. We therefore recommend that a COI is not granted allowing the complex to be re-assessed for designation when it comes of age in 2015.  
V. Fiorato, 31st October 2012

**Further Comments:**

Agreed. This complex case has had much careful thought again, and we have consulted relevant parties thoroughly. Although much changed by the recent demolition, we are convinced that there is still evident significance at this part of Broadgate and that it deserves designation, but now at Grade II (with the exception of the Serra sculpture which would warrant a higher grade). However, due to its relative youth, and since we are assured that it is not under threat of further demolition or removal of statues, listing cannot presently be recommended. We are committed to providing designation clarity and to the COI as a mechanism of certainty. However, we do not think a COI is appropriate here since the buildings will come of age two and a half years from now, after which we would wish to assess again.  
Emily Gee  
2 November 2012

## Annex 1

### Factual Details

**Name:** Broadgate phases 1-4 (excluding No. 3 and site of Nos. 4 and 6 Broadgate)

**Location:** No. 100 Liverpool Street, City of London, Broadgate Circle, stage area and shops, Broadgate, City of London, Broadgate Square with associated paving and landscaping, Broadgate, City of London, 'Leaping Hare on Crescent and Bell' sculpture, Broadgate, City of London, Nos. 1-2 Broadgate, City of London, Nos. 8-12 Broadgate, City of London, Broadgate Circle, stage area and shops, Broadgate, City of London, Nos. 1-2 Broadgate, City of London, Nos. 8-12 Broadgate, City of London, The Octagon, Octagon Arcade and 'Fulcrum' sculpture, Broadgate, City of London, Broadgate Square with associated paving and landscaping, including 'Leaping Hare on Crescent and Bell' sculpture, Broadgate, City of London,

County	District	District Type	Parish
Greater London Authority	City and County of the City of London	London Borough	Non Civil Parish

### History

The Broadgate estate was developed on and around the site of two adjacent railway termini: Broad Street, built in 1865 for the North London Railway, and the larger Liverpool Street, built in 1875 by the Great Eastern. Broad Street had suffered severe damage during WWII and had afterwards fallen into near-disuse. An initial masterplan for the site, drawn up in 1974 by Fitzroy Robinson & Partners on behalf of British Rail, had envisaged the closure and demolition of Broad Street and the complete rebuilding of Liverpool Street; this scheme was effectively blocked by a sustained preservation campaign, which led to the listing of Liverpool Street's western train shed at Grade II in 1975. A revised scheme, retaining the listed train shed and the Great Eastern Hotel, was given permission in 1979 but was not carried out.

Events in the mid-1980s - chiefly the 'Big Bang' that followed the deregulation of the UK financial markets in 1986, and the City of London's ongoing struggle to maintain its status as a world financial hub in competition with its emerging rival in Docklands - generated an intense demand for new office space, especially on fringe sites outside the traditional City heartland. To meet this growing demand, the Broad Street scheme was revived under a partnership between British Rail and Stuart Lipton's property company Rosehaugh Stanhope. A new masterplan, informed by extensive research on pedestrian movements and the needs of office users, was commissioned from Group 2 at Arup Associates, led by partner Peter Foggo - a significant departure for the firm, which had previously been known for its work on public and education buildings and bespoke office schemes rather than speculative developments such as Broadgate. The character of the development, a privately-owned commercial estate incorporating leisure and retail uses within landscaped public spaces - including three new squares - was based on US models and was relatively new to the UK. The buildings themselves, deep-plan, medium-rise 'groundscrapers' with open trading floors arranged around top-lit central atria, were designed to accommodate the new technologies and ways of working highlighted in the influential ORBIT (Office Research: Buildings and Information Technology) study of 1983 by the office design consultants DEGW.

Foggo's team was directly responsible only for phases 1-4 of the development, comprising the western area around Broadgate Square and Finsbury Avenue Square, where No. 1 Finsbury Avenue, a slightly earlier office block also developed by Lipton and Foggo, was absorbed into the complex. Foggo had initially envisaged taking his visual cue from the exposed structural steelwork of the Finsbury Avenue building, but following discussions with the developer and the City planning authorities the facing material was changed to pink granite. The later phases 5-14 were designed by the Chicago practice of Skidmore Owings & Merrill (SOM); included in this part of the scheme was a third public space, Exchange Square, built as an 'air rights' development over the railway tracks at the north-east corner of the site, and extending southwards along Bishopsgate to replace the unlisted eastern train shed at Liverpool Street. The remaining part of the station was restored and extended by British Rail's own architects' department. The new buildings were constructed on a 'shell and core' basis, with the architects responsible only for the exteriors and atrium spaces, leaving the standardised office interiors to be fitted out by the tenants themselves.

The demolition of Broad Street Station began in May 1985, and work on the first phase of the new development (No. 4 Broadgate) was formally inaugurated by Margaret Thatcher in July. The work, overseen by Bovis Construction Ltd, proceeded at unprecedented speed thanks to extensive prefabrication and

US-inspired techniques of 'fast-track' construction and project management. Broadgate Square and Circle were officially opened by the Prince of Wales in December 1987. The entire scheme, including the SOM phases was completed in 1991, an occasion marked by a visit by the Queen. In the same year, the Arup portions of Broadgate won the RIBA President's Choice Award, which was followed in 1992 by the Silver Medal from the Royal Town Planning Institute.

A programme of renewal and remodelling of the public spaces was carried out in 2000, and a major phase of expansion, centred on the 35-storey Broadgate Tower to the north of Exchange Square, took place in 2005-9. In 2011-12 the north side of Broadgate Square, comprising Nos. 4 and 6 Broadgate, was demolished; a new building, No. 5 Broadgate, designed by Make Architects, will occupy the site. One of the ventilation shafts in front of No. 100 Liverpool Street has also been removed as part of the Crossrail scheme.

Peter Foggo (1930-93) was born in Liverpool and studied architecture at Liverpool University. After graduation he worked for Architects' Co-Partnership, and in his spare time designed a number of small private houses in collaboration with his fellow-graduate David Thomas, including Sorrell House near Chichester (1960, Grade II\*). From 1959, Foggo and Thomas worked for the design arm of Ove Arup and Partners, which became Arup Associates in 1963. Foggo established himself as one of Arup's leading architects, eventually becoming a Senior Director of the firm. His multidisciplinary team, 'Group 2', was responsible for a number of prestigious corporate projects including the much-praised Wiggins Teape offices in Basingstoke (1973-6). Influenced by Louis Kahn in America, his work was noted for its careful and precise integration of building services with office and circulation space. At Finsbury Avenue and Broadgate, Foggo worked closely with Stuart Lipton, one of the most successful property developers of the 1980s and the founder of the development company Stanhope, whose other projects have included Stockley Park near Heathrow and Paternoster Square in the City of London. Foggo and many of his design group left Arup in 1989 to establish an independent practice, Peter Foggo Associates, which has specialised in City office buildings; Foggo himself died of a brain tumour in 1993, and was commemorated in a posthumous exhibition held at the RIBA the following year.

### Details

The Broadgate estate is the largest development of its kind in the City of London, covering 32 acres and containing 1.25 million square feet of office space as well as numerous shops, restaurants and bars. The buildings, mainly steel-framed medium-rise blocks with glazed atria, are of varied external character, ranging from the Hi-Tech minimalism of No. 1 Finsbury Avenue to the monumental Beaux Arts manner of SOM's Nos. 135-175 Bishopsgate. The development is unified by consistent landscaping, making extensive use of grey granite setts and slabs, and by a programme of large-scale sculptures situated at key nodal points and in the foyers of the individual buildings. The overall plan features three large pedestrian squares connected by a loose grid of streets and walkways, and combines elements of axial formality in the layout of the principal spaces with a more picturesque and informal handling of the connections between them. Large-scale works of modern art, placed within the public areas and in the glazed atria of the office buildings, were integral to the design.

The area to which this application relates comprises Broadgate Square and the smaller Octagon area to the south. It includes the buildings that enclose these spaces (i.e. Nos. 1-2 and 8-12 Broadgate and No. 100 Liverpool Street), but excludes No. 3 Broadgate and the demolished Nos. 4 and 6 Broadgate, for which a COI was granted in 2011. It also includes the Broadgate Circle, the sculptures 'Fulcrum' and 'Leaping Hare with Crescent and Bell', and the associated paving and landscaping.

Broadgate Square was the centrepiece of the development, and the most consistent in architectural character. The surrounding buildings, all by Foggo and Arup Associates, are steel-framed blocks built to a uniform height of eight storeys, each with an inner skin of glass set back behind a brise-soleil grid of pink granite slabs - rough-textured on the face and with their edges highly polished - hung from bronzed metal fixings.

No. 100 Liverpool Street forms the external focal point. The granite grid here is composed mainly of face-set slabs hung more than a metre in front of the glass skin, forming a deep overhang at ground level with a stepped plinth beneath and three granite-clad ventilation shafts in front. The building has a formal street façade, with a portico-like canopied entrance set centrally beneath a tall oriel window. On either side are two unequal-sized cylindrical towers: the smaller tower to the right is recessed and almost windowless, while the much larger left-hand tower is set forward to mark the entry-point to the estate, with the open stone grid treated as a kind of hanging porticulis.

Beyond is a sunken enclosure known as the Octagon, which contains Richard Serra's sculpture 'Fulcrum', four giant Cor-ten steel slabs leaning together in a teepee-like formation. The space is partly enclosed to the north by the canted end bays of Nos. 1-2 and 8-12 Broadgate, which frame views into the square itself. The paving and steps here were renewed in 2000, replacing the original octagonal formation with the present semicircular one. To the right, a glass screen wall marks the entrance to the Octagon Arcade, a low-level shopping mall that runs behind No. 100 via two top-lit atria to emerge on the lower concourse at Liverpool Street Station; another arm of the mall connects with Sun Street Passage to the north.

Much of the square itself is occupied by an amphitheatre-like structure known as the Broadgate Circle, supposedly inspired by André le Nôtre's Bosquet de la Salle de Bal at Versailles. Three tiers of travertine-clad galleries with plantings and trellises form a three-quarter circle overlooking a sunken central stage, used for corporate events, performances and, in winter, as an ice-skating rink. Surrounding the stage is a low-level parade of shops. Alterations in 2000 included the insertion of retail booths at the open ground-floor level and the extension of the first-floor wine bar to enclose much of the lower gallery. The square is paved in grey-pink granite slabs, with a ring of grey granite setts around the outside of the Circle. In the south-east corner is Barry Flanagan's bronze sculpture 'Leaping Hare on Crescent and Bell': the bell lies on its side with the crescent upright across its mouth and the hare seeming to float overhead.

The buildings surrounding the square are granite-clad up to the fourth floor, with the glazed upper floors recessed behind mansard-like screens of louvred metalwork. The entrances to the various blocks are expressed as double or quadruple-height glazed voids cut into or imposed upon the external grid, with tall foyer spaces visible beyond; those in the corners of the square have projecting glazed hoods. The side and rear faces of the buildings, which also serve to define the other public spaces of the development feature projecting stair-towers with canted sides and vertical bands of glazing. These elevations serve to define parts of the other public spaces of the development: e.g. Nos. 1-2 form the south side of Finsbury Avenue Square, while the long rear face of Nos. 8-12 overlooks Sun Street Passage between Broadgate and the western flank of Liverpool Street Station, an area which also accommodates a bus and taxi interchange. The north side of the square, comprising the original Nos. 4 and 6 with an axial walkway between, has now been demolished to make way for the new No. 5 Broadgate. (No. 3, a small cylindrical building in the walkway between Broadgate Square and Finsbury Avenue Square, was retained; this building already has COI status.)

The interiors of the office buildings are mainly standardised grid-plan office floors, designed to be fitted out to the tenants' specifications, and stripped out and remodelled when the need arose - as has indeed occurred, in some cases more than once. Only the atria were designed to the architects' specifications. These are full-height circulation spaces surrounded by balconies and covered by cupola-like steel and glass roofs. Some, like the eight-storey atrium at No. 1, rise over the entrances and act as foyers, while others sit at the heart of the blocks and serve as circulation spaces and light-wells.

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**PLANNING DECISION NOTICE**

City of London - Michael Blamires  
 Department of the Built Environment  
 P.O. Box 270  
 Guildhall  
 London  
 EC2P 2EJ

Development Management Service  
 Planning and Development Division  
 Environment & Regeneration Department  
 PO Box 3333  
 222 Upper Street  
 LONDON N1 1YA  
**Case Officer:** Victor Grayson  
**T:** 020 7527 6726  
**E:** [planning@islington.gov.uk](mailto:planning@islington.gov.uk)  
**Issue Date:** 05 March 2015  
**Application No:** P2015/0352/OBS  
*(Please quote in all correspondence)*

Dear Sir or Madam

**TOWN AND COUNTRY PLANNING ACTS**

**BOROUGH COUNCIL'S DECISION: Observations to adjoining borough - comments**

Notice is hereby given, in respect to the request for observation(s), of the above stated response of Islington Borough Council, the Local Planning Authority, in pursuance of its powers under the above mentioned Acts and Rules, Orders and Regulations made thereunder. The response relates to the application / development referred to below, at the location indicated.

The observations (if any) of the Borough Council are noted below.

<b>Location:</b>	100 Liverpool Street & 8-12 Broadgate, London EC2M 2RH		
<b>Application Type:</b>	Observations to Adjoining Borough		
<b>Date of Application:</b>	22 January 2015	<b>Application Received:</b>	22 January 2015
<b>Application Valid:</b>	22 January 2015	<b>Application Target:</b>	12 February 2015

**DEVELOPMENT:**

Observations to the City of London for planning application for refurbishment and extension of the existing building including retention of building's structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide commercial office (B1) accommodation and flexible commercial floorspace comprising additional office (B1), retail (A1/A2/A3), and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building (total 68,303sqm GEA).

**OBSERVATIONS:**

The loss of this important building, which forms part of what remains of the 1980s Broadgate development, is regrettable, however the impacts of the development upon Islington would be limited, and therefore no objection is raised on townscape grounds.

Given the sites location, the known need for office accommodation within the City of London and the City Fringe, the vulnerability of office accommodation throughout much of London as a result of recent changes to permitted development legislation and the globally important role of the City



of London as a centre for finance and business, the proposed increase in office floorspace is supported.

The Delivery and Servicing Plan and the Framework Construction Logistics Plan appended to the Transport Assessment do not illustrate vehicular routes to and from the site. The City of London are requested to consult LB Islington on any plans relating to demolition, construction, delivery and servicing which would be submitted in association with any condition to a consent should permission be granted.

Certified that this document contains a true record of a decision of the Council

Yours faithfully



**KAREN SULLIVAN  
SERVICE DIRECTOR - PLANNING AND DEVELOPMENT  
AND PROPER OFFICER**





# City of Westminster

Your ref: MICHAEL BLAMIREs  
My ref: 15/00682/OBS

Please reply to:  
Tel No:  
Email: southplanningteam@westminster.gov.uk

Renee Clarke  
020 7641 2681

Michael Blamires  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	FPD
TPD	23 FEB 2015	LTP
OM		SSE
No	123897	PP 9
FILE		DD

Development Planning  
Westminster City Hall  
64 Victoria Street  
London SW1E 6QP  
9 February 2015

Dear Sir/Madam

### TOWN AND COUNTRY PLANNING ACT 1990

23 FEB 2015

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

#### SCHEDULE

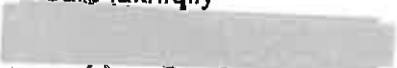
Application No.: 15/00682/OBS      Application Date: 20.01.2015  
 Date Received: 27.01.2015      Date Amended: 27.01.2015

Plan Nos: Letter dated 20 January 2015 from City of London.

Address: 100 Liverpool Street, City Of London, London, EC2M 2RH

Proposal: Refurbishment and extension of existing building including retention of building's structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide commercial office (B1) accommodation and flexible commercial floorspace comprising additional office (B1), retail (A1/A2/A3), and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building. (Total 68,303sq.m GEA) includes 8-12 Broadgate.

Yours faithfully



John Walker  
Operational Director Development Planning

60





Mr Michael Blamires  
 City Of London Corporation  
 Department of the Build Environment  
 Development Management  
 P O Box 270  
 Guildhall, London  
 EC2P 2EJ

Development & Renewal  
 Development Management  
 Town Hall, Mulberry Place  
 5 Clove Crescent  
 London  
 E14 2BG  
[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

PSDD	CP2	PP
OM	24 FEB 2015	ITP
No		SSE
FILE	123922	PP
		ED

**Application Number:** PA/15/00132

**Enquiries to:** Kamlesh Harris  
**Tel:** 0207 3645278  
**Email:** [kamlesh.harris@towerhamlets.gov.uk](mailto:kamlesh.harris@towerhamlets.gov.uk)

18 February, 2015

Dear Mr Michael Blamires,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
 THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT  
 PROCEDURE) (ENGLAND) ORDER 2010**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

<b>Location</b>	100 Liverpool Street & 8-12 Broadgate London EC2M 2RH
<b>Proposal</b>	Refurbishment and extension of existing building including retention of building's structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide commercial office (B1) accommodation and flexible commercial floorspace comprising additional office (B1), retail (A1/A2/A3), and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building. (Total 68,303sq.m GEA). This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the Environmental Statement may be obtained from URS Infrastructure & Environment Uk Ltd, St Georges House, 5 St Georges Road, Wimbledon, London SW19 4DR, CDs are free of charge.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out above into consideration:-



The Council has no objections to this proposal.

However, it is noted that this proposal is accompanied by an Environmental Statement and the Council's EIA officer wishes to raise the following points:

General

- 1) With respect to the list of cumulative developments, confirmation is requested as to why only developments within 500 m have been considered? Also, no cumulative developments within LBTH have been included, and therefore the following should be added: Fruit and Wool Exchange PA/11/2220.
- 2) Reference is made to the implementation of a site waste management plan (SWMP) - it should be noted that the SWMP Regulations have now been repealed and therefore the implementation of a SWMP will need to be ensured through a planning condition.

Socio Economics

- 1) Confirmation is requested whether there will be a temporary loss of the existing land uses during the construction works, as this does not appear to have been assessed?
- 2) With respect to the three options tested, we have the following queries:
  - Whilst it is understood how the maximum figure has been identified for each option, it is unclear how the remaining uses have been split to ensure the WCS – please can additional information be provided?
  - Why has leisure (D1) only been considered for option 3?
  - Why has a maximum retail (A1) option not been assessed?
  - For Option 3, the leisure (D1) use is stipulated as 1,371 (GIA) – should this not be 2,147?
  - It is unclear why an employee density of 6/8 has been allocated for office use (B1) – this is the minimum/below the minimum identified in the HCA guidance, and therefore could be underestimating the number of employees (which would have consequences to other assessments).

Volume 2

- 1) The viewpoints chosen are all relatively short distance – there are no medium/long distance views, apart from the two LVMF views. Importantly for LBTH, there are no views from the west or LBTH.
- 2) The built heritage assessment only considers listed buildings within close proximity to the site (page 9) – it is unclear why buildings from further afield were not considered, given the increase in height and the high number of heritage assets in the area.

I look forward to hearing from you about the above.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



**Owen Whalley, Head of Planning and Building Control**

**Planning and Borough Development**  
Kensington Town Hall, Hornton Street, LONDON, W8 7NX

**Executive Director Planning and Borough Development**  
Jonathan Bore



Mr T Rayment  
City of London  
Department of the Built Environment  
PO Box 270 Guildhall  
LONDON  
EC2P 2EJ

Date: 26/01/2015

My Ref: OB/15/00343

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990**

**100 Liverpool Street and 8-12 Broadgate, LONDON, EC2M 2RH**

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

**SCHEDULE**

**Development:**

This Council is asked for its observations on an application submitted to City of London (14/01285/FULE1A) for refurbishment and extension of existing building including retention of building's structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide commercial office (B1) accommodation and flexible commercial floor space comprising additional office (B1), retail (A1,A2,A3), and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of works ancillary to the main building.

**Site Address:**

100 Liverpool Street and 8-12 Broadgate, LONDON,  
EC2M 2RH

**RBKC Drawing Nos:**

OB/15/00343

**Applicant's Drawing Nos:**

As submitted.

**Application Dated:**

20/01/2015

**Application Completed:**

22/01/2015

**ACKNOWLEDGED**



Yours sincerely,

A black rectangular redaction box covering the signature of Jonathan Bore.

**Jonathan Bore**  
**Executive Director, Planning and Borough Development**

**INFORMATIVE(S)**

The full report is available for public inspection on the Council's website at [www.rbkc.gov.uk/187154](http://www.rbkc.gov.uk/187154) . If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

# Transport for London



Your ref: 14/01285/FULEIA  
Our ref: 15/0214

Michael Blamires

Via email only  
michael.blamires@cityoflondon.gov.uk

10th February 2015

Dear Michael,

## **100 Liverpool Street & 8-12 Broadgate, London EC2M 2RH**

This letter follows the recent submission of the above planning application and follows our pre-application advice letter issued to the applicant's planning consultant on 26<sup>th</sup> November 2014. A copy of this letter can be provided if necessary. The following comments are made by Transport for London officers on a 'without prejudice' basis only and are intended to ensure that this development is successful in transport terms and in line with relevant London Plan policies. These comments also do not necessarily represent the views of the Greater London Authority.

### **Site Location and Development Proposals**

The site is bounded to the south by Liverpool Street, to the west by Eldon Street and Broadgate Circle, to the north by the 5 Broadgate development site, currently under construction, and to the east by Sun Street passage and Liverpool Street bus station, the western part of which is within the red line boundary of the application with bus driver and staff facilities being provided within the 100 Liverpool Street building. 200m further to the east is the A10 Bishopsgate which is part of the Transport for London Road Network (TLRN).

The site is highly accessible by public transport, being immediately adjacent to Liverpool Street station where national rail and underground services on the Central, Metropolitan, Circle and Hammersmith & City lines can be accessed, as well as 17 bus routes. Docklands Light Railway and Waterloo & City line services are within walking distance at Bank station, as are Northern line services and additional national rail services and bus routes at Moorgate station. From 2018, Crossrail services will also stop at Liverpool Street, with an entrance into the Crossrail station being located immediately south of the site on Liverpool Street itself. As such, the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b. There are however no cycle hire docking stations immediately adjacent to the site, the nearest being approximately 250m away to the south.

The application proposes to refurbish and extend the current building, providing additional office, leisure and retail floorspace. As the application retains some flexibility over land use, two scenarios have been assessed – a 'maximum office' scheme and a 'maximum retail' scheme. This approach is

**MAYOR OF LONDON**



VAT number 756 2770 08

Transport for London  
Group Planning

Windsor House  
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welcomed, and it is accepted that a scenario with a greater proportion of D2 use does not need to be assessed.

#### **Access and Bus Station Facilities**

Access for cars and service vehicles remains unchanged under these proposals, with vehicles accessing from the north via Broad Lane. At present, cyclists share this route and it is acknowledged that this results in potential conflicts between cyclists and service vehicles, particularly as the geometry of the service area means that service vehicles have to reverse long distances. As such, it is proposed to relocate cycle parking from the basement to the ground floor, with access into this area from Sun Street Passage. Sun Street Passage is covered by no entry restrictions for all vehicles except local buses and as such the expectation would be that cyclists would dismount and walk the final few metres into the parking area.

However, we do accept that this is inconvenient and some cyclists may not obey these restrictions, which would have safety implications for the operation of the bus station. At the same time, the final design of the part of Liverpool Street to the south of the application site is currently being discussed, and is therefore currently not known. As such, and given that we understand that construction of this development could not start until late in 2016 by which point a design should have been agreed in principle, details of cycle access should be secured by condition as a pre-commencement condition. To allow for as much flexibility as possible in designing this final state, we would strongly encourage the applicant to make passive provision for access into the cycle parking area from the south, adjacent to the building's main entrance. This may require some alteration to the number and size of doors between this building core and the cycle parking area as per the guidance recently released as part of TfL's London Cycle Design Standards, available at:

<https://www.tfl.gov.uk/cdn/static/cms/documents/lcds-chapter8-cycleparking.pdf>

Pedestrian access will be from Liverpool Street and from Broadgate Circle, with no general pedestrian access into the bus station area which is supported. However, at present three fire escapes from the building that lead directly into the bus station are shown on the submitted plans, although we are not aware of these being used in the past. Although it is acknowledged that some effort has been made to reduce this to two, with one fire escape relocated to exit to the north, TfL strongly feel that continued provision of emergency exits into a bus station is inappropriate particularly given that there is no public access into its western side. The applicant has not demonstrated that all reasonable alternative building layouts have been explored to enable these fire escapes to be relocated. To inform this process, we would also expect an indication of the number of people expected to use each exit and the amount of space needed for their safe congregation. Assuming that process is exhausted, we would in any event expect a

management strategy for evacuation of the building to be provided to ensure that conflicts between pedestrians and buses and impacts on bus services in the area are minimised.

It is proposed to relocate the bus driver toilets a short distance to the north-west within this development. This would have the benefit of making them more private (with doors not opening towards waiting passengers in the adjacent bus station) as well as allowing for a wider footway to be provided in their current location. On the basis that they are no smaller than the existing facilities, this is therefore welcomed but a pre-commencement condition must be secured on any consent requiring a detailed design to be agreed with TfL. The proposed location for the relocated bus station offices slightly to the south-west of the existing offices also seems appropriate. We had however requested that the applicant investigated incorporating a toilet for bus station staff into the office to avoid them needing to share with bus drivers and although this is acknowledged in the Design and Access Statement, it is not clear whether or not this is possible as this is not shown on drawings. Similarly, a condition requiring detailed design of this office space is required on any consent.

#### **Car and Cycle Parking**

Car parking is proposed to reduce from 33 spaces provided at present to two blue badge spaces. Subject to confirmation from the City of London's and the GLA's access officers that this level of provision is sufficient, TfL welcome this.

It is also proposed to provide additional cycle parking in accordance with the standards set out in the Further Alterations to the London Plan (FALP), access to which is discussed in more detail above. This results in a requirement for up to 695 spaces depending on the final land use, and it is proposed to provide around 600 spaces as Josta cycle stackers with a further 113 secure lockers for folding bikes at a provision of ten lockers for each seven more traditional cycle parking spaces required. This mixture of cycle parking types seems reasonable given data collected by TfL on the use of folding bikes in central London and provision above the FALP standards is welcomed, as is the installation of lockers, showers and drying areas linked to the number of cycle parking spaces. However, we would want to avoid setting a precedent on cycle parking type for future applications without having better data to base any such decisions on. As such, we would request that the use of lockers versus more traditional cycle parking is monitored specifically through the Travel Plan and that this data is subsequently shared with TfL to help inform future cycle parking guidance. Any section 106 obligation to secure the Travel Plan should reference this requirement specifically.

#### **Walking and Public Realm**

Upon line opening, an entrance to Liverpool Street Crossrail station will be located immediately to the south of the proposed development on Liverpool Street. The applicant is in discussions with Crossrail, their consultants Burns



and Nice and the City in relation to the final design of the public realm in this location and I understand that there are also ongoing discussions between TfL and the City over the final designs. Although the design for Liverpool Street is yet to be finalised, it would be useful to quantify the amount of footway space that is required to accommodate station flows, background demand and demand associated with this development to help inform any designs that may be produced.

The proposals to remove the steps outside the existing building wherever possible in order to maximise available footway space are nonetheless welcomed, although it is acknowledged that some will need to remain due to issues with levels.

#### **Trip Generation and Impact Assessment**

Trip generation has been carried out based on a first principles approach, following the same methodology as that adopted for the neighbouring 5 Broadgate site. Although the resultant trip generation has not been checked against the results from more traditional methods as requested at the pre-application stage, the resultant trip generation does appear reasonable. Although the development will generate a number of trips across the various public transport modes, TfL does not consider that any specific public transport mitigation will be required, beyond the Crossrail contribution referred to below.

#### **Travel Plan**

A framework Travel Plan has been submitted with the application and is of a good quality. This Travel Plan should be secured through the Section 106 agreement for the site.

Similarly, a Delivery and Servicing Plan has been submitted and is of a good quality. However, this should be secured by condition so that a more detailed plan can be approved once the mix of uses and occupiers are known. The commitment to targets and monitoring of the plan is welcomed.

#### **Construction**

A framework Construction Logistics Plan has been submitted as part of the application and sets out the principles of the construction methodology. Whilst this is welcomed and contains a number of measures that are seen as being positive, it is relatively generic at this stage. As such, a condition requiring a detailed CLP to be submitted and agreed by the City, Crossrail and TfL prior to any works on site should be submitted. It is also noted that the CLP does not appear to propose any construction access via the bus station. If this is the case, and construction can be managed from outside this area, this is welcomed.

The applicant is also in discussions with London Underground over impact on LU infrastructure during construction. Whilst this is welcomed we do ask that a condition is included on any planning permission granted stipulating that:

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- accommodate the location of the existing London Underground structures and tunnels
- accommodate ground movement arising from the construction thereof
- and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

**Reason:** To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2011 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

#### **Section 106 and Community Infrastructure Levy**

The City of London adopted its Community Infrastructure Levy (CIL) charging schedule in July 2014. A full charging schedule is available from the council, but both office and retail uses are charged at £75 per square metre. The Regulation 123 list identifies that this levy can be spent on 'transport improvements'.

In addition, in accordance with London Plan policy 8.3 the Mayor commenced CIL charging for developments on 1st April 2012. Within the City of London, the charge is £50 per square metre. The site is also in the area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (April 2013). In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and this should be reflected in the wording of the section 106 agreement. The charge under the SPG that should be secured through the section 106 is the maximum £2,425,270, calculated as follows:

Land Use	Existing (sqm)	Proposed (sqm)	Net change (sqm)	Crossrail charge per sqm	Crossrail charge
Office	48,240	64,484	16,244	£140	£2,274,160
Retail	526	2,205	1,679	£90	£151,110
Hotel	0	0	0	£61	£0
<b>Total Crossrail charge payable on commencement to TfL</b>					<b>£2,425,270</b>

TfL can however provide some suggested wording for inclusion into the section 106 agreement given the flexible nature of some of the floorspace proposed if this is useful.

I hope the above is useful and please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.

Yours sincerely

Mark Day  
**Principal Planner, TfL Borough Panning**  
 Email: mark.day@tfl.gov.uk  
 Phone: 020 3054 7025

Copy to:  
 Patricia Charleton – TfL  
 Hermine Sanson – GLA  
 Craig Stansfield – City of London  
 Vaughan Sutton, Charlotte Spetch – Arup

-----Original Message-----

From: [BCTAdmin@thameswater.co.uk](mailto:BCTAdmin@thameswater.co.uk) [<mailto:BCTAdmin@thameswater.co.uk>]  
Sent: 02 February 2015 11:14  
To: PlanningQueue  
Subject: 3rd Party Planning Application - 14/01285/FULEIA

Corporation of London  
DTS Ref: 42862  
Department of Planning & Transportation  
Ref: 14/01285/FULEIA  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Our  
Your

2 February 2015

Dear Sir/Madam

Re: 100 LIVERPOOL ST & 8-12, BROADGATE, LONDON, EC2M 2RH

#### Waste Comments

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.

Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality). Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

#### Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

#### Supplementary Comments

Comment on Environmental Statement Volume 1 Part 1 Paragraph 4.100: The Thames Tideway Tunnel does not provide additional capacity to accommodate for future development. It provides protection to the environment from existing discharges from the combined sewer system.

Yours faithfully  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,  
Rickmansworth,  
WD3 9SQ  
Tel: 020 3577 9998  
Email: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)

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We provide the essential service that's at the heart of daily life.

14/01285

**Ball, Matthew**

**From:** PLN - Comments  
**Subject:** FW: 14/01285/FULEIA 100 Liverpool Street, & 8-12 Broadgate, London, EC2M 2RH

**From:** Will Orlik [mailto:WillOrlik@crossrail.co.uk] **On Behalf Of** Safeguarding  
**Sent:** 30 January 2015 10:52  
**To:** PLN - Comments  
**Cc:** [REDACTED]  
**Subject:** 14/01285/FULEIA 100 Liverpool Street, & 8-12 Broadgate, London, EC2M 2RH

Crossrail Ref: CRL-00-132483

**ACKNOWLEDGED**

30 JAN 2015

Dear Michael Blamires,

**14/01285/FULEIA 100 Liverpool Street, & 8-12 Broadgate, London, EC2M 2RH**  
*Refurbishment and extension of existing building including retention of building's structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide commercial office (B1) accommodation and flexible commercial floorspace comprising additional office (B1), retail (A1/A2/A3), and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building. (Total 68,303sq.m GEA). This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the Environmental Statement may be obtained from URS Infrastructure & Environment Uk Ltd, St Georges House, 5 St Georges Road, Wimbledon, London SW19 4DR, CDs are free of charge. | 100 Liverpool Street & 8-12 Broadgate London EC2M 2RH*

Thank you for your letter dated 20 January 2015 and the accompanying planning application documents relating to the above site, requesting the views of Crossrail Limited on the above application.

Crossrail is a proposed new railway that will link Heathrow and Maidenhead in the west to Shenfield and Abbey Wood in the east using existing Network Rail tracks and new tunnels under Central London.

The Crossrail Bill which was introduced into Parliament by the Secretary of State for Transport in February 2005 was enacted as the Crossrail Act on the 22nd July 2008. The first stage of Crossrail preparatory construction works began in early 2009. Main construction works have started with works to the central tunnel section to finish in 2018, to be followed by a phased opening of services.

Crossrail Limited administers a Direction issued by the Department for Transport on 24th January 2008 for the safeguarding of the proposed alignment of Crossrail.

The site of this planning application is identified within the limits of land subject to consultation under the Safeguarding Direction.

The implications of the Crossrail proposals for the application have been considered and the detailed design of the proposed development needs to take account of the construction of Crossrail.

Therefore if, as the Local Planning Authority, you are minded to grant planning permission for the development, Crossrail Limited are of the view that **the following condition[s] should be applied:**

**Crossrail condition – concurrent working**

- C2 None of the development hereby permitted shall be commenced until a method statement has been submitted to, and approved in writing, by the Local Planning Authority to include arrangements to secure that, during any period when concurrent construction is taking place of both the permitted

development and of the Crossrail structures and tunnels in or adjacent to the site of the approved development, the construction of the Crossrail structures and tunnels is not impeded.

.....  
The implications of the Crossrail proposals for the application have been considered and the proposed development needs to take account of the construction of Crossrail and of the following **INFORMATIVE:**

Crossrail is very likely to have monitoring equipment both on the inside of the building and on its external facades. The equipment is installed under the Crossrail Act 2008 and records ground movements (measured automatically or manually) and is essential for the control of ground settlement impact on buildings during Crossrail's works. Prior to commencement of works on the premises please contact the **Crossrail Helpdesk** ([helpdesk@crossrail.co.uk](mailto:helpdesk@crossrail.co.uk) - Tel: **0345 602 3813**) as soon as possible to obtain details of any monitoring equipment installed in order to ensure that your works do not interfere with Crossrail's monitoring equipment.

.....

You may inspect and/or purchase copies of Plans, Sections, Environmental Statements, Explanatory Notes and Non-Technical Summaries pertaining to the Crossrail proposals at specified Libraries, Local Authority Offices or directly from Crossrail Limited at "28<sup>th</sup> Floor, 25 Canada Square, Canary Wharf, London E14 LQ".

**In order for us to keep track of the progress of the application it would be most helpful if you could please forward the decision notice when available.**

In addition, the latest project developments can be found on the Crossrail website [www.crossrail.co.uk/safeguarding](http://www.crossrail.co.uk/safeguarding) , which is updated on a regular basis.

I hope this information is helpful, but if you require any further assistance then please feel free to contact a member of the Safeguarding Team on 0345 602 3813, or by email to [safeguarding@crossrail.co.uk](mailto:safeguarding@crossrail.co.uk)

Yours sincerely,

**Will Orlik | Safeguarding Coordinator**  
Crossrail Limited | 25 Canada Square | London | E14 5LQ  
Tel: 020 3229 9100 | Helpdesk (24hr) 0345 602 3813

Desk Location CS28/Y1/22  
T 020 3229 9207  
[willorlik@crossrail.co.uk](mailto:willorlik@crossrail.co.uk)  
[www.crossrail.co.uk](http://www.crossrail.co.uk)

**MOVING LONDON FORWARD**

**Ball, Matthew**

---

**From:** PLN - Comments  
**Subject:** FW: Network Rail consultation - 14/01285/FULEIA

**From:** Toolan Adrian [mailto:Adrian.Toolan@networkrail.co.uk]  
**Sent:** 20 February 2015 11:14  
**To:** PLN - Comments  
**Subject:** Network Rail consultation - 14/01285/FULEIA

**ACKNOWLEDGED**

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 14/01285/FULEIA. Please see related comments below;

The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

I give below my comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land.

#### **Future maintenance**

The development must ensure that any future maintenance can be conducted solely on the applicant's land. The applicant must ensure that any construction and any subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land and air-space, and therefore all/any building should be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary. The reason for the 2m (3m for overhead lines and third rail) stand off requirement is to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to facilitate works. The applicant / resident would need to receive approval for such works from the Network Rail Asset Protection Engineer, the applicant / resident would need to submit the request at least 20 weeks before any works were due to commence on site and they would be liable for all costs (e.g. all possession costs, all site safety costs, all asset protection presence costs). However, Network Rail is not required to grant permission for any third party access to its land. No structure/building should be built hard-against Network Rail's boundary as in this case there is an even higher probability of access to Network Rail land being required to undertake any construction / maintenance works. Equally any structure/building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams' ability to maintain our boundary fencing and boundary treatments.

#### **Drainage**

No Storm/surface water or effluent should be discharged from the site or operations on the site into Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other



works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed near/within 10 – 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

#### **Plant & Materials**

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

#### **Scaffolding**

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

#### **Piling**

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

#### **Fencing**

In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

#### **Lighting**

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

#### **Noise and Vibration**

The potential for any noise/ vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which holds relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.

#### **Landscaping**

Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details of the landscaping to be known and approved to ensure it

does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. Lists of trees that are permitted and those that are not permitted are provided below and these should be added to any tree planting conditions:

**Permitted:** Birch (Betula), Crab Apple (Malus Sylvestris), Field Maple (Acer Campestre), Bird Cherry (Prunus Padus), Wild Pear (Pyrus Communis), Fir Trees – Pines (Pinus), Hawthorne (Cretaegus), Mountain Ash – Whitebeams (Sorbus), False Acacia (Robinia), Willow Shrubs (Shrubby Salix), Thuja Plicatata "Zebrina"

**Not Permitted:** Alder (Alnus Glutinosa), Aspen – Poplar (Populus), Beech (Fagus Sylvatica), Wild Cherry (Prunus Avium), Hornbeam (Carpinus Betulus), Small-leaved Lime (Tilia Cordata), Oak (Quercus), Willows (Salix Willow), Sycamore – Norway Maple (Acer), Horse Chestnut (Aesculus Hippocastanum), Sweet Chestnut (Castanea Sativa), London Plane (Platanus Hispanica).

**Vehicle Incursion**

Where a proposal calls for hard standing area / parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

As the site is adjacent to Network Rail's operational railway infrastructure, Network Rail strongly recommends the developer contacts [AssetProtectionAnglia@networkrail.co.uk](mailto:AssetProtectionAnglia@networkrail.co.uk) prior to any works commencing on site. Network Rail strongly recommends the developer agrees an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website at [www.networkrail.co.uk/asp/1538.aspx](http://www.networkrail.co.uk/asp/1538.aspx).

Kind regards,

Adrian Toolan

\*\*\*\*\*  
\*\*\*\*\*

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

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\*\*\*\*\*



14 / 01 285

ENGLISH HERITAGE

LONDON OFFICE

Mr Michael Blamires  
Corporation of London  
Department of Planning & Transportation  
PO Box 270  
Guildhall  
LONDON  
EC2P 2EJ

Direct Dial: 020 7973 3775  
Direct Fax: 020 7973 3792

Our ref: W: P00444881

3 February 2015

Dear Mr Blamires

**Notifications under Circular 01/2001, Circular 08/2009 &  
T&CP (Development Management Procedure) Order 2010  
100 LIVERPOOL STREET & 8-12 BROADGATE LONDON EC2M 2RH  
Application No 14/01285/FULEIA**

Thank you for your letter of 20 January 2015 notifying English Heritage of the application for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

### **Recommendation**

**This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.**

It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

In returning the application to you without comment, English Heritage stresses that it is not expressing any views on the merits of the proposals which are the subject of the application.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001  
[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

*English Heritage is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*





ENGLISH HERITAGE

LONDON OFFICE

Yours sincerely



**Tom Nancollas**

Business Officer

E-mail: [thomas.nancollas@english-heritage.org.uk](mailto:thomas.nancollas@english-heritage.org.uk)



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the FOIA or EIR applies.*

Date: 26 January 2015  
 Our ref: 142927  
 Your ref: 14/01285/FULEIA



Mr M Blamires  
 Department of Planning & Transportation  
 City of London  
 PO Box 270  
 Guildhall  
 London  
 EC2P 2EJ

Sustainable Development  
 Hornbeam House  
 Crewe Business Park  
 Electra Way  
 Crewe  
 Cheshire  
 CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Blamires,

**ACKNOWLEDGED**

**Planning consultation:** Refurbishment and extension of existing building including retention of building's structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide commercial office (B1) accommodation and flexible commercial floorspace comprising additional office (B1), retail (A1/A2/A3), and leisure (D2) uses at lower ground, ground and first floor levels and flexible office (B1)/restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building. (Total 68,303sq.m GEA). This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the Environmental Statement may be obtained from URS Infrastructure & Environment Uk Ltd, St Georges House, 5 St Georges Road, Wimbledon, London SW19 4DR, CDs are free of charge.

**Location:** 100 Liverpool Street & 8-12 Broadgate London EC2M 2RH.

Thank you for your consultation on the above dated 20 January 2015 which was received by Natural England on 20 January 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**The Wildlife and Countryside Act 1981 (as amended)**

**The Conservation of Habitats and Species Regulations 2010 (as amended)**

The lack of specific comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated sites, landscapes. It is for the local authority to determine whether or not this application is consistent with national or local policies on biodiversity and landscape and other bodies and individuals may be able to help the Local Planning Authority (LPA) to fully take account of the environmental value of this site in the decision making process, LPAs should seek the views of their own ecologists when determining the environmental impacts of this development.

We would, in any event, expect the LPA to assess and consider the possible impacts resulting from this proposal on the following issues when determining this application:

**Local sites**

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.



### **Impact Risk Zones for Sites of Special Scientific Interest**

Natural England has recently published a set of mapped Impact Risk Zones (IRZs) for Sites of Special Scientific Interest (SSSIs). This helpful GIS tool can be used by LPAs and developers to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. Further information and guidance on how to access and use the IRZs is available on the [Natural England website](#).

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours sincerely

James Hughes  
Sustainable Development Consultation Team



**Blamires, Michael**

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**From:** Daniel Barker <Daniel.Barker@communities.gsi.gov.uk>  
**Sent:** 19 January 2015 14:37  
**To:** Blamires, Michael  
**Subject:** 100 Liverpool St and 8-12 Broadgate - MRB/14/01285/FULEIA

We acknowledge receipt of your letter and box containing the above Environmental Statement.  
We have no further comments to make on this application.  
For future reference, please note that we are content to only receive discs or e-mails with enclosed necessary documents, and hard copies are unnecessary.

Thanks,

Daniel Barker  
Planning Casework Support Officer  
National Planning Casework Unit

5 St Philips Place  
Birmingham  
B3 2PW  
Tel: 0303 44 48063  
E-mail: [daniel.barker@communities.gsi.gov.uk](mailto:daniel.barker@communities.gsi.gov.uk)

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14/01285

DP3351/PEH/TJWH

1<sup>st</sup> April 2015

DP9

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**F.A.O Michael Blamires**

Dear Michael,

02 APR 2015

**TWENTIETH CENTURY SOCIETY OBJECTION**

**100 LIVERPOOL STREET AND 8-12 BROADGATE, EC2**

Thank you for providing us with the comments of the Twentieth Century Society in respect of the above planning application.

As you will be aware, both 100 Liverpool Street and 8-12 Broadgate are the subject of a Certificate of Immunity which was granted in January 2013. The effect of the certificate is to preclude the Secretary of State from listing the buildings for a period of five years.

The proposals have been designed to be a high quality and sustainable development, which makes optimum use of a site in a highly accessible location adjacent to Liverpool Street Station. The delivery of new, modern commercial floorspace which will result from the development represents a further significant investment in the City of London and London as a World City.

Should you have any queries or require any further information, please do not hesitate to contact either Paul Henry or Tim Holtham of this office.

Yours sincerely,

**DP9 Limited**

Encs.

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