

Committee:	Date:
Planning and Transportation	2 May 2017
Subject: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035sq.m. GIA), restaurant use (Class A3) at part basement and part ground floor (1,090sq.m. GIA) and associated plant areas (2,245sq.m.) (Total Floorspace 7,660sq.m. GIA).	Public
Ward: Farringdon Within	For Decision
Registered No: 14/00300/FULMAJ	Registered on: 27 May 2014
Conservation Area: St Paul's Cathedral	Listed Building: No

Summary

Planning permission is sought for the redevelopment of the site behind the retained facade of 3 - 5 Ludgate Hill to provide a part five, part seven storey building with three basement levels for use as a 132 bedroom hotel (Class C1) with Class A3 retail at part lower ground floors and part ground floor, with associated plant at basement and sixth floor level (total floor space 7,660sq.m GIA).

50 objections have been received across three public consultations from 28 residents and their representatives regarding the proposed development. The objections relate to the loss of office accommodation and local retail uses, the proposed hotel use, the impact on the St. Paul's Cathedral Conservation Area, the capacity of the surrounding streets for the vehicles and pedestrians associated with the development and the potential impact of the development on residential amenity including loss of daylight and sunlight, loss of privacy from overlooking, impact on air quality and increased noise from construction works, the operation of the hotel and its associated plant. The objections are summarised in a table in the body of the report with responses provided in respect of the various issues raised.

The proposed development would result in the loss of 3,381sq.m (GIA) of office floorspace. Office viability information has been provided in support of the application, which demonstrates that continued office use would not be a viable option on this site. This information has been independently verified by consultants on behalf of the City Corporation.

The principle of hotel use on this site is in accordance with Local Plan policies. The proposed servicing arrangements are considered to be acceptable. There is considered to be sufficient capacity in the surrounding streets for the vehicles and pedestrians associated with the development. Retail floorspace would be re-provided in the development to complement the retail offer on Ludgate Hill.

The height, bulk, massing and design of the proposed building would preserve the character and appearance of the St. Paul's Cathedral Conservation Area, through the retention of the facade to Ludgate Hill, suitably varied architectural treatments along the perimeter of the site and carefully designed setbacks at the upper levels of the building.

The building has been designed to sufficiently minimise the potential impact on the amenities of nearby residential occupiers in relation to privacy, overlooking, noise, daylight and sunlight.

The applicant's daylight and sunlight assessment, which has been independently reviewed by Delva Patman Redler on behalf of the City Corporation, demonstrates that the majority of windows and rooms in neighbouring properties would not experience noticeable reductions in daylight and sunlight. Whilst there would be some impacts on daylight and sunlight as a result of the development the majority would be minor in nature and are considered to be acceptable given the densely developed urban nature of the site.

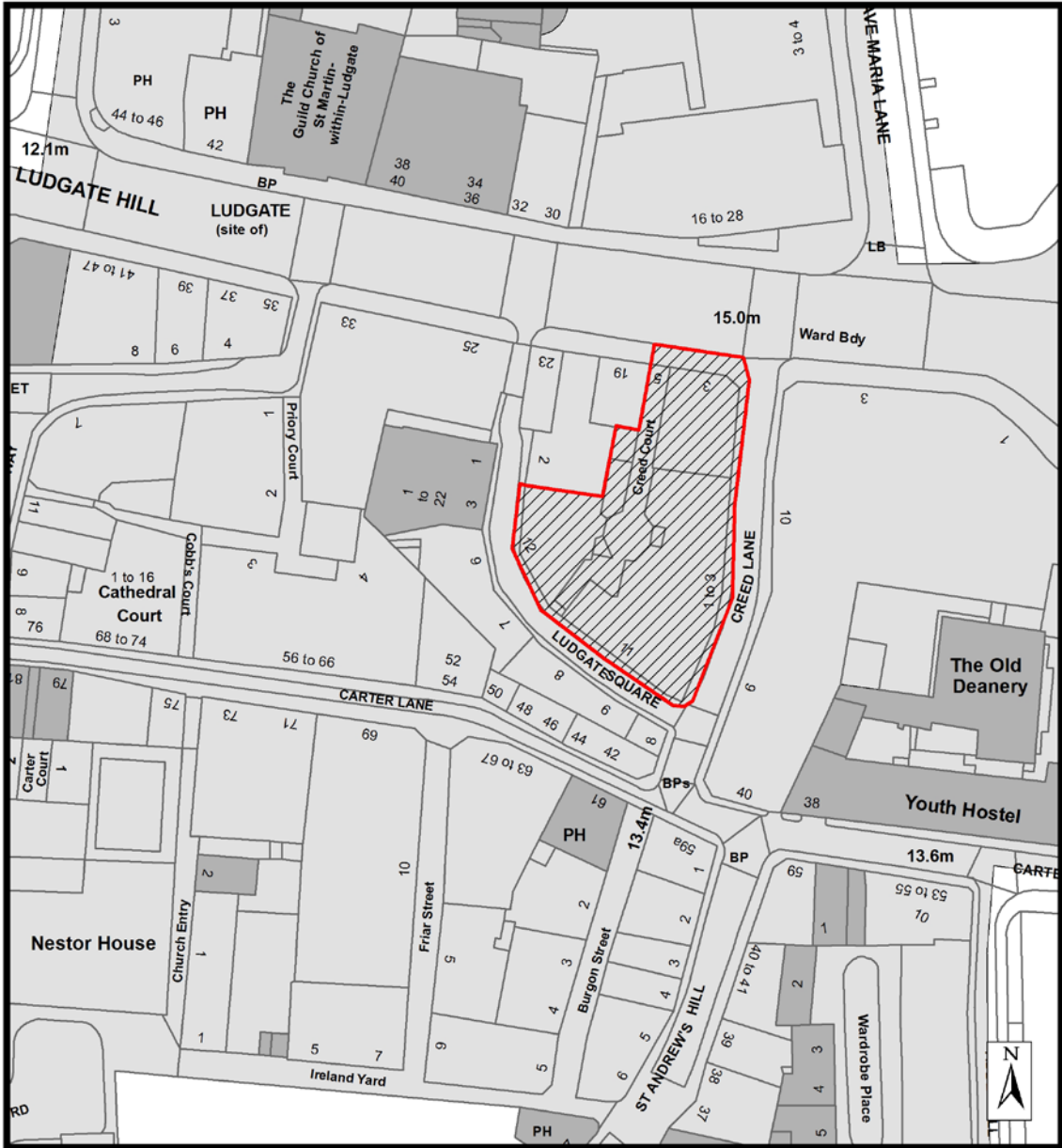
The proposed development is considered to comply with the Development Plan as a whole and to be appropriate subject to conditions, CIL payments and a Section 106 agreement being entered into to cover matters set out in this report.

Recommendation

Planning permission be granted for the above proposal in accordance with details set out in the attached schedule, subject to:

- (i) Planning obligations being entered into as set out in the body of this report, the decision not being issued until such obligations have been executed:
- (ii) That your officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town & Country Planning Act 1990.


Site Location Plan



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ADDRESS:
Bernard Morgan House

CASE No.
14/00300/FULMAJ

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



DEPARTMENT OF THE BUILT ENVIRONMENT



Main Report

Application Site and Existing Buildings

1. The site is located on the south side of Ludgate Hill and occupies the majority of the street block bounded by Ludgate Hill to the north, Creed Lane to the east and Ludgate Square to the west.
2. The buildings subject to the planning application comprise the Creed Court development of connected buildings constructed between 1986 and 1990. The buildings have frontages at 3 – 5 Ludgate Hill, 1 – 3 Creed Lane and 11 – 12 Ludgate Square, and additional entrances onto Creed Court, an open court partially covered by a glazed walkway. Creed Court is accessed at its northern end via a passageway beneath 3 – 5 Ludgate Hill, and at the southern end through a gated entrance beneath the buildings into Ludgate Square.
3. The existing buildings generally comprise five storeys with four separate office suites of mixed sizes over five ground floor retail units. The office suites are accessed via their own dedicated core from entrances on the street frontages and from lobbies entered from Creed Court. The office suites are currently vacant.
4. 3 – 5 Ludgate Hill was reconstructed behind its 1885 painted stucco facade which also returns for the length of one bay into Creed Lane. The remainder of the street frontages around the site are a varied mix of red or yellow stock brick facades, each a pastiche of the 19th Century commercial buildings formerly on the site, and 1 – 3 Creed Lane which is a building clearly of its time but which itself incorporates architectural references to the 19th Century buildings that it replaced. The buildings form part of the St Paul's Cathedral Conservation Area. The Ludgate Hill frontage forms part of the processional route that's runs from The Strand along Fleet Street, Ludgate Hill to St. Paul's Cathedral and beyond.
5. To the north of the site is 16 – 28 Ludgate Hill, a seven-storey office building with retail at ground floor level. To the east of the site is 1 – 3 St. Paul's Churchyard, a seven-storey office building with retail at ground floor level and 9 and 10 Creed Lane, which contain the Grange Hotel serviced apartments across four and five storeys of accommodation.
6. Immediately to the west of the site, on the opposite side of Creed Court, is Lambert House, a five-storey residential conversion with an additional penthouse floor and retail at ground floor to the Ludgate Hill frontage. To the south and west, 1 – 9 Ludgate Square are residential conversions of three and four storeys with commercial units occupying the ground floors of 6 – 9 Ludgate Square.

Relevant Planning History

7. Consent was granted in August 1985 for demolition in a conservation area for "*Demolition of existing facades to 11 Ludgate Hill, 1, 2, 3, 4, 5, 6 & 7 Creed Lane and 4, 5, 10, 11, 12 & 13 Ludgate Square, together*

with demolition of related buildings complete. Demolition of buildings behind retained and restored facades to 13, 15 and 17 Ludgate Hill.”

8. *At the same time planning permission was granted for “Restoration of facades to 13, 15, 17 & 17A Ludgate Hill. Erection of new facades to 11 Ludgate Hill, 1,2,3,4,5,6 & 7 Creed Lane and 4,5,10,11 & 12 Ludgate Square. Erection of new office accommodation behind the above facades at 1st., 2nd., 3rd & 4th. flr. levels & storage space at basement level. Erection of shops and small units (restaurant/wine bar) ground & basement levels with storage and ancillary space, plus plant at roof and basement levels.”*
9. The above consent and permission relate the existing buildings that are on the application site.
10. There have been several other planning applications for the site but the majority are minor applications for shopfront changes, new plant, satellite dishes, advertisements etc. and are not considered to be relevant to this application.

Proposal

11. Planning permission is sought for:
 - The demolition of the existing buildings behind the retained facade of 3 – 5 Ludgate Hill;
 - The erection of a part five, part seven storey building with three lower ground / basement levels for use as a 132 bedroom hotel use (Class C1) at part basement, part ground and first to sixth floors (132 bedrooms) (3,035sq.m. GIA); with
 - Restaurant use (Class A3) at part lower ground floors and part ground floor (1,090sq.m. GIA);
 - A Class A3 retail unit to Ludgate Hill (75sq.m GIA); and
 - Associated plant areas at lower basement and sixth floor level (2,245sq.m.) (Total Floorspace 7,660sq.m. GIA)
12. The proposed development would have a ground floor entrance at the corner of Ludgate Hill and Creed Lane with further entrances to the corner of Ludgate Square and Creed Lane and a secondary entrance / exit to the proposed restaurant at the eastern end of Ludgate Square. The retail unit (Class A3) to Ludgate Hill would have an independent entrance.
13. A combined restaurant (Class A3) and hotel reception area would occupy the ground floor, with hotel rooms to the upper six levels. Two lower ground floors would be used for restaurant, hotel spa and back of house facilities and the third basement level for plant. The central core would extend up through the building with its top level incorporated into a plant area at roof top level. The remaining areas of roof would be either greened or would provide space for two arrays of photovoltaic panels.

14. Creed Court itself, the pedestrian access into the interior of the street block, is not retained in the proposals. Instead, a central lightwell would provide daylight to a limited number of hotel rooms through translucent windows to the interior of the site. The lightwell would also continue to provide daylight and sunlight to the residential properties within Lambert House, located immediately to the west of the site.

Consultations

15. The application has been advertised on site and in the local press. The residential premises of Lambert House, The Gallery 38 Ludgate Hill, 1 Church Entry, Priory House, 3 St. Andrew's Hill, 36 St. Andrew's Hill, St. Andrew's House, Kings Wardrobe Apartments, The Old Deanery, 1 Wardrobe Place, 3 Ludgate Square, 8 – 9 Ludgate Square, Cathedral Court, 46 – 48 Carter Lane, 50B Carter Lane and 77 Carter Lane have been individually consulted.
16. The applicant has carried out their own public consultation exercise following the submission of the application. Letters were sent to, and meetings have been held with, the residents of Lambert House to discuss the impact of the proposals on their amenity.
17. The views of other City of London departments have been taken into account. Some detailed matters remain to be dealt with by conditions and a Section 106 agreement.
18. Transport for London have not objected to the proposals but have requested that the level of cycle parking provision complies with London Plan Standards and that a Delivery and Service Plan and Construction and Logistics Plan are secured. They have advised that an appropriate taxi rank arrangement be devised for taxis in line with Transport for London's Rank Action Plan (2015).
19. City of London Conservation Area Advisory Committee raised no objection to the proposals.
20. A number of changes have been made to proposals in response to residents' concerns and officer request, which has led to two further consultations; one in 2015, the other in 2016. The changes that have been consulted on sequentially as part of the application are:
 - i. Design amendments to the internal courtyard including the introduction of opaque glazing to all courtyard windows to prevent overlooking, restricted access to the courtyard for maintenance purposes only and the use of white glazed bricks to increase daylight reflectivity within the courtyard;
 - ii. An enlargement of the proposed courtyard area to increase the level of daylight and sunlight to the residential properties in Lambert House above that which was originally proposed. The enlargement resulted in the reduction of hotel rooms proposed from 140 to 132, the movement of the main hotel core southwards within the development and the relocation of the proposed roof top plant area eastwards towards Ludgate Square.

21. A total number of 50 objections have been received across the three consultations periods (22 in 2014; 17 in 2015; 11 in 2016) from 28 residents and / or their representatives. The objections and responses are summarised in the table below:

Representation	No. of comments on this point	Response
The increased massing and height proposed would result in a loss in the daylight and sunlight received by nearby residential properties.	20	The impact on daylight and sunlight to surrounding residential properties is considered acceptable and in accordance with Local Plan policy. This is discussed in more detail in this report.
The proposed roof terrace would have a detrimental impact on residential amenity through increased noise and greater overlooking.	13	The roof terrace has been removed. The roof would only be accessible for maintenance purposes and in emergency. A condition is included to ensure this.
The proposed courtyard would have a detrimental impact on residential amenity through increased noise, overlooking and light spillage.	10	The proposed courtyard would only be accessible for maintenance purposes and in emergency. All proposed windows to the courtyard would be fixed and opaque. Conditions are included to ensure that these matters are secured and maintained.
The sixth-floor hotel rooms facing west onto Ludgate Hill would directly overlook the terraces of Flat 22, 3 Ludgate Square.	1	The windows of the proposed sixth floor facing west onto Ludgate Square would be blind windows that would serve the proposed plant room, which would not result in overlooking of the residential amenity terrace.
The proposed entrances / exits on Ludgate Square would cause considerable noise that would channel up the narrow street.	1	The proposed restaurant doors at ground floor level to Ludgate Square are emergency exits only. A condition is included to ensure this arrangement is maintained. There is a secondary entrance to the restaurant, which serves an entrance lobby to stairs, which is further towards Creed Lane.
The surrounding streets	17	The increase in vehicle traffic would

<p>of Creed Lane and Ludgate Square are not suitable for the increased vehicles or higher volumes of traffic that would result from the development.</p>		<p>be mostly as a result of taxis, with a small increase in servicing trips, which would be to Ludgate Hill and Creed Lane where the entrances and service entrance are located. It is considered that there is sufficient capacity in these areas. Servicing would be restricted outside peak times to avoid the majority of pedestrian movements in these areas.</p>
<p>The servicing requirements for the hotel would create noise during unsociable hours.</p>	<p>2</p>	<p>The servicing hours would be restricted by condition to ensure that there would be no servicing between 23:00 and 07:00.</p>
<p>The hotel use would create more pedestrian and vehicular activity, most notably at evenings and weekends when existing residents would expect a quieter time.</p>	<p>4</p>	<p>The proposed hotel would spread vehicle and pedestrian activity across weekdays and weekends thus partially alleviating congestion at peak times. The majority of activity would be away from the relatively quiet Ludgate Square where the majority of residential properties are located.</p>
<p>The development would result in the loss of office accommodation, which has not been sufficiently justified.</p>	<p>6</p>	<p>The viability information submitted at the various stages of the application has suggested that continued office use would not be viable on this site. An independent assessment of the latest viability appraisal has confirmed that continued office use would not be viable. The loss of office accommodation is therefore considered to be acceptable in principle in accordance with Local Plan policies.</p>
<p>The hotel use is inappropriate; the area is already saturated with Hotels.</p>	<p>17</p>	<p>The site is located close to the City's most important tourist attraction, St. Paul's Cathedral, as well as City Thameslink station. The principle of hotel use on this site is considered to be acceptable and in accordance with Local Plan policies.</p>
<p>The development would result in a loss of mixed uses, including retail.</p>	<p>8</p>	<p>The development would provide 1,090sq.m (GIA) of retail (Class A3) floorspace. The Ludgate Hill frontage of the site is along an identified Retail</p>

		Link, which has a range of retail uses.
A hotel development of the scale proposed would be detrimental to the character of the conservation area.	12	The proposed building has been designed to preserve the character and appearance of the St Paul's Cathedral Conservation Area retaining the facade to Ludgate Hill as part of the proposals. The appearance of the building and its impact on local townscape views are considered to be acceptable.
The proposed glazed bricks to the courtyard would be visually austere and would initially result in glare. They would become dirty and unsightly.	3	The proposed reflective white glazed brickwork is typical of and appropriate to courtyards and lightwells in city centre locations such as this. There are existing white glazed bricks to the southern courtyard elevation of Lambert House, which would be complemented by the proposed brickwork.
The proposed plant will generate an unsuitable level of noise for the neighbouring residential properties.	7	The noise impact assessment submitted with the application confirms that the cumulative noise from the proposed plant would be at least 10dB below the minimum background level at the nearest noise sensitive premises. A condition is included to ensure that this is achieved.
The proposed extraction equipment at roof level will result in noise and odours and a reduction in air quality.	2	The proposed replacement of the existing 20 years old heating plant by modern equipment would have a positive impact on air quality and provide much greater efficiency. All combustion flues would terminate at least one metre above the highest roof of the development to ensure the maximum dispersion of any pollutants.
There would be noise and disruption caused by the demolition and construction works.	7	Conditions are included requiring a scheme of protective works from noise, dust, vibration and other environmental effects during demolition and construction.
The courtyard between Creed Court and Lambert House would be reduced in area.	3	The existing courtyard area is 132sq.m (96sq.m taking account of the high level walkways obstructions). The proposed courtyard area would

		be 115sq.m. The proposed courtyard would be more regular in shape and would be enlarged directly opposite the windows in Lambert House.
The proposed development would be inappropriately larger and higher than the existing building.	11	The proposed development would be lower than the existing buildings towards to Ludgate Hill but higher towards Ludgate Square / Creed Lane. The existing buildings have a maximum roof height of 33.4m (AOD), rising to 36.8m at the top of the highest plant room. The proposed development would have a maximum roof height of 36.5m rising to 38.3m at the top of the plant room. The adjacent Lambert House has a maximum roof height of 37m, rising to 37.8m at the top of the lift overrun.
Views of St. Paul's and the River Thames will be lost as a result of the increase in height of the development.	1	Planning legislation does not afford the right of a private view. However, views of St. Paul's would improve for residents of Lambert House as result of the development.
The proposed development and its basement would adversely affect the structural stability of Lambert House.	1	The Ground Movement Assessment submitted with the application predicts that the potential for damage to the Lambert House would generally be negligible, very slight or slight. The proposed demolition and construction works would ensure that the site is sufficiently reinforced until the new basement structure and upper floors are complete.

Policy Context

22. The development plan consists of the London Plan 2016 and the City of London Local Plan 2015. The London Plan sets out the Mayor's vision for London up to 2036. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A of this report.
23. The London Plan requires that new development should not adversely affect the safety of the transport network and should take account of cumulative impacts of development on transport requirements. New development is required to be of the highest architectural quality and not to cause harm to the amenity of surrounding land and buildings, in respect of overshadowing, wind and micro climate.

24. 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.
25. There is relevant City of London supplementary planning guidance in respect of: Planning Obligations, the City of London Community Infrastructure Levy Charging Schedule and Protected Views (including St. Paul's Depths). There is relevant Mayoral supplementary planning guidance in respect of Sustainable Design and Construction, Control of Dust and Emissions during Construction and Demolition, and Use of Planning Obligations in the funding of Crossrail and the Mayoral CIL.
26. Government Guidance is contained in the National Planning Policy Framework (NPPF) and the NPPF Practice Guide. 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.

Considerations

27. 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);
 - 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);
 - 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).
28. Paragraph 131 of the NPPF advises, "In determining planning applications, local planning authorities should take account of:
 - The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities, including their economic vitality; and

- The desirability of new development making a positive contribution to local character and distinctiveness.”
29. The NPPF states at paragraph 14 that ‘at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking.....For decision-taking this means: approving development proposals that accord with the development plan without delay...” It further states at Paragraph 2 that:
- “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise’.
30. It states at Paragraph 7 that sustainable development has an economic, social and environmental role.
31. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.

Principal Issues to be considered

32. The principal issues to be considered in the determination of this planning application are:
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
 - The loss of office accommodation;
 - The principle of hotel development;
 - The appropriateness of the bulk, massing and design of the proposals in the context of the local area and local views;
 - The character of the St. Paul’s Cathedral Conservation Area;
 - The setting of St. Paul’s Cathedral and other heritage assets;
 - Servicing, transport and impact on public highways;
 - The impact on residential amenity and specifically:
 - a) The impact of the proposals on the daylight and sunlight enjoyed by neighbouring residential properties;
 - b) The impact of the proposals on privacy and overlooking;
 - c) The noise impact of the proposed plant;
 - d) The potential impact of the demolition and construction works.
 - The potential impact of the proposed basement extension on the structural stability of neighbouring buildings, St. Paul’s Cathedral and archaeological remains.

Loss of Office Accommodation

33. The proposed development would result in the loss of 3,381sq.m (GIA) of office floorspace. Local Plan policies CS1 and DM1.1 seek to protect office accommodation where it is considered to be suitable for long term viable office use and there are strong economic reasons why loss of that accommodation would be inappropriate. The Office Use Supplementary Planning Document (SPD) sets out detailed criteria for evaluating the long-term viability of office accommodation and requires the submission of a viability appraisal and evidence of marketing in support of an application for change of use.
34. The Local Plan and Office Use SPD were adopted in January 2015. Prior to this, the City Corporation had sought to protect viable office accommodation through draft policies in the emerging Local Plan published in January 2013, although the draft policies carried little weight until they had been considered and endorsed through the Local Plan Public Examination in October 2014. In May 2013, the City of London was granted an exemption from national permitted development rights for the change of use of offices to residential development on the grounds that the City was an office cluster of national importance. This added weight to the emerging policy approach in the draft Local Plan to protect viable office accommodation in the City.
35. Pre-application discussions on the potential redevelopment of Creed Court commenced in 2013. The applicant provided information on the viability of Creed Court as an office location and marketing of the buildings for continued office use in line with the requirements of the draft Local Plan. The evidence indicated that the building would not be a viable office in the longer term.
36. The planning application for hotel development was submitted in April 2014 along with updated viability and marketing evidence and an assessment of the potential for redevelopment for office use. This evidence repeated the view that refurbishment and redevelopment would not be viable and that continued office use would not be a viable option in the longer term.
37. In November 2015, revised and updated viability information was provided by the applicant, in line with the requirements of the now adopted Local Plan and Office Use SPD. This information considered the potential for a light refurbishment of the existing office accommodation, a more comprehensive refurbishment and a redevelopment behind a retained facade to provide Grade A office accommodation. This updated information highlighted the requirement for capital investment to market the building successfully, including a need for new M&E installations, new floors and ceilings, new windows and replacement lighting. The information also highlighted difficulties arising from the lack of a prominent entrance to Ludgate Hill, small and irregular floorplates, substandard floor to ceiling heights and restrictions on the potential for additional floorspace through redevelopment due to St Paul's Heights limitations. The viability appraisals demonstrated that the likely rental level achievable through refurbishment would be

insufficient to provide a viable return to the building owner in the longer term. Whilst there was potential for redevelopment behind a retained facade, the constraints imposed by a lack of a prominent office entrance, differences in levels through the site and the restriction on upwards extension, meant that a significant uplift in floorspace was not deliverable and that any development would not be viable in the longer term.

38. Research undertaken for the City Corporation (Clusters and Connectivity: The City as a Place for SMEs, March 2016) has highlighted the growing importance of small and medium sized enterprises (SMEs) to the City's economy. The applicant was asked to address the potential for Creed Court to provide such accommodation for the SME sector. This further information was provided in October 2016 and identified that light refurbishment of Creed Court would be necessary to provide an attractive location for SMEs, particularly when compared with other accommodation available or planned in the area. The market rent deliverable as a result would be unlikely to be sufficient to meet the costs of refurbishment and provide an acceptable level of return in the longer term. Creed Court would not be able to compete with other locations providing higher quality accommodation for SMEs without comprehensive refurbishment which had already been shown to be unviable in the longer term.
39. In November 2016, a further revised viability appraisal was submitted considering the potential for comprehensive refurbishment of Creed Court for office use, and redevelopment and construction of a new Grade A office building behind a retained facade. The City Corporation appointed independent consultants to review this appraisal. In assessing the applicant's appraisal, the City's consultants sought independent verification of build costs and considered in detail the individual elements of the appraisal. The City's consultants looked at the potential viability on a current day and growth basis and undertook sensitivity analysis of the results, looking at the implications of changes in build costs and office rental values. The City's consultants concluded that both the office refurbishment and office redevelopment options, at current day and assuming growth, generated returns significantly below those that would be expected by a rational developer and that continued office use would not be viable.
40. The loss of office accommodation at Creed Court have been considered over a number of years from pre-application stage through submission of the application and subsequent amendments to detailed proposals for this site. At all stages, the viability information has indicated that continued office use would not be viable on this site. The latest viability appraisal, submitted in November 2016, has been independently assessed by consultants on behalf of the City Corporation and this independent verification has confirmed that continued office use would not be viable. The loss of office accommodation at Creed Court is considered therefore to be acceptable in principle under Local Plan policies CS1 and DM1.1.

Proposed Hotel Use

41. The site is located close to the City's most important tourist attraction, St. Paul's Cathedral, as well as City Thameslink station and St. Paul's Underground Station. The principle of hotel use on this site is acceptable, providing appropriate transport and servicing arrangements are implemented and the amenity of adjoining occupiers is safeguarded.
42. Policy DM 11.3 states that new hotel development will be permitted if it does not prejudice the primary business function of the City and is not contrary to policy DM 1.1, which states that a change of use from office to other uses will be acceptable if a site is no longer suitable for office use. Policy DM 11.3 also states that new hotel development will not be acceptable unless satisfactory arrangements for pick-up/drop-off, services delivery vehicles and coaches, appropriate to the size and nature of the hotel.
43. The applicants have successfully demonstrated through a viability appraisal that the site is not viable for office use. Suitable transport and servicing arrangements have been proposed, which are covered in the relevant section of this report.

Retail Floorspace

44. The Ludgate Hill frontage of the site is along an identified Retail Link which joins Cheapside Principal Shopping Centre (PSC) and Fleet Street PSC. Policy CS20 of the Local Plan seeks to enhance the retail environment in retail links. Policy DM20.2 encourages the provision and will resist the loss of retail frontage and floorspace within the retail links. A mix of shops and other retail uses will be encouraged in the retail links, ensuring that the location and balance of uses does not adversely affect the function of the link, any nearby PSC or their surrounding areas.
45. The existing retail floorspace on site comprises approximately 946sq.m (GIA) at ground and lower ground floors and includes units along Ludgate Hill, Creed Lane and Ludgate Square. It is proposed to replace the existing retail units with 1,015sq.m (GIA) of restaurant (Class C3) space across the ground floor and two basement levels and a retail unit (Class A3) to the Ludgate Hill frontage of the site (75sq.m GIA).
46. The proposed restaurant (Class A3) will maintain the provision of retail floorspace on the site and the proposed retail unit to Ludgate Hill will maintain the retail link between Fleet Street and Cheapside in accordance with Local Plan policy.

Design

Bulk and Massing

47. The overall form of the scheme has been developed with two key factors informing the bulk and massing of the current proposals. These are; the apparent height of the replacement building as seen from street level, and the potential impact of the new building on the

residential amenity nearby residential occupiers in terms of daylight and sunlight.

48. The existing buildings on the site are considered to be of an appropriate height for this particular part of the conservation area. On the Ludgate Hill frontage the site is seen in the middle distance from the churchyard of St Paul's Cathedral at the top of Ludgate Hill as one of the buildings of similar height on the southern side of the street. Closer to, from opposite the site within Ludgate Hill or from the southern end of Ave Maria Lane, this frontage is seen to be a continuation of a longer run of buildings of a similar architectural style with compatible storey heights, cornice lines and parapet heights, etc. An increase in apparent height on this elevation would have been visually unwelcome. The Creed Lane and Ludgate Square elevations of the existing buildings are considered to be of an appropriate scale for this part of the conservation area given the height of the neighbouring buildings and the narrow width of the streets.
49. The massing of the building has been carefully designed to ensure that the street elevations from ground to fourth floor are of a similar height to the existing buildings. Above this level, the fifth, sixth and plant storeys have all been set back so as to be generally out of sight from the street. A stepping downwards in height from six to four stories southwards along Creed Lane has been made to address the sharply falling ground level along the street and to match the height of the new development with the lower height of neighbouring buildings at the south-east corner of the site.
50. In views from the upper levels of neighbouring buildings the elevations have been carefully considered to still read as a coherent design even though the full height of the new building would not be apparent from pedestrian level views. Following much discussion and negotiation, it is considered that the architects have satisfactorily resolved the increase in the overall height of the new building in comparison to the existing buildings whilst maintaining an acceptable appearance in the context of the Conservation Area.
51. The second principle constraint in terms of bulk and mass has been the need to retain acceptable levels of daylight and sunlight to the residential flats in the neighbouring Lambert House. The design and configuration of the upper parts of the building has been significantly amended to take account of these factors.

Architectural Expression

52. Although their internal linkages are more extensive than is apparent from the street, the existing 1980s buildings on the site are externally expressed around the perimeter of the site as a series of distinct facades. The quality of their facing materials is high but some details such as corbel brackets and metalwork which have a 1980s flavour now appear slightly dated.
53. The proposed building would repeat the approach of breaking the facade down into distinctly different elements around the site to reduce

its scale. The existing buildings on the site have been given five related treatments along Creed Lane and three further different treatments along Ludgate Square. The proposals have the same number of facade treatments along each street. A range of alternative architectural options were considered for the current scheme and the approach adopted was developed to best accord with the context and characteristics of the surrounding conservation area.

54. The individual facades would again have a similar appearance to the 19th century warehouse and commercial buildings that occupied the site prior to replacement by the existing buildings. The proposed buildings would be faced in yellow stock or red brick with slate roofs and timber window frames and retail frontages. Traditional details including stone dressings, ground floor glazed bricks, warehouse style doors at upper levels, projecting dormers, etc. would be employed to introduce further variety and interest into the individual facades. At higher level, out of site from the street, upper level roofs and plant enclosures would be faced in zinc.
55. Within the central court a more contemporary architectural language would be adopted. Roof coverings would again be zinc and windows would be metal framed. The outlook of the residents of the neighbouring Lambert House has been given particular attention to improve the quality of views seen from their windows. The glazing of the hotel windows would be opaque to prevent overlooking issues, the courtyard walls would be faced with reflective white glazed brickwork, and trees would be planted at the base of the courtyard to introduce greenery.

London View Management Framework and St. Paul's Heights

56. The Mayor London's View Management Framework (LVMF) is Supplementary Planning Guidance to the London Plan and sets out the strategic context for the protection of identified landmarks. The development falls within the Viewing Corridors and Background Assessment Areas for a number of protected vistas of St Paul's Cathedral but does not rise sufficiently high to breach any of these long distance protected vistas.
57. The site falls within the St Paul's Heights policy area that protects local views of St Paul's Cathedral from within and around the City. The St Paul's Heights height restrictions would restrict the overall height of the proposals to c.40.5m to 42.3m AOD but the townscape considerations that have determined the overall envelope of the building have restricted its maximum height to 38.3m AOD making the proposals fully in accordance with the provisions of the policy.

Setting of St Paul's Cathedral and Local Views within the Conservation Area

58. The existing buildings are mentioned in complimentary terms within the St Paul's Cathedral Conservation Area Character Study and Management Plan. They are considered to be sympathetic to their locality and to "harmonise well with earlier buildings on the street by incorporating traditional proportions and features". The existing

buildings also feature within a number of important views identified in the document. The proposed building has been subject to a comprehensive study of local townscape views, including those referred to in the Conservation Area Character Study to assess its impact on the setting of St Paul's Cathedral and from within the surrounding streets, as per the requirement set out in paragraph 132 of the National Planning Policy Framework (NPPF). The appearance and increased height of the new building across parts of the site has been developed with the aim of avoiding detrimental impacts to the relevant designated heritage assets which in this case comprise the St Paul's Cathedral conservation area and the listed buildings referred to below.

59. With regard to St Paul's Cathedral, views along Ludgate Hill heading eastwards towards the Cathedral would be essentially unchanged. There are plant enclosures at roof level on the existing buildings, the proposed removal of which is considered to be beneficial in views looking back westwards from the Cathedral. The existing buildings are clearly visible in views from the Cathedral's Golden Gallery and Stone Gallery. Although the increased height of the building has been disguised at street level by carefully designed set-backs, the overall height would be evident in views from St Paul's Cathedral, but the degree to which this increased height would be noticeable amongst the surrounding roofscape would be minimal.
60. From other locations around the site, in views from Ave Maria Lane, views looking north and southward along Creed Lane, and looking east and westward along Ludgate Square, there would be a noticeable change in the appearance of this building but it is considered that there would be no detrimental impact on the essential character of these streets. The awkward architectural arrangement of the current buildings as they turn the corner from Creed Lane into Ludgate Square would be improved by the revised manner in which the proposed buildings would address this junction.

Setting of Other Listed buildings

61. A number of other listed buildings are located sufficiently close to the site for their settings to be potentially affected by the proposed development. These buildings include: 1 – 3 Ludgate Square (Grade II) to the west of the site; the Church of St Martin (Grade I) on the northern side of Ludgate Hill; 34 – 40 Ludgate Hill (Grade II) to the northern side of Ludgate Hill; St Paul's Deanery (Grade I) to the east of the site; and the Youth Hostel, 36 Carter Lane (Grade II) to the east of the building. The setting of these buildings would not be adversely affected by the proposals.

Design Conclusion

62. The design of the proposed building has been the subject of much discussion to reduce its impact on the character of the surrounding streets within the St Paul's Cathedral conservation area, to ensure compliance with the provisions of NPPF Paragraph 132 and relevant

Local Plan policies. The appearance of the building and its impact on local townscape views are considered to be acceptable.

Transport and Servicing

63. The Transport Assessment submitted with the application sets out an evaluation of the likely vehicle movements as a result of the development and how the servicing regime would be accommodated to facilitate the redevelopment of the site and the change of use from office (Class B1) to hotel (Class C1) and restaurant (Class A3).
64. The site is located within 300m of St. Paul's London Underground Station and City Thameslink Rail Station. Nine daytime bus services (including one 24 hour service) and seven night-bus services are accessible from the site.
65. Two main pedestrian entrances to the hotel are proposed; one onto Ludgate Hill and one at the corner of Creed Lane and Ludgate Square. An additional entrance to the restaurant is located at the Creed Lane end of Ludgate Square.
66. An average of 76 taxi trips to and from the hotel and restaurant are predicted per day, which is an increase of 71 trips over the existing office and retail use of the site. Taxi trips to the hotel would be distributed throughout the day, with peaks occurring at the beginning of the business day and in the early evening. Taxi trips to the restaurant would occur at lunchtime and late evening so that peak periods for the uses would not coincide. It is anticipated that taxi drop offs would be primarily from Ludgate Hill and also Creed Lane adjacent to the entrances to the building. However, it would not be appropriate to provide a taxi rank in this location.
67. An average of 23 servicing trips to the hotel and restaurant is predicted per weekday. The majority of these trips will be made using a transit type van (15 trips). A proportion of trips would be made using rigid vehicles. A small increase of three service trips per day is predicted compared to existing building trip rates (presuming full occupancy), with an increased proportion of transit type vans.
68. It is proposed to provide an on-road service area on the Creed Lane elevation of the building in approximately the same location as the existing service area, which would feed into a central core to enable servicing throughout the building.
69. Servicing hours would be restricted by condition to ensure that no servicing of the premises is carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. This would satisfactorily remove the potential for noise impact from servicing on neighbouring residential properties during these hours.
70. Further restrictions on servicing times would be between 07:00 and 09:00, 12:00 and 14:00 and 16:00 and 19:00 Monday to Friday to help manage traffic and avoid congestion in the area and to help manage

the safe and convenient movement of pedestrians and cyclists in the area, particularly during peak times.

71. A delivery and servicing plan would be required through the Section 106 agreement.

Cycle parking and facilities

72. Policy DM 16.3 of the Local Plan requires cycle parking provision for hotel development to meet London Plan standards. Policy DM 16.3 states that the City Corporation encourages these standards to be exceeded and encourages on-street cycle parking in suitable locations.
73. A minimum of 24 cycle parking spaces would be provided on site for hotel staff and patrons within a dedicated area at lower ground floor level. Staff shower rooms and changing facilities would be provided adjacent to the cycle parking. The proposed cycle parking provision would conform to London Plan cycle parking standards.
74. A travel plan would be required through the Section 106 agreement.

Pedestrian Movement

75. A pedestrian movement analysis has been submitted with the application. The analysis identifies that overall pedestrian movement in the area around the site is 49% higher during a weekday than the weekend, which is typical of an area dominated by office uses. The weekday movement pattern is typical of central business areas with three clear peaks: the morning, evening and lunch time peaks. The weekend movement rates are comparatively low with activity concentrated along Ludgate Hill.
76. The introduction of a hotel use on the site would spread pedestrian activity across weekdays and weekends thus partially alleviating congestion during weekday peak times. The majority of pedestrian activity is anticipated to continue to be along Ludgate Hill and away from the relatively quiet Ludgate Square, where the majority of residential properties are located.
77. Creed Court, the internal pedestrian walkway through the site would be replaced in the proposed development by a central lightwell. The walkway was designed to provide access to the office suites on the upper floors and does not offer a convenient pedestrian shortcut through the site. The walkway is in private ownership and is designated as permissive path. There are gates at the northern and southern entrances to the walkway, access through which is managed so that the gates are unlocked while the office units are occupied and locked when they are not. On this basis, the incorporation of the walkway into the development is considered to be acceptable.

Access and Inclusive Design

78. Local Plan Policy DM 10.8 Access and Inclusive Design requires that developments meet the highest standards of accessibility and inclusive design. The proposed development would provide level access via the main entrances. There are level changes across the site which would

be addressed at ground floor level through internal ramps, details of which are required by condition.

79. At least 10% of the hotel rooms would be accessible for people with disabilities, which would be required by condition. The proposed pool and spa facilities would be easily accessible with sufficient space for all hotel occupants to manoeuvre. The proposed staff changing areas would incorporate accessible shower and changing facilities adjacent to the standard male and female changing areas.
80. Due to a limited footprint and restricted vehicle access into the site, no disabled car parking spaces are proposed as part of the development. A condition is included requiring the submission of an accessibility management plan prior to the occupation of the hotel including details of accessible car parking provision as well as drop off and collection arrangements for disabled visitors.

Waste Management

81. The proposed development includes a centralised waste store located internally on the lower ground floor. Waste would be stored here and brought up to street level via a service lift for collection from the service area at Creed Lane within the City of London's allocated commercial waste collection times. The proposed waste storage and collection arrangements have been reviewed by the City of London's Community Facilities Manager who has confirmed that they comply with City of London requirements.

Sustainability and Energy

82. The revised Design and Access Statement submitted in 2016 provides evidence that the development is predicted to achieve an "Excellent" rating with a score of 71% using the Other Buildings: Hotel assessment criteria which falls under the SD5076:4.0 BREEAM 2014 New Construction for England. A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved would be required to be submitted as soon as practicable after practical completion secured by condition.
83. The revised Design and Access Statement provides evidence that the proposed building has been designed to achieve a 38.2% improvement over the 2013 Building Regulations Part L. This is achieved through building fabric, on site CHP for domestic hot water supply and the use of Aerothermal heat pumps. This complies with the London Plan target of a 35% improvement over the 2013 Building Regulations. The development has been designed to enable connection to a district heating network in the future.
84. The development includes proposals for small areas of green roof across the different roof levels, which would provide opportunities for biodiversity and rainwater attenuation. Further details of the position and size of the green roofs, the type of planting and the contribution of the green roofs to biodiversity and rainwater attenuation are required by condition. Photovoltaic arrays are proposed at roof level, the details of which are required by condition.

Impact on Residential Amenity

85. The site is on the edge of the Carter Lane Residential Area as indicated in the City of London Local Plan. Local Plan Policy DM21.3 Residential Environment states that the amenity of existing residents within identified residential areas will be protected by resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance and requiring new development near existing dwellings to demonstrate adequate mitigation measures to address any potential detrimental impact.

Daylight and Sunlight

86. Local Plan Policy DM10.7 Daylight and Sunlight resists development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy DM21.3 requires development proposals to be designed to avoid overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation.
87. The BRE guidelines consider a number of factors in measuring the impact of development on daylight and sunlight on existing dwellings:
- Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
 - Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.
 - Sunlight: sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of

due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and receives less than 0.8 times its former sunlight hours as result of a proposed development; and has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

Daylight and Sunlight Assessment

88. The application is supported by a daylight and sunlight assessment which considers its impact on neighbouring residential properties at 1 – 3 Ludgate Square, 2 Ludgate Square (Lambert House), 6 – 7 Ludgate Square, 8 – 9 Ludgate Square, 46, 48 and 50 Carter Lane.
89. An initial daylight and sunlight assessment was submitted with the application in 2014. The City Corporation commissioned Delva Patman Redler to independently review the assessment. This review indicated a number of significant adverse impacts on the daylight and sunlight received by neighbouring properties, most notably in Lambert House and the applicant was asked to amend the scheme to improve the situation. Revised proposals and a revised daylight and sunlight assessment were submitted in 2016, which were further reviewed by Delva Patman Redler on behalf of the City Corporation. The comments below relate to these latest proposals and not earlier iterations of the proposed development.

1 Ludgate Square

90. This property is located to the west of the site. Of the 31 windows assessed for daylight 30 would achieve BRE compliance for VSC. One window would experience a reduction in VSC of 23.3% and serves a room that has an additional 8 windows that would comply with the BRE guidelines. All rooms meet the BRE's daylight distribution (NSL) standard. The daylight impact is considered to be negligible. The sunlight results would be BRE compliant.

Lambert House, 2 Ludgate Square

91. This residential property is located directly to the west of the site and shares the internal courtyard to Creed Court. 17 windows to the internal courtyard in this property were assessed for daylight. Two would experience a reduction in daylight (VSC) of more than 20%; these losses would be 20.8% and 21.6%, which is marginally above the noticeable level.
92. 15 courtyard facing rooms to nine flats were assessed for daylight distribution (NSL). Of the 15 rooms assessed five would experience reductions in daylight distribution (NSL) that would not technically comply with the BRE guidelines; Three would experience reductions between 23.4 – 30.5%; two would experience reductions of 40.7 and 43% (the windows serving these two rooms would meet the VSC

standard, however). Overall, the reductions in daylight to this property is considered to be minor adverse with a small number of incidences of minor to moderate adverse impact.

93. All 17 windows face within 90 degrees of due south and have been assessed for sunlight. 15 out of the 17 windows would meet the BRE guidelines for APSH. One window, which serves a bedroom, would experience an annual reduction in sunlight from 14% to 6% APSH (a reduction of 57%); the other window, which also serves a bedroom would experience an annual reduction in sunlight from 22% to 16% (a reduction of 27%). It is noted that the windows affected would comply with the BRE guidelines in terms of daylight (VSC). It is also noted that the remaining bedrooms in these properties would comply with the BRE guidelines in terms of sunlight (APSH) and that the living room and kitchens to these flats have windows facing away from the site onto Ludgate Square and would not be affected by the development.
94. Overall, the sunlight impact on the majority of windows at this property would be negligible. Whilst there are two incidences where the sunlight impact to windows would be noticeable the daylight impact to these windows would not be noticeable and the remainder of these properties would not be noticeably affected in either daylight or sunlight terms.
95. It should be noted that there a number of flats within this property that would achieve gains in daylight and sunlight as a result of the proposed development. One window would experience noticeable increases in daylight and sunlight; with a 28.2% increase in VSC and a 45% increase in APSH; the bedroom that the window serves would experience a 47.4% increase in daylight distribution (NSL).

3 Ludgate Square

96. This property is located to the west of the site. Seven of the 24 windows assessed for daylight for this property would not meet the VSC standard and would serve the one room that would not meet the NSL standard. The VSC losses would be between 22% and 28%, the NSL loss would be 33.3%. The room served by the window that does not meet the NSL standard would retain around 60% of its floor area receiving direct sky visibility, which can be considered good for a dense urban location. The reductions in daylight are considered to be of a minor adverse impact. The sunlight results would be BRE compliant.

6 – 7 Ludgate Square

97. These buildings are located to the south west of the proposed development. Planning permission was granted in 2013 to convert the building from office to residential with a commercial unit at ground floor level (ref: 12/00955/FULL). To date, only the residential units on the upper floors have been completed. Of the 43 windows assessed for VSC, 37 would achieve BRE compliance. Five of the six windows that would not achieve compliance would experience technical transgressions of between 20 - 23.5%, marginally above the 20% change that is regarded as noticeable. The remaining window would experience a VSC reduction of 42.9. This window serves a living room,

which is served by five other VSC compliant windows and would comply with the daylight distribution test (NSL).

98. Of the 20 rooms assessed, four would not achieve BRE compliance for NSL. All four rooms would experience between 24 and 35% reductions. Two would retain daylight distribution (NSL) well over 50%, which can be considered good for a dense urban location. Overall the daylight reduction to this property is considered to be of a minor adverse impact.
99. Only 7 Ludgate Square has windows within 90 degrees of due south and all which would meet the BRE guidance for sunlight (APSH).

8 – 9 Ludgate Square

100. These buildings are located immediately to the south of the site and have recently been converted to residential accommodation on the upper floors. Of the 22 windows assessed for VSC, 11 would achieve BRE compliance. Six would experience minor reductions of 20 – 29%, four between 30 – 40% and one would experience a loss of 41.2%. All of these windows currently experience relatively low levels of VSC in the existing condition (all less than 9.9% from a target of 27%), therefore any reduction in daylight would be disproportionately high as a result. In absolute quantum terms, no windows would see a reduction of more than 3.1% VSC. Of the nine rooms assessed only one would not achieve BRE compliance for NSL, with a reduction of 33.99%.
101. The daylight reduction to this property as a result of the development is considered to be mostly minor adverse. Whilst one window and the room it serves would experience a moderate adverse impact, this room is a bedroom, which is considered less important in terms of daylight distribution (NSL).
102. No windows within the property face within 90 degrees of due south, so they have not been assessed for sunlight.

46 Carter Lane

103. This property is located to the south of the site and comprises of commercial units on the lower floors with residential units on the upper floors. One of the two windows assessed in this property would not meet the VSC standard with a reduction of 24.5% from existing. However, where a room has two windows it is appropriate to assess the average loss across both windows and in doing so the VSC standard would be met. In addition, the NSL standard is met. Therefore, the overall daylight impact on this property is considered to be negligible.
104. As the windows within this property do not face within 90 degrees of due south, they have not been assessed for sunlight.

48 Carter Lane

105. The windows and rooms to this property would meet both the VSC and NSL tests. The windows within this property do not face within 90 degrees of due south, so they have not been assessed for sunlight.

50 Carter Lane

106. The property is located to the south of the site. The upper floors are in residential use. The results for this property show that one window out of the two tested would not meet the VSC standard, and both rooms served by the two windows would not meet the NSL standard, with one experiencing a reduction in NSL of 35.65%, the other a reduction of 42.24% (however, the window to this room would meet the VSC standard). The VSC reduction to the window that does not pass is 21.4% below the existing level and is therefore only a marginal breach. The reduction in daylight to these rooms as a result of the development is considered to be minor to moderate adverse.
107. As the windows within this property do not face within 90 degrees of due south, they have not been assessed for sunlight.

Daylight and Sunlight Conclusions

108. The revised daylight and sunlight assessment demonstrates that the majority of windows and rooms assessed would not experience noticeable reductions in daylight and sunlight with high levels of compliance rates of VSC (80% overall), NSL (78%) and APSH (94%).
109. Whilst there will be some impacts on the daylight and sunlight received by neighbouring properties, the majority of these impacts would be minor in nature.
110. The scheme has been revised to enlarge the proposed courtyard area within the development to minimise the daylight and sunlight impact on the adjacent Lambert House. The majority of daylight and sunlight impacts to this building would be negligible with a small number of incidences where there would be reductions in daylight and sunlight. In some instances there would be gains in daylight and probable sunlight as a result of the proposed development.
111. Overall, the daylight and sunlight implications for neighbouring properties are considered to be acceptable given the densely developed urban nature of the site and in accordance with the requirements of Local Plan Policy DM10.7 and DM21.3.

Privacy and Overlooking

112. Objections have been raised by local residents regarding the potential for increased overlooking and a loss of privacy as a result of the proposed development. The concerns raised relate specifically to the potential for overlooking from the restaurant and hotel windows facing the courtyard shared with Lambert House, the courtyard itself and the roof terrace at Ludgate Hill. In response to these concerns all proposed windows to the courtyard have been made fixed and opaque and access to the courtyard and roof has been restricted to maintenance purposes and in the case of emergency only. These design details and restrictions would be controlled by conditions.
113. A further objection was raised that the additional sixth floor of hotel rooms facing west onto Ludgate Hill would directly overlook the terraces of Flat 22, 3 Ludgate Square. The windows of the proposed

sixth floor facing west onto Ludgate Square would be blind windows that would serve the proposed plant room, which would not result in overlooking of the residential amenity terrace.

Noise

114. Policy DM15.7 of the Local Plan requires that the layout, orientation and use of buildings should be designed such that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as residential units. Any potential noise conflict between existing activities and new development should be minimised, with mitigation measures introduced where the avoidance of noise conflicts is impractical.
115. The proposed development has been designed to mitigate the noise impact on neighbouring residential properties. The proposed courtyard shared with Lambert House would only be accessible for maintenance purposes and in emergency. The windows to the shared courtyard would be fixed and opaque. The main entrances to the development would be to Ludgate Hill and the corner of Creed Lane and Ludgate Square away from residential properties. The servicing area would be on Creed Lane in place of the existing, away from the existing residential properties.
116. The proposed restaurant use (Class A3) would replace the existing retail units at ground and lower ground floor, including a drinking establishment (Class A4) which is located at the corner of Ludgate Square and Creed Lane.
117. The amenity roof terrace included in the original proposal has been removed and replaced with an area of green roof which would only be accessible for maintenance purposes and in emergency.

Noise Impact of Plant

118. Policy DM15.7 requires that developers will need to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
119. The existing building contains an array of roof top plant rooms around the existing courtyard that is shared with Lambert House. The proposals include basement level plant and a rooftop plant enclosure to be located in a similar location to the existing rooftop plant rooms at the south-east corner of the courtyard.
120. The Environmental Noise Survey Report submitted with the application sets out the findings of an acoustic background noise level survey and identifies the measures that will be undertaken to ensure the new plant will operate at 10dB below current minimum background levels, including the selection of low-noise plant, the use of an external acoustic enclosure to the plant and atmospheric duct-mounted attenuators, where necessary, on air moving plant.
121. A condition has been included requiring the noise level from any plant be maintained at 10dB(A) or more below the minimum background

level at the nearest sensitive receptors, including nearby residential premises.

Air Quality

122. Policy DM15.6 of the Draft Local Plan provides guidance on air quality and highlights that developers are required to consider the impact of their proposals on air quality and where appropriate provide an Air Quality Assessment. The whole of the City of London is classed as an Air Quality Management Area for nitrogen dioxide (NO₂) and particulates (PM₁₀).
123. Localised pollutant emissions to air are anticipated as a result of the proposed boiler plant, particularly from the proposed on-site Combined Heat and Power (CHP) unit. However, the replacement of the existing 20 years old heating plant by modern equipment would have a positive impact on air quality and provide much greater efficiency.
124. Conditions are recommended to ensure that all combustion flues terminate at least one metre above the roof of the development to ensure the maximum dispersion of pollutants. The proposed flues to the development would terminate at seventh floor roof level so as to be sufficiently away from any neighbouring residential windows.
125. Further conditions would be imposed to control the nitrogen oxide (NO_x) emission levels from any on-site plant installed within the building. An Air Quality Neutral Assessment would be required to be submitted before the development commences to ensure that the development is at least air quality neutral, or if it is not that a scheme of mitigating the air quality impact is submitted and approved in writing by the City Corporation as Local Planning Authority.

Mitigating the impact of construction works

126. Conditions have been included requiring the submission of details of a scheme for the protection of nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition and construction. The scheme would be required to adhere to the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites.
127. Further conditions have been included requiring the submission of deconstruction and construction logistics plans to manage all freight vehicle movements to and from the site during demolition of the existing buildings and the construction of the development. The logistics plans will be required to include relevant measures from the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk.

St Paul's Depths

128. The site is within the area prescribed by the City of London (St. Paul's Cathedral Preservation) Act. The Act controls works involving deep

excavations in the vicinity of the Cathedral which may result in subsidence of the foundations and risk to the structure of the Cathedral. The existing building has one basement and the proposed scheme would have three basement levels and new foundations. As deep level works are proposed and in accordance with the Act, the Dean and Chapter have been consulted.

129. A Structural Report, Basement Impact Assessment and Ground Movement Assessment have been submitted with the application and it is proposed to carry out supplementary ground investigation, but this is not yet programmed. The Basement Impact Assessment concludes that the construction of the proposed basement shall have no adverse effects on St Paul's Cathedral. The Dean and Chapter have responded that following the supplementary ground investigation the findings of the report would need to be reviewed in the light of the new information, and confirmation of whether this would change the applicant's conclusion in relation to the effects of the development on St. Paul's Cathedral. It is only then that the Dean and Chapter would be in the final position to complete their recommendation in respect of the Act.
130. Conditions are attached to cover supplementary ground investigation, details of the basements and lower ground floor, foundations and piling configuration. This is to ensure that that no subsidence, harm or risk of danger is caused to the foundations or structure of St. Paul's Cathedral and this may require modification of the basement areas and foundation design.

Ground Movement Assessment

131. The Ground Movement Assessment submitted with the application considers the effects of the proposed basement construction on the adjacent building at Lambert House. The assessment predicts that the potential for damage to the Lambert House would generally be negligible, very slight or slight.
132. It is anticipated that monthly monitoring would take place at least weekly during groundworks and daily where excavation against critical areas is underway. The separate phases of work, including demolition, piling and the subsequent excavation of the proposed basement structures would in practice be separated by a number of weeks which would allow any necessary curing to take place.

Archaeology

133. The site is in an area of significant archaeological potential where remains from the Roman to the post medieval may be expected. It is adjacent to a major Roman road leading into the city and within the north eastern area of the Norman Montfichet's Tower. A Historic Environment assessment and a report of the first phase of archaeological evaluation have been submitted with the application.
134. The existing building has a single basement at differing levels which has affected potential archaeological survival. The potential is low in the deeper basement area and moderate elsewhere. The first phase of

archaeological evaluation has provided additional information on archaeological potential. This indicates low survival with potential for deep cut features to survive below the basement floor slab. Further evaluation is planned and the results of this work would inform the design of an appropriate mitigation strategy. The survival of any archaeological features would have the potential to understand further the character and features of Montfichet's Tower.

135. Conditions are attached to cover archaeological evaluation, a programme of archaeological work and foundation design.

Planning Obligations and Community Infrastructure Levy

136. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City's environment and facilities. It would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
137. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
138. The planning obligations and CIL contributions are set out below.

Mayoral CIL and Planning Obligations

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
Mayoral Community Infrastructure Levy payable	£60,350	£57,936	£2,414

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

The Crossrail contribution has been calculated using the method provided in annex 4 for mixed use development, in the Mayor of London SPG "Use of Planning Obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy."

The total Crossrail contribution under the proposed calculation is less than the amount under the existing calculation. Therefore, there is no Crossrail payment due.

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£90,525	£85,999	£4,526
City Planning Obligation Affordable Housing	£24,140	£23,899	£241

City Planning Obligation Local, Training, Skills and Job Brokerage	£3,621	£3,585	£36
City Planning Obligation Monitoring Charge	£2,500	Nil	£2,500
Total liability in accordance with the City of London's policies	£120,786	£113,483	£7,303

City's Planning Obligations

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

- Highway Reparation and other Highways obligations
- Delivery and Servicing Management Plan
- Hotel Management Plan
- Travel Plan
- Local Training, Skills and Job Brokerage Strategy (Construction & End Use)
- Public Realm
- Local Procurement
- Carbon Offsetting
- Utility Connections
- Coach Parking and Drop-Offs

140. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Monitoring and Administrative Costs

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

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

Site Specific Mitigation

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

Conclusion

144. The proposed redevelopment of the site would result in the loss of 3,381sq.m (GIA) of office floorspace. The applicants have successfully demonstrated through an office viability appraisal that the site is not viable for office use. The appraisal has been independently verified by consultants on behalf of the City Corporation.
145. The Creed Court site is appropriate in principle for hotel development located close to St. Paul's Cathedral and a variety of public transport links. The proposed servicing arrangements for the development are considered to be acceptable and there is considered to be sufficient capacity in the surrounding streets for the vehicles and pedestrians associated with the development. Retail floorspace would be re-provided in the development to complement the retail offer on Ludgate Hill and to ensure that the Retail Link between Fleet Street and Cheapside is maintained.
146. The height, bulk, massing and design of the proposed building would preserve the character and appearance of the St. Paul's Cathedral Conservation Area, through the retention of the facade to Ludgate Hill, suitably varied architectural treatments along the perimeter of the site and carefully designed setbacks at the upper levels of the building.
147. The building has been designed to sufficiently minimise the potential impact on the amenities of nearby residential occupiers in relation to privacy, overlooking, noise, daylight and sunlight. In particular, revisions have been made to the internal courtyard to ensure there is no overlooking of adjoining residential buildings and the building has been designed to concentrate activity away from nearby residential properties. The applicant has agreed to conditions limiting access to the courtyard and roof space within the development for maintenance and emergency only.
148. The applicant's daylight and sunlight assessment, which has been independently reviewed by Delva Patman Redler, demonstrates that the majority of windows and rooms in neighbouring properties would not experience noticeable reductions in daylight and sunlight. Whilst there would be some impacts on daylight and sunlight as a result of the development the majority would be minor in nature and are considered to be acceptable given the densely developed urban nature of the site.
149. The proposed development is considered to comply with the Development Plan as a whole and to be appropriate subject to conditions, CIL payments and a Section 106 agreement being entered into to cover matters set out in this report.

Background Papers

Internal

Memo 01 September 2016 Department of Markets and Consumer Protection

External

Minutes 10 July 2014 City of London Conservation Area Advisory Committee

Letter 16 December 2014 BRE

E-mail 11 August 2016 Environment Agency

E-mail 22 August 2016 Thames Water

E-mail 08 September 2016 Transport for London

Letter 16 September 2016 Delva Patman Redler

Summary Assessment for Financial Viability February 2017 Gerald Eve

Letter 18 April 2017 Oliver Caroe, Surveyor to the Fabric

Residents' Objections

Letter undated Andrew Sanilitro

Letter undated Mr. M. Rimmer

Letter 30 June 2014 Mr. Peter T. G. Phillips

Letter 02 July 2014 Sir Brian Langstaff

Letter 03 July 2014 Mr. K. Rimmer

Letter 03 July 2014 Matthew Rimmer

E-mail 03 July 2014 Michael Tang

Online 04 July 2014 Sir Brian Langstaff

Letter 05 July 2014 Deborah Langstaff

Letter 05 July 2014 Nicola Bell

Letter 06 July 2014 Mrs. J. L. Rimmer

E-mail 07 July 2014 Niklaus and Cilgia Föh

Letter 07 July 2014 Mr. J. Colombano and Ms. M. L. Kirk

Letter 07 July 2014 Dr. Y. Oliver

Online 08 July 2014 Alderman Vincent Keaveny

E-mail 08 July 2014 Dr. Y. Oliver

Online 08 July 2014 Dr. Y. Oliver

Letter 08 July 2014 Gilbert Holbourn

E-mail 09 July 2014 Clare James

E-mail 10 July 2014 Ann Holmes

Online 11 July 2014 Ms Nicola Bell
Online 14 July 2014 Mr. Roshan De Alwis
E-mail 14 July 2014 Robert Meyrick
Online 30 July 2014 Miss Louise McCollough
Online 30 July 2014 Miss Emma Daykin
Online 31 July 2014 Mr. Andrew Powell
Online 31 July 2014 Mr. Rich Murton
Letter 07 March 2015 Mr. K. Rimmer
Letter 08 March 2015 J Stacey
Letter 10 March 2015 Mrs. J. L. Rimmer
Letter 12 March 2015 Syntegra Consulting
Letter 13 March 2015 Nicola Bell
E-mail 15 March 2015 Michael Tang
E-mail 16 March 2015 Nara Corominas
E-mail 17 March 2015 Julian Dacie and Pauline A Smith
Letter 17 March 2015 Bill Ellson
Online 17 March 2015 Ms. Anne Dunmore
Letter 17 March 2015 Dr. Y. Oliver
Letter 17 March 2015 Sir Brian and Lady Langstaff
Online 18 March 2015 Mr. Joe Colombano
Letter 18 March 2015 Mr. J. Colombano and Ms. M. L. Kirk
E-mail 18 March 2015 Robert Meyrick
Online 18 March 2015 Miss Louise McCullough
Letter 18 March 2015 Nick and Max Bailey
E-mail 20 March 2015 Ann Holmes
Letter 17 August 2016 Mr. K. Rimmer
E-mail 17 August 2016 Robert Meyrick
Letter 24 August 2016 Nicola Bell
Letter 26 August 2016 Mrs. J. L. Rimmer
E-mail 29 August 2016 Michael Tang
Online 30 August 2016 Mr. Nicholas Bailey
Letter 30 August 2016 Sir Brian and Lady Langstaff
E-mail 31 August 2016 Ms. Y. Tan
Letter 31 August 2016 Matthew Rimmer
Online 31 August 2016 Mr. Joe Colombano

E-mail 13 September 2016 Ann Holmes

Letter 31 October 2016 Syntegra Consulting

Application Documents

Existing Drawings

Report on First Phase of Evaluation October 2013 MOLA

Letter 09 November 2016 GIA

Hotel Management Plan undated Hotel Indigo

Historic Building Report March 2014 Donald Insall Architects

Environmental Noise Survey Report 28 March 2014 Hilson Moran

Delivery and Servicing Plan 28 March 2014 JMP Consultants Limited

Transport Statement 28 March 2014 JMP Consultants Limited

Historic Environment Assessment 19 March 2014 MOLA

Planning Statement March 2014 DP9

Townscape and Visual Impact Assessment March 2014 Tavernor
Consultancy / Hayes Davidson

Urban Design Spatial Assessment Space Syntax

Air Quality and Flood Risk/Drainage Statements 14 April 2014 Hilson Moran

Structural Report March 2014 undated Michael Alexander Consulting
Engineers

Planning Access Statement 28 July 2014 Proudlock Associates

Daylight and Sunlight Report 17 June 2016 GIA

Accessibility Management Plan undated Proudlock Associates

Design Statement undated Stephan Reinke Architects

Summary Assessment for Financial Viability 08 February 2017 Dominvs
Group

Ground Movement Assessment Report February 2017 Michael Alexander
Consulting Engineers

Basement Impact Assessment March 2017 Michael Alexander Consulting
Engineers

Appendix A

London Plan Policies

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

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

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

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

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

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

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

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

Policy 5.13 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 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

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

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

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

Policy 7.6 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 7.8 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 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

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

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

Relevant Local Plan Policies

CS1 Provide additional offices

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

DM1.1 Protection of office accommodation

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

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

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

CS2 Facilitate utilities infrastructure

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

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction

and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

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

CS4 Seek planning contributions

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

CS10 Promote high quality environment

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

DM10.1 New development

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

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

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's

environmental benefits, including biodiversity, run-off attenuation and building insulation.

- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

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

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

- a) inclusive and safe for 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.

CS11 Encourage art, heritage and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

DM11.3 Hotels

Proposals for new hotel and apart-hotel accommodation will only be permitted where they:

- a) do not prejudice the primary business function of the City;
- b) are not contrary to policy DM1.1;
- c) contribute to the balance and mix of uses in the immediate locality;
- d) do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
- e) provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;
- f) are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
- g) ensure continuing beneficial use for historic buildings, where appropriate.

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special

architectural or historic interest, character and significance or its setting.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

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

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

DM15.2 Energy and CO2 emissions

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

DM15.3 Low and zero carbon technologies

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

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

DM15.4 Offsetting carbon emissions

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

DM15.6 Air quality

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

DM15.7 Noise and light pollution

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

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

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

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

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

DM16.2 Pedestrian movement

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

DM16.3 Cycle parking

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

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

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

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

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

CS17 Minimising and managing waste

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

DM17.1 Provision for waste

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

DM18.2 Sustainable drainage systems

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

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;

- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

CS20 Improve retail facilities

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

DM20.2 Retail links

To encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

DM20.3 Retail uses elsewhere

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 14/00300/FULMAJ

Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London

Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035sq.m. GIA), restaurant use (Class A3) at part basement and part ground floor (1,090sq.m. GIA) and associated plant areas (2,245sq.m.) (Total Floorspace 7,660sq.m. GIA).

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme.
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
- 3 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address

the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

- 4 The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur or be necessary.
REASON: To ensure the stability of the structure to be retained in accordance with the following policy of the Local Plan: DM12.2.
- 5 The building(s) shall not be demolished (unless otherwise permitted by the Local Planning Authority in the circumstances identified in this condition) before a contract or series of contracts for the carrying out of substantial works of redevelopment have been made and planning permission has been granted for the redevelopment for which the contracts provide. Such contracts shall include the construction of all foundations, above ground framework and floor structures. Works of demolition may be permitted prior to the completion of the contract(s) if the Local Planning Authority is satisfied that the site is required for archaeological investigation and the developer has submitted evidence to show that development will proceed upon completion of the investigation.
REASON: In the interest of visual amenity and to ensure that the site is not left vacant indefinitely in accordance with the following policy of the Local Plan: DM12.2.
- 6 Before any works hereby permitted are begun an Air Quality Assessment demonstrating that the development is at least air quality neutral shall be submitted to and approved in writing by the Local Planning Authority. If the development is not at least air quality neutral, a scheme of mitigating the air quality impact shall be submitted to and approved in writing by the Local Planning Authority prior to the development taking place.
REASON: In order to positively address air quality in accordance with the following policy of the Local Plan: DM15.6.
- 7 Unless otherwise agreed in writing with the Local Planning Authority, archaeological evaluation shall be carried out in accordance with the

Written Scheme of Investigation for an Archaeological Evaluation dated 12 July 2013.

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

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

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 9 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 10 Ground Investigation shall be carried out in accordance with a timetable and scheme of such investigation work submitted to and approved in writing by the Local Planning Authority before any commencement of Ground Investigation work and a report of the work submitted to the Local Planning Authority within 4 weeks of completion of the investigation work.

REASON: To ensure that the impact of the development foundations and basements and lower ground floor is considered in relation to the preservation of the foundations and structures of St. Paul's Cathedral in accordance with the following policies of the Local Plan: CS 12 and DM12.4.
- 11 Before any works hereby permitted are begun, following supplementary ground investigation works, details of the basements and lower ground floor, foundations and piling configuration, to include a detailed design and method statement, shall be submitted to and approved in writing by the Local Planning Authority, such details to show that no subsidence, harm or risk of danger is caused to the foundations or structure of St. Paul's Cathedral.

REASON: To ensure the preservation of the foundations and structure of St. Paul's Cathedral in accordance with the City of London (St Paul's Cathedral Preservation) Act 1935 and the following policies of the Local Plan: CS12 and DM 12.1.

- 12 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction shall be submitted to and approved in writing by the Local Planning Authority prior to any construction work taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.

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

- 13 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address [driver training for] the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

- 14 Before any construction works are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance

Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 15 No piling or construction of basements using penetrative methods shall take place until it has been demonstrated that there would be no unacceptable risk to below ground utilities infrastructure, details of which shall be approved in writing by the Local Planning Authority in liaison with Thames Water before such works commence and the development shall be carried out in accordance with the approved details.

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

- 16 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.

- 17 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 the ground and upper level surfaces and courtyard elevations;
- (b) details of the proposed new facade(s) including typical details of the fenestration and entrances;
- (c) details of the different facade treatments and courtyard elevations;
- (d) typical details of stonework;
- (e) details of ground floor elevations including shopfronts;
- (f) details of the ground floor entrances;
- (g) details of windows and external joinery;
- (h) details of dormer windows;
- (i) details of soffits, hand rails and balustrades;
- (j) details of all alterations to the existing retain facade;
- (k) details of junctions with adjoining premises;

- (l) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;
- (m) details of plant and ductwork to serve the A3 / C1 use(s);
- (n) details of the rooftop plant enclosure;
- (o) details of all ground level surfaces including materials to be used;
- (p) details of external surfaces within the site boundary including hard and soft landscaping;
- (q) details of service entrance doors to Creed Lane;
- (r) details of rainwater drainage and measures for the prevention of rainwater run-off onto the public highway;
- (s) details of the removal, storage, restoration and relocation of the cartouche to Creed Lane;
- (t) details of the internal access ramps at ground floor level including ramp lengths, gradients and level changes.

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, DM10.8, DM12.2.

- 18 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
- 19 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.
- 20 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: CS15, DM15.1, DM15.2.

- 21 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.
- 22 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling 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 policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 23 Details of the position, size and arrangement of the photovoltaic panel installation 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 in accordance with the following policies of the Local Plan: CS10, CS15, DM10.1, DM15.3.
- 24 Unless otherwise approved by the LPA there must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 25 No part of the roof areas or courtyard shown on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 26 No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 27 No servicing of the premises shall be carried out between the hours of:
(i) 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays; or
(ii) 07:00hrs and 09:00hrs, 12:00hrs and 14:00hrs, 16:00hrs and 19:00hrs, Mondays to Fridays.
Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To manage traffic, avoid congestion and manage the safe and convenient movement of pedestrians and cyclists in the area and to reduce air and noise pollution, in accordance with the following policies of the Local Plan: DM15.7, DM15.7, DM16.1, and DM16.2.
- 28 Unless otherwise approved by the Local Planning Authority the doors and windows to any restaurant on the Ludgate Square frontages shall be kept closed. The doors may be used only in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 29 Self-closing mechanisms must be fitted on the doors at Ludgate Square and Creed Lane before the Class A3 and C1 use(s) commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 30 The two sets of 'means of escape doors' to Ludgate Square shown the drawings hereby approved must not be opened or left open except in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 31 A further set of doors must be fitted between the hotel entrance doors at the corner of Ludgate Square and Creed Lane and this extra set of doors shall be retained for the life of the premises. These doors must not be left open except in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 32 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 33 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 34 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
- 35 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.
REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 36 No cooking shall take place within any Class A3 or C1 use(s) hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by

the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 37 Any generator on the site shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.
REASON: To minimise adverse air quality in accordance with policies DM15.6 and DM 21.3 of the Local Plan and policies 7.14 B a and c of the London Plan.
- 38 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants.
REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2015 and the Local Plan DM15.6.
- 39 No boilers that have a dry NOx emission level exceeding 40 mg/kWh (measured at 0% excess O2) shall at any time be installed in the building.
REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.
- 40 A. No CHP plant in the thermal input range 50kWth to 20MWth with NOx emissions exceeding that specified in Band B of Appendix 7 to the GLA Sustainable Design and Construction Supplementary Planning Guidance published April 2014 (or any updates thereof) shall at any time be installed in the building.
B. Prior to any CHP plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority:
1. The results of an emissions test demonstrating compliance with Part A of this condition and stack discharge velocity carried out by an accredited laboratory/competent person; and
2. An equipment maintenance schedule demonstrating that the emission standard would always be met.

C. The CHP plant shall at all times be maintained in accordance with the approved schedule.

REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.

- 41 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 20 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.
- 42 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.
- 43 Provision shall be made for disabled people to obtain access to the building via the principal entrance 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.
- 44 At least 10% of the hotel rooms hereby permitted shall be constructed to be accessible for people with disabilities, details of which 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 and maintained for the life of the development.
REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policies of the London Plan and City of London Local Plan: Policy 4.5, DM10.8.
- 45 Prior to the occupation of the hotel an Accessibility Management Plan shall be submitted to and approved by the Local Planning Authority including details of accessible car parking provision for disabled visitors to the building. Such provision shall thereafter be operated in accordance with the approved Accessibility Management Plan (or any amended Accessibility Management Plan that may be approved by the Local Planning Authority) for the life of the building.

REASON: To ensure that adequate car parking provision is made for disabled users of the hotel in accordance with the following policy of the Local Plan: DM10.8.

- 46 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: Location Plan, Site Plan, Drawing nos. A1100, A1101, A1102, A1103, A1104, A1105, A1106, A2100 Revision V21, A2101 Revision V24, A2102 Revision V23, A2103 Revision V22, A2104 Revision V21, A2105 Revision V21, A2106 Revision V21, A2107 Revision V21, A2108 Revision V21, A2109 Revision V22, A2110 Revision V21, A2111 Revision V22, A2112 Revision V21, A3000 Revision V22, A3001 Revision V22, A3002 Revision V21, A3003 Revision V21, A3004 Revision V21, A3005 Revision V21, A3100 Revision V21, A3101 Revision V21, A3102 Revision V21, Written Scheme of Investigation for an Archaeological Evaluation, MOLA, 12 July 2013.
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 The Mayoral Community Infrastructure Levy is set at a rate of £50 per sq.m on "chargeable development" and applies to all development over 100sq.m (GIA) or which creates a new dwelling.

The City of London Community Infrastructure Levy is set at a rate of £75 per sq.m for offices, £150 per sq.m for Riverside Residential, £95 per sq.m for Rest of City Residential and £75 on all other uses on "chargeable development".

The Mayoral and City CIL charges will be recorded in the Register of Local Land Charges as a legal charge upon "chargeable development" when development commences. The Mayoral CIL payment will be passed to Transport for London to support Crossrail. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and owners of the land will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Section106 Planning Obligations Officer. This Notice is available on the

Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

- 2 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.

- 3 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.
- 4 Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

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.

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.

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.

- 5 Excavation within the vicinity of St. Paul's Cathedral requires separate approval from the Cathedral under the City of London (St. Paul's Cathedral Preservation) Act 1935. The area where St Paul's Depths approval is required is shown on the City's web site. Developers are advised to contact the Dean and Chapter of St Paul's Cathedral for an informal discussion: The Registrar, Chapter House, St Paul's Churchyard, London, EC4M 8AD (020 7246 8350) registrar@stpaulscathedral.org.uk. Application can be made directly to the Dean and Chapter of St Paul's Cathedral or via the Development Division, Department of the Built Environment, City of London, EC2P 2EJ.

Andrew Sanalidro
6 Priory House
3 Friar Street
London
EC4V5DT



Dear Sir,

Re: Planning Application 14/00300/FULMAJ- Creed Court 3 -5 Ludgate Hill, 1-3 Creed Lane & 11-12 Ludgate Square London EC4A 7HA

On behalf of myself and other residents I must strongly object to the above planning application. I also wish to register my dismay that until yesterday I was totally unaware of and not been notified or consulted about this application and that none of the residents in my apartment block were aware of it. In no particular order of strength I would make the following comments:-

Servicing

Servicing of the hotel seems to depend upon a 'lay-by' sort of arrangement in Creed Lane, which will lead to increased traffic and the inevitable traffic danger of obstruction, congestion, nuisance, disturbance etc which will have harmful effects on the amenity of local residents.

Due to the above Grange St Pauls Hotel Apartments in Creed Lane cannot service their site from Creed Lane and trolley items delivered elsewhere to their lift in the basement at Carter Lane. This will not be possible for the 3 Hotel entrances and retail entrance proposed. Furthermore Creed Lane is a one way street (except for cycles) and servicing, deliveries arrivals and departures for a Hotel this size or indeed any size will inevitably produce traffic jams, disturbances and nuisance for local residents and create even more of a rat run in streets including Deans Court where the Bishop of London and his family are in residence.

Protection of office space

A material consideration and aim of the draft Local plan is to protect small, affordable office suites in the City, for use by small or 'start up' firms servicing larger businesses. We understand such space has been disappearing over the past few years as sites get redeveloped or listed buildings get changed into residential use and neither we local residents nor the Corporation want the City to provide space only for the large mega-firms or business concerns. Accordingly we also want to provide and more importantly to retain a quantity of small, individual type office space such as this site currently delivers. Accordingly loss of this site to alternative use is not warranted and would be a most regrettable and regressive step.

Retail

The scheme replaces some good retail space currently on this site with hotel ancillary retail (ie bars and restaurant) which really isn't retail at all, and which certainly cannot be classified as retail use class A1 or A2, which some of the present accommodation on the site could be. There is therefore a

ACKNOWLEDGED

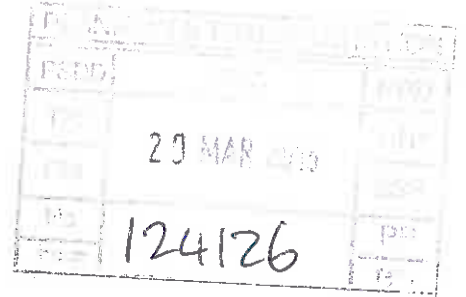
loss of genuine retail use and possible lack of proper 'active' frontage if the hotel ground floor operates from behind curtains or blinds. We residents already suffer from a myriad of restaurants and bars in Carter Lane and any with an entrance in Creed Lane will cause even further disturbance, nuisance and loss of amenity.

For the above planning reasons we wish to register our strong objections to this scheme and request that consent be revised. In addition we request that you re-consult local residents on this application as it is clear that any communications that have allegedly been sent have not reached us and particularly the local residents in closest proximity to the above site.

Yours faithfully,

Andrew Sanalitra

Planning Department
Attention: Liam Hart
City of London
P.O.Box 270
Guildhall
London
EC2P 2EJ



Dear Mr Hart

Your Ref: 14/00300/FULMAJ

I refer to the above referenced planning application and list my objections as follows:

1. **Specific to Lambert House, 2 Ludgate Square BRE guidelines for the daylight and sunlight report have NOT been met by a huge margin. These findings have been hidden in the submission:**

VSC – Vertical Sky Component

65% of rooms do not meet BRE guidelines some by 40%+

NSL – No Sky Line

40% of windows do not meet BRE guidelines, including 27% which transgress by 40%+

APSH – Annual Proable Sunlight Hours

67% of rooms do not meet BRE guidelines

65% of windows do not meet BRE guidelines

Eliminate the massing on the site and many of these issues disappear.

2. **Per Residential Environment “the amenity of existing residents...needs protecting”. This is not being achieved in the non compliance for Lambert House by large percentage points in relation to the BRE guidelines.**
3. **ADF has been utilised by GIA, as per the BRE guidelines this form of measurement should be specifically excluded.**
4. **GIA have chosen to ask Dr Littlefair selective questions about BRE rather than to get him to do a full assessment of the proposal. Selective and leading questions provide no independance in the application and should be excluded.**



5. The increased massing on the site is unnecessary particularly to the south of the proposed development with the increased height and proposed plant room. Per policy "demonstrate mitigation measures to address detrimental impact" has not been achieved. Greatly increasing massing on the site makes no sense and greatly impacts Lambert House, 2 Ludgate Square
6. Reference is made in the planning application to bedrooms overlooking the development and being of "less importance". To be clear I utilise one of my rooms on a mixed use basis. I own my own company and hence utilise this space as my office.
7. I find it difficult to understand the logic of another hotel in the City of London. In this direct vicinity we already have a large number of hotels – Grange St Paul's, Grange St Paul's Suites, Club Quarters, the Youth Hostel, The Crowne Plaza, Premier Inn, as well as many short stay apartments including the Kings Wardrobe. Per the new plan adopted by the City of London on 15th January 2015 my understanding is that additional hotels are undesirable.
8. It has not been proven by the developers that the current office space is not viable. It is imperative that different types of office space remain in the City of London.
9. The proposal of a roof terrace 6.2m away from windows at Lambert House is unacceptable. The noise pollution (no noise assessment has been provided) will severely impact the amenity of existing residents.
10. It is stated that the windows of 2 Ludgate Square "can only theoretically benefit from morning sunlight" and "it is unlikely that any APSH (Annual Proable Sunlight Hours) would penetrate deep into the rooms". This is an incorrect statement for my apartment as sunlight penetrates both rooms (and further into my apartment). This was one of the main reasons I purchased my apartment and DM 10.1 New development "The amount of daylight and sunlight received has an important effect on the general amenity of dwellings". My amenity as an existing resident needs to be protected as this would be lost with the proposed increased massing on the site.

Your sincerely,


(Mr.) M. Rimmer

Flat 13, Lambert House,

2 Ludgate Square, London. EC4M 7AS

14 / 00300

Flat 2
3 St Andrews Hill
London EC4V 5BY

Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

30th June, 2014

ACKNOWLEDGED

For the attention of Mr Liam Hart

Dear Sirs,

**Town and Country Planning Act
Creed Court, 3-5 Ludgate Hill**

DATE	04 JUL 2014	SP
OFF		SOE
No	121960	SP
FILE		DE

I have been a resident of St Andrews Hill and a customer of premises in Ludgate Square (the tailors and the café) since 1998.

During my time as a resident in the St Pauls/Blackfriars locality, I have witnessed a steady increase in the number of premises offering accomodation (e.g. the Grange Hotel and its annex), or food and drink (too numerous to list). This trend is in danger of ruining the attractions of the locality as a mixed area of shops, offices and residential (in addition to a reasonable number of bars and restaurants). The buildings to be demolished are very much part of the basic and traditional mixed use of the area and the proposed hotel will further exacerbate the excessive number of bars and restaurants.

I would therefore like to register my objection to the proposed development.

Yours faithfully,

P.T.G.Phillips

From Sir Brian Langstaff

Flat 5, Lambert House
2, Ludgate Square,
LONDON EC4M 7AS
2nd July 2014

Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 3EJ

Fao Ted Rayment

BY POST and EMAIL ATTACHMENT

Dear Mr Rayment,

Application 14/00300 (Creed Court and Ludgate Hill): Objection

Summary

We have a residential flat at Flat 5, on the second floor of Lambert House, 2 Ludgate Square, EC4M 7AS. Two of our habitable rooms overlook what it currently an atrium/open void, surrounded by offices which are quiet and usually unoccupied at night, and have sunlight by day.

Our (1) **light**, (2) **privacy**, (3) **noise levels** and (4) **general amenity** will be seriously threatened by the proposed (over)development.

There is no good reason to depart from Planning principles, from BRE guidance, and (especially as the City of London) being a standard bearer for setting standards of good urban planning, especially since the need for further hotel development of this mass is dubious and not established by empirical evidence; nor is it good practice to grant permission for development which so affects existing legal rights to light that legal action is then required to enforce them (which if taken would, simply, prevent the development in its proposed form)

Detail

(1) LIGHT

The daylight/sunlight report is flawed. It simply considers neither the staircase windows, nor (more significantly perhaps) 4 windows to habitable rooms which in addition to the 10 it does consider would be seriously affected. These are south facing windows, at the rear of nos. 4, 8, 12 and 15. The original plans of the development show that at least one of these is a kitchen: even if the others are bedrooms (and I do not know) they are habitable rooms, which is the criterion which matters.

What it does show, despite this, is that so far as our flat is concerned (Windows W1/702 and W2/702) –

- (a) We shall lose 100% of the sunlight we currently enjoy (the ASPH has a 100% reduction)
- (b) Suffer a vertical sky component reduction of 29.72% and 24.57% respectively (*beyond the maximum permitted to be compliant with BRE, which is 20%*).
- (c) Suffer a loss of average daylight factor - 0.99% and 1.15%. The neighbour below us falls even further below BRE, which provides for a *minimum* of 1% for bedrooms. (*NB this cannot be dismissed by vague references to "It is sometimes questioned whether the use of ADF is valid..." as the report argues – who questions it? On what basis? The report itself accepts that neither the British Standard nor CIBSE question it, but, instead, adopt it*)
- (d) NSC : 27.7% and 41.6% reductions (below BRE maximum 20%)

The report recognises that the windows at 2nd floor level already have low VSC values, and notes that "any reduction results in a disproportionate percentage change". This is not a reason to be dismissive of the change: what it means is that the change is particularly significant in percentage terms. The fact that premises may have low light is no argument for diminishing it to a significant further proportionate extent. We note, in passing, that the windows above ours all experience reductions in VSC between 25.2 and 29.37% - well beyond BRE compliance limits.

The proposed mitigation for this does not hold water: the report reads -

"...For example, in an historic city centre a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings"

Note the qualification – that the new matches the existing. Here, the proposed massing is in excess of the height and proportions of the existing buildings, and does not simply match it. The massing is two storeys higher to the south of Lambert House.

The report argues: *"Clearly if a room which is being designed for a new development is deemed to have sufficient light against the British Standards, then it should equally follow for a room assessed in a neighbouring existing building."*

Why does this follow? The answer is it does not: the daylight analysis should be measuring the impact of the new massing on existing daylight provision, not commenting on, or providing a view on, the existing design of the neighbouring buildings. If someone had built a home that optimised natural daylighting for reasons of well-being, environmental sustainability and to reduce energy use and utilities costs, then surely it is not acceptable to overshadow them to the minimum standards, thus rendering those principles null and void.

The report argues that (somehow) bedrooms are less important than other rooms, and it should be assumed that the windows are those of bedrooms. This cannot be accepted: although BRE minima are slightly lower for bedrooms such a distinction is not otherwise made by official guidance, and verges on the unprofessional. The room is a habitable room – that is what counts. The use of it made by the occupant should not matter. As it happens, we know that when the first owner occupied the flat below us (No 1) he used one of the rooms as a dining room/study, and not as a bedroom, and this use is plainly open to any resident.

(2) NOISE

Emerging Policy DM 15.7 of the Draft Local Plan relates to noise pollution, and highlights that the layout, orientation and use of buildings should be designed such that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as residential units and any potential noise conflict between existing activities and new development.

The atrium below us creates significant noise at times, because noise funnels up the void between the back of Creed court and the back of Lambert house. Because of the office use of the buildings, and the time they are easily accessible through Creed Court, this does not create a significant problem, intrusive though it can be over short periods. The noise we do get, however, is despite a degree of acoustic shielding created by the glass cover to the atrium and walkway.

The proposed design is unspecific as to the likely use of the new space – but it seems as if it will be an area annexed to Reception at the hotel, so cannot easily be shut off and made subject to Planning undertakings. We suspect it will be used for sitting out in/ drinking/ talking, all of which will occur from early morning till late in the evening after what would normally be closing time for a pub. The applicants should be specific as to this, and should provide an acoustic assessment of the impact of the design (we cannot see one). If the design were changed such that the noise would be restrained below, say, acoustic glass, it might be possible to ameliorate this – but this is for the applicants to propose, and at present the application breaks both the planning policy set out above, and Part 4 of Core Strategy Policy CS15, which requires development to positively address issues associated with (inter alia) the protection of the City's quiet areas and quiet times of day for businesses (daytime) **and residents (night time)**.

(3) PRIVACY

Our bedroom windows will be overlooked, by hotel windows. The design puts them closer by some margin than the current offices.

London Plan Policy 7.6 provides:

“Environment and Residential Amenity

5.50. Developments are required to consider and mitigate any potential negative impacts on the amenity of surrounding land and buildings in relation to privacy and overshadowing”

This says it all, but it is not just words: we understand that London councils take privacy very seriously: indeed, they are bound to do so not least because of the impact of Article 8 of ECHR, as scheduled to the Human Rights Act 1998.

Unless the design is changed, we shall require to keep net/muslin curtains up at all times of the day – further diminishing light, as a consequence of our need for privacy which we value, and the current arrangement provides significantly.

(4) GENERAL AMENITY

A result of the proposed building, with its effect on light, will mean an increase in the extent of our use of lighting, the problems of noise and light intrusion at night (affecting sleep when the rooms are used as bedrooms), the need to ensure visual privacy, and all the difficulties that might come with policing planning conditions as to noise etc., - as well as lesser considerations such as a reduction in our ability to have sunlight for indoor plants! Further, if the atrium is used for food service and/or if cooking vents open into it, there will potentially be unpleasant smells.

It will be bad enough having the development under construction – it must please be a planning condition that work does not begin before 0800, nor continue after 1700 during that phase

Need For Development And Design Changes

These serious consequences, affecting our light, privacy, noise and amenity, in breach of the Draft Plan and good planning principles, are a consequence of the desire to pack the site full of hotel rooms. As a result, the massing is very considerably greater than the present. This in itself is objectionable, but the justification is said to be a need for hotel accommodation in an area of London in which there is also a need for office accommodation. We query whether the need for hotel accommodation is actually as pressing as the applicants suggest – within the last few years, Crowne Plaza has opened off New Bridge Street; as has a new Premier Inn, just behind New Bridge Street, between that and Salisbury Square; and as has the Grange St.Paul's Hotel off Carter Lane/Godliman street. All this is in addition to the Club Quarters opposite the proposed development in Ludgate Hill, the King's Wardrobe (serviced short-stay apartments) off Carter Lane just behind Creed Court, and (for the less well-heeled) the YHA in Cater Lane. There is no paucity of hotel or similar accommodation. We note there is no empirical evidence to show the occupancy levels of these hotels, which should be a first step in assessing need for more accommodation at the expense of office space.

If a hotel is to be built, the damaging aspects of the design can be ameliorated to prevent the damage to our property as we have described it. The size of a bedroom can be stripped out of the wall opposite our affected windows, and the increase to 7 storeys at the South reduced (there is no principled reason why it should exceed the present height); privacy can also be addressed in part by redesign of the overlooking windows. Noise can be subject to sufficient acoustic constraint, and a redesign of the atrium from being a circulation area, or the provision of sufficient guarantees by way of planning condition to ensure that the area is not used at times which would conflict with neighbouring residential use.

Concluding Observations

We are seriously concerned about the impact of the proposed development. In its conflict with neighbouring residential property such as ours it does not meet planning standards. We are not die-hard opponents of some development in principle (though require to be convinced of the need for it) but adamant that unless each of light, noise, privacy and general amenity is addressed satisfactorily the plan should be rejected.

Yours faithfully,

Sir Brian Langstaff

14 / 00300

07 JUL 2014	
No	121970
FILE	

Planning Department
Attention: Liam Hart
City of London
P.O. Box 270
Guildhall
London
EC2P 2EJ

ACKNOWLEDGED

3 July 2014

Dear Sir,

Your Ref: 14/00300/FULMAJ

I refer to the above referenced Planning Application for a hotel on Ludgate Square/Ludgate Hill/Creed Lane and enclose my objections to this Application for your consideration.

(Mr) K. Rimmer

Flat 13
Lambert House
2 Ludgate Square
London
EC4M 7AS



Re: PLANNING APPLICATION 14/00300/FULMAJ – PROPOSED NEW HOTEL ON LUDGATE HILL/LUDGATE SQUARE/CREED LANE

I submit the following objections to the above Application in the form of Comments based on the document "St. Paul's Cathedral Conservation Area, Character Summary & Management Strategy" adopted by the City of London Corporation 22 March 2013.

Page references are to the above-mentioned document.

Building Heights

Page 20. "Buildings within the conservation area are largely consistent in height according to each street."

Comment: At present the highest point on Ludgate Square is the 5th floor of Lambert House, which is a pent house set back from the building line so that it is not visible from street level. The proposed hotel is generally being built to this highest level and above. Thus, the height profile will be increased substantially and will be visible from street level. It would seem that a modest concession on building height on Lambert House is being used to increase the height generally on the Square. Should this be allowed it will act as a precedent for further planning applications to increase the heights of nearby buildings, perhaps even on the other side of Ludgate Square. To establish a trend of increasing building heights would be seriously detrimental to the conservation area.

Page 20. "Buildings on Ludgate Square form an interesting grouping as they reduce in height from Ludgate Hill to the junction with Creed Lane."

Comment: Much of the gradual reduction in height will be eliminated under this Application with only minor reductions close to the junction with Creed Lane.

Ludgate Square & Creed Lane

Page 24. "A curved lane (Ludgate Square) through a passage between the grand warehouses of Ludgate Hill, provides a transition to the domestic scale of Creed Lane and Carter Lane....."

Comment: The "transition" will be virtually eliminated under this Application to be replaced by a single building considerably higher than existing buildings. (See comments re building heights above). The increased building height will also have a substantial effect on residents on the west side of Ludgate Square. At this time of year apartments in 1 & 3 Ludgate Square have the benefit of direct sunlight at around 10.00 a.m. This will be significantly affected by the proposed additional height in the Application.

Page 29. "On Ludgate Hill and around the cathedral the streets and spaces are filled with workers and visitors at all times of the week, whilst narrower streets can remain tranquil and virtually deserted."

Comment: Ludgate Square is at present a tranquil street but will no longer be so with a large hotel, including an entrance to the hotel. The additional footfall will change the ambience of the Square completely.

Management Strategy – Planning Policy

Page 38. The Civic Amenities Act 1967 requires the local planning authority to “ formulate and publish proposals for the preservation and enhancement of any parts of their area which are Conservation Areas.”

Comment: While I understand that “preservation” does not mean that there can be no change I do not believe that this Application can be considered an “enhancement” because the Ludgate Square elevation is proposed to change from a gradual stepping down from north to south to one where the elevation will increase in height and essentially continue at that height for most of the length of the Square. This is a very retrograde step in a conservation area.

Transport

Page 41. “Much work has already been done in reducing motor traffic in the City, including in the St. Paul’s Conservation Area.”

Comment: If the Corporation’s policy is to reduce traffic in the St. Paul’s area this Application will have a substantial adverse effect on that policy simply because it will be a busy hotel primarily serviced, for customers and supplies, by motor traffic.

Page 42. “Ludgate Square and Carter Lane west of Creed Lane are pedestrian zones. Motor vehicles are prohibited from Carter Lane between 8 a.m. and 6 p.m. Monday – Friday and from Ludgate Square at all times except for loading. Access for cyclists in both pedestrian zones is maintained at all times.”

Comment: To build a hotel in this location, with the constant arrival and departure of guests, other customers and delivery vehicles, will destroy this aspect of current policy by substantially increasing motor traffic.

Page 42. “As motor vehicle through traffic is further reduced, opportunities to enhance the environment for pedestrians and cyclists to move and linger and enjoy the spaces will further increase.”

Comment: If a hotel is built it will have precisely the opposite effects to what is intended because motor traffic will increase, thus reducing opportunities to enhance the environment for pedestrians and cyclists who will be significantly less likely to enter the area let alone linger in generally narrow streets unsuitable for mixing pedestrians and cyclists with motor vehicles.

Condition of the Conservation Area

Page 45. “Potential pressures on the area have been identified as new development, utilities replacement works, and the impact of road traffic.....The condition of the Conservation Area is judged to have improved in recent years, and is expected to further improve in coming years.”

Comment: If potential pressures on the area have already been identified as “new development..... and the impact of road traffic” it is hard to see how a new hotel can be anything but seriously detrimental to the area in both respects.

While I agree that the area has improved in recent years it is hard to see how the proposed new hotel contributes to the expectation that the area is “to further improve in coming years.” As stated

elsewhere above, the hotel will damage the elevations on Ludgate Square and Creed Lane and cause increased motor traffic to the detriment of cyclists and pedestrians, all in an area part pedestrianised and generally consisting of narrow roads with severe vehicle restrictions.

Page 45. "Planning applications (will) be judged against local, regional and national policies and guidance identified above, and loss of buildings and features that contribute to the character of the area will be resisted accordingly."

Comment: It seems to me that the Application for a hotel is contrary to the above policies and guidance for the reasons stated in my above "Comments," particularly those relating to building heights and motor traffic. In addition, I would suggest that the demolition of the buildings in Ludgate Square will reduce the attraction of the Square as part of a Conservation Area which, by its very nature, should seek to retain a major proportion of the existing buildings. Furthermore, the tailors shop and the hairdressers (which will be demolished under the Application) provide services which have been well used by residents and people who work in the area for 25 years and 15 years respectively. These are precisely the types of business that add character to the area as well as providing desirable services.

Taking a broader view, I would have thought that it was a national policy to develop the City's primary function as the nation's major wealth-creating location. However, having worked in The Old Deanery, Deans Court, during the 1990's one of the most obvious changes since that time is that the area now appears to be much more geared towards tourism than business. There are now several hotels nearby, Grange St. Paul's, Crowne Plaza, Premier Inn Blackfriars and Club Quarters, Ludgate Hill, plus many more restaurants, cafes, sandwich shops etc., all primarily aimed at the tourist trade. It seems to me that this area has many advantages for business, which are not being fully utilised for that purpose. There are excellent transport links, with nearby stations at Blackfriars, City Thameslink, St. Paul's and Mansion House and numerous bus services on Ludgate Hill and Farringdon Street. I believe that a better use of any development on Ludgate Hill/Ludgate Square/Creed Lane would be to refurbish the existing buildings for use as offices, perhaps with some residential aspect, in order to re-generate business activity.

In addition to my objections above related to the document adopted 22 March 2013 by the City of London Corporation I have the following objections based on my understanding of the Planning Application and its likely effects on residents of Lambert House, 2 Ludgate Square. I appreciate that decisions can only be made based on planning law and related legislation and I admit to having no specialist knowledge of such matters. However, if the Applicant has any intention of being a "good neighbour" or if the city Corporation is able in any way to protect residents' reasonable concerns I would suggest that the following matters be considered:

1. The External Building Services Plant is situated very close to Lambert House, 2 Lambert Square, and I am concerned that it will cause noise and/or smells as well as being unsightly. Ideally, this should be sited further away from Lambert House, 2 Ludgate Square.
2. The proposed Rooftop Terrace is close to and overlooks windows of Lambert House, 2 Ludgate Square. I am concerned about the privacy and noise aspects of this area, particularly as it is likely to be used for many hours of the day.
3. There are proposed hotel bedroom windows overlooking the internal courtyard that appear to be extremely close to windows in Lambert House, 2 Ludgate Square. This seems to me to be wholly unreasonable.

4. **The Daylight and Sunlight Report appears to be incomplete in that it covers only 10 of the 17 windows that face the internal courtyard.**
5. **The present internal courtyard is generally quiet, but even if only 2 people are conversing in normal tones the noise funnels up the well and is very intrusive at 4th floor level and presumably at other levels of Lambert House, 2 Ludgate Square. If this area became frequently used for conversation or other noise-generating activity the effect on residents of Lambert House would be considerable, particularly given the extensive hours that a hotel operates. The fact that the Application substantially reduces the area of the internal courtyard might even exacerbate the noise-funnel problem. I would suggest that this matter be given serious attention at this stage rather than result in constant complaints to the Council of noise disturbance. Perhaps consideration could be given to putting some form of roof on to contain any noise.**

In summary, I would say that siting a hotel of this size in the Conservation Area is completely inappropriate based on its proposed height and on the resulting increase in motor traffic in an area of narrow streets, one way streets and pedestrian sections, intended to encourage cyclists and pedestrians to linger and enjoy the unique ambience of the area. Furthermore, several important aspects of the Application appear contrary to the Character Summary & Management Strategy adopted by the City Corporation on 22 March 2013.

**(Mr.) K. Rimmer
Flat 13
Lambert House
2 Ludgate Square
London
EC4M 7AS**

3 July 2014

14 / 00300

Flat 13
Lambert House
2 Ludgate Square
London
EC4M 7AS

July 3, 2014

ACKNOWLEDGED

Planning Department
Attn: Liam Hart
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

03 JUL 2014

Your Ref: 14/00300/FULMAJ

Location: Creed Court 3 – 5 Ludgate Hill, 1 – 3 Creed Lane and 11 – 12 Ludgate Square, London EC4M 7AA

Dear Sir,

I would like to raise my objections to the above planning application. I feel that it is inappropriate based on the following:

Change of Use – I believe that the loss of office space is an issue. The City's role should be to protect the overall stock of existing office accommodation. I do not believe that it is appropriate that this site be subject to a change of use to a hotel.

Accessibility – development will generate significant amounts of vehicular and personal movement, and the Application does not accommodate the efficient delivery of goods, supplies and guests. The majority of roads in the area are subject to yellow line restrictions and waiting is not allowed at any time, although loading is permitted. Ludgate Square is a pedestrian zone, restricting vehicular access to service vehicles in a southbound direction only. Whereas Creed Lane is indeed a "lane" where direction is limited in a northbound direction only and both have footway widths which are already narrower than the guidelines set. Also, Carter Lane is pedestrian only, between 8am and 6pm Monday to Friday. According to the core strategy the city has defined its highway hierarchy to further reduce the adverse impacts of motor vehicle traffic. This proposal does not create a safe and secure layout and will result in conflicts between traffic, cyclists and pedestrians. Per the Application, servicing the hotel (including the restaurant) will have a considerable adverse impact on Creed Lane and surrounding streets. It would seem more appropriate to provide off street servicing as any vehicle larger than a transit van would cause an obstruction. Per the Application, the proposed hotel will generate 2-

S

6 taxi pickups/drops offs every 30 minutes. The surrounding streets simply cannot cope with this increase with average dropping off times of 3 minutes 48 seconds.

Increase in floor space – Inappropriate increase in floor space from 4,850m² to 8,735m² – I do not believe that the bulk, scale and massing on this site is appropriate to the setting, amenities and surrounding buildings. It will impact the conservation area as this proposal does not contribute to the balance and mix of uses in the immediate locality. As an example in Ludgate Square we currently have an independent tailor who has been located here for over 25 years as well as an independent hairdresser who has been located here for over 15 years. With this new development both businesses would be closed and their premises demolished, in effect extinguishing the individuality that both premises materially contribute to the area. These are desirable tenants providing services that are well used and who should be encouraged, not eliminated. The proposals will alter the character of Ludgate Square to its detriment as part of a Conservation area.

Daylight and Sunlight report – has not been done correctly. Analysis has only been done on 10 affected windows at Lambert House, 2 Ludgate Square when in fact 17 windows (or even 23 windows should communal space be considered) should have been analysed as they are all directly affected and this includes a kitchen which has a higher BRE guideline allocation. Therefore the current representations are completely incorrect and should be deemed null and void. (Looking at the current assessment for the 10 rooms, for No Sky Line (NSL) all rooms experience a reduction of between 28.9% and 45%, far beyond the 20% BRE guidelines and for Annual Probable Sunlight hours (APSL) 9 of the 10 windows experience BRE transgressions which are fairly significant).

External building services plant – has been situated on the 6th floor at the highest point on the development directly next to bedroom windows at Lambert House, 2 Ludgate Square. Nothing has been done to maximise separation from noise sensitive properties, and no demonstration has been shown in regard to background noise levels associated with the new plant and equipment.

Rooftop terrace public space – little mention has been made about this in the submission and the usage. In the report “Hotel Need Assessment” it states on page ii a “destination rooftop and restaurant” In the hotel management plan no mention has been made, though the restaurants on the ground floor and lower ground floor hours of use are 6am to midnight. The proposed terrace will have direct views into the windows of Lambert House, additionally is it appropriate that a public space on a high floor should be built and used next to a residential development? I have serious concerns as to the noise and disturbance and overlooking which will be completely intolerable.

July 3, 2014

Page 3

Location of bedroom windows – in the proposal it appears that some hotel windows in the internal courtyard will be situated very close to bedroom windows in Lambert House, 2 Ludgate Square. This will lead to a lack of privacy and overlooking. There must be rules about how close these hotel windows can be situated to existing residential properties. I would also hope that all hotel windows that face the internal courtyard are non-opening windows and for the linen cupboards, bathrooms and internal stairwells that overlook the internal courtyard that they have frosted glass.

Internal Courtyard – currently the internal courtyard is used as a business entrance with gates which are secured and locked of an evening. Additionally, the courtyard currently has a glazed partial cover over it so as to provide protection from the weather. The Application appears to reduce the internal courtyard area by 50%. Is this appropriate, as this also diminishes the daylight and sunlight for Lambert House, 2 Ludgate Square? It also appears to utilise it as a public open space with no cover provided to mitigate noise pollution. The present internal courtyard is generally quiet. It is noticeable that if 2 people hold a conversation outside of the partial glazed cover the noise can be very intrusive. I fear that given the extensive hours that a hotel operates and this became well used for conversation or other noise-generating activity, the effect on residents of Lambert House would be considerable – loss of daylight and sunlight, noise and disturbance and light pollution.

Height – The highest point for the proposed development is 39,445 and adjacent to my bedroom window. The current highest point is 36,830 which is unobtrusive and a very small part of the overall rooftop design. The density in height for the proposed development is extreme in that the heights for the majority of the roof top are 39,443, 38,765, 38,655 and 36,795 all of which enclose (by the reduction in 50% from the current internal courtyard size) and overlook the internal courtyard with 17 residential windows from Lambert House, 2 Ludgate Square. The loss of daylight or sunlight and overshadowing would be extreme. The design has not been well thought out and the layout and density impacts are too great. These heights simply need to be reduced.

Yours faithfully,

Matthew Rimmer
Flat 13, Lambert House
2 Ludgate Square
London
EC4M 7AS

Ball, Matthew

14 / 00300

From: PLN - Comments
Subject: FW: Planning Application Reference 14/00300/FULMAJ

From: Michael Tang [REDACTED]
Sent: 03 July 2014 00:10
To: PLN - Comments
Subject: Planning Application Reference 14/00300/FULMAJ

03 JUL 2014

Dear Mr Hart

Planning Application Reference 14/00300/FULMAJ

My name is Michael Tang and my property is Flat 1, Lambert House, 2 Ludgate Square, London EC4M 7AS

ACKNOWLEDGED

I am writing to register an objection to the planning application for Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ)

My objections are

- (1) There will be a reduction in natural light in the rooms, which are beyond the BRE guidelines
- (2) The impact of an increase in the levels of noise has not been fully assessed
- (3) A loss of privacy

Reduction in natural light beyond BRE guidelines

My flat has two windows which overlook the central courtyard in Creed Court. There will be an unacceptable reduction in daylight. This fact is confirmed in the Daylight and Sunlight Report. The decrease in light for the two windows are measured as

- Decrease of 39.43% and 36.5% based upon Vertical Sky Component (VSC),
- Decrease of 27.55% and 25.16% based upon Average Daylight Factor (ADF),
- Decrease of 42.4% and 25% sq ft loss based upon Daylight Distribution Analysis
- 100% loss of Annual Sunlight Hours

Additionally, the Report recognises that the overall absolute change based upon VSC will have a disproportionate impact on my property. We will experience decreases beyond suggested No Skyline (NSL) guidelines, failing to achieve 2011 BRE compliance. It will also fail to meet the BRE compliance for minimum ADF values of 1% post-construction.

Increase in levels of noise

The Environmental Noise Survey fails to recognise that 2 Ludgate Square is a residential property which adjoins the proposed development. The measurements taken fail to reflect the impact of the increased external plant noise on the flats facing inward to the central courtyard in Creed Court, in particular those at the lower level. The points at which the measurements were taken are not in this courtyard in Creed Court.

Additionally, the location of the "high performance trickle ventilators to elevations facing Ludgate Square and the Central Courtyard" will likely project noise upwards and towards the rooms in 2 Ludgate Square. Again, there is a disproportionate impact on the flats at the lower level. No account has been taken of this increased noise nor the visual impact of trickle ventilators immediately outside our windows.

The proposed location of the restaurant is next to the property. The noise from the restaurant is likely to be exacerbated by the narrow nature of Ludgate Square forcing the noise to be channelled towards the property. The restaurant will be open daily until 12 midnight.

Loss of privacy

There will be a loss of in privacy due to the hotel rooms facing 2 Ludgate Square, with potential views into our rooms, especially at night and on weekends – which is not the case at present. The average occupancy rate is projected to be 81.6% throughout the week which will result in a significant increase in people. Further, there will be light pollution at night, especially from additional streetlights, hotel rooms and corridors.

This is a major commercial development which will have a significant impact on a residential property immediately next to it and I believe that these matters need to be addressed. Can you please acknowledge receipt of this mail.

Many thanks.

Yours sincerely

Michael Tang

Ball, Matthew

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 04 July 2014 09:50
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

ACKNOWLEDGED

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:49 AM on 04 Jul 2014 from SIR BRIAN LANGSTAFF.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

04 JUL 2014

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: SIR BRIAN LANGSTAFF
Email: [REDACTED]
Address: FLAT 5, LAMBERT HOUSE 2 LUDGATE SQUARE LONDON

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I have submitted a detailed letter of objection, but have not yet had an acknowledgement. In summary: We have a residential flat at Flat 5, on the second floor of Lambert House, 2 Ludgate Square, EC4M 7AS. Two of our habitable rooms overlook what it currently an atrium/ open void, surrounded by offices which are quiet and usually unoccupied at night, and have sunlight by day. Our (1) light, (2) privacy, (3) noise levels and (4) general amenity will be seriously threatened by the proposed (over)development. Our rights to light are to be breached. There is no good reason to depart from Planning principles, from BRE guidance, and (especially

as the City of London) being a standard bearer for setting standards of good urban planning, especially since the need for further hotel development of this mass is dubious and not established by empirical evidence; nor is it good practice to grant permission for development which so affects existing legal rights to light that legal action is then required to enforce them (which if taken would, simply, prevent the development in its proposed form) We will lose 100% existing direct sunlight, have reductions in VSC and ADF considerably below BRE guidelines; in breach of planning policy DM 15.7 of the Draft Local Plan there will be unacceptable noise intrusion; in breach of London Plan Policy 7.6 privacy will be interfered with in particular by overlooking windows; and, as it happens, in an area already teeming with traffic small local lanes, or overcrowded Ludgate Hill will have to cope with additional hotel traffic. In short, we shall be overshadowed, overlooked, overexposed to noise, and over-trafficked by the proposed overdevelopment (7 storeys high, adding two to the existing, and building a side wall nearer to our bedroom windows, where the massing should broadly be in line with the existing but is proposed to be much greater), for which there is no clear evidence of demand at the expense of office space.

From Deborah Langstaff

14 / 00300

Flat 5, Lambert House
2, Ludgate Square,
LONDON EC4M 7AS
5th. July 2014

Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 3EJ

05 JUL 2014

ACKNOWLEDGED

Dear Sirs,

Application 14/00300 (Creed Court and Ludgate Hill): Objection

My husband and I own Flat 5, Lambert House, 2 Ludgate Square. The proposed development next to our flat will come uncomfortably close to our two bedroom windows. The combined effect of that and the extra height to the South will deprive us of light. I am happy to provide access to the flat so that you may assess this for yourselves.

The outside lower ground space below the windows will generate noise, as it will be funnelled up between the proposed building and our block of flats.

The proposed building will have bedroom windows overlooking ours, which will affect our privacy.

The applicants suggest that there is a need for hotel space in this part of central London. Has any survey been done of the need for this? An indication of what might be found, if one were, is a sample survey of my own. Yesterday morning, I enquired of three hotels in the immediate vicinity of the proposed building. I asked each for 3 double rooms, for three nights, the weekend of Friday 11th. – Sunday 13th. They all had vacancies. This is in the height of the summer season, and only one week away....

A further problem of hotel use is the effect (drop offs/picks ups etc), on traffic flow which is already near breaking point on Ludgate Hill.

If there really is need for hotel use, which I doubt, then the building should be on a smaller scale, further away from the back of Lambert House, with safeguards in place against noise, loss of privacy, and intrusion from lighting etc.

Yours faithfully,

Deborah Langstaff

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Liam Hart
Department of the Built Environment
PO Box270
Guild Hall
London ECA2PJ 2EJ

Nicola Bell
Flat 14
Lambert House
2 Ludgate Square
London EC4M 7AS

5th July 2014

Dear Mr Hart

Planning Application ref.14/00300/FLMA

I wish to express my concerns and objection to the proposals on the proposed development which has major impact on the residents of Lambert House.

1. Massing the proposed building is large and there are already two hotels in close proximity.
2. Overlooking from the proposed hotel rooms and terrace area.
3. Overshadowing caused by the increased height of the building.
4. Loss of daylight and sunlight.
5. Materials to be used which include white glazed bricks in the light well which would likely cause reflections and glare to Lambert House.
6. The impact on the important local historic environment.
7. Pedestrian safety would surely be affected during demolition, construction and by service vehicles.

To explain further please consider the following concerns:-

- 1 Within the planning submission the loss on natural light seems to be considered inevitable.
2. The drawings (plans and elevations) available for viewing at The Guild Hall are confusing, difficult to understand and too faint to see the true impact on the skyline and the effect on Lambert House.
3. The proposed roof top terrace said to provide views of historic London sites may well impose problems from lighting, noise smoke and overview of residential property. It also implies high elevations.
4. Service vehicles, narrow streets, noise smoke, fumes, 24 hour operation give rise to major concerns.
5. Roof top plant noise and fumes from extract systems yet to be designed must have some adverse impact.

6. If the developer needs the special acoustic glazing units for the hotel to provide suitable internal noise levels, will he provide the same for the residents of Lambert House at his cost?
7. The proposals refer to the 5th Floor Level of Lambert House and seem to assume all floors are the same layout. This should be investigated and confirmed or otherwise.
8. There is likely to be an increase in ambient noise levels and detrimental impact on air quality.
9. The proposals gloss over the intrusion and degradation for Lambert House and appear to be unavoidable and of no concern.
10. Will the developer provide indemnity for adverse effects to Lambert House and provide suitable acceptable accommodation at his cost for residents during the most intrusive periods of work.
11. Perhaps I could offer what may be a more acceptable counter proposal that could include an office development linked to residential property at the southern end of Creed Lane, Carter Lane and Ludgate Square to be more suited to the preservation of the historic Old London with narrow streets and a feeling of village life with a blend of facilities in the Ludgate Hill Conservation Area.
12. Finally please advise me when the Planning Committee will review the application so that if possible I, or a representative can attend.

Nicola Bell a resident of Lambert House.

Planning Department
 Attention: Liam Hart
 City of London
 P.O. Box 270
 Guildhall
 London ECP 2EJ



ACKNOWLEDGED

6th July 2014

Dear Sir,

YOUR REF: 14/00300/FULMAJ – Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square

In reference to the above Planning Application I enclose my objections to the Application for your consideration:-

The Proposed Building Plan for a Hotel instead of the existing Office. Creating a conflict between residential and commercial in an historic, conservation area of St. Paul's London.

There are already sufficient hotels in the St. Paul's Conservation Area. Grange St. Paul's, Godliman Street, Grange St. Paul's Serviced Suites, Creed Lane, Club Quarters, Ludgate Hill, Y.H.A, Carter Lane, The King's Wardrobe serviced apartments off Carter Lane. These are contained in a small area around Lambert House, 2 Ludgate Square. There is not sufficient evidence to suggest any more Hotels are needed. It would also be more appropriate for the Hotels to be located away from residential areas.

There are more hotels on the perimeter of this conservation area.

This Proposed Plan brings a lot more vehicles into the area which are pedestrian zones. Motor vehicles are prohibited from Carter Lane between 8 a.m. and 6 p.m. from Monday to Friday and from Ludgate Square at all times except for loading. Access for cyclists to both pedestrian zones is maintained at all times. Carter Lane east of Godliman Street is a route for use by pedal cycles and pedestrians only. The Corporation states that "In adopting the Core Strategy the City has refined its highway hierarchy to further reduce the adverse impacts of motor vehicle traffic, including the valued character of the City's conservation areas." The effects of another large hotel would appear to be contrary to this stated strategy.

The Application alters the Character of Ludgate Square taking away shops which add to the amenities there. Also Ludgate Square is entered by an Arch from 23 Ludgate Hill which leads into a narrow passage opening into a small cobbled lane. It allows unloading but because of the small entrance any larger vehicle than a small van grazes the brickwork under the Archway. Lambert House exits directly onto the lane. There is no pavement. The lane is particularly quiet and tranquil and is ideal for residents living there. The Archway is also a good viewing point for pedestrians to stand and take photographs of St. Paul's Cathedral. If the proposed hotel use vehicles under this Archway it would be a hazard for pedestrians and cyclists and take away the peacefulness of the lane. All Lambert

House residents have wooden sash opening windows so quietness is of importance from living room, bedroom and kitchen windows.

The narrow lanes and alleys of Ludgate Square (which is not a Square), Carter Lane, Deans Court and Creed Lane are prime historic tourist areas and unsuitable for any additional traffic. They should be left as they are and not bring about a massive, bulky height and density hotel, which far exceeds the present office height of 4 floors. Creed Lane could become a service area for Dustcarts, Coaches, Taxis and Delivery Lorries, exacerbating the noise levels and pollution and spoiling a tourist area which is mostly for pedestrians and cyclists.

The existing building can easily remain at its present height and be refurbished to bring it up to date. Small/medium offices are always in demand for the smaller business, and makes good economic sense for the City of London. Office hours are by far better for residents and as they do not work at weekends in comparison to a 24 hours working hotel

The proposed building has 7 and a bit floors and 3 basements. The bit floor is the PLANT placed close to the windows of Lambert House, 2 Ludgate Square. The residents windows open on to the internal atrium and I am concerned about pollution and air quality that will enter the windows. (steam, ventilation for the City's Sewer Network, noise etc.) No details of the PLANTS WORKING is given on the Application.

Residential and hotels are not a good mix because of lack of privacy for residents, increase of noise, pollution, and additional bulk and heights. Not forgetting this is a Conservation Area.

Yours faithfully,

Mrs. J. L. Rimmer
Flat 13
Lambert House
2 Ludgate Sqaure
London
EC4M 7AS

2 pages.

Ball, Matthew

From: PLN - Comments
Subject: FW: Planning Application ref.14/00300/FULMAJ

From: Niklaus Föh [REDACTED]
Sent: 07 July 2014 09:49
To: Chipperfield, Rob
Cc: Hart, Liam; PLN - Comments
Subject: Planning Application ref.14/00300/FULMAJ

07 JUL 2014

ACKNOWLEDGED

Dear Mr Chipperfield

Thank you for receiving us in your office on Friday 27.6.2014. As owners of Flat 9 (3rd floor), Lambert House, 2 Ludgate Square since the year 2000 we herewith express our main observations concerning the Creed Court Project (14/00300/FULMAJ) as follows :

1. Proposed new Public Courtyard

The project seems to create a courtyard accessible for guests and staff of the hotel as well as for visitors of the bar. This would produce odour and smoke and noise during day and nighttime. The noise will echo from the walls in this narrow courtyard in front of our bedrooms. The impact on our wellbeing would be very negative and is in our opinion intolerable.

There is neither air-conditioning nor recirculated air-circulationing system in our flat and it is therefore essential that we are able to keep the windows open. We think that any proposed courtyard should be as wide as possible to allow fresh air from outside and should be inaccessible to hotel guests and staff. We therefore suggest that if planning permission is granted there should be strict limits on the use in order to mitigate the most negative impact on the enjoyment of our flat.

2. Daylight and Sunlight Report

This report shows an obvious change to the worse for our flat, below the accepted standards. The report wipes this away saying we have to tolerate this in the urban area which is unacceptable and ignores our acquired right of light for the present level. The report seems to us to be highly unprofessional because it describes the effects on 10 windows but in fact ignores many more in Lambert House.

3. Size of the Hotel

The application shows a planned hotel with 140 bedrooms. We think in this historical and small area there is space only for a small boutique hotel, i.e. not more than say 50 to 80 bedrooms. There are surely enough hotel rooms in the immediate area with the Grange and Club Quarters only a few yards away. The planned development would be out of character with the local area and would cause an imbalance against residential properties in the local neighbourhood and would make Lambert House a very small island.

4. Rooftop Destination Bar

We fear such a bar will have a most negative impact on our flat by noise and people watching our bedrooms which not only affects our privacy but could cause a security problem too. We therefore suggest that it should not be permitted, but if it is, then there should be strict limits on its use in order to mitigate its impact and appropriate screening is erected on the roof to ensure users cannot see into the flats.

5. Entrance doors



From a transport statement we learned an additional entrance door is planned from Ludgate Square but the drawings only show two escape doors to Ludgate Square. We presume that there will be no entrance door from Ludgate Square because this would lead to noise and smoke impact on the residential flats on both sides of Ludgate Square. To be clear Ludgate Square is a pedestrian zone, restricting vehicular access to service vehicles in a southbound direction only.

6. Effects of the Rebuilding procedures

Our flat will be affected on two sides by the demolition and rebuilding process. We fear the stability of our building could be damaged by this project. We propose the developer has to engage an independent specialist to inspect and document the original state of Lambert House including all flats in the house prior to start the works. The developer should be obliged to monitor permanently the condition of Lambert House. During the works regular inspections of Lambert House and its flats shall be provided. Damages to the Lambert House and/or its flats have to be repaired by the developer in any case. Therefore, the developer shall provide insurance indemnity for any defects caused by the works.

7. Dust, Noise and Vibrations during the works

We fear dust, noise and vibrations during the works could be unbearable for us (retired people) and for our grandchildren (1-8 years). It is very important to mitigate the negative effects on our property by strict conditions which we suggest the Council to impose. Or will the developer be obliged to offer us and provide suitable, acceptable alternative accommodation during the work ?

In conclusion the Creed Court Project (14/00300/FULMAJ) is not acceptable for us. We expect that this project will not be approved by the relevant authorities or attached with conditions to an approval to prevent any negative influence for the area of Ludgate Square and to compensate all affected residents.

Thank you very much in advance for considering our concerns. Please keep us informed by email about the next steps.

Kind regards

Niklaus and Cilgia Föh
Flat 9, Lambert House
2, Ludgate Square
London EC4M 7AS

[REDACTED]

Mr. J. Colombano and Ms. M L Kirk
 Flat 16, Lambert House
 2 Ludgate Square
 London EC4M 7AS

For contacts please use: XXXXXXXXXX

FAO Mr Liam Hart,
 Planning Officer
 Development Division (west),
 Dept. of the Built Environment
 City of London Corporation,
 PO BOX 270
 Guildhall,
 London, EC2P 2EJ

ACKNOWLEDGED

07 JUL 2014

7TH July 2014

Dear Mr Hart,

RE: Planning application 14/00300/FULMAJ at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London, EC4M 7AA - OBJECTION

I write to you as the owner of Flat 16, Lambert House, 2 Ludgate Square in relation to lodging a formal objection to the above proposal on the grounds of excessive mass and bulk of the proposal, noise and disturbance, loss of daylight/sun light, overlooking and privacy concerns, the need for a hotel in place of offices and the adverse impact of the scheme on both the St Paul's Cathedral conservation area and the Ludgate Hill conservation area.

Summary of concerns

Each of the concerns will be addressed in turn, however in summary the scheme is considered unacceptable in its impact and therefore fails to comply fully with the City of London Corporation's planning policies and guidance. The proposed increase in mass and bulk adjacent to the bedroom windows of Flat 16 would result in an unduly overbearing impact on the outlook from these windows. The proposed terrace is likely to be used for hotel guests as a smoking area and for outdoor gatherings thereby resulting in noise and general disturbance/ nuisance to the occupiers of the adjacent flats including No. 16. In addition to this, users of the terrace could look directly into the windows of our property and the neighbours below (also bedroom/ habitable room windows) and our private terrace. The proposed scheme results in a substantial reduction in daylight and sunlight received by our flat. We argue that there is no substantial evidence showing a need for a hotel on this site and the fact that the offices are not viable. Finally we argue that the very nature of the proposal and associated impacts will adversely affect the character and appearance of the conservation areas the scheme is locate in.

Mass and Bulk

Policy CS10 (Design) of the City of London's Core Strategy (2011) states that the Corporation will promote a high standard and sustainable design of buildings and having regard to their surroundings by 'Ensuring that the bulk, scale, massing, quality of materials and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and

spaces. In addition to this draft DM Policy 10.1 (New Development) states that the Corporation will require all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that 'the bulk and massing of schemes are appropriate in relation to their surroundings...'

It is difficult to ascertain from the submitted drawings the exact increase in height of the proposed hotel; it can reasonably be estimated to be somewhere between 1.2m and 1.7m, however as the applicant has not provided like for like comparisons in terms of floor levels and comparative sections this cannot be confirmed. This is worrying as I would question the need for this approach which appears somewhat contrived. Even if the increase was just over a metre, due to the proximity of the proposed plant to flat 16 (it would adjoin our property at a perpendicular angle) the new higher structure would overbear on our property resulting in a sense of enclosure and an unneighbourly relationship which is considered unacceptable and fails to comply with the aforementioned policies.

Noise, Nuisance and Disturbance

The City of London draft Policy DM 15.7 (Noise and light pollution) states that 'Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours.' In addition to this draft Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will encourage high quality roof gardens and terraces where they do not 'immediately overlook residential properties'.

There are two concerns over the submitted application in regards to noise. Firstly the use of the atrium, although unknown, is likely to be frequented by guests of the hotel for the purposes of dining, drinking, chatting etc and as a communal gathering spot. There may even be live entertainment if the weather permits as is common with several higher end hotels in the city. This is likely to result in noise from these activities being channelled up the void between the back of Creed Court and the rear of Lambert House resulting in disturbance to the occupiers of these flats including flat 16. This impact will be exacerbated through the activity occurring in the evening till midnight and possibly beyond, at a time when the majority of neighbouring occupiers will be asleep.

The second concern is the use of the newly created terrace at roof level. At present the site contains plant housing/rooms opposite the bedroom windows of flat 16. The proposal includes the provision of a roof terrace that would measure approximately 6.2m from the habitable room windows in the eastern flank elevation of our flat facing the new development. As with the use of the new courtyard space for the hotel, guests are likely to congregate on the roof terrace for social activities such as drinking and smoking resulting in general noise, disturbance and nuisance to our flat to the detriment of our amenity and quality of life within the flat. As such this element of the proposal is considered unacceptable and conflicts with the Corporation's policies mentioned above.

Daylight and Sunlight

The City of London Saved UDP Policy ENV36 and draft Policy DM 10.7 (Daylight and sunlight) of the Emerging Local Plan (December 2013) state that the Corporation will look to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

Subsequently the BRE guidance, as noted by the authors of the 'Daylight and Sunlight' report submitted as part of the application, advises that an alteration to the Vertical Sky Component (VSC) daylight and No Sky Line (NSL) of less than 20% is considered by the BRE to be reasonable and likely to be unnoticeable by the occupant. In addition to the VSC and NSL, the Annual Probable Sunlight Hours (APSH) is another BRE-approved criterion for assessing the amount of sun available in both summer and winter for each given window which faces 90 degrees of due south.

The calculations provided in the report do not appear to have been calculated from a visit of the neighbouring properties affected and thereby cannot provide the most accurate results. Notwithstanding this the report notes that there will be a loss of 49% for sunlight received for one of the bedroom windows of which equates to a 100% loss of sunlight in winter as a result of the proposed development. In regards to the VSC of flat 16 (top floor) the bedroom window closest to the proposed plant room would suffer an alteration of 25.8%, clearly greater than the 20% threshold as stipulated in the BRE guidance. The resulting loss of daylight and sunlight is considered unacceptable and would significantly harm the amenity and enjoyment of our property and is therefore considered non-compliant with the Corporation's relevant daylight and sunlight policies.

A further point to note is that within the report the authors state that the guidelines indicate that they should be interpreted flexibly in City Centre locations 'if new developments are to match the height and proportions of existing buildings'. This is misleading as the scheme is clearly going to be higher and bulkier than the existing and therefore it could be argued that the guidance may not be relevant in which case the scheme would fail to comply with most of the BRE guidelines intended for schemes matching the existing bulk and height. Finally it is somewhat alarming to read on page 12 of the submitted Daylight and Sunlight Report that No 2, Ludgate Square of which our flat is one of the properties in this block, would be adversely affected by the development as per the following 'Most properties around the site would only experience small BRE transgressions to their daylight and sunlight; however 2 Ludgate Square would experience reductions beyond the suggestions within the BRE guidelines. Due to the location of this building, these reductions will most certainly be unavoidable if there is to be any increase in massing on the Creed Court site'.

We consider that the above is unacceptable and the scheme has failed to comply with BRE guidance as stipulated in the report.

Overlooking and Privacy

London Plan Policy 7.6 states that 'Developments are required to consider and mitigate any potential negative impacts on the amenity of surrounding land and buildings in relation to privacy and overshadowing'. In addition to this the draft Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will 'encourage high quality roof gardens and terraces where they do not immediately overlook residential properties'. This is strengthened by Saved Policy HOUS 10 (Overlooking and Daylighting) which states 'To require where practicable that the privacy, outlook and daylighting levels of residential accommodation is respected by the form of adjacent development'.

The proposed floor plan showing Level 6 referenced 'A2109 Rev V09' illustrates a proposed terrace accessed from the eastern side of the building and by all of the guests and visitors to the hotel and not only those with rooms at this level. The terrace would measure a distance of approximately

6.2m from the bedroom windows along the east elevation of flat 16 and would be adjacent to the private terrace serving our flat along its south-eastern elevation. In the absence of any details regarding the use of the terrace and screening along the western elevation, there are legitimate concerns that, in addition to potential noise and disturbance, as covered earlier in this report, occupiers of the terrace could directly look into the bedroom windows of our property to the significant detriment of our amenity.

Our specific concerns in regards to the relationship between the proposed terrace and the bedrooms are two-fold. Firstly we are concerned over the fact that our young daughters sleep in both of the bedrooms facing the proposed terrace and any overlooking from the terrace by strangers into their bedrooms while they are occupied is an unnerving thought for us and would be the case for any parent of young children. Additionally we are very concerned that our young children will be exposed, on a regular basis to people smoking, drinking, perhaps using foul language when inebriated and general antics associated with adult behaviour. This should not be the case and we should as family should be able to enjoy the basic right of peace, privacy and safeguarding of our children.

In regards to the part of the proposed terrace adjacent to our terrace there is only a small waist-high railing separating our property from the proposed hotel. In the absence of a formal garden, our modest terrace is the only outdoor amenity space provision for us to enjoy, which has been especially designed for the children to include a small play table and sand box. We would be most concerned at not only hotel guests and visitors looking into this area but potentially also strangers engaging in conversation with our children and worse still crossing over to our side given the limited safeguarding of the existing boundary treatment. Overall the proposed terrace would be a direct invasion of our privacy, an infringement on the safety of our children and significantly harmful to our amenity and enjoyment of our home, such that we may have to consider moving to another home where we feel safe and can raise a young family. Needless to say, we feel that this element of the scheme would fail to comply with the council's relevant policies and guidance.

Hotel Need and Loss of Offices

Draft Policy DM 1.1 (Protection of office accommodation) states that the Corporation will refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable offices and there are strong economic reasons why the loss would be inappropriate. The Office Redevelopment Viability Study (March 2014) submitted as part of the planning application does not, in our view, fully justify the loss of the current office use. The information presented illustrates that in its current state the offices would still yield a return of 7%. In this case little work would need to be done. The author of the report compares the return of £15 rent per sq. ft. to that of between £45 and £67.50 per sq. ft achieved by new 'Grade A' offices at nearby Basinghall Street, London Wall and High Holborn. However, whilst the newer offices attract a higher rent the report has not mentioned the build cost for these offices which would equally be high and would surely eat significantly into the Gross Development Value (GDV); this would affect the overall profit achieved in real terms. Finally the marketing information presented does not provide appendices illustrating the individual adverts placed for each of the publications/websites mentioned. Without tangible figures demonstrating the site has been marketed at a 'fair market rent' for a suitable period of time it is difficult to accept that the office use is no longer viable, except

to justify the office loss for an alternative use that will generate more profit for the site owners and nothing else. In this respect the scheme fundamentally fails to comply with the Corporation's policy aimed at protecting offices and the scheme is therefore considered unacceptable on these grounds.

Draft Policy DM 11.3 (Hotels) states that 'Proposals for new hotel and apart-hotel accommodation will only be permitted where they are not, amongst other factors, contrary to policy DM 1.1 and do not result in adverse impacts on the amenity of neighbouring occupiers'. It is evident from the previous sections of this objection letter/statement that as the hotel would adversely affect the amenity of neighbours the hotel proposal conflicts with aforementioned policy. Furthermore given the lack of justification for the loss of the office use the scheme again fails to comply with the hotels policy.

It is noted from the report to support the hotel development submitted with the application that 21 sites with planning permission to either extend or redevelop for hotel use are highlighted as either not ready or not yet having implemented the planning consent. The report argues that there is a distinct lack of 4-5 star hotels within the vicinity (1 mile radius from the application site), which in our view is plainly false as a non-exhaustive list as per the following illustrates at least 6 such hotels:

- Grange, St Pauls Hotel (Luxury 5-Star) located at 10 Godliman Street, EC4V 5A
- Crowne Plaza London- The City (5-Star) located at 19 New Bridge Street, EC4V 6DB
- Threadneedles Hotel (Boutique 5-Star) located at 5 Threadneedles Street, EC2R 8AY
- Club Quarters St Pauls (4-Star) located at 24 Ludgate Hill, EC4M 7DR
- The Kings Wardrobe (Full-Serviced Residences 5-Star) located at 6 Wardrobe Place, EC4Y 1LL
- Apex Temple Court Hotel (4-Star) located at 1-2 Sejeants Inn, Fleet Street, EC4Y 1LL

The fact that any extant planning permissions haven't been implemented on the above or any other hotels or sites within the vicinity should not prejudice the decision to grant permission for another hotel in the area on the basis that others have not been built. The Corporation have clearly allowed hotel development in the hope that that these will eventually be built but cannot be responsible for ensuring they are built; this would go beyond the scope of the planning permission and indeed the planning process. Additionally there is nothing preventing the applicant from receiving permission and 'banking' the site as a speculative investment- adding to the several other sites that have not implemented consents for the same reason.

A final point to note on this matter is one of the importance of the Corporation listening to local resident's views; over the years the Corporation sends us questionnaires on how we would like to see the city improved and meet the needs and aspirations of residents, especially families. The Corporation claims that every effort has been made to ensure that there is a balance between commercial and residential uses and the provision of green urban spaces and public services for young families. In this respect the proposed scheme undermines the City of London Corporation's own goals and aims. In terms of a need for hotel development on this site, the application does not, in our view, suitably justify this and therefore this aspect of the scheme is considered unacceptable and fails to comply with the Corporation's relevant policies. Moreover a new hotel in this location with an increased bulk as proposed would truly have an adverse impact on the 'soul' of the neighbourhood thereby appearing out of keeping with the character and appearance of the surrounding area.

Adverse Impact on Conservation Area

Both our property and the application site fall within both the Ludgate Hill and St Paul's Cathedral Conservation Area. Draft Policy DM 12.2 (Development in Conservation Areas) of the Corporation's Local Plan states that 'Demolition in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area'. Saved UDP policy ENV 11 supports this stating that the Corporation shall look to 'resist the demolition of buildings which make a positive contribution to the character or appearance of a conservation area and to encourage their sympathetic refurbishment.'

The scheme proposes the retention of only a façade and will involve significant demolition of the existing building which would not comply with the Corporation's relevant policies as above. We are concerned that the impact of the proposed development including the increase in traffic, increase in the bulk and volume of the replacement building and the general intensification of activity on this site on a 24-hour basis will harm the overall balanced and unique character of both the conservation areas. In this regard the scheme is considered unsympathetic to the conservation areas it is located in and fails to comply with the Corporation's relevant policies.

Conclusions

It is our view that, for the reasons highlighted above, the proposed hotel development at this site is considered unacceptable and fails to comply with the Council's relevant policies and BRE guidance. If the Council is minded to approve the application we would suggest further evidence in respect of the loss of office use and the need for a hotel at this site. We would like to see revised plans demonstrating details of adequate screening to overcome the overlooking issues and noise mitigation from the use of the terrace and courtyard below. We would also like to see further details of a noise survey carried out from our flat as the nearest noise-sensitive receptor and any measures to reduce any new plant noise. I would ask that this information is requested from the applicant at the earliest opportunity and we are provided with a chance to study this information and comment in good time before a decision is reached.

I trust the above is clear, however, should you require further clarification please do not hesitate to contact either myself or my wife, Marie Louise by email at the following address: joe_colombano@yahoo.co.uk. As per our earlier telephone and email conversations we would still like to invite you to our flat to assess the impact the proposal will have on our property in greater detail.

Yours Sincerely,



Mr J Colombano and Ms M L Kirk
(Owners of Flat 16, Lambert House)

For the attention of Mr. Liam Hart, Planning Department,

City of London, P.O. Box 270, Guildhall, London EC2P 2EJ via email to liam.hart@cityoflondon.gov.uk

07 July 2014

Dear Mr. Hart,

RE: Your reference – 14/00300/FULMAJ, Demolition of existing buildings behind retained façade to 3 Ludgate Hill to provide a 7-storey building for hotel use, restaurant use and associated plant areas

Having viewed the proposals and relevant documents regarding the proposed demolition of the current building and proposed development of a new hotel, I am extremely concerned about all the potential problems the demolition and development will likely bring. I am the owner of one of the residential flats in Lambert House, 2 Ludgate Square, whose building will be directly adjoining to this proposed hotel development.

The first major concern is the likely reduction of daylight to our building and other existing surrounding residential buildings. Therefore I read with great interest the Daylight and Sunlight Report prepared by Gordon Ingram Associates (GIA) on behalf of the client, Dominiv's Living Ltd. I have found the assumptions they had based their report on, to be misleading. GIA made no attempt to hide the fact that it was difficult for them to obtain floor plans of the affected neighboring properties. A comparison of the existing and proposed daylight and sunlight levels was completed by GIA to advise on potential light changes impacted by the proposed new development.

On page 24 of the pdf version of the Daylight and Sunlight Report available to view online at your website, it states that the "BRE handbook provides the formula for calculating the average daylight factor (ADF)" in order to determine reasonably the extent of interior daylighting. To compare for example, kitchens are recommended to require double the ADF than bedrooms, as shown in the table on page 25. However, pages 12 and 13 assume that two thirds of the windows of Lambert House affected by the light well are bedroom windows, with the remaining third "to serve circulation space". This assumption is wrong in the case of my property because the windows belong to the kitchen and the bathroom.

Page 21 explains the two other main methods of measurement recommended by the BRE handbook for calculating daylight to existing residential properties: Vertical Sky Component (VSC) and No Sky Contours (NSC). Page 23 goes further to even point out the advantages and disadvantages of these methods. VSC may give a quick indication of the lighting potential but "does not take into account the window size, room size or room use". NSC, being "very dependent upon knowing the actual room layouts", "does take into account the number and size of windows to a room, but does not give any quantitative or qualitative assessment of the light in the rooms, only where sky can or cannot be seen".

This then led me to scrutinize page 44, the Appendix 4, Daylight and Sunlight Table of Results. My building is Lambert House, 2 Ludgate Square. The first table displays VSC and ADF data together, with the view as explained on page 25 that VSC serves as an initial guide if room layout and uses are not reasonably known, as opposed to ADF where room layout and uses are either known or predicted. As mentioned before, GIA does not have the entire building floor plans for Lambert House.

The VSC data on page 47 show VSC mathematical values for light hitting the windows to be decreasing when going from existing building layout to proposed development. All the values are shown to be decreasing except for two stairs windows listed as W3/703 and W3/704 (these can be viewed on a diagram on page 40). This would make sense because those two stairs windows are on the top two floors of my building. So effectively, the proposed new hotel development is shown here to have an adverse daylighting impact on my building, especially on the lower floors.

The ADF data on the same page 47 also show ADF mathematical values for light hitting the windows to be decreasing when going from existing building layout to proposed development. Again, the only exceptions are

ACKNOWLEDGED

the stairs windows (W3/702), (W3/703) and (W3/704) (these can be viewed on a diagram on page 40). Therefore, this is another indicator of the adverse daylighting impact on my building, especially on the lower floors.

Reviewing the No-Sky-Line (NSL) data on page 48 again leads to similar conclusions for my building.

Reviewing the Annual Probable Sunlight Hours (APSH) data on page 52 also leads to similar conclusions for my building. I am actually more alarmed to see data listed as 100% annual loss for 5 windows when going from existing building layout to proposed development, with most hovering above 50% annual loss. There is only one exception, W3/704, i.e. the fourth floor stairs.

In fact, this Daylight and Sunlight Report by GIA acknowledges on page 13 the limited daylight already received currently in the light well, affecting the flats in my building. However, their very flawed assumption that "as the rooms in question are understood to be bedrooms, the BRE states that sunlight to bedrooms is considered to be less important". As I mentioned already, my flat windows facing the light well are those of the kitchen and bathroom. You must also consider the possibility that other flat windows are like mine, or the possibility that the rooms may have started out as bedrooms but have now experienced the change in use to, for example, a study.

From our point of view as resident and owner, I am also very concerned about the noise disturbances caused by demolition and construction of a new building adjoining my building. The noise disturbances will not abate if the proposed hotel development does go ahead, because as you can imagine, a fully functioning hotel with restaurant services would have an endless stream of hotel guests coming and going, along with transport like taxis and coaches serving the hotel. The noise disturbances would continue with the logistical supply side of the hotel business.

Another major concern would be the traffic caused by the logistical supply side of the hotel business. It will be difficult for vehicles larger than a transit van to service the hotel, using the Ludgate Square entrance, as mentioned in the Delivery and Servicing Plan Part 2, listed in the proposal. Their proposal is to use Creed Lane. As you know, Creed Lane is only a one-way street. Realistically, it will be hard to coordinate deliveries and servicing on a one-way street. Page 7 of this plan suggests "an average of 23 daily servicing trips predicted" for this proposed hotel development, with the majority serviced by transit vans. Any passing by other vehicles may require mounting the kerb. Surely this would impact adversely on the pedestrian safety.

In addition, the Delivery and Servicing Plan Part 1 does state on page 15 that "a delivery and servicing survey was undertaken on 20th June 2013, between 07:00 and 11:00 hours... on Creed Lane and along the Site's frontage on Ludgate Hill". Why was this survey carried out only on one day and for only 4 hours? In fact, it was taken on a Thursday over a year ago.

A 140-bed hotel would generate a great deal of refuse, and refuse vehicles will be the largest vehicle type to service the hotel. This in turn will exacerbate the traffic conditions of the surrounding areas.

Therefore I feel these concerns should be addressed. Thank you for looking into my objections and I look forward to hearing from you.

Yours sincerely,

Dr. Y. Oliver

Flat 15, Lambert House, 2 Ludgate Square, London EC4M 7AS

Wells, Janet (Built Environment)

From: PLN - Comments
Sent: 08 July 2014 18:56
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 6:56 PM on 08 Jul 2014 from Alderman Vincent Keaveny.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Alderman Vincent Keaveny

Email: [REDACTED]

Address: Members' Room Guildhall London

Comments Details

Commenter Type: Councillor

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I write to object to the proposed development of a hotel on the Creed Court/Creed Lane/Ludgate Square site. The development of a seven storey (plus plant) building for use as a 140 room hotel is highly unsuitable for a constricted site in a Conservation Area adjacent to a residential building, Lambert House. The development will adversely affect the light and privacy enjoyed by its residents. The size and bulk of the building is out of keeping with surrounding buildings. The operation of the plant on the new building will significantly affect nearby residents day and night, introducing noise and smells which are not currently a concern for them. I note that the proposed development includes an atrium courtyard and a roof terrace. Both aspects of the proposal are likely to have a serious impact on the residents of Lambert House when operational, with noise and nuisance arising from numbers of people congregating in these areas, especially in the evening and late at night.

As has been observed by other objectors, the roof terrace would also impinge on the privacy of bedrooms in adjacent flats. The increase in vehicle traffic in Ludgate Square (even if only for deliveries and drop offs) will have a serious adverse effect on the characterful and tranquil nature of this Conservation Area. The narrow entrance to Ludgate Square from an extremely busy point in Ludgate Hill, and the absence of pavement in parts of Ludgate Square, means that any significant increase in traffic will create a real danger for residents, passers by and road users such as cyclists. The general increase in traffic that a hotel of this size will bring in the Creed Lane and Carter Lane will have noticeable adverse effect on the residents and businesses in the nearby streets, which are narrow and ill suited for any significant volume of vehicle traffic. In this respect, the development runs counter to the Character Summary & Management Strategy adopted by the Corporation in March 2013.

Wells, Janet (Built Environment)

From: PLN - Comments
Sent: 08 July 2014 17:10
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 5:09 PM on 08 Jul 2014 from Dr. Y. Oliver.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Dr. Y. Oliver

Email:

Address: Flat 15, Lambert House, 2 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I object to this planning application and have emailed you my concerns in my objection letter to you via PLNComments@cityoflondon.gov.uk, and I hope you have received my email. Essentially, my main concerns are the noise disturbances caused by the demolition of the current building, the construction and running of the proposed hotel development. Other main concerns include the traffic, especially the vehicles servicing the site and hotel, and the increased refuse storage and collection. I look forward to you addressing my objection letter.

Flat 19
3 Ludgate Square
London
EC4M 7AS

July 8th 2014

PLANNING	SEARCHED
RECORDED	INDEXED
TRIP	FILED
DATE	14 JUL 2014
NO	1 22 037
FILE	

Planning department
City of London
Guildhall
London
EC2P 2EJ

Attn: Liam Hart,
Ref Planning Application 14/00300

Dear Sirs,

I bought the above 4th floor flat in 2001, from new. I have lived here continuously since then. I am most concerned about the proposal to allow a hotel in this alley. I have read the comments, and objections on line, and can only fully endorse all the points made.

It seems to me a disastrous idea. I cannot believe that the city would contemplate allowing this.

My key objections are as follows:

1. This is an historic conservation area
2. The plan is for a large hotel, and includes raising the height of the buildings in this area. This is quite inappropriate.
3. It will destroy the peace and the quality of our residential area, which has already suffered from recent changes.
4. Access for the potential number of visitors to the hotel is a potential nightmare.
5. The impact on the values of all residents' properties would be significant.

I would be seriously disappointed to see this application supported by my City Council.
A retrograde step indeed.

Gilbert Holbourn



ACKNOWLEDGED

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Planning Application Ref 14/00300/FULMAJ

From: Clare James
Sent: 09 July 2014 09:26
To: PLN - Comments; Hart, Liam
Subject: Planning Application Ref 14/00300/FULMAJ

Planning Application Ref 14/00300/FULMAJ

I am writing in my capacity as Common Councilman for the Ward of Farringdon Within with my comments on the abovementioned planning application which has been drawn to my attention by a number of residents in the immediate vicinity.

I share residents' concerns over the sheer bulk and mass of the proposed building. There would appear to be an unacceptable loss of daylight and sunlight affecting certain residents and a loss of privacy from overlooking from users of the roof terrace.

There are already a number of hotels in this area. In addition there are longstanding issues resulting from the night time economy in the area. The addition of the proposed hotel will only act to exacerbate the potential for late night noise and disturbance to residents.

Kind regards

Clare James

Common Councilman for the Ward of Farringdon Within
Members' Room
Guildhall



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1 **ACKNOWLEDGED** 08 JUL 2014

Ball, Matthew

14 / 00300

From: Pln - CC - Development Dc
Subject: FW: Email Regarding PT_LH/14/00300/FULMAJ COL:02635606

From: Ann Holmes [REDACTED]
Date: 10 July 2014 09:00:23 BST
To: liam.hart@cityoflondon.gov.uk
Subject: PT_LH/14/00300/FULMAJ

ACKNOWLEDGED

10 JUL 2014

Dear Mr. Hart

I write to object to the planning application for building a hotel on Ludgate Hill (your ref **PT_LH/14/00300/FULMAJ**). I write both as a Common Councilman for, and a resident of, Farringdon Within, the ward within which the proposed development is situated.

This development seems to me not to respect the rights of significant numbers of local residents, especially their right to quiet enjoyment of their homes.

As well as noise disturbance, the proposed scheme looks as though it would also create unacceptable levels of light loss and overlooking for some flats.

I think the need for a hotel in this location is questionable. If such a need is deemed to exist, I think these plans need to be taken back to the drawing board, and a scheme proposed which does not disadvantage residents, in the way the present proposals appear to.

I should be grateful if you would acknowledge receipt of this objection.

Yours sincerely

Ann Holmes

Flat 1, 43 Bartholomew Close, EC1A 7HN

Adjei, William

From: PLN - Comments
Sent: 11 July 2014 20:52
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 8:52 PM on 11 Jul 2014 from Ms Nicola Bell.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Ms Nicola Bell

Email: [REDACTED]

Address: 14 Lambert House 2 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I have already submitted a detailed objection and a shorter version on_line to this site.I have received confirmation of the direct objection made to Mr.Liam Hart (planning officer concerned) and do not understand why no reference is available here.Please investigate.Please reply to [nicola](#) [REDACTED]

Adjei, William

From: PLN - Comments
Sent: 14 July 2014 12:20
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:19 PM on 14 Jul 2014 from Mr Roshan De Alwis.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Roshan De Alwis

Email: [REDACTED]

Address: 11 Lambert House 2, Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity

Comments: I strenuously object. This development would pose a huge detrimental impact on the quality of life for the individual residents in the surrounding area. The demolition and construction of such tall building will have a massive impact on dust and pollution for all residents and local employees. Equally disturbing is the impact terms of light. A 7 storey building would significantly diminish the already restricted light into neighbouring buildings.

Adjei, William

From: Hart, Liam
Sent: 14 July 2014 10:19
To: PLN - Comments
Subject: FW: Your Ref. 14/00300/FULMAJ; Creed Court / Creed Lane / Ludgate Square, St Pauls.

Dear Sir,

I write in connection with the hotel development proposed in the application referenced above, and wish to associate myself with the many objections already registered with you. My concerns relate to the residential building at Lambert House, 2 Ludgate Sq. EC4M 7AS.

I would briefly summarise my objections as follows:-

1. This location is a very special part of the St. Pauls and Ludgate Hill Conservation Areas. I accept this doesn't mean no changes ever, but if conservation means anything it must be to retain the existing mixed character and use of the immediate locale. A hotel on this scale, occupying most of the block must surely be contrary to the aims of any Conservation Area designation.

2. Traffic Flow. This is already, and reasonably so, an area of traffic limitations and pedestrian zones. The limousine / taxi movements that might be expected with a hotel on this site must be quite in-appropriate for the streets in this neighbourhood. This would apply not only to guests but also those other visitors attending conferences, events etc. I can also imagine the R/H and L/H manoeuvres from and into Ludgate Hill can only add to the congestion often seen there.

3. Logistics. As an extension to point (2) the daily delivery of supplies into such a tight location must inevitably add to the general level of noise, nuisance and hazard. The removal of waste (also daily I assume) would contribute further to the loss of amenity as well as the right to peaceful and quiet enjoyment. Based upon a number of personal experiences I assume most of these movements would be during "un-social hours".

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4. Noise. I have seen the many comments about the atrium / courtyard. I am likely to be less directly affected by these problems but still have concerns that noise could travel around the corridors of Lambert House with negative impacts not currently felt. The proposal for a Rooftop Bar does cause concern however. In addition to normal clientele it will surely be used for events as well – including after midnight. The consequent noise / music will certainly pose a disturbance to neighbouring residents.

Much the same has to be said in relation to the plans to locate the external services plant. This is totally unsuitable for residents' peaceful enjoyment of their homes generating noise 24/7 I assume.



5. Right to daylight. My flat is less directly affected by this consideration but I fully support the comments you have received from residents whose rights and objections have been extensively set before you.

6. Noise, disturbance, dirt and dust during the demolition / construction period. This is a self-evident objection I believe. In general I support any plan to re-develop behind an existing façade where it retains the historic character of a location. This is no exception, but it seems such an approach adds to the duration of a project, creating a timeline which residents should not be expected to suffer from.

If re-development / modernisation is needed, then in such a sensitive area as this it should occur within the existing structures and layouts and ideally with a continuation of the existing mixed uses.

I will look forward to hearing from you in due course and to learning of the key dates in the progress of this application.

Yours sincerely

Robert Meyrick

(Flat3, Lambert House

2, Ludgate Sq.)

Ball, Matthew

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 30 July 2014 19:21
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

30 JUL 2014

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 7:21 PM on 30 Jul 2014 from Miss Louise McCullough.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Miss Louise McCullough

Email: [REDACTED]

Address: Lamb Building Temple London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity
- Traffic or Highways

Comments: I am a Barrister who often cuts through from St Paul's tube station to Temple or comes from the Bailey for social amenity. The proposed development would lead to increased traffic in the narrow side roads both during the building works and thereafter which would be detrimental to the present amenity. I cannot see the need for further hotel accommodation in this space bearing in mind both the Grange hotel and its apartments and at the other end of the spectrum the YHA. There are a considerable number of restaurants already in the area and I do not see that the proposed development enhances the vicinity at all.

Ball, Matthew

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 30 July 2014 22:19
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

30 JUL 2014

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:18 PM on 30 Jul 2014 from Miss Emma Daykin.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart
[Click for further information](#)

Customer Details

Name: Miss Emma Daykin
Email: Not specified
Address: 45 Canadian Avenue London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
- Noise
- Residential Amenity
- Traffic or Highways

Comments: I write to object to the proposed development of a hotel on the Creed Court/Creed Lane/Ludgate Square site. The development of a seven storey (plus plant) building for use as a 140 room hotel is highly unsuitable for a constricted site in a Conservation Area adjacent to a residential building, Lambert House. The development will adversely affect the light and privacy enjoyed by its residents. The size and bulk of the building is out of keeping with surrounding buildings. The operation of the plant on the new building will significantly affect nearby residents day and night, introducing noise and smells which are not currently a concern for them. I note that

the proposed development includes an atrium courtyard and a roof terrace. Both aspects of the proposal are likely to have a serious impact on the residents of Lambert House when operational, with noise and nuisance arising from numbers of people congregating in these areas, especially in the evening and late at night. As has been observed by other objectors, the roof terrace would also impinge on the privacy of bedrooms in adjacent flats. The increase in vehicle traffic in Ludgate Square (even if only for deliveries and drop offs) will have a serious adverse effect on the characterful and tranquil nature of this Conservation Area. The narrow entrance to Ludgate Square from an extremely busy point in Ludgate Hill, and the absence of pavement in parts of Ludgate Square, means that any significant increase in traffic will create a real danger for residents, passers by and road users such as cyclists. The general increase in traffic that a hotel of this size will bring in the Creed Lane and Carter Lane will have noticeable adverse effect on the residents and businesses in the nearby streets, which are narrow and ill suited for any significant volume of vehicle traffic. In this respect, the development runs counter to the Character Summary & Management Strategy adopted by the Corporation in March 2013.

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 31 July 2014 09:13
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

31 JUL 2014

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:13 AM on 31 Jul 2014 from Mr Andrew Powell.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Andrew Powell
Email: [REDACTED]
Address: Flat 3 16 Lymington Road London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
- Noise
- Residential Amenity
- Traffic or Highways
Comments: I am very concerned that this development will have a significant and irreversible impact on the conservation area.

Ball, Matthew

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 31 July 2014 13:54
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:54 PM on 31 Jul 2014 from Mr Rich Murton.

31 JUL 2014

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA.

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Rich Murton
Email: [REDACTED]
Address: 27 westrovia court 5 moreton st london

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
- Noise
- Residential Amenity
- Traffic or Highways

Comments: I work at Old Bailey, the area is already highly congested. Another hotel (which I really don't think is needed) would exacerbate this area which is already continually blocked. Its a hugely popular bus route with many routes running regular services and as a result is continually blocked as a result of the A201 junction. In addition am concerned it would commercialise and spoil that conservation area

Department of Planning and Transportation
 Attention: Liam Hart
 City of London
 P.O.Box 270
 Guildhall
 London
 EC2P 2EJ

7 March 2015.

PLANNING	12 MAR 2015
NSUR	
TPO	
CH	
NO	
PRE	124051

Dear Mr. Hart,

YOUR REF: 14/00300/FULMAJ

I refer to the above referenced Planning Application for a hotel on Ludgate Hill/ Ludgate Square/ Creed Lane and submit my Objections for your consideration.

INTRODUCTION

My objections are given below in the following format:

1. comments on the letter dated 23 February 2015 from GIA accompanying the Daylight and Sunlight report.
2. Comments on the Daylight and Sunlight Report with specific reference to Section 2, Executive Summary, and Section 9, Conclusions.
3. Further comments on other aspects of the Daylight and Sunlight Report.
4. Reference to Policies in the City of London Plan adopted 25 January 2015.
5. Comment relating to "St. Paul's Cathedral Conservation Area, Character Summary and Management Strategy" adopted by the City of London Corporation 22 March 2013.

ACKNOWLEDGED

OBJECTIONS

1. Comments on the letter dated 23 February 2015 from GIA accompanying the Daylight and Sunlight Report

The letter states that the review of the Daylight and Sunlight report implications " has been undertaken by reference to the standards and criteria within the 2011 BRE by Dr. Littlefair which is the primary authority in these matters."

In addition, GIA has submitted a copy of a letter from Dr. Littlefair dated 16 December 2014, in support of their case.

I am prepared to accept GIA's statement that the BRE and Dr. Littlefair are accepted as expert in this area.

That being so, I do not think it acceptable for GIA to use BRE/Dr. Littlefair's guidance when it suits them, but to disregard it when it does not suit them. For example, on page 5 of the Daylight and Sunlight Report it is stated "the BRE states that the ADF method should only be considered in new build accommodation....." No. 2 Ludgate Square is 15 years old and yet GIA has used the ADF method as part of its review of all 17 windows under consideration. This is not acceptable and the fact that they suggest that they have used "reasonable assumptions" in this connection is hardly convincing, because they are not impartial in this matter.



I would suggest that, based on BRE/Dr. Littlefair's expertise, all reference to ADF should be ignored.

2. Comments on the Daylight and Sunlight Report with specific reference to Section 2,

Executive Summary, and Section 9, Conclusions

Section 2 Executive Summary.

Paragraph 2.

It is stated "....due to the existing low levels of daylight especially within the lower levels of the building" i.e. of 2, Ludgate Square.

This reference to "existing low levels of daylight " is definitely not true of the 4th floor, where one of the main features of our flat is how light it is. Indeed, this was a major reason for purchasing the flat.

Also, this statement cannot be true of the penthouse on the floor above.

We have enclosed several photographs taken in December 2014 and February 2015 as evidence of very high levels of sunlight to our flat.

Paragraph 3.

It is stated that " The final window located at the fourth floor which would experience a 24% alteration, marginally above the 20% suggested by BRE"

It is not correct to say that this is marginally above BRE guidance. It is 4% above the 20% guidance. Thus, it is 20% above the guidance level, which is substantial.

Paragraph 4.

Re NSL results, for 2, Ludgate Square. Although 60% of rooms achieve BRE guidance levels, 40% do not, including 27% which transgress BRE guidance by 40+%.

GIA goes on to state " This is not surprising as any increase in massing would result in reductions in NSL to this property." This is undoubtedly correct; the main problem with this planning application is the increase in massing; which is very much to the detriment of residents of 2, Ludgate Square. Eliminate the massing and many of the problems for residents disappear.

Paragraph 6.

It is stated that the windows of 2, Ludgate Square "can only theoretically benefit from morning sunlight ," and "it is unlikely that any APSH received to the windows would penetrate deep into the rooms."

This is simply not true. We have several photographs taken in December 2014 and February 2015 showing sunlight penetrating the full depth of our bedrooms (Flat 13, 4th floor, R1/704 and R2/704) and beyond. Some photographs are enclosed, for your information.

Paragraph 7.

GIA concedes that many of the windows and rooms of 2, Ludgate Square would experience BRE transgressions in VSC and NSL. **Actually, in VSC 65% do not meet BRE guidance, some by 40+%, and for NSL, 40% do not meet BRE guidance, including 27% which transgress guidance by 40+%. For APSPH 65% of windows and 67% of rooms do not meet BRE guidance.**

GIA then attempts to use ADF results to mitigate these transgressions of BRE guidance even though BRE guidance expressly states that that ADF should be applied only to new builds, which does not apply to 2, Ludgate Square, which was built in 2000.

GIA itself notes that 11 of the 15 bedrooms would experience BRE transgressions i.e. 73%. GIA repeats the statement that 2, Ludgate Square currently receives "low levels of sunlight." This is patently not true of the upper floors and, in any case, is not a reason to increase mass on the adjoining site to substantially reduce sunlight to any existing residents.

Section 9, Conclusions

In paragraph two it is stated that Stephan Reinke Architects have designed a scheme to ensure that daylight and sunlight impacts are kept to a minimum.

This is untrue in that the principal feature of the scheme is the greatly increased mass proposed for the site, which is to the substantial detriment of its nearest neighbours in the residential building of 2, Ludgate Square.

GIA goes on to quote the compliance rates of VSC (85%), NSL (71%) and ASPH (81%) in support of their statement. However, I would suggest that the VSC, NSL and ASPH tables have been designed specifically to distract attention from the fact that 2, Ludgate Square, the nearest neighbour and a residential one at that, is substantially outside BRE guidance in every aspect under consideration. This has been done by including in the tables properties in Carter Lane that are hardly affected by the proposed scheme, thus exaggerating the total compliance figures that they choose to quote.

Consider each table, as follows;

Table 01, Vertical Sky Component

Of 61 windows other than those in 2, Ludgate Square, all but 1 meets BRE guidance BUT 11 of 17 windows in 2, Ludgate Square, i.e. 65%, do not meet BRE guidance, some by 40+%.

Table 02, No Sky Line

Although 71% meet BRE guidance 40% of windows in 2, Ludgate Square do not meet guidance, including 27% which transgress BRE guidance by 40+%

Table 03, Annual Probable Sunlight Hours

While 81% of all windows meet BRE guidance, 65% of those in Ludgate Square do not. While 63% of all rooms meet BRE guidance, 67% of those in 2, Ludgate Square do not.

It should be noted that, in the Daylight and Sunlight Report, Appendix 1, page 1, GIA states "There are many instances of planning applications being refused due to impact on daylight and sunlight on neighbouring properties," and, "in central London practically all Local Authorities expressly state

they will not permit or encourage developments which create a material impact on neighbouring buildings....”

I would suggest that the above levels of non compliance with BRE guidance, as far as 2, Ludgate Square is concerned, are irrefutable evidence of material impact to the detriment of all residents of that building. Consequently, the application should be rejected on this basis alone.

3. Further Comments on other aspects of the Daylight and Sunlight Report.

1. On page 10 of the Daylight and Sunlight Report it is stated that an important part of the design element of the proposed courtyard is “the inclusion of white glazed bricks to the facade which are highly reflective to ensure that the flats facing the site receive as much light as possible.”

I would make three points in that regard;

- (i) the ADF method, which takes into account reflective light, should not be admissible because the BRE states that the ADF method should only be considered in new build accommodation, whereas 2, Ludgate Square is 15 years old.
- (ii) At present flats overlooking the courtyard look out onto a good quality brick and tile facade which is probably as attractive as is possible in the circumstances, whereas a vista of white glazed brick would be horrible aesthetically, being reminiscent of a Victorian public convenience.
- (iii) White glazed bricks would in any case soon become dirty and even more unsightly, and would lose substantial elements of reflectivity.

2. On page 11 of the Daylight and Sunlight Report it states “ due to the orientation of this building whereby the windows are facing almost fully east, any sunlight received will be unlikely to penetrate deep into the room. It should therefore be noted that any sunlight reduction to the rooms within this property (2, Ludgate Square) will most probably be at window reveals rather than deep within the room.”

This is simply not true. We have several photographs taken in December 2014 and February 2015 showing sunlight penetrating the full depth of our bedrooms and beyond (Flat 13, Fourth Floor, R1/704 and R2/704). Indeed, one of the main reasons for purchasing the flat was that it is flooded with light. (Photographs enclosed)

4. Reference to Policies in the City of London Plan adopted 25 January 2015.

There are three policies in the above Plan that relate directly to this planning application as it affects existing residents.

1. Policy DM 21.3 Residential Environment.

The policy states “ the amenity of existing residents within identified residential areas will be protected....”

Our property is in the identified residential area of Carter Lane and should be protected.

The policy requires new developments near existing dwellings “ to demonstrate adequate mitigation measures to address detrimental impact.”

Excessive massing on the site would appear to be contrary to this policy, even after the recent efforts at mitigation.

The policy states "All development proposals should be designed to avoid overlooking and seek to protect privacy, day lighting and sun lighting levels to adjacent residential accommodation."

Excessive massing, which is the main feature of this plan, actually causes all the things which this policy states should be designed out of such plans, as far as 2, Ludgate Square is concerned.

The policy states "The cumulative impact of individual developments on the amenity of existing residents will be considered."

We already have a major hotel, Grange St. Paul's, that hotel's separate suites in Creed Lane, the Youth Hostel, in Carter Lane, the King's Wardrobe serviced apartments, Carter Lane, and the Club Quarters Hotel, Ludgate Hill, either in, or in very close proximity to, what is an "Identified residential area." To build another substantial hotel seems excessive in an area identified for further residential development.

2. Policy 3.21 Housing

The policy states at 3.21.2 "In recent years most new residential development has been located in or near existing residential areas. This allows greater opportunities for creating peaceful areas and a high quality residential environment. It avoids potential conflict with commercial and office uses, and the areas are more easily serviced with facilities required by residents."

Surely the building of a hotel in what is a small area specifically designated as desirable for residential development is contrary to the above policy so recently adopted by the City of London. It would cause significantly more vehicular traffic and resultant noise and disturbance to residents who have chosen to live in a Conservation Area, which is unsuited to additional traffic because of narrow roads and pedestrianised areas. In addition, the building of a hotel will substantially reduce the area available to create further residential accommodation in what is, after all, an "identified residential area."

3. Policy DM 10.7 Daylight and Sunlight

The Policy states in paragraph one: "To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings to unacceptable levels, taking into account BRE guidelines."

I believe that my comments and analysis of the Daylight and Sunlight report on pages 2 - 6 of this letter show clearly that the proposed development will reduce noticeably the daylight and sunlight available to residents of 2, Ludgate Square and that there are many substantial transgressions of BRE guidelines, often by in excess of 40%.

There are three other Policies in the City of London Plan, less directly related to existing residents, which are worthy of more detailed consideration.

1. Policy DM 11.3 Hotels

The Policy states that Proposals for new hotels will only be permitted where they:

(i) do not prejudice primary business functions of the City.

The loss of B1 office space is prejudicial to the primary business function of the City.

(ii) are not contrary to Policy DM 1.1

The proposed hotel would be contrary to Policy DM 1.1 in that it introduces a use i.e. hotel accommodation, that adversely affects the existing beneficial mix of commercial use in that the area is already well provided with hotel rooms, serviced apartments etc.

(iii) contribute to the balance and mix of uses in the immediate locality.

The proposed hotel would not contribute to the balance and mix of uses in the immediate locality because, as stated above, there is no lack of hotel and related accommodation. It would also reduce B1 office space and the possibility of further residential development.

(iv) do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts.

The proposed hotel would result in major adverse impacts on the residents of 2, Ludgate Square, particularly related to reductions in daylight and sunlight due to proposed massing on the site.

(v) provide satisfactory arrangements for pick up/drop off, service delivery vehicles and coaches appropriate to the size and nature of the hotel.

It is doubtful if arrangements for servicing the hotel, in all its aspects, could be considered satisfactory in an area of pedestrianised, narrow and one-way streets in what is, after all, a Conservation area and an "Identified residential area."

2. Policy DM 1.1 Protection of Office Accommodation

The Policy is;

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

(i) prejudice to the primary business function of the City.

The loss of office space for use as a hotel in an area that already has substantial hotel and other types of accommodation is prejudicial to the primary function of the City.

(ii) introducing uses that adversely affect the existing beneficial mix of commercial uses.

It is introducing yet another hotel into an area which is already well supplied with what is essentially tourist accommodation in an area which has already seen a considerable loss of office accommodation to restaurants and other tourist facilities. This is an area designated as an "Identified residential area" and, if there is any change of use, it would be beneficial if it was mixed residential and office use, and retained the two small businesses, a hairdresser and a tailor, that will be lost to Ludgate Square under the current proposal.

3. Policy DM 10.1 New Development

The Policy states at 3.10.39 " The amount of daylight and sunlight received has an important effect on the general amenity of dwellings..... and the energy efficiency of buildings."

From my comments and analysis of the Daylight and Sunlight Report on pages 2 - 4 of this letter it is evident that this planning application will have a major detrimental effect on the amenity of the residents of 2, Ludgate Square with regard to light.

For those living at the higher levels, which receive much sunlight morning and afternoon there will be a significant negative effect on energy efficiency given the substantial reduction in sunlight that would result from the extensive massing that is proposed.

5. Comment relating to "St. Paul's Cathedral Conservation Area, Character Summary and Management Strategy" adopted by the City of London Corporation 22 March, 2013.

On page 45, re the Condition of the Conservation Area, it states "Potential pressures on the area have already been identified as new development, utilities replacement works, and the impact of road traffic.....The condition of the Conservation Area is judged to have improved in recent years, and is expected to further improve in coming years."

Comment: If potential pressures on the area have already been identified as "new development.....and the impact of road traffic" it is hard to see how a new hotel can be anything but seriously detrimental to the area in both aspects.

While I agree that the area has improved in recent years it is hard to see how the proposed new hotel contributes to the expectation that the area is "to further improve in coming years." The hotel will damage the elevations on Ludgate Square, as result of excessive massing, and cause increased motor traffic to the detriment of cyclists and pedestrians, all in an area part pedestrianised and generally consisting of narrow roads with severe vehicle restrictions.

Yours Sincerely,



(Mr.) K. Rimmer

**Flat 13
Lambert House
2, Ludgate Square
London
EC4M 7AS**

BEDROOM R1/704



Sent from my iPhone

In the Daylight & Sunlight Report, Section 2 Executive Summary it states in Paragraph 6 that the windows of 2, Hudgate Square "can only theoretically benefit from morning sunlight," and "it is unlikely that any APSH received to the windows would penetrate deep into the rooms."

This is simply not true, as ~~it~~ is clearly shown above, and is a major professional error or a distortion of the truth.

[REDACTED] from desk of Bedroom R1/704



Sent from my iPhone

In the Daylight & Sunlight Report, Section 2 Executive Summary, Paragraph 6, it states that the windows of 2, Ludgate Square "can only theoretically benefit from morning sunlight," and "it is unlikely that any APSH received to the windows would penetrate deep into the rooms."

As clearly shown above the sunlight at 9:13am on 23/2/15 has penetrated the full length of Bedroom R1/704 and beyond to the far wall of the entrance hall.

~~3 of 6~~

BEDROOM R2/704 23/2/15 9-34 am





DECEMBER 2014

08:55 HOURS

SKYLINE FROM

BEDROOM R1/704

THIS SKYLINE WILL DISAPPEAR
BECAUSE OF MASSING ON HOTEL
SITE AND ELIMINATE SUNSHINE
SHOWN IN ATTACHED PHOTOS



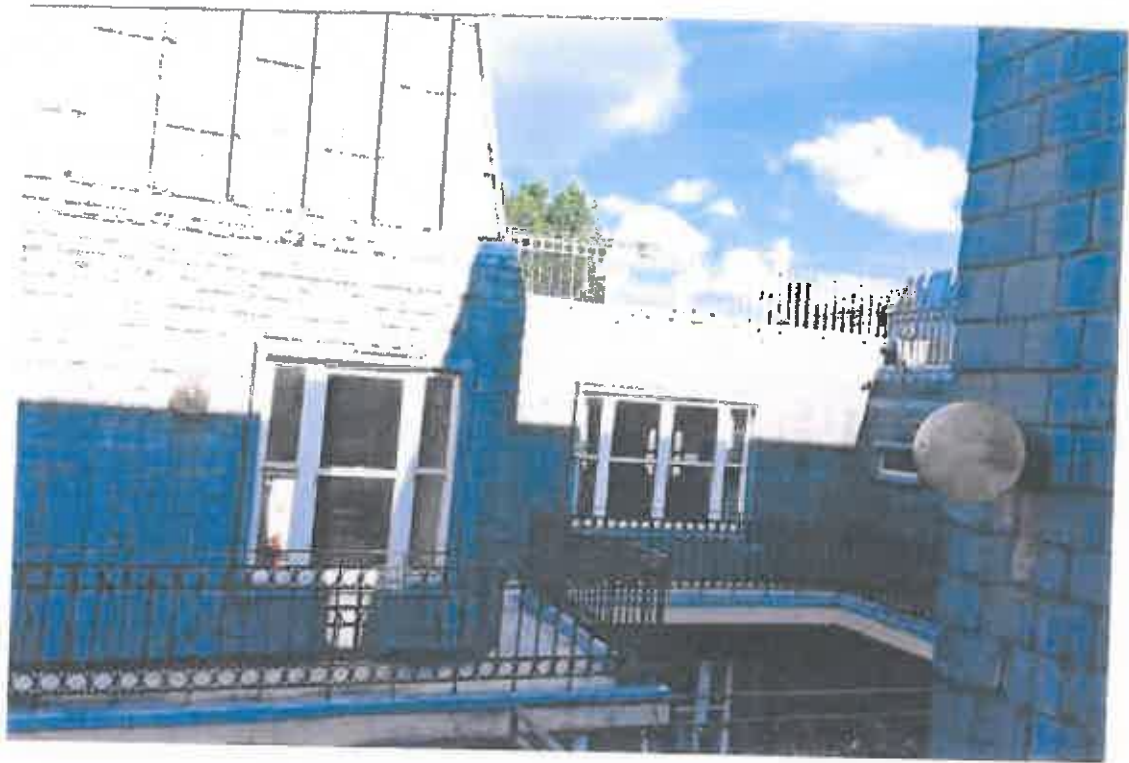
21/9/2014

13-42 HOURS

SKYLINE FROM

BEDROOM R1/704

THIS SKYLINE WILL DISAPPEAR
DUE TO MASSING ON HOTEL SITE



JUNE 2014

18-11 HOURS

SKYLINE FROM

BEDROOM R1/704

14/00300

Flat 19
3 Ludgate Square
London EC4M 7AS

8th March 2015

PLANNING PERMISSION		
PSDD	300	PPD
TPD		LTP
DM	12 JAR 2015	SUE
NO		OP
FILE	12 60 49	OT

ACKNOWLEDGED

Dear Sir / Madam

Location Creed Court 3-5 Ludgate Hill, 1-3 Creed Land And 11-12 Ludgate Square London EC4M 7AA

Having considered the proposal for planning permission at the above location, I wish to make a strenuous objection to the proposed development on the

The height of the proposed structure would have a significant impact on the light within our apartment - given it is significantly taller than the existing structure.

I hope that you will give consideration to this objection and limit the height of the new build to the existing structure.

Regards

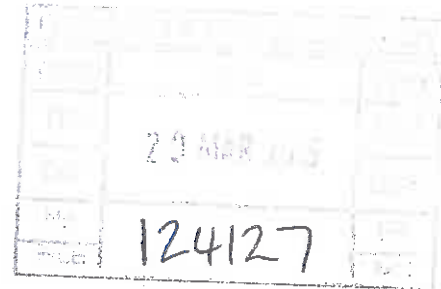
[Redacted Signature]

J Stacey

φ

Planning Department
Attention: Liam Hart
City of London
P.O. Box 270
Guildhall
London
EC2P 2EJ

10th March 2015



Dear Mr. Hart,

YOUR REF: 14/00300/FULMAJ

I refer to the above referenced Planning Application for a change of use from office to hotel. Location: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane, and 11 - 12 Ludgate Square, London EC4M 7AA

My objections are as follows:-

DM 21.3 Residential Environment page 177 states that **All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.**

REFLECTIVE LIGHT can contain **little heat content** whereas at the present time windows W1/704 and W2/704 provide sunlight which produces heat to the rooms, especially welcome in the winter months. This **energy** cuts the fuel bills.

The proposed building mass will substantially reduce light to residents of 2, Ludgate Square. While this would be somewhat offset by replacing the existing brick and tile with white glazed bricks this would be unattractive and provide only a marginal amount of reflective light. Over time these proposed white glazed bricks will weather causing the bricks to darken with lichen and pollution thereby **reducing any proposed reflection.**

In any event **reflective light relates to ADF** which, according to **BRE guidance, only applies to new build whereas 2 Ludgate Square is an existing building.**

OVERSHADOWING. The proposed 38950 mm mass plant build on the SE corner of the proposed plan will cause **overshadowing of the windows** and darken the interior of 2 Ludgate Square to the **severe detriment of residential amenity.** Photograph enclosed.

**GIA DAYLIGHT AND SUNLIGHT REPORT
EXECUTIVE SUMMARY SECTION. Page 2 and 3**



It is stated that any increase in massing would lead to non-compliance with the BRE Guide Lines relating to sunlight received by 2 Ludgate Square. **This non-compliance with BRE Guide Lines is not caused by proximity of 2 Ludgate Square to the site as is stated by Gia but by the excessive massing proposed in this planning application.** Gia refers to "low levels of

sunlight" in 2 Ludgate Square. This is certainly not true of my flat on the 4th floor and cannot be true of the penthouse on the 5th floor. Whilst flats on lower floors have lower levels of light it is not appropriate to damage their amenity by excessive massing on the adjacent site.

Dr. Littlefair's letter of 16th December 2014. Although a recognised expert on BRE his comments are based on what Gia has chosen . As such they are generic and do not reflect his opinion on this specific Planning Application.


If this application goes ahead we will loose the skyline , sunlight, daylight to our windows.

Roof Terraces do not mix well with residential neighbours even if there are time limits on the gathering of people. Inevitably there will be wedding parties, office parties participating. Can you certainly say they will all leave at 8 p.m. I doubt very much this will happen; which is likely to result in frequent complaints to the City of London.

Ludgate Square is a small lane with attractive facades and is cohesive with offices, residential and several independent shops. It will be substantially detrimental to the Conservation area to build a hotel on a large site out of proportion to the local environment.

In addition to the above objections I shall be obliged if you will take into consideration of the objections raised in my letter dated 6th July, 2014. A copy of which is attached.

yours sincerely,



Mrs. J.L. Rimmer
Flat 13
Lambert House
2 Ludgate Square
London
EC4M 7AS

5 enc: photos

①



LUDGATE SQUARE :
PROPOSED DEMOLITION OF THESE
INDEPENDANT SHOPS AND OFFICES
WHICH WILL BE DETRIMENTAL
TO RESIDENTS.

②



ARCHWAY



UPPER LUDGATE SQUARE:

FURTHER PROPOSED DEMOLITION
OF SHOPS AND OFFICES

VIEW LOOKING TOWARDS 2 LUDGATE SQ.
AND ARCHWAY LEADING TO LUDGATE HILL

3



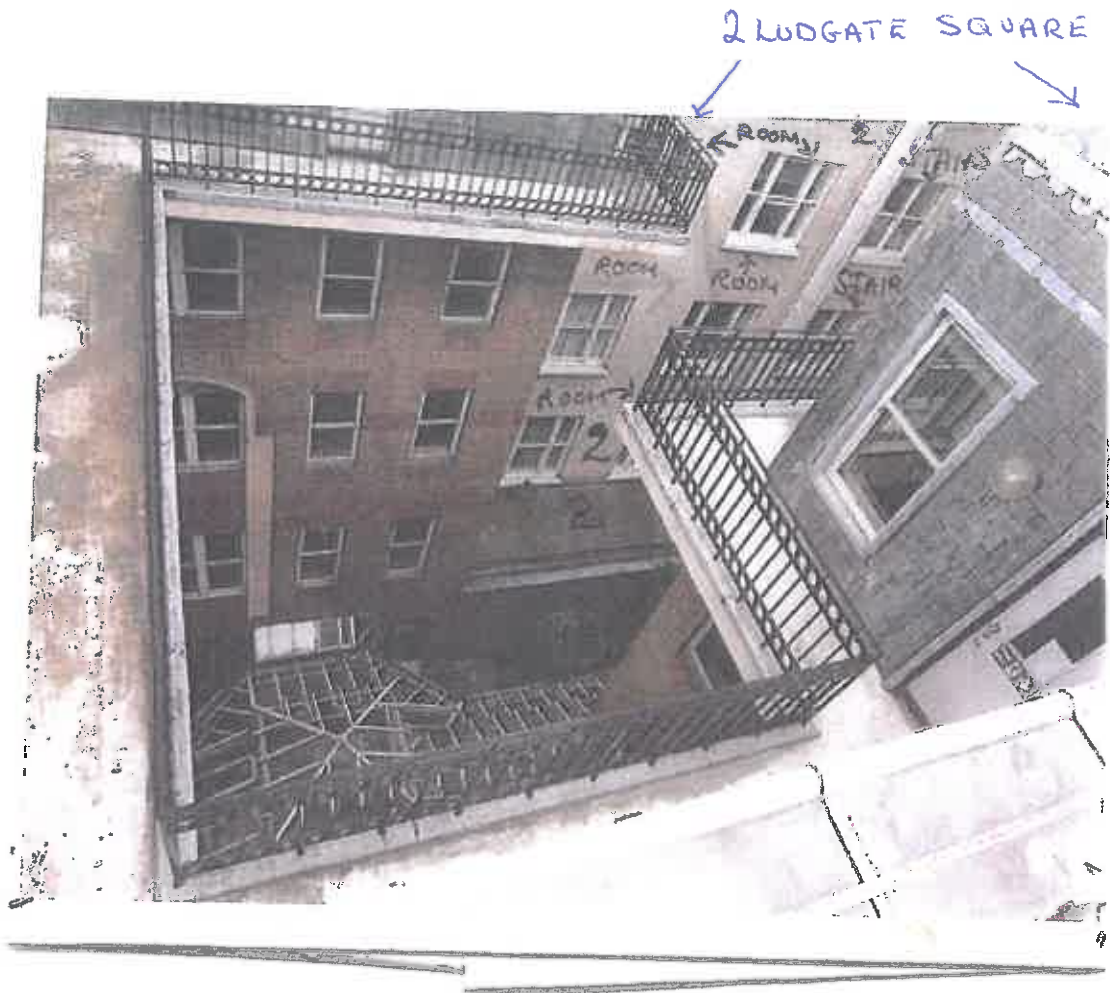
JUNE 2014 TIME ' 18:11 HOURS
SKYLINE FROM BEDROOM R1/704

4



DECEMBER 2014 TIME: 08:55 HOURS
SKYLINE FROM BEDROOM R1/704
THIS SKYLINE WILL DISAPPEAR
WITH PROPOSED HOTEL PLANT

5



The proposed plant infill of 38950
in the S.E. courtyard will cause
substantial Overshadowing of
2 Ludgate Square

1
copy of original

Planning Department
Attention: Liam Hart
City of London
P.O. Box 270
Guildhall
London EC2P 2EJ

6th July 2014

Dear Sir,

YOUR REF: 14/00300/FULMAJ – Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square

In reference to the above Planning Application I enclose my objections to the Application for your consideration:-

The Proposed Building Plan for a Hotel instead of the existing Office. Creating a conflict between residential and commercial in an historic, conservation area of St. Paul's London.

There are already sufficient hotels in the St. Paul's Conservation Area. Grange St. Paul's, Godliman Street, Grange St. Paul's Serviced Suites, Creed Lane, Club Quarters, Ludgate Hill, Y.H.A, Carter Lane, The King's Wardrobe serviced apartments off Carter Lane. These are contained in a small area around Lambert House, 2 Ludgate Square. There is not sufficient evidence to suggest any more Hotels are needed. It would also be more appropriate for the Hotels to be located away from residential areas.

There are more hotels on the perimeter of this conservation area.

This Proposed Plan brings a lot more vehicles into the area which are pedestrian zones. Motor vehicles are prohibited from Carter Lane between 8 a.m. and 6 p.m. from Monday to Friday and from Ludgate Square at all times except for loading. Access for cyclists to both pedestrian zones is maintained at all times. Carter Lane east of Godliman Street is a route for use by pedal cycles and pedestrians only. The Corporation states that "In adopting the Core Strategy the City has refined its highway hierarchy to further reduce the adverse impacts of motor vehicle traffic, including the valued character of the City's conservation areas." The effects of another large hotel would appear to be contrary to this stated strategy.

The Application alters the Character of Ludgate Square taking away shops which add to the amenities there. Also Ludgate Square is entered by an Arch from 23 Ludgate Hill which leads into a narrow passage opening into a small cobbled lane. It allows unloading but because of the small entrance any larger vehicle than a small van grazes the brickwork under the Archway. Lambert House exits directly onto the lane. There is no pavement. The lane is particularly quiet and tranquil and is ideal for residents living there. The Archway is also a good viewing point for pedestrians to stand and take photographs of St. Paul's Cathedral. If the proposed hotel use vehicles under this Archway it would be a hazard for pedestrians and cyclists and take away the peacefulness of the lane. All Lambert

Copy

2

House residents have wooden sash opening windows so quietness is of importance from living room, bedroom and kitchen windows.

The narrow lanes and alleys of Ludgate Square (which is not a Square), Carter Lane, Deans Court and Creed Lane are prime historic tourist areas and unsuitable for any additional traffic. They should be left as they are and not bring about a massive, bulky height and density hotel, which far exceeds the present office height of 4 floors. Creed Lane could become a service area for Dustcarts, Coaches, Taxis and Delivery Lorries, exacerbating the noise levels and pollution and spoiling a tourist area which is mostly for pedestrians and cyclists.

The existing building can easily remain at its present height and be refurbished to bring it up to date. Small/medium offices are always in demand for the smaller business, and makes good economic sense for the City of London. Office hours are by far better for residents and as they do not work at weekends in comparison to a 24 hours working hotel

The proposed building has 7 and a bit floors and 3 basements. The bit floor is the PLANT placed close to the windows of Lambert House, 2 Ludgate Square. The residents windows open on to the internal atrium and I am concerned about pollution and air quality that will enter the windows. (steam, ventilation for the City's Sewer Network, noise etc.) No details of the PLANTS WORKING is given on the Application.

Residential and hotels are not a good mix because of lack of privacy for residents, increase of noise, pollution, and additional bulk and heights. Not forgetting this is a Conservation Area.

Yours faithfully,

Mrs. J. L. Rimmer
Flat 13
Lambert House
2 Ludgate Sqaure
London
EC4M 7AS

2 pages.

FAO Mr Liam Hart,
Planning Officer,
Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
London EC2P 2EJ

Dear Mr Hart,

12th March 2015

Letter of Objection: Application Reference No. 14/00300/FULMAJ
Proposed development at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA

Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

We write today on behalf of our client, Mr J Colombano and Ms M L Kirk who reside at Flat 16, Lambert House, 2 Ludgate Square, neighbouring the proposal. We have been contacted by our client after concerns were raised that the proposed development will infringe on the daylight and sunlight currently enjoyed by their property (as laid down in the BRE "Site layout planning for daylight and sunlight: a guide to good practice", 2011 by PJ Littlefair).

Our client Mr J Colombano through his letter to City of London dated 7th July 2014 raised some issues regarding daylight, sunlight matters subsequent to a development being submitted to the Council. The proposed scheme has since been modified by Stephen Reinke Architects and a revised daylight and sunlight report has also been submitted by GIA. We have reviewed this revised report, and comment as follows.

Although we acknowledge that the architects have incorporated further improvements following the consultation on the planning application we have made a comparison between the first and second analysis. The table below shows that overall the revised scheme improves the VSC results from 0.07% up to 13.54%. The revised scheme will further impact 4 surfaces with additional VSC losses ranging from 0.02% to 1.29%.

Whilst we concur that the revised scheme will improve the VSC results compared to the first analysis we still have some major concerns regarding the impact on surrounding properties.

Vertical Sky Component

Room	Window	Vertical Sky Component Existing	Proposed (1st analysis)	Proposed (2nd analysis)	Difference
46 CARTER LANE					
R1/820	W1/820	13.06	12.39	12.23	-1.29
R1/820	W4/820	78.42	75.49	75.54	0.07
48 CARTER LANE					
R2/830	W2/830	22.60	19.34	19.31	-0.16
R2/830	W5/830	83.04	80.20	80.18	-0.02
50 CARTER LANE					
R3/810	W3/810	11.96	9.55	9.51	-0.42
R1/811	W4/811	27.22	23.64	23.67	0.13
3 LUDGATE SQUARE					
R1/100	W1/100	3.59	3.61	3.75	3.88
R1/100	W2/100	3.70	3.78	3.93	3.97
R1/100	W3/100	3.12	3.12	3.32	6.41
R1/101	W1/101	6.27	6.16	6.37	3.41
R1/101	W2/101	5.71	5.70	5.90	3.51
R1/101	W3/101	5.49	5.38	5.65	5.02
R1/101	W4/101	5.01	4.95	5.17	4.44
R1/102	W1/102	9.56	8.88	9.10	2.48
R1/102	W2/102	8.91	8.34	8.57	2.76
R1/102	W3/102	8.59	7.89	8.25	4.56
R1/102	W4/102	7.96	7.42	7.66	3.23
Room	Window	Vertical Sky Component Existing	Proposed (1st analysis)	Proposed (2nd analysis)	Difference
R1/103	W1/103	14.64	12.84	13.09	1.95
R1/103	W2/103	13.94	12.25	12.51	2.12
R1/103	W3/103	13.50	11.82	12.12	2.54
R1/103	W4/103	12.66	11.12	11.40	2.52
R1/104	W1/104	22.42	18.76	19.01	1.33
R1/104	W2/104	22.88	19.19	19.42	1.20
R1/104	W3/104	22.23	18.57	18.85	1.51
R1/104	W4/104	21.67	18.08	18.35	1.49

R1/104	W5/104	24.15	20.54	20.79	1.22
R1/104	W6/104	20.39	16.93	17.20	1.59
R1/104	W7/104	21.63	18.04	18.30	1.44
R1/105	W19/105	79.87	79.52	79.53	0.01
R2/105	W1/105	32.29	32.25	32.26	0.03
1 LUDGATE SQUARE					
R2/100	W4/100	2.44	2.43	2.53	4.12
R2/100	W5/100	2.12	2.11	2.25	6.64
R2/100	W6/100	0.99	0.96	1.09	13.54
R2/100	W7/100	0.37	0.37	0.37	0.00
R2/101	W5/101	3.84	3.73	3.87	3.75
R2/101	W6/101	3.56	3.45	3.58	3.77
R2/101	W7/101	3.30	3.22	3.38	4.97
R2/101	W8/101	2.99	2.97	3.07	3.37
R2/101	W9/101	0.64	0.64	0.64	0.00
R2/101	W10/101	0.47	0.47	0.47	0.00
R2/102	W5/102	6.34	5.84	5.99	2.57
R2/102	W6/102	5.89	5.47	5.60	2.38
Room	Window	Vertical Sky Component Existing	Proposed (1st analysis)	Proposed (2nd analysis)	Difference
R2/102	W7/102	5.50	5.15	5.31	3.11
R2/102	W8/102	4.99	4.75	4.86	2.32
R2/102	W9/102	1.18	1.18	1.18	0.00
R2/102	W10/102	0.87	0.87	0.87	0.00
R2/103	W5/103	10.48	9.32	9.51	2.04
R2/103	W6/103	9.80	8.88	9.03	1.69
R2/103	W7/103	9.24	8.50	8.66	1.88
R2/103	W8/103	8.45	7.93	8.04	1.39
R2/103	W9/103	2.44	2.44	2.44	0.00
R2/103	W10/103	1.78	1.78	1.78	0.00
R2/104	W8/104	17.39	14.94	15.14	1.34
R2/104	W9/104	18.04	15.71	15.87	1.02
R2/104	W10/104	16.84	14.97	15.14	1.14
R2/104	W11/104	16.07	14.61	14.75	0.96
R2/104	W12/104	19.01	17.36	17.49	0.75
R2/104	W13/104	14.66	13.64	13.77	0.95
R2/104	W14/104	16.21	15.10	15.20	0.66
R2/104	W15/104	5.64	5.64	5.64	0.00
R2/104	W16/104	4.58	4.58	4.58	0.00
2 LUDGATE SQUARE					

R1/701	W1/701	4.54	2.75	2.95	7.27
R2/701	W2/701	4.63	2.94	3.09	5.10
R1/702	W1/702	7.37	5.18	5.53	6.76
R2/702	W2/702	8.06	6.08	6.29	3.45
R1/703	W1/703	14.06	9.93	10.54	6.14
Room	Window	Vertical Sky Component Existing	Proposed (1st analysis)	Proposed (2nd analysis)	Difference
R2/703	W2/703	14.42	12.98	13.20	1.69
R1/704	W1/704	24.29	17.31	18.39	6.24
R2/704	W2/704	24.10	23.99	24.32	1.38
R1/705	W1/705	34.49	25.80	27.26	5.66
R2/705	W2/705	35.00	31.91	32.15	0.75
19 LUDGATE HILL					
R4/701	W4/701	5.19	N/A	2.74	N/A
R4/701	W5/701	4.96	N/A	2.63	N/A
R4/702	W4/702	8.13	N/A	4.89	N/A
R4/702	W5/702	7.93	N/A	4.78	N/A
R4/703	W4/703	12.04	N/A	8.93	N/A
R4/704	W4/704	19.01	N/A	16.51	N/A

The executive summary of GIA's report dated 13th November 2014 makes it clear that "in relation to the daylight and sunlight impacts to adjoining properties, 2 Ludgate Square would be the most affected, which is not surprising given its close proximity to the site". We question why the revised scheme still includes an increase in massing (compared to the existing site) to the south of this property, which will clearly result in losses of daylight and sunlight. The following statement from the GIA report reiterate even more this concern "Due to these low existing levels of daylight and sunlight, they are very sensitive to any increase in massing on the Creed Court site and any reduction most often leads to non-compliance if the BRE guidelines are strictly applied". Although the existing levels are already poor it is not a justifiable reason to make these levels even poorer.

Paragraph 2.2.7 of the BRE guide "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011)" states that **"if the VSC, with the new development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time."**

With the proposed development in place:

- * 60% of the windows at 2 Ludgate Square failed to meet the above criteria
- * 71% of the windows at 19 Ludgate Hill failed to meet the above criteria
- * 50% of the windows at 50 Carter Lane failed to meet the above criteria



50 Carter Lane

-

2 Ludgate Square and 19 Ludgate Hill

- * We do not agree with GIA's statement as to whether any occupier would notice such a change in VSC. As per the BRE criteria above, we can confirm that occupants at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane will notice the reduction in the amount of skylight available.

Regarding the No-Sky Line criteria (NSL), here again with the proposed development in place:

- * 30% of the windows at 2 Ludgate Square failed to meet the above criteria for good daylight distribution
- * 60% of the windows at 19 Ludgate Hill failed to meet the above criteria for good daylight distribution
- * 100% of the windows at 50 Carter Lane failed to meet the above criteria for good daylight distribution

It is correct that BRE states that bedrooms are less important, however they still need to be analysed. It does not mean they can be ignored and we express our concern at GIA's statement that the impact "is not surprising as any increase in massing on the Creed Court site (to the south) would result in reduction in NSL to this property". The proposed increase in height and proposed plant room are unreasonable in this case and would have a detrimental impact on the surrounding properties in terms of daylight. Our statement is supported by the below BRE paragraph 2.2.9:

"If, following construction of a new development, the no-sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 its former values this will be noticeable to the occupants, and more of the room will appear poorly lit."

- * We note that 80% of the rooms at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane which are already adversely impacted in terms of VSC will also be adversely impacted in terms of NSL. These rooms will look darker and gloomier if the proposed scheme was built and we add this is in contravention of the City of London Policy DM 10.7.

The Policy DM 10.7 Daylight and sunlight aims to prevent development which would noticeably reduce the daylight and sunlight available to nearby dwelling and open spaces to unacceptable levels, taking account of the BRE's guidelines.

- * The proposed scheme will be higher and bulkier than the existing site and will significantly harm the surrounding properties at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane and is therefore non-compliant with the Council's Policy.

Another type of assessment which was carried out by GIA, called ADF, takes into account reflective light. For the purposes of the assessment, the internal layouts of the properties at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane must be known. According to the report, some floor plans of 2 Ludgate Square were obtained from the Land Registry, however, there is no evidence of these floor plans in the report. The accuracy of the ADF assessment is therefore questionable as we believe no site survey was carried out on this property and no contact was made with the owners in order to gain access to the impacted flats and take accurate measurements. For a development of this size we would expect accurate details/information and not assumptions. We therefore require that a proper assessment is carried out at the properties at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane.

Another concern we have is the actual use of the ADF assessment in the report. The following ADF criteria based upon room usage were used in the assessment:

- 2% ADF for kitchen
- 1.5% ADF for living/dining room
- 1.0% ADF for bedroom

Whilst we can agree with these values, we cannot concur with the use of the ADF assessment in this situation. In the BRE guide, the above ADF criteria can be found in paragraph 2.1.8 under the chapter 2.1 New Development. We confirm that the properties at 2 Ludgate Square and 19 Ludgate Hill are not new developments but existing buildings.

The ADF methodology should not be used on existing buildings. The BRE guide states in Appendix F, paragraph F6 ***"In assessing the loss of light to an existing building, the VSC is generally recommended as the appropriate parameter to use. This is because the VSC depends only on obstruction, and is therefore a measure of the daylight environment as a whole. The average daylight factor (ADF) (Appendix C) also depends on the room and window dimensions, the reflectance of interior surfaces and the type of glass, as well as the obstruction outside. It is an appropriate measure to use in new buildings because most of these factors are within the developer's control"***. As previously mentioned, no site survey was carried out and all the ADF results submitted appear to be only based on assumptions as shown in the report page 5 (5.0 Assumptions).

BRE guide paragraph F7 also states ***"Use of ADF for loss of light to existing buildings is not generally recommended"***.

BRE guide paragraph F8 points out that there are some situations where meeting a set ADF target value with the new development in place could be appropriate as a criteria for loss of light:

- i. where the existing building is one of a series of new buildings that are being built one after another, and each building has been designed as part of the larger group
→ **Not applicable on this project**
 - ii. as a special case of (i), where the existing building is proposed but not built. A typical situation might be where the neighbouring building has received planning permission but not yet been constructed
→ **Not applicable on this project**
 - iii. where the developer of the new building also owns the existing nearby building and proposes to carry out improvements to the existing building (e.g. by increasing window sizes) to compensate for the loss of light. However, where there is a long-term occupier of the existing building it would be appropriate for there to be no reduction in ADF, or at worst only a small reduction.
→ **Not applicable on this project**
 - iv. where the developer of the new building also owns the existing nearby buildings and the affected rooms are either unoccupied or would be occupied by different people following construction of the new building”
→ **Not applicable on this project**
- * Following the above comments, we are of the opinion that *Appendix 5 "Detailed ADF Report"* of GIA's report is irrelevant in this case and the results should therefore not be taken into consideration.

Regarding the sunlight assessment we concur that all main living rooms of dwellings should be analysed if they have a window facing within 90° of due South. Kitchens and bedrooms are indeed less important as stated by BRE (paragraph 3.2.3) although care should be taken not to block too much sun. In this context, we bring to your attention that with the proposed development in place:

- * 80% of the windows at 2 Lugdate Square failed to meet the criteria for good sunlighting
- * 43% of the windows at 19 Lugdate hill failed to meet the criteria for good sunlighting

The BRE sunlight test is a three stage process and all aspects must fail for loss of sunlight to be an issue as stated in paragraph 3.2.11:

- 1) *The total APSH is <25%, or the winter APSH is <5%.*
- 2) *The window received less than 0.8 times its former APSH in either period.*
- 3) *Has a reduction in sunlight over the whole year greater than 4% of APSH.*

The results show that the development fails the BRE sunlight tests for the properties at 2 Ludgate Square and 19 Ludgate Hill.

Overall, and as per GIA's conclusion, many of the windows and rooms to 2 Ludgate Square and 19 Ludgate Hill will experience BRE transgressions in VSC, NSL and sunlight levels following implementation of the proposed scheme. We therefore consider that the development failed to comply with the BRE guidance and is therefore unacceptable.

In summary,

- 1) The scheme failed to meet the VSC criteria for 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane.
- 2) The scheme failed to meet the NSL criteria for 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane.
- 3) The scheme failed to meet the sunlight criteria for 2 Ludgate Square and 19 Ludgate Hill.
- 4) The ADF assessment is based on too many assumptions and is irrelevant in this case.
- 5) No site survey was carried out on the properties at 2 Ludgate Square and 19 Ludgate Hill and no contact was made with the owners.

We respectfully request that no decision is made in favour of the application until the applicant further improves the design and demonstrates that there are no adverse impact in terms of VSC and sunlight levels on the properties at 2 Ludgate Square and 19 Ludgate Hill. The revised scheme improves the daylight/sunlight results, however, as demonstrated in this report, this is not by a sufficient amount. Due to the location of the building, the impact on surrounding properties like 2 Ludgate Square and 19 Ludgate Hill will be unavoidable if there is to be any increase in massing on the Creed Court site (to the south).

With respect to GIA's letter dated 23rd February 2015, whilst we appreciate the list of improvements, we focus on the effects on 2 Ludgate Square.

GIA's letter:

In summary, the effects on 2 Ludgate Square are as follows:

- There are some daylight (Vertical Sky Component (VSC) and No Sky Line (NSL)) reductions beyond the guidelines suggested by the BRE Handbook. There would be a 35% VSC compliance rate and a 60% NSL compliance rate. However, white glazed bricks means 80% of rooms facing the courtyard will experience better daylight levels (using ADF measurement).

It appears that 2 Ludgate and 19 Ludgate Hill were considered as one building. In that case, we can agree with GIA that there would be a 65% VSC non-compliance rate and 40% NSL non-compliance rate. As stated in this report, the use of ADF as a criteria is irrelevant here and should not be taken into consideration for existing buildings as per the BRE guidance.

- Whilst there would be some sunlight losses the BRE letter attached clarifies in a detailed analysis "Normally we would not include loss of sunlight to bedrooms; and loss of sunlight to bedrooms would not be treated as a material issue...". In terms of the compliance rate for APSH, this is 35% following construction of the proposed scheme.

We would like to reiterate BRE clearly states that kitchens and bedrooms are indeed less important although care should be taken not to block too much sun. The assessment shows that on 2 Ludgate Square and 19 Ludgate Hill we have annual sunlight losses ranging from 25% to 100% which are well above the 20% reduction allowed by BRE. With regards to the winter sunlight, all impacted windows will experience 100% loss of sunlight during winter months as a result of the proposed development.

The letter attached from Dr Paul Littlefair only recites the BRE guidance. Indeed, this letter supports our previous comments in the sense that **"Site layout planning for daylight and sunlight: a guide to good practice" states that sunlight loss is only significant if the reduction of sunlight received over the whole year is greater than 4% of annual probable sunlight hours**". This is demonstrated in the table below:

Room	Window	Room Use	Existing Annual APSH	Proposed Annual APSH	Reduction	Impacted ?
2 LUDGATE SQUARE						
R1/701	W1/701	BEDROOM	3	0	3.0	NO
R2/701	W2/701	BEDROOM	6	0	6.0	YES
R1/702	W1/702	BEDROOM	6	0	6.0	YES
R2/702	W2/702	BEDROOM	13	0	13.0	YES
R1/703	W1/703	BEDROOM	11	0	11.0	YES
R2/703	W2/703	BEDROOM	24	11	13.0	YES
R1/704	W1/704	BEDROOM	26	7	19.0	YES
R2/704	W2/704	BEDROOM	40	30	10.0	YES
R1/705	W1/705	BEDROOM	49	30	19.0	YES
R2/705	W2/705	BEDROOM	56	50	6.0	YES
19 LUDGATE HILL						
R4/701	W4/701	BEDROOM	10	3	7.0	YES
R4/701	W5/701	BEDROOM	10	4	6.0	YES
R4/702	W4/702	BEDROOM	15	11	4.0	NO
R4/702	W5/702	BEDROOM	16	9	7.0	YES
R4/703	W4/703	BEDROOM	21	22	1.0	NO
R4/704	W4/704	BEDROOM	38	43	5.0	NO
R5/704	W5/704	BEDROOM	20	28	8.0	NO

→ 12 out of 17 windows (71%) at 2 Ludgate Square and 19 Ludgate Hill will experience loss of annual sunlight greater than 4%.

The last paragraph of Dr Paul Littlefair's letter states:

Your email also explained that the courtyard part of the proposed building would be clad in white glazed bricks to reflect extra light to the nearby windows. The vertical sky component, which is the basis for the BRE guidance) does not take account of reflected light. However, having light coloured external surfaces does increase the daylight to neighbouring windows and could offset the loss of light. One way to check this would be to carry out a detailed analysis using software

We reiterate that ADF methodology should not be used on existing buildings. The BRE guide states in Appendix F, paragraph F6 and F7, *"In assessing the loss of light to an existing building, the VSC is generally recommended as the appropriate parameter to use" [...]* *"Use of ADF for loss of light to existing buildings is not generally recommended"*. Paragraph F8 points out that there are some situations where meeting a set ADF target value with the new development in place could be appropriate as a criteria for loss of light however, they do not apply to this project.

For the reasons above, the proposed development is considered unacceptable and fails to comply with the BRE guidance which Council follows regarding the impact on daylight and sunlight to nearby dwellings. We respectfully request a revised scheme is submitted that will comply with the BRE guidelines specially on the buildings at 2 Ludgate Square and 19 Ludgate Hill.

We would be grateful if you could acknowledge receipt of this letter. Should you wish to discuss any aspect please do not hesitate to contact the writer.


We look forward to hearing from you.

Yours sincerely,

Florian Cassandro
Sustainable Design Engineer

Liam Hart
Department of the Built Environment
PO Box270
Guild Hall
London ECA2PJ 2EJ

Nicola Bell
Flat 14
Lambert House
2 Ludgate Square
London EC4M 7AS



13 March 2015

Dear Mr Hart

Planning Application ref.14/00300/FLMA Revised Scheme.

I assume that all previous comments and objections will ,where relevant, be reconsidered with regard to the revised application.

Destruction of the local historic environment is of prime concern and the existing mix of office,residential,and small retail business should be retained.

Massing of the revised building plans to the southern elevation will inevitably be detrimental to light levels within the courtyard area.Even a small percentage decrease to already admitted lower than recommended levels will be significant and should not be approved.It seems that the planning so far is based upon assumptions of the use of the residential areas of Lambert House and not confirmed to be accurate.Should this be investigated ?

Noise from the proposed plant rooms and roof top terrace is a major concern and since there seems not to be any ambient noise level readings/recordings for the courtyard area, upon which to base any future complaints seems to be negligent.Are there any details of the noise levels for the proposed plant items ?

Potential glare from the proposed white glazed tiles on some elevations although possibly will increase some light levels, could easily be a source of nuisance.Have any glare calculations been submitted please ?

Security at roof top level is a serious concern and details of any proposals would be appreciated as easy access to Lambert House must be prevented.

Nicola Bell a resident of Lambert House.

ACKNOWLEDGED

Adjei, William

From: Hart, Liam
Sent: 16 March 2015 10:11
To: DBE - PLN Support
Subject: FW: Creed Court - Reference 14/00300/FULMAJ

Dear Mr Hart

I am writing to register an objection to the planning application for Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ)

In my original objection, I raised concerns relating to

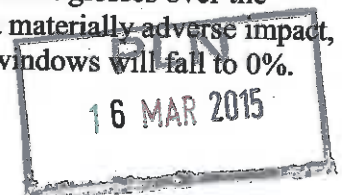
- A reduction in natural light in the rooms which are beyond the BRE Guidelines
- An increase in the levels of noise
- A loss of privacy

ACKNOWLEDGED

The recent re-submission of the Daylight and Sunlight Report fails to address my concerns regarding the loss of daylight. The proposed increase in the height of the new building above the existing level at the south of the development will reduce the size of the existing lightwell and will restrict the daylight and sunlight entering the lightwell. The report acknowledges this fact and concludes that "the increased massing to the south will result in a loss of daylight and sunlight to the windows within the current lightwell". The report further acknowledges that, regarding the Vertical Sky Component (VSC) and No Sky Line (NSL), there are reductions which are beyond the BRE Guidelines.

For Flat 1, Window R1/701 suffers a reduction in VSC of 35% which exceeds the BRE Guidelines of less than 20%. The NSL has a reduction of 44%, again this is greater than the BRE Guidelines of less than 20%. For Window R2/701, the reduction in VSC is 33% and NSL is 23.7%. Both reductions are greater than the BRE Guidelines of 20%. Indeed, for R2/701, the Annual Probable Sunlight Hours (ASPH) falls from 6% to 0%. This is not acceptable. The assumption that these rooms are bedrooms is incorrect as they are used as a study and a living area which are occupied for much of the day. I would also add that reflected light is not the same as natural daylight. The same extent of loss of daylight and sunlight are also suffered by the other residents of 2 Lambert Square and the report notes that 11 of the 15 rooms would suffer reductions beyond the BRE Guidelines.

In the conclusion of the report (Section 9), the statement that there is a high compliance rate of VSC, NSL and ASPH is only justified by including the existing or planned residential properties of 1, 6-7 and 8-9 Ludgate Square and 50 Carter Lane which are not materially impacted. This statement glosses over the highly detrimental impact on 2 Ludgate Square, which is the only property with a materially adverse impact, due to its close proximity and shared lightwell. Indeed, the ASPH for one of my windows will fall to 0%.



With reference to the new City of London Plan (adopted in January 2015), I believe that the City of London Corporation should consider the amenity problems created by this proposed development on existing residents and act to protect the existing housing and amenities in the residential area of Carter Lane. I would further question the requirement for another hotel in the St Paul's area, given the number of existing hotels and serviced apartments in the immediate area. These include the Grange Hotel (which has 433 rooms), the Crown Plaza Hotel in New Bridge Street (205 rooms), the Premier Inn in Dorset Rise, Apex Temple Court Hotel in Fleet Street (184 rooms), the Travelodge Hotel in St Swithin's Lane and the serviced apartments at Club Quarters on Ludgate Hill and Kings Wardrobe. Additionally, given the narrowness of Carter Lane, Creed Lane and Ludgate Square, it would be difficult to provide access for service delivery vehicles and taxis without causing congestion and disruption to the residential area around Carter Lane.

The proposed changes to the application do not address my original objections and it is difficult to understand how the developers believe the changes have improved the situation regarding the daylight and sunlight issues.

Yours sincerely

Michael Tang

Flat 1
2 Ludgate Square
London
EC4M 7AS

Adjei, William

From: Corominas, Nara [REDACTED]
Sent: 16 March 2015 22:31
To: PLN - Comments
Subject: 14/00300/FULMAJ - NARA COROMINAS OBJECTION

Dear Liam,

I would like to object to the above planning application on the basis of the following:

Height of the hotel:

- I do not believe the size of the hotel is adequate for the location that it is in, next to St. Pauls Cathedral. It would contribute to deteriorating the architectural landscape.
- All existing buildings are on average 4 floors high so I am not sure why the hotel has the privilege to overtake this historic height.

Size of the hotel:

- The size of the hotel is enormous. This area is primarily a mix of residential and office based properties, therefore these proposals would lead to significant 'massification' of the area. The area, surrounded by the emblematic Cathedral, should remain a low density area.
- In my opinion, St Paul's Cathedral should remain the tallest construction. The hotel would be too close to the Cathedral and would likely diminish its historical magnificence as has been the case with other churches spotted around London.

Daylight and sunlight report:

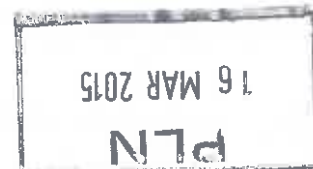
- I believe the amount of proposed light lost by the residents of Lambert House in 2 Ludgate Square is so material, it cannot be ignored. Purchasing a flat next to St. Pauls Cathedral is a privilege at the expense of hard work to be able to do so. Therefore, to think that the enjoyment of our own residences will be greatly compromised on account of hotel guests, who come and go, is unacceptable.
- In addition, the amount of sunlight coming into the flat was paramount in purchasing my property at Lambert House.

Rooftop bar:

- I am not sure a rooftop bar next to residences is appropriate due to the noise and disturbances that would be caused.
- In addition, the proposed bar would overlook directly into the windows of Lambert House which would completely devalue our properties.
- How is there certainty that that 8pm curfew will be respected in the long term?

Thank you in advance for considering my concerns

ACKNOWLEDGED



Nara Corominas
Flat 9, Lambert House
2 Ludgate Square
EC4M 7AS



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Adjei, William

From: [REDACTED]
Sent: 17 March 2015 17:44
To: PLN - Comments
Cc: Julian Dacie
Subject: FAO Liam Hart re Creed Court planning

Re: your ref 14/00300/FULMAJ

Town and Country Planning Act 1990

Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA

We own one of 20 residential flats in Priory House, which is within the conservation area which will be significantly affected by this development, particularly at weekends. We object strongly to the proposal for the Hotel on the following grounds:

1. Traffic and pollution.

There are estimated to be 23 Service Delivery events every 24 hours, (10 of which will be between 2 and 8am) as well as taxi pick up and drops offs associated with guests arriving and departing from 150 rooms. We note that there is no estimate of likely taxi movements anywhere in the planning submission. The traffic count included with the submission reported 52 movements in Creed Lane between 7 and 11am which is likely to be the busiest part of the day for traffic. An estimate of 150 current traffic movements in 24 hours does not seem unreasonable to us. An increase in traffic of 23 hotel servicing movements and perhaps 75 taxi movements in 24 hours would represent an almost 40% increase of traffic in Creed Lane. This makes the statement in the pollution report that 'traffic counts are anticipated to remain unchanged' and that 'impact on local air quality will be negligible' incredible. There is no estimate in the planning submission of any changes to traffic movements in Ludgate Square, which is virtually traffic free at present. The passage of small vans and taxis through this narrow street is likely to be increase considerably with resultant impact on air quality.

In addition to worsening air quality, the proposed development is likely to cause traffic hazards to pedestrians. When Creed Lane is blocked by refuse vehicles or box vans, which is likely to be 5 times a day according to the planning report, each taking 'up to 20 minutes on average to unload', there will be a temptation for vehicles on Carter Lane to drive straight through the westerly end of Carter Lane to avoid delay. This is supposed to be pedestrians only between 8 am and 6pm.

If taxis or transit type panel vans are parked in Creed Lane to service the Hotel, larger vehicles will need to mount the kerb to pass them. The swept path analyses in the delivery and servicing plan show refuse and box van type vehicles passing a London Taxi with very tight margins, without the need to mount the kerb. However these analyses included inaccurate dimensions for the vehicles. For example, the width of a TX4 taxi is 2.036m including mirrors, a Vito taxi is 2.241m including mirrors, considerably more than the width figure used in the swept path analysis of 1.749m. Accordingly the swept path analyses cannot provide an accurate indication of the likelihood of obstruction to the roadway of Creed Lane. It seems likely that it will be routine for larger vehicles to mount the pavement to avoid obstruction on Creed Lane.

Will consideration could be given to the provision of bollards on the pavement of Creed Lane to stop this temptation? Similarly could a retractable bollard or similar device be used to physically prevent traffic abusing the pedestrianised western end of Carter Lane between 8am and 6 pm?

According to Craig Stansfield of City Of London Transport Strategy Dept the servicing of this proposed hotel will have a 'considerable adverse impact on Creed Lane and surrounding streets'. We see no evidence that any changes proposed to the plans subsequent to this statement have ameliorated this impact substantially.

ACKNOWLEDGED

S

2. Character of the conservation area.

The area around Carter Street, Creed Lane, Friar Street etc will be significantly changed by the presence of

another Hotel in the area, particularly at weekends. The peace and character of the area will undoubtedly be changed for the worse.

We have read the report from Daniel Watney about the financial non viability of using the space for offices. It remains unclear to us as to whether the assumptions from which the conclusions have been derived can be justified. We are not convinced, despite the conclusions of the report, that a change of use is inevitable. We cannot see a compelling reason for the Planning Authorities to agree a change of use that will mean that the local residents will see a reduced quality of life and that the conservation area will be spoilt. We would request that even at this late stage, the planning authorities reject this application.

Julian Dacie
Pauline A Smith

17 Priory House
6 Friar Street
London EC4V 5DT

Your ref: 14/00300/FULMAJ

Bill Ellson
13 Reginald Road
LONDON
SE8 4RS

17th March 2015

OBJECTION

City of London Corporation
Department of Planning & Transportation

Dear Sirs,

**Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane & 11-12 Ludgate Square,
LONDON EC4M 7AA**

At page 10 of the applicant's 'Office Redevelopment Viability Study' it is claimed that "The purchase of the property was predicated on the fact that the office floors could achieve £15.00 per sq ft;..." The notion that the property was purchased by the applicants with the intention of continuing to rent out the property as offices is simply not true.

The Dominvs Group purchased the property from Aviva Life & Pensions UK Ltd on 20 November 2012, registered with the Land Registry on 13 Dec 2012¹ and "a series of pre application submissions and meetings" with CoLC town planners regarding redevelopment commenced in January 2013².

The Dominvs Group are hoteliers with premises in Aberdeen, Darlington, Dumfries and Sheffield. They also own a number of industrial estate properties. The only other London offices shown on their website³, namely Willow House, 17-23 Willow Place SW1P 1JH, in fact received planning permission, for change of use to residential & ancillary works, from City of Westminster in January this year (CoW ref:14/02816/FUL).

The 'Office Redevelopment Viability Study' also states that (predicated on a rent of £15 per sq ft) the property is valued at £10.6 million. The Land Registry record that Dominvs paid Aviva £15,230,000 for the property. The study goes on to state that Dominvs had only managed to find two tenants at rents of £6 and £7.50 per sq ft. If that is correct then, based on the applicant's own methodology, they should have paid somewhere around £4.24 - £5.3 million for the property.

That Dominvs have, on the face of it, paid three times what the property is actually worth to them is their problem, not that of neighbouring residents nor that of the City of London Corporation.

¹ Title NGL665744 (Land Registry titles are PUBLIC documents than can be obtained by anybody on payment of a nominal fee)

² Box 5 'Application for Planning Permission' signed by DP9 on 27 May 2014, stamped received by CoLC same day.

³ <http://dominvsgroup.com/commercial/> (accessed 17 Mar 2015)

ACKNOWLEDGED



At the time that Dominvs purchased the property the Development Plan for the City of London might have looked kindly on an application for change of use from offices to a hotel at the above location, but if Dominvs instructed professional advisors they would have been warned that policies can and do change.

In March 2013 CoLC published *Taking Stock: The Relationship Between Businesses and Office Provision in the City*. This study by Ramidus Consulting Limited stated at page 1:

"A vital ingredient of the City's ability to adapt to change has been the pool of smaller, less highly specified and lower cost buildings available to smaller occupiers. In the City, smaller buildings are concentrated in Conservation Areas, and they tend to provide older, less flexible and lower quality accommodation compared to modern Grade A space."

at page 17, Figure 2.7 identifies those parts of City as where small offices are clustered, which unsurprisingly highlights the area where the property is located. And at page 66 the report states:

"The movement toward larger, more highly specified buildings, and the types of occupiers that they support, is a key part of the City's global role. But balance is crucial. And a vital ingredient of the City's ability to adapt to change has been the pool of smaller, simpler and lower cost buildings available to occupiers whose business models demand a more diverse stock of buildings."

In January this year CoLC adopted the new Local Plan, under which the application falls to be decided. Unsurprisingly the Local Plan, informed by *Taking Stock*, does not look kindly on the application.

Policy DM 11.3 Hotels (p103) is explicit that proposals for new hotel accommodation will only be permitted where they do not prejudice the primary business function of the City; and they are not contrary to policy DM1.1; and they do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts; provide satisfactory arrangements for pick-up/drop off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel.

Policy DM 1.1 Protection of office accommodation (p35) is direct and forceful, it is: To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons: prejudicing the primary business function of the City; or, removing existing stock for which there is demand in the office market or long term viable need; or, introducing uses that adversely affect the existing beneficial mix of commercial uses.

I would note in regard of 'adverse impacts on the amenity of neighbouring occupiers' that local resident Sir Brian Langstaff has submitted an informed and forceful objection. Perhaps the applicants should be reminded that planning permission is not a license to commit a nuisance.

The application is contrary to the Development Plan for the City of London and should be refused.

I note that Alderman Keaveny, Ann Holmes CC & Clare James CC have all objected to the application and I shall be forwarding this letter to them, copying in the other ward members.

I trust that I will be informed when the matter comes before the Planning and Transportation Committee.

Yours faithfully

Bill Ellson

Adjei, William

From: PLN - Comments
Sent: 17 March 2015 16:11
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 4:10 PM on 17 Mar 2015 from Ms Anne Dunmore.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.). (REVISED SCHEME)

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Ms Anne Dunmore

Email: [REDACTED]

Address: Offices, 1 - 3 Ludgate Square, London EC4M 7AS

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: Unsuitable location for large scale development in narrow quiet residential street which is currently pedestrian access only.



For the attention of Mr. Liam Hart, Planning Department,

City of London, P.O. Box 270, Guildhall, London EC2P 2EJ via email to liam.hart@cityoflondon.gov.uk

17 March 2015

ACKNOWLEDGED

Dear Mr. Hart,

RE: Your reference – 14/00300/FULMAJ, Demolition of existing buildings behind retained façade to 3 Ludgate Hill to provide a 7-storey building for hotel use, restaurant use and associated plant areas

Having viewed all the proposals and relevant documents regarding the proposed demolition of the current above-mentioned building and proposed development of a new hotel in its place, I still strongly object to it all. The proposed revisions and even the sunlight animation video still have not addressed in full my concerns brought up in my first objection letter to you dated 07 July 2014.

I am the owner of one of the residential flats in Lambert House, 2 Ludgate Square, whose building will be directly adjoining to this proposed hotel development.

My first concern is the reduction of light into my property caused by this proposed hotel development:-

- My flat sits on the fourth floor of Lambert House, 2 Ludgate Square, and it does overlook the current courtyard. The increase in mass and change in structure will definitely adversely impact the light my flat currently receives.
- In addition, it is obvious that the analysts instructed by the proposed hotel owners, Dominiv's Living Ltd., called Gordon Ingram Associates (GIA), did NOT read my previous objection letter dated 07 July 2014. I will again state my case.
 - According to the revised Daylight and Sunlight Report prepared by GIA and dated 13 November 2014, the Report once again assumed and highlighted one of my windows facing the courtyard to be a bedroom, as can be viewed on Figure 2, page 10, and again on page 15. This information is absolutely FALSE because that room is my kitchen. Also, the next window along and in front of the balcony is my bathroom. I have already pointed this out in my previous letter.
 - It is important for me to point this out again because one of their main arguments is stated on page 11. "It should be noted that all site facing windows serve bedrooms and the 2011 Building Research Establishment (BRE) suggests that sunlight amenity to bedrooms is of less importance". So this particular argument can go out of the window!
 - According to BRE guidelines, kitchens are recommended to require double the ADF than bedrooms.
 - In fact, page 2 sees GIA summarizing that at Lambert House, "of the 15 rooms assessed, 11 would experience losses in Annual Probable Sunlight Hours (APSH) beyond the suggested BRE guidelines".
 - Thus, if GIA does not pay attention to my concerns raised in my previous objection letter, then I am likely to believe they will not pay attention to concerns raised by other residents. With the long time period of several months passing since the previous public consultation



taking place last summer, they did not effectively check with all the residents whether their windows would truly be bedroom windows.

- If they can continue to make the assumption that my windows overlooking the courtyard are bedroom windows, then why can't I hold my assumption that all my neighbours' windows in my building are kitchen and bathroom windows?
- You must also consider the possibility that other flat windows are like mine, or the possibility that the rooms may have started out as bedrooms but have now experienced the change in use to, for example, a study.

Page 10 of the same revised GIA Daylight and Sunlight Report actually did point out that "although the BRE suggests that the Average Daylight Factors (ADF) method of assessment should only be used for new build accommodation, as we have managed to obtain floor plans of this building and as the ADF method of assessment considers reflective light, this assessment has been included for this property", Lambert House, 2 Ludgate Square.

- Lambert House should not be considered new build any longer, because it is older than ten years old, at least.
- Obviously, the GIA is manipulating the use of BRE to suit their needs, and that this revised Daylight and Sunlight Report is biased. GIA will obviously be in full support of its client, the commissioning company, Dominiv's Living Ltd.

In fact, page 18 of the GIA report states that GIA admits the following conclusions:-

- "2 Ludgate Square would experience reductions beyond the suggestions within the BRE guidelines".
- In addition, "due to the location of this building, these reductions (in daylight and sunlight) would most certainly be unavoidable if there is to be any increase in massing on the Creed Court site".
- To support this, the Daylight and Sunlight tables of results in Appendix 4 in this report shows that my flat will experience 13% loss in Vertical Sky Component (VSC) for my kitchen window (labelled as R4/704).
 - According to the BRE handbook for calculating daylight to existing residential properties, the disadvantage of using VSC may give a quick indication of the lighting potential but "does not take into account the window size, room size or room use".
- In addition, GIA admits that the Annual Probable Sunlight Hours (APSH) investigation will see a huge reduction in annual % loss in sunlight for Lambert House, 2 Ludgate Square. The flats on all the floors below me will experience 100% reduction, which is absolutely UNACCEPTABLE. I am actually more alarmed to see data listed as 100% annual loss for 5 windows when going from existing building layout to proposed development, with most hovering above 50% annual loss.

This means that GIA report cannot base their conclusions appropriately on averages. Page 18 sees GIA and Stephan Reinke Architects supporting a scheme that is "reflective in the high compliance rates of Vertical Sky Component (VSC) at 85 %, No Sky Line (NSL) at 71 % and Annual Probable Sunlight Hours (ASPH) at 81 %". Their conclusions are based on the inclusion of data regarding other buildings that will not be directly overlooking the hotel courtyard, such as 1 and 3 Ludgate Square, and 46, 48 & 50 Carter Lane.

Therefore, the revised Daylight and Sunlight Report by GIA, commissioned by Dominiv's Living Ltd. is misleading.

My next concern is actually the choice of white glazed bricks proposed to be used in the new hotel development. Page 10 of the GIA report states the following: "an important design element of the proposed courtyard is the inclusion of white glazed bricks on the proposed façade which are highly reflective to ensure that the flats facing the site receive as much light as possible".

- The highly reflective appearance of these bricks can lead to uncomfortable glare. Appendix 5 (detailed ADF report) already shows the proposed reflectance to be 70 %, compared to the current 20 %.
- In a letter by Gordon Ingram of GIA addressed to Mr. Hart of the Planning Department at the City of London, dated 06 February 2015, Mr. Ingram mentioned the following:
 - On page 1, Stephan Reinke Architects have proposed that "all courtyard hotel windows will be opaque frosted windows... and will be non-opening".
 - Therefore, any discomfort from potential glare caused by these bricks will not be experienced by the hotel residents and staff.
 - However, for all of Lambert House residents, our windows can open and are not opaque frosted, thereby affected adversely by the glare. On extremely sunny days, this glare is likely to be blinding.
- On the other hand, white glazed bricks will get dirtier faster and rain streaks will be more evident. This would not be aesthetically pleasing at all.

My next concern is the proposed further improvements to the courtyard by the architects, as discussed in the same letter by Mr. Ingram of GIA:-

- "Trees will be planted in the base of the courtyard". However, "access will not be possible (other than for maintenance) from the hotel to the courtyard".
- If access is not going to be possible, what is the need for trees?
 - Is the idea of planting trees to encourage future access to the courtyard because the trees have to be maintained?
 - Is this going to be an excuse so that one day, the courtyard will be opened up to hotel residents and staff?
 - Realistically, any access for the purpose of maintenance can eventually become access for hotel staff and/or residents to have cigarette breaks? This can then become a nuisance especially in terms of noise, with people chatting being magnified louder in a confined space. I have on occasion been able to hear people's conversations in the current courtyard. My flat is on the fourth floor of Lambert House.
- My other point is that there has been no discussion of the type of trees proposed to be planted.
 - Are the trees being grown in containers or will they be grown in the ground that they can quickly cause damage to the foundations of surrounding buildings? Will the roots of the trees damage the foundations of our building and even the hotel?

- Any damage will increase our already high service charges because our managing agents will have to spend time investigating and dealing with it.
- Will the roots be able to reach the sewers thereby causing potential significant damage too? The worst case scenario will be the sewers overflowing and leaking, very unhygienic to the public and smelly. The hotel is proposing to accommodate 140 rooms.
- How tall will these trees get? Will they get so tall eventually that they could block the light into our building, especially the flats on the floors below mine?

The same letter by Mr. Ingram of GIA proposes that the terrace on the roof level will be landscaped to prevent users from looking into the courtyard.

- There is no mention of any safety barrier to prevent anybody, especially children, from wandering away and falling into the courtyard.
- There is nothing to stop anybody from throwing anything into the courtyard. Food and beverages will be served on the roof terrace, I assume. There is nothing to stop anybody from throwing garbage or broken glass into the courtyard.
- The letter states on page 1 that 'terrace on the roof will be closed at 8pm (Monday – Sunday)'. There is no mention of what time it will be opened up. Will it be opened in the early hours of the mornings, 1am perhaps?

One concern not addressed is the congestion and noise of traffic and people in this and the surrounding areas, as discussed below:-

- Already, St. Paul's Cathedral is national and well-loved landmark, visited by hordes of tourists daily. The congestion is already present, made evident by tour guide buses, taxis and other transport. Because St. Paul's Cathedral sits on Ludgate Hill, and a few meters away, Ludgate Square can be entered from Ludgate Hill at a slightly lower elevation, I find many people standing in front of the Ludgate Square entrance posing for photographs and/or taking photographs.
- Directly in front of St. Paul's Cathedral, you also have a very busy, well-used pedestrian crossing on Ludgate Hill, nearby Creed Lane. Ludgate Square can be entered from Ludgate Hill, and it continues onto Creed Lane.
- At the moment, Ludgate Square is a very quiet street. There are three main residential buildings, nos. 1, 2 and 3 Ludgate Square, surrounded by a few shops and offices, plus a pub. Creed Lane is also a quiet street, and there is already a small hotel boutique on this street.
- Both Ludgate Square and Creed Lane are very short one-way streets. None of the proposals and their amendments adequately address how to maintain these peaceful streets, free of congestion and noise.
- Demolition and construction of proposed buildings will of course bring more congestion and noise, as well as pollution.
- The proposed hotel, once opened, will of course add more congestion and noise.
 - It will have to be serviced in various ways, from linen supply vehicles to food and beverages suppliers.

- In addition, the hotel guests will require transport to and from the hotel.
- It will not be practical to have a taxi rank, at the front of the hotel building on Ludgate Hill or at the back of the building on Ludgate Square or even at the side on Creed Lane.
- If that is the case, the hotel is likely to have hotel staff at various points outside attempting to summon taxis or limousine drivers.
- Ludgate Hill is already congested with tourist traffic, tour buses, taxis, supply vehicles, etc. At various times of the day, one can easily observe many stopping by for various reasons.
- Realistically, the hotel guests cannot be expected to maintain the peaceful atmosphere of the areas at all hours. This hotel will have restaurant dining areas open to its resident and non-resident guests. As it is part of a service industry, its main objective is to serve its customers in a good timely manner and in a profitable manner. Any noise complaints will take time for the hotel to address, and I believe the hotel and its partners will be more sympathetic to its paying clientele. In addition, guests will be free to come and go to frequent other amenities, and there is no realistic way to prevent any returning guests from being disruptive.

My next concern not yet addressed, is that of the amount of servicing this hotel will need, eg. in terms of linen, food, beverages and waste:-

- The proposed hotel development will likely see its servicing carried out on Ludgate Square and Creed Court.
- Both streets are one-way and narrow. It will be impossible to park a service vehicle for unloading and loading, and expect pedestrians and residents to squeeze safely past any vehicle and hotel staff at work. There is not enough room for this, especially since all three residential buildings, 1 – 3 Ludgate Square, occupy the entrance of Ludgate Square at the Ludgate Hill end. Realistically, any service vehicle will need to stay at least a few minutes to do any meaningful work.
- A 140-room hotel is likely to accommodate regular visits by their service suppliers.
- Also, any storage of refuse is likely to be situated at the back of the hotel on Ludgate Square, basically away from the Ludgate Hill. A 140-room hotel would generate an immense amount of refuse. This in turn would lead to a greater number of pick ups by refuse collection vehicles. As Ludgate Square is one-way only, its entrance, at the Ludgate Hill end, is limited by a low-level arch and a narrow entrance. Thus, small refuse collection vehicles can only be used to service the hotel and will make many regular visits.

In summary, from my point of view as resident and owner, I worry about the congestion and the noise disturbances caused by demolition and construction of a new building adjoining my building. The noise disturbances will not abate if the proposed hotel development does go ahead, because as you can imagine, a fully functioning hotel with restaurant services would have an endless stream of hotel guests coming and going, along with transport like taxis and coaches serving the hotel. The noise disturbances and traffic congestion would continue with the logistical supply side of the hotel business.

In reality, it will be difficult for vehicles larger than a transit van to service the hotel, using both Ludgate Square and Creed Lane. Realistically, it will be hard to coordinate deliveries and servicing on a one-way street. At the previous public consultation, page 7 of the Delivery and Servicing Plan Part 2 suggests “an average of 23 daily

servicing trips predicted" for this proposed hotel development. Any passing by other vehicles may require mounting the kerb. Surely this would impact adversely on the pedestrian safety.

This proposed hotel development, in fact, will have an adverse impact on the daylight and sunlight entering Lambert House.

Therefore I feel all these concerns listed here must be addressed. Thank you for looking into my objections and I look forward to hearing from you.

Yours sincerely,

Dr. Y. Oliver

Flat 15, Lambert House, 2 Ludgate Square, London EC4M 7AS

Sir Brian and Lady Langstaff,
 Flat 5, Lambert House,
 2, Ludgate Square,
 London EC4M 2AS
 17th. March 2015

City Planning Officer,
 (Fao Liam Hart)
 City of London,
 PO Box 270
 Guildhall
 London EC2P 2EJ



Dear Sirs,

Creed Court Development EC4M 7AA: Your ref: 14/00300/FULMAJ

ACKNOWLEDGED

Thank you for your letter inviting observations on the revised proposal.

My wife and I took the opportunity last November of viewing the model of the proposal, listening to the architect, planning agent, developer, and light analysis consultant, and seeing the plans in somewhat larger scale than can be achieved on a computer screen. Our conversations were without prejudice, at Mr. Graham's request, so I shall not refer to them.

All the revisions now proposed were then on offer, though the revised light report was not then available.

Unfortunately, the proposed revisions do not meet the central objections we raised in our previous letters of objection: they make a number of improvements, such as those in respect of frosted glass, removal of low-level balcony, tree planting, and restriction of access, which are welcome in so far as they go, but which do not address the following, which are the result of what is both inappropriate and over-development of the site:

- (1) the reduction of light;
- (2) the massing of the scheme
- (3) encroachment
- (4) evening noise
- (5) the lack of need in the area for more hotel space (especially at the expense of offices)
- (6) increased traffic movement (the factor perhaps most open to debate, since the comparison must be with office use: but we think it probable)
- (7) loss of visual amenity/neighbourliness.

I shall deal with the bullet points on each after some general comments.

First, the revised proposal is for a rectangular light well, replacing an attractively irregular and considerably larger courtyard. It is to be glazed in white reflective tiles. Whereas no doubt typical of many New York light-wells (the architect is American), this makes it visually austere, and uncomfortably reminiscent of public facilities. But most concerning of all is the degree of encroachment upon the present courtyard

space. The light well is significantly smaller than the existing courtyard. In order to make the space regular in shape, the square plan section to the North East corner of the present courtyard is to be removed. However, apart from its removal, the east side wall of the whole atrium is to move nearer to our building than the present wall by about a metre – this is not immediately obvious looking at the plans, because the plans of the existing show the edge of the balconied walkway misleadingly in thick black line as if it were the edge of the present building, when it is not: instead this balcony juts out over the present building line. Not only will the wall move in from the East, but that to the South will advance so as to be at right angles with the corner of our flats 1, 5, 9, 13. Instead of the eye being taken naturally to the right, as we look out of our windows, we look into something reminiscent of a public facility, albeit leavened by the tracery of green leaf trees below, with a wall immediately to our right. It is this encroachment, coupled with the additional height to the South, which is both un-neighbourly and reduces light: it is an indictment of the scheme that it demands white tiling (with its unpleasant resonance) in order not to reduce our light even further.

Second, the proposed building is significantly (and unnecessarily) higher to the South. The plans supplied with the light report record the heights. The highest point of the existing in the SW is put at 34640, though the building immediately to the right on looking out of our window is 36830. The highest proposed is now 38950 in the SW – i.e. it is 4.2 metres higher than the current SW block, and 2.1 metres higher in respect of the building stack immediately to our right – though this existing stack extends for only a few feet, and is now to be built at over 38 metres height across the entire southern side of the light well, next to our windows.

Third, all this is actually unnecessary for there to be a hotel. It is not a given that any development should be bigger than its predecessor. If, for instance, the developer were prepared to forego the stack of 6 bedrooms one on top of the other that is responsible for much of the encroachment (perhaps putting the escape route there), and reduce the height of its plant room, many of the objections would have much less substance.

Turning to my bullet points:

(1) LIGHT: The wording of the latest report does its best to disguise, but cannot avoid the fact that the plan reduces our light, the level of which is already tenuous, below BRE guidelines applicable to the effect on existing development. This should be sufficient on its own as a planning consideration to require rejection of the development as planned.

However, ever to get to these estimated levels of light the author had made questionable assumptions. First, contrary to his understanding, I had thought that the windows facing south into the courtyard gave onto living rooms. Second, I know that at least one occupant has used a room facing on to the courtyard as a dining room/study, not as a bedroom – and we have ourselves considered this possibility in the past with one of our bedrooms. I am surprised the report makes statements about the present and assumed intended use of the rooms without even asking their occupants. No attempt has been made to come to our flat to ask questions, take readings etc.

The latest daylight report states "In summary, many of the windows and rooms to 2 Ludgate Square would experience BRE transgressions in VSC and NSL following implementation of the proposed scheme". It also states "Of the 15 rooms assessed, 11 would experience losses in APSH beyond the suggested BRE guidelines". Taking our own flat as an example, I suggest it is too dismissive to imply that reductions for our two windows which face the courtyard of (respectively) 24.97% and 21.96% (for VSC), losses of 43.9% and 17.8% respectively (on the "Daylight Distribution Analysis", which I note is not mentioned as such in dealing with the text on page 12 relating to Flat 5), and a *complete* loss of sunlight (!!) are not of particular significance. They are to us: and I do not doubt similar losses will be to other flat holders

Whilst some rooms will have no change in Average Daylight Factor (ADF), others will show a marginal improvement. However, ADF is used commonly for assessing the adequacy of new development, rather than the impact of a development on existing buildings. Clearly a marginal change for some rooms in this measurement does not excuse a failure to comply with BRE guidelines for Visible Sky Component, No-Sky Line, and also Annual Probable Sunlight Hours

As justification for the transgressions the daylight report states "Due to the location of this building, these reductions would most certainly be unavoidable if there is to be any increase in massing on the Creed Court site." I would suggest that the simple way to avoid such transgressions would be to avoid increasing the massing in an already dense piece of urban fabric.

The design team have attempted "to improve the overall amenity of the courtyard", and their attempts are appreciated, but unfortunately they have not succeeded. It is surprising in a factual report to find the following subjective conclusion: "The proposed cladding is white glazed brick to match 2 Ludgate Square which would be more aesthetically pleasing for the occupiers and the size and shape of the light well is designed to enhance the sense of enclosure." The aesthetics are clearly questionable, and I would be surprised if any existing residents wanted an increased sense of being "enclosed" or surrounded by an encroaching new behemoth.

There seems little point in granting permission for a development which it may almost inevitably attract a right-to-light injunction.

(2) MASSING: Simply too great, as can be shown by comparing the footprint of the present courtyard with the proposed, the height of the South East corner with the existing, and the additional storey(s).

(3) ENCROACHMENT See above, in my first point. Neighbourliness is an important planning concept in urban areas: it makes this objection one of real significance.

(4) EVENING NOISE Office use is generally very quiet, especially at night. Hotel use is always noisier, especially in the late evening: and it is at that time when residential accommodation most values the absence of noise.

(5) LACK OF NEED for an hotel. As I pointed out in my earlier letter the area is very well served by hotel and short-term (holiday) lets. Office accommodation has, if anything, given way to some residential use, and should be preserved.

(6) INCREASED TRAFFIC MOVEMENTS: inevitable, though to some extent dependent on the size of the hotel. This one is "going for big".

(7) LOSS OF VISUAL AMENITY/NEIGHBOURLINESS: See my three general points above.

The objections I raised in my earlier letter, and that submitted by my wife, still stand: please have regard to them, albeit in the context of the revised proposals.

In summary, the changes made are not new to us, are cosmetic rather than central to the scheme, and provide no compelling answer to the points we raise above. The features that give rise to them are not necessary for development on the site.

Yours faithfully,

Brian Langstaff
Deborah Langstaff

Hampson, Rebecca

From: PLN - Comments
Sent: 18 March 2015 13:38
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:37 PM on 18 Mar 2015 from Mr Joe Colombano.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.). (REVISED SCHEME)

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Joe Colombano

Email: [REDACTED]

Address: Flat 16 Lambert House 2 Ludgate Square, London

Comments Details**ACKNOWLEDGED**

Committer Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:
 - Noise
 - Residential Amenity

Comments: Please see objection letter sent today (18/03/2015) to plncomments@cityoflondon.gov.uk and to the case officer Liam Hart



FAO Mr Liam Hart
 Planning Officer,
 Development Division (west)
 Dept. of the Built Environment
 City of London Corporation,
 PO BOX 270,
 Guildhall,
 London, EC2P 2EJ

Mr J Colombano and Ms M L Kirk
 Flat 16
 Lambert House
 2 Ludgate Square
 London
 EC4M 7AA

ACKNOWLEDGED

18th March 2014

Dear Mr Hart

RE: Re-consultation on revised plans and information for planning application 14/00300/FULMAJ at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London, EC4M 7AA

Thank you for re-consulting us on the revised plans and information in respect of the above development in your letter dated 27th February 2015. Further to our written objection to the above scheme sent to you in July last year, we have stated our case for objecting to the most recent updates and amendments to the proposal and kindly request that this is considered as part of the decision-making process. For ease of reference we have detailed our concerns directly relating to the summary of the changes that are proposed as per you letter.

Closure of the roof terrace at 8pm (Mon-Sun)

The City of London adopted Policy DM 15.7 (Noise and light pollution) states that 'Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours.' In addition to this Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will encourage high quality roof gardens and terraces where they do not 'Immediately overlook residential properties'.

The revised scheme proposes to close the roof terrace at 8pm Monday through to Sunday. Whilst this would make a difference at night time, we cannot understand how this can still be acceptable given the distance of only 6.2m from terrace to the habitable room windows in the eastern flank elevation of our flat facing the new development. This was a concern that was highlighted and detailed in our objection to the originally submitted scheme (see appendix). Our working and lifestyle patterns are such that we may be at home during the day time or weekends and will still be subjected to guests congregating on the roof terrace for activities such as drinking and smoking resulting in general noise, disturbance and nuisance to our flat to the detriment of our amenity and quality of life within the flat. This element of the proposal remains unacceptable, despite the reduction in the hours it will be accessed and therefore conflicts with the Corporations now adopted policies mentioned above.



Notwithstanding the above concerns of allowing a terrace in this location in the first instance, we question the ability of the Corporation to enforce that the terrace is cleared of guests by 8pm daily; it would be very easy for guests to remain on the terrace until after this time and given that most authorities are stretched in terms of staff numbers and workload we cannot imagine that this issue will be a high priority for planning enforcement officers. It is also partly for this reason that a terrace should not be created in this location.

Trees are proposed to be planted in the base of the courtyard and no access to the courtyard for guests (only for maintenance purposes)

The revised scheme proposes trees to be planted in the atrium, also referred to by the proposed developer as the courtyard. However, the 4 no. trees shown on the latest plans were already proposed as part of the original submission – we fail to understand how this element is a revision and why this was included on the letter as part of the re-consultation exercise. Notwithstanding this issue, these trees appear to be a token gesture that does little to improve the situation for the neighbouring residents in terms of noise from social activities of guests; laughing, music, chatter etc.

The policy requires a noise assessment to be conducted to satisfy any potential harm by way of noise that a proposed development could have on the surrounding area; this has clearly not been addressed as part of the revised scheme. The concerns remains that the noise generated by guests at this level is likely to channel up the void between the back of Creed Court and the rear of Lambert House resulting in disturbance to occupiers of these flats including ours at No. 16.

A further revision noted in the re-consultation letter to residents was the fact that there will be no access to the courtyard for guests – this will be only for maintenance purposes. Having reviewed the plans we find it hard to believe that a supposedly high-end hotel would not provide their guests with an external amenity area at ground level. It would be reasonable for a guest to perhaps want some fresh air or enjoy a drink outside or make a phone call without either having to leave the building i.e. go onto the main road which is noisy or access the roof terrace at the sixth – floor level to do this. We suspect that the developers will probably add an external door once consent has been granted – perhaps even without permission. In this regard we feel that whilst the aims of the revised approach are amicable and will help the noise situation somewhat, a question mark remains over whether this will be the case in reality.

Landscaping of the of the terrace at roof level to prevent users from looking in to the courtyard and all windows to adjacent courtyard to be non-opening and obscure glazed

London Plan Policy 7.6 states that 'Developments are required to consider and mitigate any potential negative impacts on the amenity of surrounding land and buildings in relation to privacy and overshadowing'. In addition to this the now adopted Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will 'encourage high quality roof gardens and terraces where they do not immediately overlook residential properties'.

The revised scheme appears to focus more on protecting the views from the courtyard into the neighbouring properties than preventing overlooking from the roof terrace into the windows of these properties – this seems do little to reduce significantly the impact on our property. Details of landscaping for the proposed terrace have not been provided. We would like to know the exact

location and density of the screening and how significant this will be in reducing overlooking and privacy issues.

As mentioned in our original objection letter we are worried that the creation and use of the proposed terrace could lead to an overlooking of our amenity area and our young daughter's bedrooms and the fact that the activities associated with the terrace i.e noise, drinking, possibly smoking and general adult banter and frolics could be harmful to our daughters' well being. Notwithstanding the fact that we are opposed to any sort of terrace development in this location, the absence of screening details is a concern and in this regard this element of the scheme cannot be supported by us.

The developers claim that the proposed screening will prevent the overlooking from the terrace to the courtyard- perhaps a better approach would be to design screening that would prevent overlooking into other residents bedroom windows. The proposed obscure glazing will help to prevent overlooking to the court yard, however, from our perspective this does nothing to improve privacy and being overlooked by hotel guests. As such our concerns detailed previously in respect of privacy and overlooking still stand.

The hotel courtyard elevations would be finished in white glazed brick to improve light reflectivity

Policy DM 10.1 (New development) requires proposals to be of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling and that appropriate, high quality and durable materials are used. In addition to this Policy DM 12.2 (Development in conservation areas) states that development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

Having viewed the online information including the You Tube video and day/sun light projections, we remain concerned that simply changing the material choice would not improve the day light and sunlight received by the neighbouring properties. Whilst this is covered in some detail below, we consider that the developers are again making a token gesture to improve aesthetics/cladding of the proposal to secure consent. We oppose this change and consider it to have minimal impact on the improvement of day and sunlight. We also consider that changing the finish would be detrimental to the designs aims of development within conservation areas. The proposed choice of material would appear very modern looking and does not appear sympathetic to the character and appearance of the conservation area and the surrounding residential buildings. In this regard the scheme is unacceptable and does not comply with the Corporation's relevant design and conservation/heritage policies.

Reduction in roof top bulk away from east elevation of Lambert House to the south elevation of Lambert House

Policy CS10 (Design) of the City of London's Core Strategy (2011) states that the Corporation will promote a high standard and sustainable design of buildings and having regard to their surroundings by 'Ensuring that the bulk, scale, massing, quality of materials and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces'. Additionally, adopted Policy DM 10.1 (New Development) states that the Corporation will require all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that 'the bulk and massing of schemes are appropriate in relation to their surroundings...'

The reduction in the roof top bulk away from the east elevation of Lambert House to the south elevation of this building was noted in the letter to the case officer Liam Hart on 23rd February 2015 by the developer's appointed consultants rather than being noted on the re-consultation letter. Having reviewed the revised plans, there appears to be very little change in terms of bulk and massing which is still a major concern. Our initial objections to this element remain in that due to the proximity of the proposal to our flat, the new structure would overbear on our property resulting in a sense of enclosure and an unneighbourly relationship which is considered unacceptable and fails to comply with the above policies.

Updated daylight and sunlight report

The City of London's adopted DM Policy CS10 10.7 (Daylight and sunlight) states that the Corporation will look to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open space to unacceptable levels, taking into account the BRE's guidelines. We noted in our original objection that the scheme as proposed did not fully comply with the BRE guidelines and hence failed to adhere to the Council's relevant policy as mentioned above.

The developers provided a revised day light/sun light assessment based on some of the small changes that have been proposed such as those highlighted above. However we have taken the liberty of commissioning independent acoustic experts, Syntegra Consulting, to review the revised report which has, incidentally, now been revised twice from that of the original submission. The report and assessment, prepared by Syntegra, attached in the appendix of this letter demonstrates that the revised scheme would still have an unacceptable impact in terms of day and sunlight reduction on the neighbouring properties.

The report queried why the developer's appointed day/sunlight consultants selectively chose to refer to BRE guidance only where it met their needs and chose to ignore other elements of the guidance where this would not have supported the revised scheme. It was quite clear that the applicant's consultant's were referring to the existing buildings as new development rather than as existing buildings for the purposes of attempting to comply with respective lighting levels and standards. The methodology used by the applicant's consultants was also queried as one which was not most suited to this particular case. Syntegra's report concludes that the proposed development as revised would be unacceptable and failed to comply with the BRE guidance which the Corporation follows and that 'We (Syntegra) respectfully request a revised scheme is submitted that will comply with the BRE guidelines specially on the buildings at 2 Ludgate Square and 19 Ludgate Hill'.

Conclusions

We consider that the revised scheme does not overcome the concerns raised in our initial letter of objection to the originally submitted proposal and would like you to consider this letter in conjunction with our original letter (appendix 1) and the daylight/sunlight assessment of the developer's updated sunlight/daylight statement we have commissioned by independent experts (appendix 2). We still wait to see adequate screening measures to prevent overlooking into our property and noise mitigation measures to prevent disturbance from the roof terrace. We would also like to have assurances that the courtyard/atrium at ground level will not be accessed by hotel guests.

Our initial views in respect of the need for hotel development in this principally residential area still stand (see appendix 1). The area does not need new hotel development which will undoubtedly affect the intrinsic character of the area. As you are aware the draft DM policies referred to under the original objection are now adopted as of January 2015 and hence the greatest amount of 'weight' should be afforded to these policies over and above any other guidance of superseded policies. The developer has not provided additional information in respect of demonstrating that the current offices on site are not viable – this was a point raised under the original objection and is something which is required by Policy DM 1.1 (Protection of office accommodation). Likewise further to listing the nearby hotels in the area to exemplify that there are plenty of high-end hotels in the vicinity, the developer has not demonstrated the real need for a hotel in this area – we would like to see more information on this element.

The revised scheme, much like the original, appears contrived and unsympathetic to the area. It would harm the amenity of the surrounding properties, the occupiers of whom live here partly because they enjoy the character and peacefulness of vicinity. The scheme has little regard for the surrounding and introduces a use that would be better suited elsewhere. We therefore respectfully request that the scheme is refused on the grounds of the concerns highlighted above as failure to do so would not be in the public interest.

I trust the above is clear, however, should you require further clarification please do not hesitate to contact either myself or my wife, Marie Louise by email at the following address

[REDACTED]

I look forward to hearing from you and hope that you can support refusal of the application.

Yours Sincerely

Mr J Colombano and Ms M L Kirk

(Owners of Flat 16, Lambert House)

FAO Mr Liam Hart
Planning Officer,
Development Division (west)
Dept. of the Built Environment
City of London Corporation,
PO BOX 270,
Guildhall,
London, EC2P 2EJ

Mr J Colombano and Ms M L Kirk,
Flat 16,
Lambert House,
2 Ludgate Square,
London,
EC4M 7AS,

7TH July 2014

Dear Mr Hart

RE: Planning application 14/00300/FULMAJ at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London, EC4M 7AA.

I write to you as the owner of Flat 16, Lambert House, 2 Ludgate Square in relation to lodging a formal objection to the above proposal on the grounds of excessive mass and bulk of the proposal, noise and disturbance, loss of daylight/sun light, overlooking and privacy concerns, the need for a hotel in place of offices and the adverse impact of the scheme on both the St Paul's Cathedral conservation area and the Ludgate Hill conservation area.

Summary of concerns

Each of the concerns will be addressed in turn, however in summary the scheme is considered unacceptable in its impact and therefore fails to comply fully with the City of London Corporation's planning policies and guidance. The proposed increase in mass and bulk adjacent to the bedroom windows of Flat 16 would result in an unduly overbearing impact on the outlook from these windows. The proposed terrace is likely to be used for hotel guests as a smoking area and for outdoor gatherings thereby resulting in noise and general disturbance/ nuisance to the occupiers of the adjacent flats including No. 16. In addition to this, in the absence of adequate screening, users of the terrace could look directly into the windows of our property and the neighbours below (also bedroom/ habitable room windows) and our private terrace. The proposed scheme results in a substantial reduction in daylight and sunlight received by our flat. We argue that there is no substantial evidence showing a need for a hotel on this site and the fact that the offices are not viable. Finally we argue that the very nature of the proposal and associated impacts will adversely affect the character and appearance of the conservation areas the scheme is located in.

Mass and Bulk

Policy CS10 (Design) of the City of London's Core Strategy (2011) states that the Corporation will promote a high standard and sustainable design of buildings and having regard to their surroundings by 'Ensuring that the bulk, scale, massing, quality of materials and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and

spaces. In addition to this draft DM Policy 10.1 (New Development) states that the Corporation will require all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that 'the bulk and massing of schemes are appropriate in relation to their surroundings...'

It is difficult to ascertain from the submitted drawings the exact increase in height of the proposed hotel; it can reasonably be estimated to be somewhere between 1.2m and 1.7m, however as the applicant has not provided like for like comparisons in terms of floor levels and comparative sections this cannot be confirmed. This is worrying as I would question the need for this approach which appears somewhat contrived. Even if the increase was just over a metre, due to the proximity of the proposed plant to flat 16 (it would adjoin our property at a perpendicular angle) the new higher structure would overbear on our property resulting in a sense of enclosure and an unneighbourly relationship which is considered unacceptable and fails to comply with the aforementioned policies.

Noise, Nuisance and Disturbance

The City of London draft Policy DM 15.7 (Noise and light pollution) states that 'Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours.' In addition to this draft Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will encourage high quality roof gardens and terraces where they do not 'immediately overlook residential properties'.

There are two concerns over the submitted application in regards to noise. Firstly the use of the atrium, although unknown, is likely to be frequented by guests of the hotel for the purposes of dining, drinking, chatting etc and as a communal gathering spot. There may even be live entertainment if the weather permits as is common with several higher end hotels in the city. This is likely to result in noise from these activities being channelled up the void between the back of Creed Court and the rear of Lambert House resulting in disturbance to the occupiers of these flats including flat 16. This impact will be exacerbated through the activity occurring in the evening till midnight and possibly beyond, at a time when the majority of neighbouring occupiers will be asleep.

The second concern is the use of the newly created terrace at roof level. At present the site contains plant housing/rooms opposite the bedroom windows of flat 16. The proposal includes the provision of a roof terrace that would measure approximately 6.2m from the habitable room windows in the eastern flank elevation of our flat facing the new development. As with the use of the new courtyard space for the hotel, guests are likely to congregate on the roof terrace for social activities such as drinking and smoking resulting in general noise, disturbance and nuisance to our flat to the detriment of our amenity and quality of life within the flat. As such this element of the proposal is considered unacceptable and conflicts with the Corporation's policies mentioned above.

Daylight and Sunlight

The City of London Saved UDP Policy ENV36 and draft Policy DM 10.7 (Daylight and sunlight) of the Emerging Local Plan (December 2013) state that the Corporation will look to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

Subsequently the BRE guidance, as noted by the authors of the 'Daylight and Sunlight' report submitted as part of the application, advises that an alteration to the Vertical Sky Component (VSC) daylight and No Sky Line (NSL) of less than 20% is considered by the BRE to be reasonable and likely to be unnoticeable by the occupant. In addition to the VSC and NSL, the Annual Probable Sunlight Hours (APSH) is another BRE-approved criterion for assessing the amount of sun available in both summer and winter for each given window which faces 90 degrees of due south.

The calculations provided in the report do not appear to have been calculated from a visit of the neighbouring properties affected and thereby cannot provide the most accurate results. Notwithstanding this the report notes that there will be a loss of 49% for sunlight received for one of the bedroom windows of which equates to a 100% loss of sunlight in winter as a result of the proposed development. In regards to the VSC of flat 16 (top floor) the bedroom window closest to the proposed plant room would suffer an alteration of 25.8%, clearly greater than the 20% threshold as stipulated in the BRE guidance. The resulting loss of daylight and sunlight is considered unacceptable and would significantly harm the amenity and enjoyment of our property and is therefore considered non-compliant with the Corporation's relevant daylight and sunlight policies.

A further point to note is that within the report the authors state that the guidelines indicate that they should be interpreted flexibly in City Centre locations 'if new developments are to match the height and proportions of existing buildings'. This is misleading as the scheme is clearly going to be higher and bulkier than the existing and therefore it could be argued that the guidance may not be relevant in which case the scheme would fail to comply with most of the BRE guidelines intended for schemes matching the existing bulk and height. Finally it is somewhat alarming to read on page 12 of the submitted Daylight and Sunlight Report that No 2, Ludgate Square of which our flat is one of the properties in this block, would be adversely affected by the development as per the following 'Most properties around the site would only experience small BRE transgressions to their daylight and sunlight; however 2 Ludgate Square would experience reductions beyond the suggestions within the BRE guidelines. Due to the location of this building, these reductions will most certainly be unavoidable if there is to be any increase in massing on the Creed Court site'.

We consider that the above is unacceptable and the scheme has failed to comply with BRE guidance as stipulated in the report.

Overlooking and Privacy

London Plan Policy 7.6 states that 'Developments are required to consider and mitigate any potential negative impacts on the amenity of surrounding land and buildings in relation to privacy and overshadowing'. In addition to this the draft Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will 'encourage high quality roof gardens and terraces where they do not immediately overlook residential properties'. This is strengthened by Saved Policy HOUS 10 (Overlooking and Daylighting) which states 'To require where practicable that the privacy, outlook and daylighting levels of residential accommodation is respected by the form of adjacent development'.

The proposed floor plan showing Level 6 referenced 'A2109 Rev V09' illustrates a proposed terrace accessed from the eastern side of the building and by all of the guests and visitors to the hotel and not only those with rooms at this level. The terrace would measure a distance of approximately

6.2m from the bedroom windows along the east elevation of flat 16 and would be adjacent to the private terrace serving our flat along its south-eastern elevation. In the absence of any details regarding the use of the terrace and screening along the western elevation, there are legitimate concerns that, in addition to potential noise and disturbance, as covered earlier in this report, occupiers of the terrace could directly look into the bedroom windows of our property to the significant detriment of our amenity.

Our specific concerns in regards to the relationship between the proposed terrace and the bedrooms are two-fold. Firstly we are concerned over the fact that our young daughters sleep in both of the bedrooms facing the proposed terrace and any overlooking from the terrace by strangers into their bedrooms while they are occupied is an unnerving thought for us and would be the case for any parent of young children. Additionally we are very concerned that our young children will be exposed, on a regular basis to people smoking, drinking, perhaps using foul language when inebriated and general antics associated with adult behaviour. This should not be the case and we should as family should be able to enjoy the basic right of peace, privacy and safeguarding of our children.

In regards to the part of the proposed terrace adjacent to our terrace there is only a small waist-high railing separating our property from the proposed hotel. In the absence of a formal garden, our modest terrace is the only outdoor amenity space provision for us to enjoy, which has been especially designed for the children to include a small play table and sand box. We would be most concerned at not only hotel guests and visitors looking into this area but potentially also strangers engaging in conversation with our children and worse still crossing over to our side given the limited safeguarding of the existing boundary treatment. Overall the proposed terrace would be a direct invasion of our privacy, an infringement on the safety of our children and significantly harmful to our amenity and enjoyment of our home, such that we may have to consider moving to another home where we feel safe and can raise a young family. Needless to say, we feel that this element of the scheme would fail to comply with the council's relevant policies and guidance.

Hotel Need and Loss of Offices

Draft Policy DM 1.1 (Protection of office accommodation) states that the Corporation will refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable offices and there are strong economic reasons why the loss would be inappropriate. The Office Redevelopment Viability Study (March 2014) submitted as part of the planning application does not, in our view, fully justify the loss of the current office use. The information presented illustrates that in its current state the offices would still yield a return of 7%. In this case little work would need to be done. The author of the report compares the return of £15 rent per sq. ft. to that of between £45 and £67.50 per sq. ft achieved by new 'Grade A' offices at nearby Basinghall Street, London Wall and High Holborn. However, whilst the newer offices attract a higher rent the report has not mentioned the build cost for these offices which would equally be high and would surely eat significantly into the Gross Development Value (GDV); this would affect the overall profit achieved in real terms. Finally the marketing information presented does not provide appendices illustrating the individual adverts placed for each of the publications/websites mentioned. Without tangible figures demonstrating the site has been marketed at a 'fair market rent' for a suitable period of time it is difficult to accept that the office use is no longer viable, except

to justify the office loss for an alternative use that will generate more profit for the site owners and nothing else. In this respect the scheme fundamentally fails to comply with the Corporation's policy aimed at protecting offices and the scheme is therefore considered unacceptable on these grounds.

Draft Policy DM 11.3 (Hotels) states that 'Proposals for new hotel and apart-hotel accommodation will only be permitted where they are not, amongst other factors, contrary to policy DM 1.1 and do not result in adverse impacts on the amenity of neighbouring occupiers'. It is evident from the previous sections of this objection letter/statement that as the hotel would adversely affect the amenity of neighbours the hotel proposal conflicts with aforementioned policy. Furthermore given the lack of justification for the loss of the office use the scheme again fails to comply with the hotels policy.

It is noted from the report to support the hotel development submitted with the application that 21 sites with planning permission to either extend or redevelop for hotel use are highlighted as either not ready or not yet having implemented the planning consent. The report argues that there is a distinct lack of 4-5 star hotels within the vicinity (1 mile radius from the application site), which in our view is plainly false as a non-exhaustive list as per the following illustrates at least 6 such hotels:

- Grange, St Pauls Hotel (Luxury 5-Star) located at 10 Godliman Street, EC4V 5A
- Crowne Plaza London- The City (5-Star) located at 19 New Bridge Street, EC4V 6DB
- Threadneedles Hotel (Boutique 5-Star) located at 5 Threadneedles Street, EC2R 8AY
- Club Quarters St Pauls (4-Star) located at 24 Ludgate Hill, EC4M 7DR
- The Kings Wardrobe (Full-Serviced Residences 5-Star) located at 6 Wardrobe Place, EC4Y 1LL
- Apex Temple Court Hotel (4-Star) located at 1-2 Sejeants Inn, Fleet Street, EC4Y 1LL

The fact that any extant planning permissions haven't been implemented on the above or any other hotels or sites within the vicinity should not prejudice the decision to grant permission for another hotel in the area on the basis that others have not been built. The Corporation have clearly allowed hotel development in the hope that that these will eventually be built but cannot be responsible for ensuring they are built; this would go beyond the scope of the planning permission and indeed the planning process. Additionally there is nothing preventing the applicant from receiving permission and 'banking' the site as a speculative investment- adding to the several other sites that have not implemented consents for the same reason.

A final point to note on this matter is one of the importance of the Corporation listening to local resident's views; over the years the Corporation sends us questionnaires on how we would like to see the city improved and meet the needs and aspirations of residents, especially families. The Corporation claims that every effort has been made to ensure that there is a balance between commercial and residential uses and the provision of green urban spaces and public services for young families. In this respect the proposed scheme undermines the City of London Corporation's own goals and aims. In terms of a need for hotel development on this site, the application does not, in our view, suitably justify this and therefore this aspect of the scheme is considered unacceptable and fails to comply with the Corporation's relevant policies. Moreover a new hotel in this location with an increased bulk as proposed would truly have an adverse impact on the 'soul' of the neighbourhood thereby appearing out of keeping with the character and appearance of the surrounding area.

Adverse Impact on Conservation Area

Both our property and the application site fall within both the Ludgate Hill and St Paul's Cathedral Conservation Area. Draft Policy DM 12.2 (Development In Conservation Areas) of the Corporation's Local Plan states that 'Demolition in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area'. Saved UDP policy ENV 11 supports this stating that the Corporation shall look to 'resist the demolition of buildings which make a positive contribution to the character or appearance of a conservation area and to encourage their sympathetic refurbishment.'

The scheme proposes the retention of only a façade and will involve significant demolition of the existing building which would not comply with the Corporation's relevant policies as above. We are concerned that the impact of the proposed development including the increase in traffic, increase in the bulk and volume of the replacement building and the general intensification of activity on this site on a 24-hour basis will harm the overall balanced and unique character of both the conservation areas. In this regard the scheme is considered unsympathetic to the conservation areas it is located in and fails to comply with the Corporation's relevant policies.

Conclusions

It is our view that, for the reasons highlighted above, the proposed hotel development at this site is considered unacceptable and fails to comply with the Council's relevant policies and BRE guidance. If the Council is minded to approve the application we would suggest further evidence in respect of the loss of office use and the need for a hotel at this site. We would like to see revised plans demonstrating details of adequate screening to overcome the overlooking issues and noise mitigation from the use of the terrace and courtyard below. We would also like to see further details of a noise survey carried out from our flat as the nearest noise-sensitive receptor and any measures to reduce any new plant noise. I would ask that this information is requested from the applicant at the earliest opportunity and we are provided with a chance to study this information and comment in good time before a decision is reached.

I trust the above is clear, however, should you require further clarification please do not hesitate to contact either myself or my wife, Marie Louise by email at the following address, [REDACTED]. As we are living in New York on a work based assignment, should regular mail be necessary, I would appreciate if this were sent care of my neighbour, Mr Matthew Rimmer at Flat 13, Lambert House, 2 Ludgate Square, EC4M 7AS. As per our earlier telephone and email conversations we would still like to invite you to our flat to assess the impact the proposal will have on our property in greater detail.

Yours Sincerely,

Mr J Colombano and Ms M L Kirk

(Owners of Flat 16, Lambert House)

Hampson, Rebecca

From: Hart, Liam
Sent: 18 March 2015 17:37
To: DBE - PLN Support
Subject: FW: 14/00300/FULMAJ: Creed Court / Creed Lane / Ludgate Sq., St Pauls.

Dear DBE PLN support,

Please can you register the below objection.

Thank you,

Liam

Liam Hart
 Senior Planning Officer
 Development Division
 Department of the Built Environment
 City of London
 Telephone 0207 332 1795
www.cityoflondon.gov.uk

ACKNOWLEDGED

From: Robert Meyrick [REDACTED]
Sent: 18 March 2015 17:15
To: Hart, Liam
Subject: 14/00300/FULMAJ: Creed Court / Creed Lane / Ludgate Sq., St Pauls.

Dear Mr Hart,

I write further to my formal objection, sent by email on 9th July 2014.

Since that date, a number of reports and submissions have been issued but, in my view, none of these succeeds in overcoming my earlier objections and thus justifying planning consent. Accordingly I am still opposed to the application.

Apart from focussing on aspects of design and construction I cannot see that the applicants have adequately addressed:-

- the disputed need for more hotel accommodation in that locale,
- traffic congestion in a pedestrianized zone and conservation area
- late night / early morning deliveries and removals
- dirt, noise and disruption during any demolition / construction phases.

By way of re-affirmation I am copying my earlier email below and trust the Committee will heed the views and opinions of other local residents and reject the application accordingly.

With Kind regards

Dear Sir,

I write in connection with the hotel development proposed in the application reference above, and wish to associate myself with the many objections already registered with you. My concerns relate to the residential building at Lambert House, 2 Ludgate Sq. EC4M 7AS.

I would briefly summarise my objections as follows:-

1. This location is a very special part of the St. Pauls and Ludgate Hill Conservation Areas. I accept this doesn't mean no changes ever, but if conservation means anything it must be to retain the existing mixed character and use of the immediate locale. A hotel on this scale, occupying most of the block must surely be contrary to the aims of any Conservation Area designation.

2. Traffic Flow. This is already, and reasonably so, an area of traffic limitations and pedestrian zones. The limousine / taxi movements that might be expected with a hotel on this site must be quite in-appropriate for the streets in this neighbourhood. This would apply not only to guests but also those other visitors attending conferences, events etc. I can also imagine the R/H and L/H manoeuvres from and into Ludgate Hill can only add to the congestion often seen there.

3. Logistics. As an extension to point (2) the daily delivery of supplies into such a tight location must inevitably add to the general level of noise, nuisance and hazard. The removal of waste (also daily I assume) would contribute further to the loss of amenity as well as the right to peaceful and quiet enjoyment. Based upon a number of personal experiences I assume most of these movements would be during "un-social hours".

4. Noise. I have seen the many comments about the atrium / courtyard. I am likely to be less directly affected by these problems but still have concerns that noise could travel around the corridors of Lambert House with negative impacts not currently felt. The proposal for a Rooftop Bar does cause concern however. In addition to normal clientele it will surely be used for events as well – including after midnight. The consequent noise / music will certainly pose a disturbance to neighbouring residents.

Much the same has to be said in relation to the plans to locate the external services plant. This is totally unsuitable for residents' peaceful enjoyment of their homes generating noise 24/7 I assume.

5. Right to daylight. My flat is less directly affected by this consideration but I fully support the comments you have received from residents whose rights and objections have been extensively set before you.

6. Noise, disturbance, dirt and dust during the demolition / construction period. This is a self-evident objection I believe. In general I support any plan to re-develop behind an existing façade where it retains the historic character of a location. This is no exception, but it seems such an approach adds to the duration of a project, creating a timeline which residents should not be expected to suffer from.

If re-development / modernisation is needed, then in such a sensitive area as this it should occur within the existing structures and layouts and ideally with a continuation of the existing mixed uses.

I will look forward to hearing from you in due course and to learning of the key dates in the progress of this application.

Yours sincerely

Robert Meyrick
(Flat3, Lambert House
2, Ludgate Sq.)

Hampson, Rebecca

From: PLN - Comments
Sent: 18 March 2015 15:09
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:08 PM on 18 Mar 2015 from Miss Louise McCullough.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.). (REVISED SCHEME)

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Miss Louise McCullough

Email: [REDACTED]

Address: Lamb Building Temple London

ACKNOWLEDGED

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity
- Traffic or Highways

Comments: I have objected already to the original scheme and it seems to me that the revised scheme does not cure the chief mischief that yet another hotel in this historical and residential area is not required. Further there will be considerable loss of light and amenity for local residents who have expressed their own objections but which I endorse. Whether the windows in the proposed development are glazed or not there will be "overlooking" and loss of privacy for local residents. The proposed roof terrace is going to be open til 8 pm 7 days a week. I cannot imagine how disruptive this will be for local residents during the working day and at weekends. I thoroughly deprecate this unnecessary development and would recommend it is rejected in toto.



Nick and Max Bailey
Flat 22
3 Ludgate Square
London EC4M 7AS

Your Ref: 14/00300/FULMAJ

Wednesday 18 March 2015

ACKNOWLEDGED

Dear Liam Hart

I am writing to you as the owner of neighbouring property Flat 22, 3 Ludgate Square to object to the above application on the following grounds:

Adverse affect on the residential amenity of our property at Flat 22, 3 Ludgate Square. The proposed development will result in our roof terrace and that of our neighbouring property Flat 21, being directly overlooked by two new stories of continually occupied hotel bedrooms, (see photographs on following pages) where we are only currently overlooked by offices not occupied at evenings and weekends. What is currently a relatively private and secluded outside space will become continually overlooked resulting in an unacceptable loss of privacy and amenity for both our own and neighbouring properties.

Noise. Ludgate Square is currently a quiet street, however its unusual narrowness, preserving as it does the medieval proportions it has had for centuries, has the effect of funneling and amplifying even low levels of noise, so that on summer's evenings, when large numbers of people congregate outside the Duchess pub at the Creed Lane end, the noise levels on our roof terrace are at least loud enough to make conversation difficult. The proposal to have a restaurant running almost the entire length of the street with the associated comings and goings; as well as the traffic of guests in and out of the hotel; taxis, deliveries and other associated noise will render our outside space as good as unusable for quiet relaxation and conversation.

Visual impact of the development: the addition of two stories the entire length of Ludgate Hill and an additional service level on the roof creates an unacceptably bulky and overbearing impression, out of scale with the surrounding buildings.

Density of development. The proposed building is the third significant development to be considered in the immediate area around Ludgate Square since we moved into our property in August 2013. The first at 5 Ludgate Square, a residential development adding an additional floor, was already approved at the point we purchased our property. The second, to add an additional floor of office space at 65 Carter Lane directly overlooking our property has recently been approved - and now this proposal. This is a mixed residential area and a



conservation area and yet it seems that we are to be surrounded by almost continual development for the foreseeable future.

Adverse effect on the character and appearance of a conservation area. The small area between Ludgate Hill and the river Thames boasts some of the few streets remaining in London where the Medieval street pattern is preserved. Ludgate Square and the surrounding streets are also rare survivors of Second World War bombing in this part of the City of London. The character of Ludgate Square in particular, with the roofline falling away from six stories at the Ludgate Hill end, down to a more human, domestic scale at the opposite end is essential to the character of the street, as is the mix of residential property with small service businesses such as a tailor's, hairdressers, delicatessen and pub. This mix reflects the combination of domestic quarters and small commercial concerns that have been characteristic of this part of London since the middle ages.

The effect of a development of the scale and nature of the one proposed will be irrevocably to tear out and destroy the unique and peaceful character of this very special part of the City of London, replacing it with an anonymous, corporate identikit urban hotel such as might be found anywhere in the world from Madrid to Dubai. The 'preservation' of the façade is in effect no such thing, since the development will along its entire length greatly exceed the current height of the building, completely overpowering the scale and character of the original Victorian buildings with an insensitively designed overbearing insult to their balance and charm.

I hope you will give these objections and those of the many other residents of Ludgate Hill who feel similarly the most serious and sober consideration in respect of this egregious proposal.

Please see following page for photographic references.

Yours Faithfully,

Nick Bailey

Existing view of proposed development site from roof terrace of Flat 22, 3 Ludgate square



Impact of proposed development



Hassall, Pam

To: Hassall, Pam
Subject: FW: Creed Court Hotel Application 14/00300/FULMAJ

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

From: Hart, Liam
Sent: 20 March 2015 13:30
To: DBE - PLN Support
Subject: FW: Creed Court Hotel Application 14/00300/FULMAJ

Dear DBE PLN Support,

Please can you register, print and acknowledge the below objection?

Thank you,

Liam

Liam Hart
Senior Planning Officer
Development Division
Department of the Built Environment
City of London
Telephone 0207 332 1795
www.cityoflondon.gov.uk

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

From: Ann Holmes Sent: 20 March 2015 13:26
To: Hart, Liam
Subject: Creed Court Hotel Application 14/00300/FULMAJ

Dear Liam

I wish to register my objection to the Creed Court Hotel Application 14/00300/FULMAJ for

I think the loss of light, which would result, for residents at Lambert House, makes the current proposals unacceptable.

Residents themselves have argued in far greater detail than I would be able to, but I have visited flats in Lambert House and am convinced that the current proposal would cause considerable loss of amenity to residents.

I should be grateful if you would acknowledge receipt of this email.

Many thanks

Ann Holmes

Common Councilman for Farringdon Within.

Flat 1
43 Bartholomew Close



ACKNOWLEDGED

EC1A 7HN

Department of Planning and Transportation
City of London
P. O. Box 270
Guildhall
London
EC2P 2EJ

17 August 2016

Attention: Mr. Liam Hart

Dear Mr. Hart,

YOUR REF. 14/00300/FULMAJ

PLANNING		TRANSPORTATION	
POST	CFO	PPD	
DATE	02 SEP 2016	LIP	
PC		DSE	
FILE	123806	PP	
		DD	

I have previously written two letters of objection (dated 3 July 2014 and 7 March 2015) to the above planning application. This is my third letter of objection.

It seems to me that, over the past two years, we have made little progress. The developer has been persuaded to make minor amendments to the planning application but in its essentials it remains unchanged and subject to all the objections that I have made previously, which still stand, and which I do not intend to repeat here in detail.

The facts are that I am the part owner of a flat (13 Lambert House, Ludgate Square) in a Conservation Area which is also an "identified residential area." According to several City of London policies, quoted in detail in my previous letters, residents in such areas are to be given some protection from developments that damage their amenity.

I would suggest that the above application damages our amenity in several ways, as follows:

1. Massing immediately adjacent to Lambert House, particularly relating to the height of the proposed development, remains substantial, even after minor modifications to the original plan, with detrimental affects relating to Daylight and Sunlight on the existing residents of what is a wholly residential property. The proposal to use white glazed bricks to enhance reflectivity is unwelcome because such bricks are unsightly and would soon become dirty, thus reducing their already marginal effect.
2. Massing also will affect residents because of noise and lack of privacy from the intended public use of so called green areas on the roof.
3. Creed Lane is a one way road accessed from Carter Lane and Ludgate Square, neither of which is suitable for large vehicles or high volumes of traffic. In addition, the hotel is to have three entrances/exits on Ludgate Square which will cause considerable noise, the effect of which will be exacerbated because the Square is very narrow with relatively high walls which channel sounds upwards to the detriment of residents.

There are three policies in the City of London Plan adopted 25 January 2015 that relate directly to this planning application as it affects existing residents, as follows:

ACKNOWLEDGED

Policy DM 21.3 Residential Environment.

This policy states "the amenity of existing residents within identified residential areas will be protected." Our property is in the identified residential area of Carter Lane. Thus, our amenity must be protected, according to this policy.

The policy also states "All development proposals should be designed to avoid overlooking and seek to protect privacy, day lighting and sun lighting levels to adjacent residential accommodation." The application does not meet these criteria as far as Lambert House is concerned.

Policy 3.21 Housing.

This policy refers to the advantages of new residential development being located near existing residential areas and to the opportunities this provides for creating "peaceful areas and a high quality residential environment." I would suggest that building a hotel in a designated residential environment will have the opposite affects for residents than is intended by this policy i.e. less peaceful and a poorer quality residential environment.

In the Design Statement the developer states "there is a key opportunity to activate Ludgate Square and support weekend activities. The area as a whole can be activated in connection with the variety of hospitality offers" Thus, the hotel is intended to create more foot and vehicular traffic at evenings and weekends, the very times when existing residents, living in an "identified residential area," would expect to enjoy a generally quieter and more relaxing atmosphere than exists in the city during business hours.

Policy DM 11.3 Hotels

Part of this policy states that hotels will not be allowed where they are contrary to Policy DM 1.1. The proposed hotel would be contrary to that policy because it introduces a use, i.e. a hotel, that adversely affects the existing beneficial mix of commercial use. It does so because the immediate area is already well provided with hotel rooms, serviced apartments etc. and the construction of the proposed hotel requires the destruction of a large amount of B1 office space. Already this proposed development has caused the closure of two popular local businesses, a hairdresser and a tailor.

The policy also states that a hotel will not be allowed if it is likely to cause adverse impacts on the amenity of neighbouring occupiers. It is evident from the items listed above that this proposed hotel has many negative impacts on neighbouring occupiers, particularly its closest neighbours, in Lambert House.

The proposed hotel is a large development relative to the size of the "identified residential area" and would be better developed as a mix of offices, flats and small shops. This would be much more in keeping with its surroundings and its situation in a Conservation Area.

Yours sincerely,



(Mr.) K. Rimmer

Flat 13
Lambert House
2, Ludgate Square
London
EC4M 7AS

Adjei, William

From: Hart, Liam
Sent: 17 August 2016 16:28
To: DBE - PLN Support
Subject: FW: Your Ref. 14/00300/FULMAJ; Creed Court / Creed Lane / Ludgate Square, St Pauls.

From: Robert Meyrick [mailto:]
Sent: 17 August 2016 16:25
To: Hart, Liam
Subject: Re: Your Ref. 14/00300/FULMAJ; Creed Court / Creed Lane / Ludgate Square, St Pauls.

Dear Sir,

I write in connection with the hotel development proposed in the application referenced above, and wish to associate myself with the many objections already registered with you. My concerns relate to the residential building at Lambert House, 2 Ludgate Sq. EC4M 7AS.

I would briefly summarise my objections as follows:-

1. This location is a very special part of the St. Pauls and Ludgate Hill Conservation Areas. I accept this doesn't mean no changes ever, but if conservation means anything it must be to retain the existing mixed character and use of the immediate locale. A hotel on this scale, occupying most of the block must surely be contrary to the aims of any Conservation Area designation.
2. Traffic Flow. This is already, and reasonably so, an area of traffic limitations and pedestrian zones. The limousine / taxi movements that might be expected with a hotel on this site must be quite in-appropriate for the streets in this neighbourhood. This would apply not only to guests but also those other visitors attending conferences, events etc. I can also imagine the R/H and L/H manoeuvres from and into Ludgate Hill can only add to the congestion often seen there.
3. Logistics. As an extension to point (2) the daily delivery of supplies into such a tight location must inevitably add to the general level of noise, nuisance and hazard. The removal of waste (also daily I assume) would contribute further to the loss of amenity as well as the right to peaceful and quiet enjoyment. Based upon a number of personal experiences I assume most of these movements would be during "un-social hours".
4. Noise. I have seen the many comments about the atrium / courtyard. I have concerns that noise could travel around the corridors of Lambert House with negative impacts not currently felt. Any proposal for publicly accessible space does cause concern however. In addition to normal clientele it will surely be

ACKNOWLEDGED

used for events as well – including after midnight. The consequent noise / music will certainly pose a disturbance to neighbouring residents.

Much the same has to be said in relation to the plans to locate the external services plant. This is totally unsuitable for residents' peaceful enjoyment of their homes generating noise 24/7 I assume.

5. Right to daylight. My flat is less directly affected by this consideration but I fully support the comments you have received from residents whose rights and objections have been extensively set before you.

6. Noise, disturbance, dirt and dust during the demolition / construction period. This is a self-evident objection I believe. In general I support any plan to re-develop behind an existing façade where it retains the historic character of a location. This is no exception, but it seems such an approach adds to the duration of a project, creating a timeline which residents should not be expected to suffer from.

If re-development / modernisation is needed, then in such a sensitive area as this it should occur within the existing structures and layouts and ideally with a continuation of the existing mixed uses.

I will look forward to hearing from you in due course and to learning of the key dates in the progress of this application.

Yours sincerely

Robert Meyrick

(Flat3, Lambert House

2, Ludgate Sq.)

Liam Hart
Senior Planning Officer
Development Division
Department of the Built Environment
City of London

24 August 2016

Dear Liam

Re: Planning Application 14/00300/FULMAJ
Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane, 12 Ludgate Square

I wish to object to the planning permission application on the grounds of the following:

- I expect the Planning Authority to act with all due diligence when considering this revised application
- all the previous objections for scheme 1 should be included where relevant

Also to be considered again with due diligence are;

1. The City of London Local Plan dated January 2015 in all relevant detail.
2. The massive imposition of demolition, site clearance and construction of new property. Noise vibration, pollution and of course traffic are major concerns for the residents. There has not so far been any mention of possible compensation arrangements.
3. The proposal flies in the face of the previous statement made by the design team that a reduction of the number of Hotel rooms would make the scheme financially non viable.
4. As far as I am aware, there is no proposal regarding the timeline for which this needs to be considered.

Yours sincerely

Nicola Bell
14 Lambert House
2 Ludgate Square

City Planning Officer
Attention: Liam Hart
City of London
P.O.Box 270
Guildhall
London EC2P 2EJ

26th August 2016

Ref:14/00300FULMAJ

1 of 4 pages.

Dear Sirs

Proposed Change of Use from Office to Hotel
3-5 Ludgate Hill, 1-3 Creed Lane and
11-12 Ludgate Square

PROJ	14/00300	PPD
THD		LTP
CON	11 2 SEP 2016	SSE
PL		PP
FILE	113807	DD

My objections are as follow:-

Ludgate Square is a narrow lane and the proposed building 11 to 12 will cover three quarters of the narrow lane. The height of the build will be +38.95 metres. Towering over the other properties in the lane of 30 metres. Reducing their Daylight and Sunlight.

The Internal Light Well of 2 Ludgate Square
Courtyard Plan A0105.

The original measurements are not here only what the developer proposes by cutting out the irregular shape. The measurements should stay as they are in the Office Block.

The existing walk through from Ludgate Hill to Ludgate Square is not shown on the Ground Floor Plan. Historically this was a public right of way. Is this not still the case?

No overall measurement is shown on existing Plan for the walk through.

City of London Plan 2015 Section DM15.6 AIR QUALITY

There is a smoke stack, flues and venting of the proposed kitchen probably producing odours and noise onto the internal Light Well which will be unpleasant and a nuisance with the windows open in 2 Ludgate Square.

A2113 (v16 8.8.16)

ACKNOWLEDGED
11

Has DUCTS, SMOKE EXTRACT UNIT, FLUES and the PLANT next to and opposite 2 Ludgate Square windows these should also be assessed for Noise and Nuisance which affects the residents on the Internal Light Well. I note 2014 there was a noise assessment by the developer, but this seems entirely based on the proposed hotel.

A2100 V16 (8.8.16 Proposed Lower Ground Floor - 3 Plan

A CHP PLANT ROOM is proposed in the third basement.

Gov.UK Guide to CHP. Up to date guidelines should apply for the safety of all concerned including noise and emissions via the Internal Light Well which will damage the amenities of the residents of 2 Ludgate Square. The potential problem of flooding in a basement might also be a concern.

TERRACE

DM10.3 Roof Gardens and terraces

A2109 VO9 (8.8.16) Proposed Drawings Level 6 Plan

This Terrace is an intrusion on the privacy of the residents, particularly the children of 2 Ludgate Square. The Terrace overlooks the INTERNAL LIGHT WELL. The Terrace is directly opposite the windows of Flat 16, and overlooks down and into all the other windows of 2 Ludgate Square.

The Roof Terrace will not mix well with residential neighbours even if there are time limits on the gathering of people. Inevitably there will be social functions generating considerable noise only a few metres from residential windows. Can you certainly say they will all leave at 8 p.m. I doubt very much this will happen; which is likely to result in frequent noise and nuisance complaints to the City of London.

Amongst attractions of Flat 13 are a view of the top of St. Paul's Cathedral and across the river. Both will be lost if this application is approved.

DM 21.3 Residential environment

This Policy relates to protecting the amenity of existing residents in an identified residential area.

Its seems to me that in all areas of this policy including, noise, fumes and smells, pedestrian and vehicle movements, overlooking, privacy, sunlight and daylight the application to build a hotel is entirely contrary to the stated policy. Indeed, by its very nature as a 24 hour a day, 365 days per year business a hotel is extremely damaging to residential amenity whereas small business offices and shops tend to operate standard business hours leaving evenings and weekends quieter for residents.

3.21.16 "The avoidance of overlooking of residential accommodation is a consideration in the design and layout of both new residential buildings and other development..." In this case avoidance of overlooking residential accommodation can be achieved by reducing the mass/bulk/height of this proposed hotel or by keeping the existing Office of 4 levels.

DM 21.3

REFLECTIVE LIGHT can contain **LITTLE HEAT CONTENT** whereas at the present time windows W1/704 and W2/704 provide sunlight which produces heat to the rooms, especially welcome in the winter months. This energy cuts the fuel bills.

The proposed building mass will substantially reduce light to residents of 2, Ludgate Square. The proposed white glazed bricks would be extremely unattractive. **Reflective light relates to ADF** which, according to **BRE guidance, only applies to new build whereas 2 Ludgate Square is an existing building.**

OVERSHADOWING. The proposed 38950 mm mass plant build on the SE corner of the proposed plan will cause overshadowing of the windows and darken the interior of 2 Ludgate Square to the severe detriment of residential amenity.

MY OBJECTION WITH THIS APPLICATION IS THAT FLAT 13 Looks East and South over the internal courtyard. GIA say East. The assessment is incorrect. Page 18. This page also refers to Flat 5 as well as 13???????

Figure 05 - Photo and Window Map of 2 Ludgate Square. Page 11. Gia Daylight/Sunlight 6912 17/06/2016 with 5 appendixes.

The photo is misleading on the direction of St. Paul's in the skyline. The Cathedral cannot be seen from this direction over Flat 15. It is further up the road. Thereby given the wrong impression of the compass points. **So if the ASSESSMENTS WERE CARRIED OUT ON THIS BASIS ALL MUST BE WRONG.**

Flat 13 receives high levels of sunlight. Photographs were sent with my letter of 10th March 2015 and were put online. Please look and read.

If this application goes ahead we will lose the skyline, sunlight, daylight to our windows.

Dr. Littlefair's letter of 16th December 2014. Although a recognised expert on BRE his comments are based on what Gia has chosen. As such they are generic and do not reflect his opinion on this specific Planning Application.

TRANSPORT

**Core Strategic Policy CS16: Public Transport Streets and Walkways.
Development Management Policies DM16.1
DM16.2**

The proposed hotel:- Entrance door Creed Lane\Ludgate Hill . To avoid going around the circuit of Godllman Street, Carter Lane, bottom of Creed Lane the drivers will park on Ludgate Hill on the corners of Creed Lane for the people to allight. Causing blockages. The servicing vehicles might use Deans Court but Godllman Street is wider, therefore, the route will be Godllman Street, Carter Lane , Creed Lane. Coaches and larger vehicles would need to use this route.

For the Entrance door on Ludgate Square the drivers will use Godllman Street or Deans Court into Carter Lane, and even Ludgate Square which is very narrow . Notice there will be a considerable traffic build up at the bottom of Creed Court, Ludgate Square and Carter Lane. There will be an increase in congestion, vehicle emissions, noise of slamming car doors, noisy people all within a pedestrian zone with increasing danger to the pedestrians. The noise will filter up Ludgate Square which is a quiet tranquil lane causing a nuisance to the residents there, and in Carter Lane and St. Andrew's Hill, 24 hours , 7 days a week.

Ludgate Hill has plenty of pollution from the vehicles, however it is not appropriate to use this circuit of vehicles into the back lanes of St.Paul's and Ludgate Hill Conservation Area. The fact is there will be a considerable increase of vehicles, which will cause great negative impact to this area.

Notice now how the character of the area will be changed.


Please include where applicable my letters of 10th March 2015 and 6th July, 2014.

References for 1st paragraph of my letter:-

Building heights of Ludgate Square 12/09072/FUL ,13/00457/MDC,12/00755/FUL,14/00078/
NMA,12/00955/FUL, for 1 to 3, 6 to 7, 8,8 to 9. Applicant same name.

+ Maps and Daylight and Sunlight Report by Abba Energy Ltd for 8-9 Ludgate Square

Yours sincerely,


(Mrs.) J.L. Rimmer
Flat 13
Lambert House
2, Ludgate Square
EC4M 7AS

Weils, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: Creed Court, 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ)

From: Michael Tang [
Sent: 29 August 2016 22:28
To: Hart, Liam
Subject: Creed Court, 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ)

Dear Mr Hart

I am writing to register an objection to the revised planning application for Creed Court, 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ).

I live in Flat 1, 2 Ludgate Square, London EC4M 7AS. My flat overlooks the courtyard and the proposed hotel development and, as a result, suffers a significant reduction in the levels of daylight and sunlight. The reduction in the levels of daylight and sunlight are as a direct result of the increase in the height of the building to six floors.

Despite amendments to the design of the courtyard, the increased height of the proposed development continues to result in a decrease in the levels of light beyond the BRE guidelines in the rooms in my flat. The levels of reduction of daylight and sunlight are not acceptable.

My flat is at the lowest level and, as a consequence suffers the worst reduction in the levels of light. From the Daylight and Sunlight report, for my flat, window R1/701 suffers a NSL reduction of 40.7% and window R2/701 a reduction of 23.4%. These levels of reductions are beyond the BRE guidelines.

I challenge the other findings in the Daylight and Sunlight Report for VSC and APSH. I find it hard to understand how it concludes that the reduction in APSH is within an acceptable amount for my flat and yet for the flat directly above mine, the readings are 0% for winter APSH and 6% annual APSH. In fact, in their previous report, the APSH values for my flat fall from 6% to 0%. I believe my levels of APSH to be 0%, which is unacceptable.

Yours sincerely

Michael Tang

Hassall, Pam

To: Hassall, Pam
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 30 August 2016 16:55
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 4:54 PM on 30 Aug 2016 from Mr Nicholas Bailey.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035 sq.m. GIA), restaurant use (Class A3) at part basement and part ground floor (1,090 sq.m. GIA) and associated plant areas (2,245 sq.m.) (Total Floorspace 7,660 sq.m. GIA) (REVISED ENLARGED COURTYARD SCHEME).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Nicholas Bailey

Email:

Address: Flat 22 3 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Noise
- Residential Amenity

Comments: The bulk and scale of this development are entirely out of keeping with the unique and fragile character of Ludgate Square, one of the few intact pre WWII streets in the area. At the Creed Court end of the street, the building will be three stories higher than

the facade, although stepped back - a scale which makes a mockery of the status of this street in a conservation area, with its particular emphasis of the stepped roof heights, falling away from Ludgate Hill. This character of the local street, having persisted since pre-Victorian times, would be lost forever.

The building of yet another hotel in an area that is already exceptionally well supplied with hotel accommodation, including Club Quarters and Grange St Paul's within just yards of the proposed development, represents an unnecessary over-commercialisation of the area, and in particular Ludgate Square, which have hitherto preserved its character, rare and consequently precious in the City of London, of mixed residential and independent retail use. An extremely large hotel, catering to already well served international and business travellers, will rob the immediate vicinity of St Paul's of one of its last community streets where people live, work and shop - surely this character is one of the primary reasons international travellers come to St Paul's, and would not wish it to be vandalised to serve already-met accommodation needs.

The continual inevitable noise and disruption associated with the running of a large hotel, with regular deliveries, large amounts of refuse generated as well as the continual comings and goings of guests, the noise of revellers and restaurant goers all represent an unacceptable intrusion, disruption and disturbance to the many people who call Ludgate Square their home. Ludgate Square is an extremely narrow street, and sound is amplified upwards - even ordinary conversation in the street can be easily heard through our fifth floor window at 3 Ludgate Square, for example.

From Sir Brian and Lady Langstaff

Flat 5, Lambert House
2. Ludgate Square
LONDON EC4M 7AS
30th. August 2016

Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 3EJ

fao Liam Hart

Dear Sirs

14/00300/FULMAJ

We write to object to the proposed development.

Before the previous plan for an hotel on the Creed court site was withdrawn, we met twice with the developers, their architects and advisors. We are grateful that, in one respect, the concerns expressed by residents of 2 Ludgate Square have been listened to – the revision of the plan for the courtyard (called an “extension” though it is actually a reduction on the existing). However, the salesman’s trick of proposing what is unacceptable, withdrawing and then submitting an improved revision does not in itself make the new plan acceptable. The application must be judged for what it is, not how it has been improved: and it remains an overwritten¹ application for over-development which would have serious consequences for light, noise, privacy, and traffic flows without there being a demonstrable need for it.

LIGHT - The validity of an expert report can be tested by the principles it adopts, the assumptions the expert makes, and the absence of inherent bias. On these tests, the GIA Report is flawed. First, it appears to express as a principle that because in an urban environment there may often be a reduction of light below BRE guidelines, a further reduction is therefore more acceptable! The converse is true – what little we have becomes all the more important to preserve, since it is already below generally appropriate illumination. The principle as stated otherwise justifies ignoring BRE guidelines in the centre of any city.

It assumes that “development” means an increase in the height of proposed buildings over the existing: to accept this would lead to creeping increase in the height of buildings round St.Pauls, adversely affecting light to existing buildings. Increased size does not necessarily equal improvement.

The report still relies on “reasonable assumptions” – eg as to the use of and size of rooms, which it states are appropriate where it has not been possible to gain access. But we have not been asked for access, and made this point when the original report was submitted; and also remind² GIA that at least one flat in 2 Ludgate Square has had one of the “bedrooms” in use as a dining room/study. The author has not taken resident’s comments into account.

The third last paragraph of its “Conclusions” not only repeats the salesman’s trick referred to above, but also comments on the aesthetics of the scheme – since this is NOT within

¹ See eg para 3.1. Design and Access Statement, and several references to “animating the public realm” – i.e. people may go to use a hotel if it’s there. It’s a hotel, not a rival to St.Paul’s – come on!

² The point was made in earlier representations. GIA’s report ignores it.

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the expertise of a light consultant, it indicates a desire to “sell” the scheme. It adds to this sense of inherent bias by asserting that cladding the lightwell in white brick would be “more aesthetically pleasing” for the occupiers of No.2 Ludgate Square, without any basis for the assertion – moreover, it is actually contrary to the views expressed by the residents when they met the developers to discuss the previous plans, since residents said they thought the white bricks had a public convenience aesthetic. GIA further assert that the lightwell “is designed to enhance the sense of enclosure”. Since any lightwell is by definition an enclosure, this is meaningless sales talk.

It follows that the report cannot be taken as fully independent and impartial: and though we cannot comment on the *scientific* methodology itself, given the inherent biases shown in the report itself and the approach it takes it is safe to conclude that the reductions in light it finds will be stated at a minimum: there must be concern the actual might well be more – we note, here, that the current report does not give any calculation of ADF as such (Cf. the report supporting the original plan).

Nonetheless, even on GIA’s figures, our master bedroom will **lose ALL** its sunlight in winter, and at least 2/3 overall; the daylight distribution is to be such that we shall **lose** nearly a half (to one room), and around a sixth of the daylight (to the other) yet this is a reduction from *what is already at a low base*. The **reduction** in NSL (already poor) is nearly half. This remains unacceptable, and should not be approved.

NOISE The previous proposal was for a courtyard/lightwell to which we were assured there would be no access for hotel guests. It is now proposed to use the courtyard for “...a series of attractive hotel offers and independent A3 uses”³, and the drawings show figures in the space. This suggests a reversal of the previous proposal, such that the courtyard is now to be used by hotel guests. If so, the effect will be to create a funnel of noise from low level up and past our windows, instead of the relative peace and quiet we now enjoy.

SUMMARY The effects on light, and potential interference with habitat, are a consequence of the proposed building being higher than the existing, and it expanding horizontally towards 2 Ludgate Square. It does not need to be so – the site can be sustainably reconfigured without the effects of which we complain. The application remains a proposal for over-development of the site. In all other respects, we repeat our earlier comments.

Yours,

Sir Brian and Lady Langstaff.

³ 27/73 Design and Access statement, para. 4.4

Adjei, William

From: [REDACTED]
Sent: 31 August 2016 23:08
To: PLN - Comments
Subject: Fw: Objection letter

[REDACTED]
[REDACTED]

Dear Mr. Hart,

Re:- Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use, Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA. (Your ref: 14/00300/FULMAJ)

We would like to object to the above proposal. Having reviewed the recent documents, here are our objections:-

- there has been no mention of any proposal of servicing times for the new premises. Services can include loading and unloading of goods from vehicles, and can also include collection of refuse. This is to avoid obstruction of the Ludgate Square and surrounding streets, including Creed Lane, plus safeguarding the amenity of residents of adjacent premises.
- We question the impact of demolishing any existing building located next to or within St. Paul's Cathedral Conservation Area, to create a larger premise for hotel use. We are in support of your planning office core strategy policies such as CS12 (conserve or enhance heritage assets). In fact, we are not convinced by the Design and Access Statement by Stephan Reinke Architects, describing the front facade of my building (2 Ludgate Square) and adjacent current premises as "a consequence of 1980s poor historical mimicry to create separate buildings", see page 12 on the statement.
- This leads us to the next matter, increased congestion in Ludgate Square and surrounding areas. We enjoy leisurely strolls along these beautiful, clean and peaceful medieval streets, and we are concerned about the future overcrowding on the public realm. Page 17 on that statement already confirms our concerns, ie. that week nights and weekends will see an increase in movement and noise. Will the taxis come through a Ludgate Square for example to pick up or drop off hotel guests since the main hotel entrance is proposed to be on Creed Lane?
- 132 rooms along with restaurant facilities will require heavy use of the proposed waste storage facilities. These facilities appear to be on Creed Lane. We are concerned about these 1100 litre waste containers being wheeled onto these small streets, obstructing the public realm and crowding these streets. We are also not thrilled with the huge volume of waste generated by the hotel, thereby very concerned about potential increase in pests.
- the proposed large internal stoned courtyard is being designed for public access. What guarantees can you provide regarding noise? This will adversely affect all of us next door in 2 Ludgate Square. We doubt that honey locust trees can absorb much noise. At the moment, during summer time, when it's hot, it is very easy to hear people very well and follow their conversations when they are in the current courtyard.
- the Architect proposed drawings showed on page 15 that the hotel terrace on Level 6 will be located next



to our flat. What about the noise? What are the purposes of this terrace, and when are the opening times?

- the Daylight and Sunlight report is still based on an unchanged assumption, please see page 5, ie. the authors have not sought access to neighbouring properties.

- this light report showed the daylight and sunlight results on page 50 on Appendix 03. Page 53 shows our window, W4/704, listed as a bedroom window, but this is our kitchen window. It also shows our other window, W5/704, listed as another bedroom window, but this is our bathroom. I am going to lose about 4% in daylight vertical sky component according to this report, when this hotel is in place. Page 58 shows us that we will lose about 13% in sunlight during the winter, when this hotel is in place.

- lastly, we are worried about the air quality being affected by the proposed demolition works. How long will these proposed works last?

Thank you for giving us the opportunity to comment.

Yours sincerely,

Ms. Y. Tan
Flat 15, Lambert House, 2 Ludgate Square

14/00300

Matthew Rimmer

Flat 13 Lambert House
2 Ludgate Square
London EC4M 7AS

31 August 2016

Liam Hart
Department of the Built Environment
City of London

Dear Liam,

Please accept this letter as my objection to the proposed Creed Court Development also please consider my previous objection letters as they are still valid.

My objections are as follows with reference to the City of London Local Plan dated January 2015.

1. Policy DM 1.1 Protection of office accommodation and policy DM 1.3 Small and medium sized business units - this needs to be consider by yourselves

2. Policy DM 10.1 New development

The bulk and massing of the scheme is inappropriate, and does not take into considerations the surrounding buildings particularly 2 Ludgate Square.

To be clear the proposal is for a reduction in the existing footprint of the inner courtyard from 132m² to 115m² while at the same time massing on the south elevation to completely overshadow our homes and directly in contravention of BRE guidelines

The development has also increased in height at its highest point to the south and with the positioning of a plant room which seems totally unreasonable

3. DM 10.3 Roof gardens and terraces

The proposed terrace will immediately overlook residential premises as it is directly next to Flat 16 raising security concerns as well as the ability to look down at the apartments on lower floors.



4. DM 10.7 Daylight and Sunlight

Policy states: "To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings"

1. Assumptions and opinions have been made by the GIA in their daylight and sunlight report with inconsistencies and incorrect information still being published.
 - 1.1. For example reference is made to all rooms looking onto the inner courtyard as being bedrooms. This is factually incorrect, for example Flat 15 their kitchen and bathroom overlook the inner courtyard.
 - 1.2. GIA have utilised ADF (Average Daylight Factor) measurement which is in direct contravention to BRE guidelines and should not be used on existing buildings.
 - 1.3. "An enlarged courtyard has been proposed" - this is incorrect. the courtyard size is being reduced from 132m² to 115m²
 - 1.4. "We have not sought access to adjoining properties...we have made reasonable assumptions to the internal layouts of the rooms". Residents have always made clear the availability of our properties by all parties to get correct/gather precise information. Assumptions are unhelpful and in the most part incorrect and flawed
 - 1.5. NSL (No Sky Line) fails by 40% at 2 Ludgate Square, 50% at 8 Carter Lane and 100% at 50 Carter Lane
 - 1.6. VSC (Vertical Sky Component) 65% fails at 2 Ludgate Square, 100% at 8 Ludgate Square, 50% at 46 Carter Lane and 50% at 50 Carter Lane

5. DM 11.3 Hotels

The proposed hotel is contrary to policy DM 1.1 and will not contribute to the balance in the immediate facility. Ludgate Square has gone from office buildings to now primarily residential with the conversion of 6 - 7 Ludgate Square and 8-9 Ludgate Square into short term apart/hotel. We are already saturated with hotels nearby Grange St Pauls, Grange Suites and Club Quarters (both being directly opposite the proposed development). Apex Hotel, Premier Inn, Crowne Plaza etc

Residential amenity is not being protected

6. DM 12.2 Development in a conservation area

We are in the St Paul's conservation area the area will not be preserved or enhanced through this development. It will be to the detriment of resident

I do not see how this scheme can progress or be supported by the City of London when it contravenes so many policies and guidelines.

Yours sincerely

A black rectangular redaction box covering the signature of Matthew Rimmer.

Matthew Rimmer

Hassall, Pam

To: Hassall, Pam
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 31 August 2016 11:55
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:54 AM on 31 Aug 2016 from Mr Joe Colombano.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035 sq.m. GIA), restaurant use (Class A3) at part basement and part ground floor (1,090 sq.m. GIA) and associated plant areas (2,245 sq.m.) (Total Floorspace 7,660 sq.m. GIA) (REVISED ENLARGED COURTYARD SCHEME).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Joe Colombano

Email:

Address: Flat 16 Lambert House, 2 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: A letter raising objections to the scheme, in particular the acceptability of the daylight/sunlight received to neighbours as a result of the proposal, has been prepared on my behalf by Syntegra Consulting and

DAP Planning and Architecture. This was sent earlier today as per the stated deadline directly to the email address of the case officer, Liam Hart. Please refer to this document which forms my formal objection to the latest revisions on this project.

Adjei, William

From: Hart, Liam
Sent: 13 September 2016 10:50
To: DBE - PLN Support
Subject: FW: Objection to application 14/00300/FULMAJ

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

From: Ann Holmes
Sent: 13 September 2016 10:40
To: Hart, Liam
Subject: Objection to application 14/00300/FULMAJ

Dear Liam

It seems to me that significant problems of daylight and sunlight still remain and I would like to record my objections to this application.

Many thanks

Ann Holmes
Common Councilman for Farringdon Within

Sent from my iPad

ACKNOWLEDGED



FAO Mr Liam Hart,
Planning Officer,
Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
London EC2P 2EJ

Received.
31/10/16

Dear Mr Hart,

31 October 2016

Letter of Objection: Application Reference No. 14/00300/FULMAJ
Proposed development at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA

Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035 sq.m.), restaurant use (Class A3) at part basement and part ground floor (1,090 sq.m.) and associated plant areas (2,245 sq.m.).

We write today on behalf of our client, Mr J Colombano and Ms M L Kirk who reside at Flat 16, Lambert House, 2 Ludgate Square, neighbouring the proposal. We have been contacted by our client after concerns were raised that the proposed development will infringe on the daylight and sunlight currently enjoyed by their property (as laid down in the BRE "Site layout planning for daylight and sunlight: a guide to good practice", 2011 by PJ Littlefair).

Our client Mr J Colombano through his letter to City of London dated 8th July 2014 and 19th March 2015 raised some issues regarding daylight and sunlight matters subsequent to a planning application being submitted to the Council. The proposed scheme has since been modified by Stephen Reinke Architects and a revised daylight and sunlight report has also been submitted by GIA. We have reviewed this revised report, and comment as follows.

With respect to GIA's letter dated 17th June 2016, whilst we appreciate the list of improvements, we examined the impact to the surrounding buildings and especially focused on the effects on 2 Ludgate Square. Although we acknowledge that the architects have incorporated further improvements following the consultation on the planning application, we still have some concerns regarding the impact on surrounding properties.

According to GIA's Daylight and Sunlight report dated 17th June 2016, 2 out of 17 windows (highlighted in yellow in the below table) at 2 Ludgate Square will fail to meet the BRE Sunlight criteria. However, we have scrutinised it and found out the actual number of windows that the occupants are likely to notice a loss of sunlight and see the impact would be 12 as shown in the Sunlight Result below, Appendix 03 of GIA's Daylight and Sunlight report.



As mentioned in the BRE guide "Any reduction in sunlight access below this level (more than 25% of APSH or more than 5% of APSH in the winter months) should be kept to a minimum. If the available sunlight hours are both less than the amount above and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March), then the occupants of the existing building will notice the loss of sunlight."

Further to the above statement, even though the overall annual loss of 10 windows (W1/701, W4/701, W5/701, W1/702, W4/702, W5/702, W1/703, W1/704, W2/704, W4/703) is not greater than 4%, the occupants will notice the loss of sunlight to their homes as the centre of the windows will receive less than 25% of APSH or 5% WPSH and receive less than 0.8 times its former sunlight hours either period. Furthermore, the more care needs to be taken into the design not to block any of sunlight on these windows in the situations that the existing values are already low and slight changes of the skyline can adversely affect to these windows.

Table 03 – Annual Probable Sunlight Hours (APSH)

Address	Number of Windows	Meet BRE Guidance	Number of Rooms	Meet BRE Guidance
3 Ludgate Square	24	23	7	7
2 Ludgate Square	17	15	15	13
1 Ludgate Square	31	29	5	5
46 Carter Lane	N/A	N/A	N/A	N/A
48 Carter Lane	N/A	N/A	N/A	N/A
50 Carter Lane	N/A	N/A	N/A	N/A
6-7 Ludgate Square (residential being implemented)	11	11	2	2
8-9 Ludgate Square (residential has been implemented)	N/A	N/A	N/A	N/A
Total	83	78 (94%)	29	27 (93%)

N/A = Not Applicable

VSC result (GIA's Daylight Sunlight report, 8.0 Surrounding Properties, p12)

SUNLIGHT ANALYSIS

Room	Window	Room Use	Flat Number	Existing				Window Proposed				Room					
				Winter APSH	Annual APSH	Winter APSH	Annual APSH	Winter Loss	Annual Loss	Winter %Loss	Annual %Loss	Winter APSH	Annual APSH	Winter APSH	Annual APSH	Winter %Loss	Annual %Loss
2 LUDGATE SQUARE																	
R1/701	W1/701	BEDROOM		6	3	0	0	0	3	0.00	100.00	0	3	0	0	0.00	100.00
R2/701	W2/701	BEDROOM		0	5	0	4	0	1	0.00	20.00	0	5	0	4	0.00	20.00
R4/701	W4/701	BEDROOM		1	10	0	6	1	4	100.00	60.00	1	11	0	7	100.00	36
R1/702	W1/702	BEDROOM		1	9	0	0	1	3	100.00	33.33	1	11	0	7	100.00	36
R2/702	W2/702	BEDROOM		0	6	0	2	0	4	0.00	33.33	0	6	0	2	0.00	33.33
R4/702	W4/702	BEDROOM		2	14	0	8	2	8	100.00	57.14	2	14	0	6	100.00	37
R4/702	W4/702	BEDROOM		3	15	0	15	3	0	100.00	0.00	3	15	0	15	100.00	21
R4/702	W4/702	BEDROOM		4	15	0	15	4	0	100.00	0.00	4	15	0	15	100.00	21
R1/703	W1/703	BEDROOM		0	11	0	8	0	3	0.00	27.27	0	11	0	8	0.00	27.27
R2/703	W2/703	BEDROOM		4	22	0	16	4	4	100.00	72.73	4	22	0	16	100.00	27
R3/704	W3/704	BEDROOM		2	25	0	26	2	-1	100.00	10.40	2	25	0	25	100.00	-4
R2/704	W2/704	BEDROOM		10	40	4	37	6	3	60.00	7.50	10	40	4	37	60.00	3
R1/705	W1/705	BEDROOM		12	50	6	47	6	3	50.00	16.00	12	50	6	47	50.00	16
R2/705	W2/705	BEDROOM		18	56	16	11	2	1	22.22	1.79	18	56	16	11	22.22	1.79
R4/703	W4/703	BEDROOM		7	22	3	25	4	-4	100.00	-18.18	7	22	3	25	100.00	-18
R4/704	W4/704	BEDROOM		15	38	13	45	2	-7	13.16	-18.42	15	38	13	45	13.16	-18
R5/704	W5/704	BEDROOM		7	22	9	32	-2	-10	-28.57	-45.45	7	22	9	32	-28.57	-45

Sunlight result (GIA's Daylight Sunlight report, Appendix 03, p58)

In addition, the BRE guideline clearly suggests that bedrooms should be considered to analyse the impact on the daylighting distribution in the rooms although bedrooms are less important. The table shows that 5 out of 15 rooms will fail to meet the BRE NSL criteria and areas beyond the no sky line will be dark and gloomy and supplementary electric lighting will be needed.

As mentioned in the BRE guideline, "If following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 times its former value this will be noticeable to the occupants, and more of the room will appear poorly lit".

Further to the above statement, especially 3 rooms (R1/701, R4/701, and R1/702) on the first and second floor at 2 Ludgate Square will experience more than 30% loss (30.52% to 42.96%) as shown in the table below. Therefore, the reduction of skylight will be severely noticeable to the occupants and the natural lighting condition of rooms will be significantly poor.

DAYLIGHT DISTRIBUTION ANALYSIS

Room/ Floor	Room Use	Flat Number	Whole Room	Prev sq ft	New sq ft	Loss sq ft	%Loss
2 LUDGATE SQUARE							
R1/701	BEDROOM		121.25	60.72	36.00	24.72	40.71
R2/701	BEDROOM		102.81	43.80	33.54	10.26	23.41
R4/701	BEDROOM		140.41	50.88	42.90	18.58	30.52
R1/702	BEDROOM		121.25	88.32	50.38	37.95	43.06
R2/702	BEDROOM		102.81	55.71	47.77	8.94	15.76
R4/702	BEDROOM		150.36	78.99	56.70	22.21	28.15
R1/703	BEDROOM		121.25	100.94	94.06	14.89	13.67
R2/703	BEDROOM		102.81	80.30	95.22	-13.92	-17.12
R4/703	BEDROOM		150.36	88.37	66.96	1.41	2.06
R1/704	BEDROOM		121.25	119.74	108.97	10.77	8.99
R2/704	BEDROOM		102.81	102.46	102.46	0.00	0.00
R4/704	BEDROOM		82.11	75.67	75.61	0.06	0.09
R5/704	BEDROOM		99.81	59.05	87.03	-27.98	-47.38
R1/705	BEDROOM		87.70	85.81	85.81	0.00	0.00
R2/705	BEDROOM		85.71	84.53	84.53	0.00	0.00

No-Sky Line result (GIA's Daylight Sunlight report, Appendix 03, p56)

Even though the total failing percentage at 2 Ludgate Square has been reduced and the VSC result has been improved, several flats will still be adversely impacted by the proposed development and their right to enjoy daylight and sunlight will be infringed.

We would be grateful if you could acknowledge receipt of this letter. Should you wish to discuss any aspect please do not hesitate to contact the writer.

We look forward to hearing from you.

Yours sincerely,

Yunok Choi
Sustainable Design Engineer

yc@syntegragroup.com