

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	25 July 2017
<b>Subject:</b> Emperor House 35 Vine Street London EC3N 2PX Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.	<b>Public</b>
<b>Ward:</b> Tower	<b>For Decision</b>
<b>Registered No:</b> 17/00239/FULMAJ	<b>Registered on:</b> 24 March 2017
<b>Conservation Area:</b>	<b>Listed Building:</b> No

### Summary

The proposed development, broadly utilising the high quality design of a previously approved office development, would regenerate the site, removing the existing building and delivering a mixed use development which would enliven this eastern part of the City and contribute to the City's offer of student accommodation, heritage assets/cultural facilities and employment floorspace through the delivery of:

- A 619 room purpose built student housing;
- An exhibition space, curated in consultation with the Museum of London providing access to the Roman Wall, a designated ancient monument;
- A café with direct views over the Roman Wall, available for use by the

general public;

- Office accommodation (Grade A); and
- 911sqm of Incubator accommodation to promote the development of start-up businesses.

Alongside these uses, the development would deliver a new pedestrian access route through the site which would provide unique views over the Roman Wall and an enhanced public realm through on-site landscaping. The contemporary building design would integrate a range of measures to improve sustainability and enhance environmental performance. The high quality building design would reveal the existing ancient monument on site and would enhance the setting of the neighbouring Grade II listed building. Active frontages and proposed landscaping at ground floor level would enliven and enhance the area.

The redevelopment constitutes a sustainable development, which would deliver a number of economic, social and environmental improvements as required by the National Planning Policy Framework and is recommended for approval.

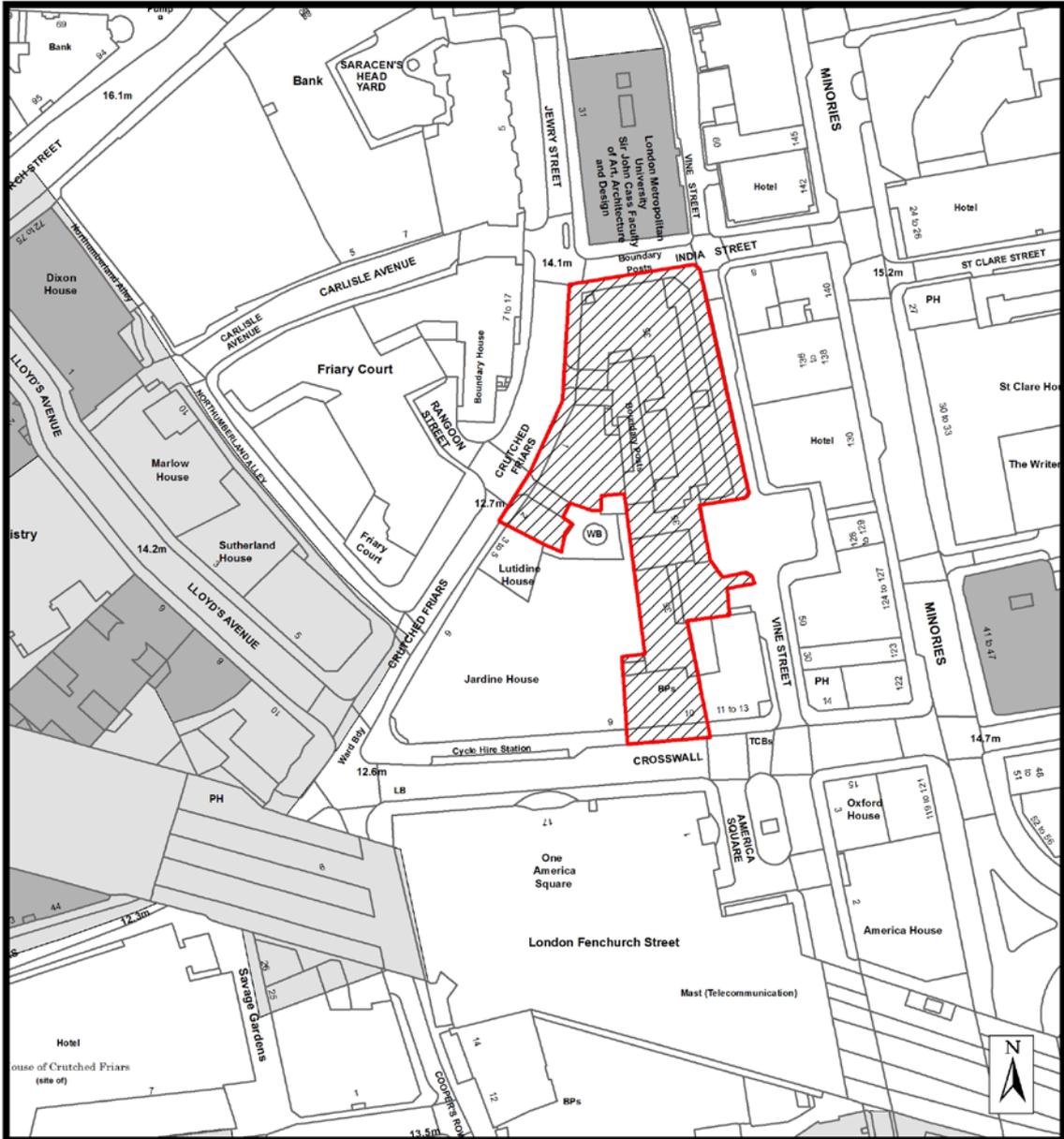
## **Recommendation**

Recommendation

(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

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

# Site Location Plan



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## ADDRESS:

Emperor House, Vine Street

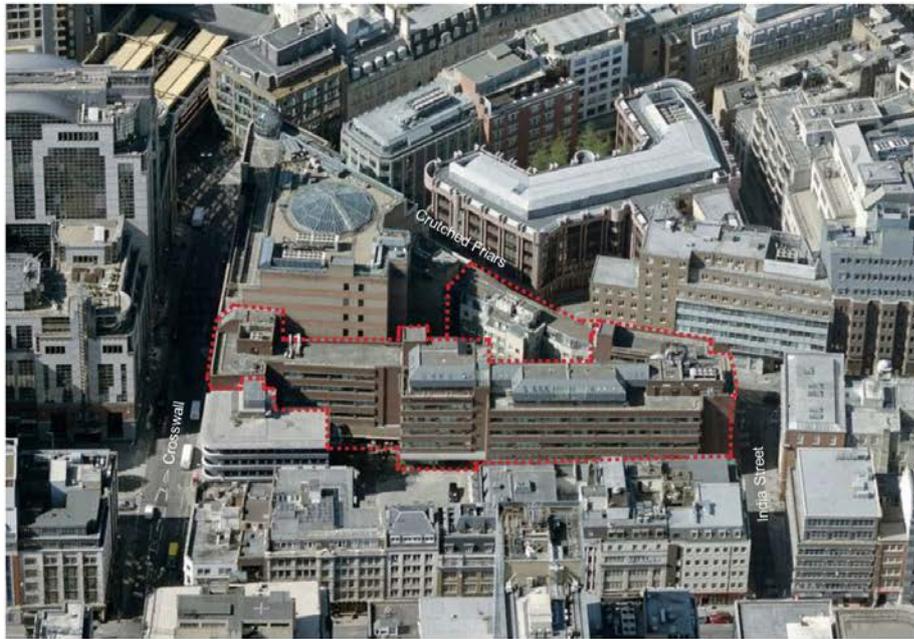
CASE No.

17/00239/FULMAJ

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



DEPARTMENT OF THE BUILT ENVIRONMENT





## **Main Report**

### **Site Description and Relevant Planning History**

1. The site is bound by India Street to the north, Vine Street to the east, Crosswall to the south and Jewry Street and Crutched Friars to the west. The buildings comprise six storey Roman Wall House and part five, part six storey Emperor House, which includes Emperor House south, to the southern edge of the site fronting Crosswall. The buildings are currently vacant but previously accommodated the following uses:
  - B1(a) offices 11,738sqm (GIA)
  - A3/A4 restaurant 296sqm
  - Nightclub (sui generis) 276sqm at basement level.
  - 683sqm ancillary space
2. The site is immediately to the south of the Grade II listed Sir John Cass College (now occupied as David Game College) Jewry Street. The Lloyds Avenue Conservation Area and Fenchurch Street Station Conservation Area are in the vicinity of the site and the development would be visible from these.
3. Excavations undertaken as part of the 1970s construction of Emperor House revealed an 11m length of the Roman City Wall which was preserved in situ in the basement of Emperor House. The remains are designated as a Scheduled Ancient Monument. At present there is no public access to it.
4. The surrounding area is characterised by commercial land uses such as offices, restaurant and cafes as well as a number of serviced apartments, residential properties and hotels. The serviced apartments, residential properties and the Chamberlain Hotel are mainly located on Vine Street and Minories.

### **Proposal**

5. The application, submitted by Urbanest UK Ltd is for:
  - Demolition of the existing buildings and redevelopment to provide a new mixed use building comprising:
  - offices (Class B1) (6,806sqm GIA) arranged over average floorplates of 350-500 GIA sqm;
  - incubator offices (Class B1) (911sqm GIA);
  - shop/ cafe unit (Class A1) (330sqm GIA);
  - 619 bedrooms of student/incubator tenant accommodation (645 bed spaces) (17,261sqm GIA);
  - associated ancillary facilities (sui generis) and exhibition space associated with a Scheduled Ancient Monument (sui generis)

(399sqm GIA); and

- associated soft landscaping on Jewry Street and Vine Street.
6. The development would comprise basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant (60.275AOD); including a new pedestrian route, creation of new public realm; associated parking, servicing, ancillary plant and storage; and other associated works (26,854 GIA).

### **Relevant Planning History**

7. Planning permission was granted on 30 June 2014 for:
- Demolition of existing buildings and redevelopment of the site to provide an office (Class B1) and retail (Class A1/A3/A4) building comprising basement, lower ground, ground and ten upper floors, together with associated works (Ref.13/00166/FULMAJ).
8. This application largely utilises the previously approved building design, bulk, height and mass with some minor modifications. The proposed development now incorporates Emperor House south, also known as The Crosswall Building. This did not form part of the previous application.
9. There is an existing Urbanest scheme at 52 Minories, approved in December 2008 which provides 177 student bedspaces. (Ref. 08/00738/FULMAJ).

### **Consultations**

10. The application has been submitted following internal pre-application discussions, a number of public exhibition meetings with residents and Member briefings.
11. The views of other City of London departments and external consultees have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 Agreement.
12. The following comments have been received:
- Tower Hamlets raised no objections.
  - Thames Water raised no objections but recommended informatives which have been included with the recommendation.
  - Transport for London has requested a £10,000 financial contribution to wayfinding signage. The applicant has agreed to this and it is incorporated into the S106 Agreement. Concerns have been raised over:
    - Access to cycle parking

- Quantum of cycle parking owing to the proposed provision of folding bikes
13. It was recommended that a financial contribution of £210,000 was made towards the Mayor's Cycle Hire Scheme. These matters are addressed in the highways section of this report.
  14. Historic England raised no objections, noting that the scheme is located on a site incorporating the Scheduled Monument, London Wall: section in Roman Wall House, Crutched Friars (SM LO26F). It is noted that the scheme has positive elements regarding the conservation, protection and public display of the remains of London Wall.

### **Neighbour Representations**

15. The application has been advertised by site and press notices and letters sent to neighbouring residential properties. Letters of objection have been received from four residents. Copies are attached to this report. The grounds of objection are summarised as follows:
  - Development scale should better reflect the character of the surrounding area. The scale of the proposed building would be harmful and does not take into account the needs or vision of the community.
  - The use would create an undesirable surge of students, resulting in consumer pressure and would be contrary to City of London policy to promote and retain office space.
  - Detrimental loss of light, contrary to BRE Guidance and a window has been omitted in the Delva Patman Redler report (Nov 2013).
  - Noise and disturbance from the proposed new pedestrian passageway.
  - Roman Wall House is in keeping with the historic character of the surrounding streets and should not be demolished.
  - The passage/public link should be removed. If retained, conditions should be included about noise and cigarette smoke generated.
  - Developer should improve the area by contributing money towards public art.
  - The benefits of students living in an area is greatly outweighed by the harm – noise, disrespect of local amenities and community, increased number of criminals who enter the neighbourhood to prey on naïve students.
  - The proposed passage would result in reduced privacy, increased pedestrian noise, increased traffic noise, noise from the proposed gate to restrict access and increased cigarette smoke.
  - The proposed public realm does little to contribute to the developing diversity and beauty of Aldgate.

- Information submitted with the application indicates that the office space would be viable.
  - There are no plans to provide the necessary support services for the increase in population numbers.
16. These matters are addressed in the assessment of the application. However, the comment regarding the Delva Patman Redler report (Nov 2013) is not addressed directly. That is because the report referred to does not form part of the application documentation for this application. The report was submitted in support of the previously approved office development scheme.
17. Eight letters of support have been received from: the Museum of London, Entrepreneurship Institute Bush House Aldwych, Kings College London (two letters), David Game College, Newcombe House, Surveyor to the Saddlers' Company (John Harding, Daniel Watney LLP), BCDH Capital Holding FC Sarl (Freeholders of Friary Court, 65 Crutched Friars) and Go Native (occupier of 8 India Street). Copies are attached to the report. Reasons for support are summarised as follows:
- Urbanest are recognised for running high quality, well managed facilities with well trained and diligent staff. This would complement King's College London's facilities.
  - Support the long term amenity benefits the proposal would provide, because the proposed accommodation would deliver high quality student facilities, enabling England to better compete with education providers globally.
  - The Roman Wall exhibition would enhance local historical attractions and link Tower Hill with landmarks in and around Aldgate.
  - The development will add to the vitality of the area and assist the growth of education and business.
  - The redevelopment would be a valuable enhancement to this part of the eastern area of the City, replacing the existing obsolete office building and enlivening the area.
  - The student population would make a helpful contribution to the economic and physical vitality of the Square Mile.
  - The proposed use would complement nearby surrounding uses.
  - Proposals represent a high quality design, which would enhance the area.
  - The provision of the Roman Wall exhibition and incubator office accommodation should be commended.
18. Two neutral letters have been received from PCU3ED. The correspondence supports the principle of the proposed development but raises concerns about the development during construction and fire safety matters. These matters are dealt with through the Construction Logistics Plan and through the Building Regulations Process.

19. Notwithstanding this, the applicant has advised that the design does not include any cladding panels with a combustible core. The proposed façade would incorporate appropriate firestopping and cavity barriers and would be designed to comply with the Building Regulations. Consultation has been undertaken with the City's Building Control department and ongoing review will be incorporated at the next design stage.

### **Policy Context**

20. The development plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
21. There is relevant City of London guidance, including the Office Use SPD and Planning Obligations, GLA supplementary planning guidance in respect of Planning Obligations and Sustainable Design Construction and Government Guidance contained in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

### **Considerations**

22. 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, any local finance considerations so far as material to the application, and other material considerations. (Section 70(2) 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);
  - To pay special attention to the desirability of preserving or enhancing the character or appearance of the Lloyds Avenue Conservation Area and Fenchurch Street Station Conservation Area (S 72(1) Planning, Listed Buildings and Conservation Areas Act 1990), which adjoin the site.
23. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990); in this case the duty is to have special regard to the desirability of preserving the settings of listed buildings.
24. The effect of the duties imposed by section 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is, respectively, to require decision-makers to give considerable weight and

importance to the desirability of preserving the setting of listed buildings and to the desirability of preserving or enhancing the character or appearance of a conservation area.

25. In respect of sustainable development 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...'*
26. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
27. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application and the views of both statutory and non-statutory consultees.
28. It is necessary to assess all of the policies and proposals in the Development Plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
29. The principal issues in considering this application are:
  - The economic benefits of the scheme;
  - The suitability of the proposed land uses;
  - The appropriateness of the bulk, massing and design of the proposals;
  - The impact of the proposal on heritage assets;
  - Servicing, transport and impact on public highways;
  - The impact of the proposal on nearby buildings and spaces, including environmental impacts such as daylight and sunlight, energy and sustainability;
  - The impact of the development on the residential amenity of neighbouring properties and
  - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.

### **Land Use/Principle of Development**

30. The proposed redevelopment of the site would deliver a mix of land uses. In assessing the application it is necessary to consider the acceptability of the loss of existing uses and the suitability of the proposed uses on the site.
31. Table 1 below compares the existing and proposed floor areas by use class on the site:

<b>Land Use</b>	<b>Existing sqm (GIA)</b>	<b>Proposed sqm (GIA)</b>	<b>Net Change sqm (GIA)</b>
Office (Class B1)	11,738	6,806	-4,932
Incubator Office Accommodation (Class B1)	0	911	+911
Student Accommodation (Sui Generis)	0	17,261	+17,261
Retail	296	330	+34
Nightclub (Sui-Generis)	276	0	-276
Exhibition (Sui-Generis)	0	399	+399
Ancillary Space	683	1,147	+528
<b>Total</b>	<b>12,993</b>	<b>26,854</b>	<b>+13,861</b>

**Table 1: Existing and Proposed Floor Areas**

32. The Local Plan supports a variety of land uses. However, the primary focus of the Local Plan is to promote the delivery of a world class business city and the protection and provision of office floorspace, with other uses considered to be complementary. Local Plan policies CS1 and DM1.1 seek to protect existing office accommodation and require proposals for the loss of existing offices to be supported by a viability assessment which considers the long term viability of the building or site for office accommodation. The application is supported by a viability assessment which considers: the viability of refurbishing the existing office accommodation; the viability of redeveloping the site for offices assuming that this scheme matches an extant office permission on the site; and the viability of delivering a greater quantum of office floorspace alongside the student accommodation. The applicant's viability report has been independently reviewed by a consultant appointed by the City Corporation in line with RICS best practice guidance and codes of conduct.
33. The existing vacant office building was built in the 1970s to a specification no longer suitable for contemporary office occupiers. A major refurbishment of the existing buildings would be required to bring them up to the standard necessary to meet current office demand. The applicant's viability appraisal indicates that the likely achievable rents on

a refurbished scheme would not be sufficient to generate a viable return to a developer given the cost of undertaking the refurbishment works. The City's viability consultants have reviewed the assumptions behind the applicant's appraisal and have agreed with the applicant that it would not be viable to refurbish the existing office buildings.

34. The Local Plan requires developers to demonstrate that existing office buildings would not be viable in the longer term, The Office Use Supplementary Planning Document provides further detail and indicates that developers should not only consider the potential for refurbishment of existing buildings, but should also consider whether redevelopment to provide new office accommodation would deliver a viable office scheme. There is an extant planning permission on this site for the demolition of existing buildings and redevelopment of the site to provide an office (Class B1) (25,078sqm) and retail (Class A1/A3) (361sqm) building comprising basement, lower ground, ground and ten upper floors, together with associated works. (25,439sq.m GEA). The applicants have considered whether this development would provide a viable office scheme under the terms of the policy. Their viability assessment concludes that the potential return to a developer would be insufficient to support this development. The City's viability consultants have appraised the applicant's viability study, including the projected office rents and build costs. They consider that the applicant's estimated rents are potentially too conservative and that construction costs may have been over-estimated. However, even allowing for this, the City's consultants conclude that the extant scheme would generate a profit on cost of 12.66%, which is considered to be substantially below the 20% margin expected in current market conditions, and the scheme is therefore unviable.
35. The proposed development provides a student housing scheme, but includes B1 office floorspace targeted at small and medium sized firms and the provision of incubator space for start-ups. To minimise the potential loss of office accommodation, the applicant was asked to consider the viability of increasing the level of office floorspace and reducing the size of the student housing element. The viability appraisal has considered a 'counterfactual scheme', in which the total office floorspace would increase to the level in the existing buildings with a consequent reduction in the number of student bedrooms to 423. The appraisal concluded that increasing office floorspace would reduce the viability of the scheme and that the originally proposed mix of student housing and offices was the optimum that could be delivered. The City's consultants have reviewed this element of the appraisal and have indicated that the potential profit on cost from increasing the office content would be just under 15%, below the target rate of 20% the consultants consider necessary for a mixed use scheme of this type. They conclude that a counterfactual scheme, with a higher office content would therefore also be unviable.

36. Notwithstanding the above, the applicant has explored the opportunity of increasing office floorspace at the site by increasing the floorplates. A modest increase in floorspace could be accommodated by:
- Removing the pedestrian through route
  - Reducing the size of the triple height exhibition space
  - Removing the amenity space and projecting the building further forward on Jewry Street
37. Officers consider that the harm that would be caused by the removal of these elements would not be outweighed by the benefit of the modest increase in office floorspace that could be achieved.

### **Office Accommodation**

38. The proposed 6,806sqm GIA office building would be built over 13 floors (including ground floor), with a small roof terrace at 10th floor level, facing north and would result in a loss of 4,932sqm (GIA), 2,359sqm (NIA) of existing vacant office accommodation. The office would have a separate, set back entrance to the north of the site, from India Street to create an attractive public realm area and enhance the setting of Grade II Sir John Cass College (now David Game College). The space has been designed to be particularly attractive to SMEs, with flexible, open plan floorplates of 350-500sqm GIA per floor. It is anticipated that the office would be multi-let and could potentially accommodate 12+ SME companies. The space has been designed with floor to ceiling glazing on three sides, delivering high levels of natural light and dedicated cycle storage and shower/changing facilities.
39. The development would deliver in addition dedicated incubator office accommodation (911sqm). Urbanest have had success in creating such facilities on two other schemes they have delivered in London but this would be the first of its kind in the City and would be located at part ground and part lower ground floor levels, with a dedicated entrance on Crosswall. This space would have direct views of the Roman Wall exhibition space with access to an internal courtyard and would be fitted out to the same standard as the office space. The space would be constructed and funded by Urbanest and thereafter, provided at a peppercorn rent, meaning that the accommodation would be available to businesses which could not otherwise locate within the City of London. It is proposed that the incubator space would be occupied by King's College London Entrepreneurship Institute through 'The King's 20 Accelerator', a programme run by the Entrepreneurship Institute, which provides financial support to the 20 brightest start-up ventures each year. The programme is open to Alumni of the University from up to the previous seven years. It is proposed that the incubator space would provide co-working office space and ancillary support and resources for these start-up ventures and could accommodate approximately 100 people. The most recent cohort includes ventures from FinTech, MedTech, Education and Media & Consumer Goods. The applicant has

also committed to providing up to 59 rooms to be made available to the incubator occupiers to enable them to live and work in the City. It is proposed that the rooms would be made available for 51 weeks of the year, with the tenancy of the accommodation matching that of the incubator space, anticipated to be 12-18 months. The details of how the incubator space and associated accommodation would be secured through the S106 agreement.

### **Student Accommodation**

40. In considering the student housing element, regard must be had to the need for student housing, the suitability of the site for delivering student housing and the quality of accommodation that would be delivered.
41. The proposal would deliver 619 rooms (645 bed spaces) of purpose built student accommodation with ancillary plant and accommodation, including a laundry room and a common room. The accommodation would be provided over 14 floors above ground floor level, with 6 floors of student accommodation to Emperor House south, 14 floors to the Vine Street block and 13 floors on Jewry Street. The 619 rooms would provide a mix of bedroom types including studios, en-suite clusters, non en-suite clusters, and twin bedrooms, with 10% proposed to be wheelchair accessible/adaptable. The proposed design and layout would deliver high quality student accommodation. The accommodation would be for students attending King's College London, who have signed an agreement with the applicant for a 10 year period. This link or with another identified University would be secured by the S106 Agreement in order for the development to be in accordance with London Plan Paragraph 3.53B.
42. The London Plan (2016) states that London's universities make a significant contribution to its economy and labour market (Policies 3.18 and 4.10) and states that it is important that the attractiveness and potential growth of Universities is not compromised by inadequate provision for new student accommodation. The London Plan estimates that there will be a requirement for 20,000-31,000 student accommodation places over the 10 years to 2025 and recognises that the provision of specialist student accommodation (as proposed here) is necessary to meet the need and to reduce the pressure on other elements of housing stock currently occupied by students, especially in the private rented sector (London Plan 2016 paragraph 3.52).
43. The City of London Local Plan recognises that a thriving residential community contributes to the City of London's vitality and makes it livelier and safer outside working hours. The Local Plan identifies clustered locations for the delivery of future housing developments. The application site is located 'near to' the Mansell Street residential cluster and policy DM 21.1 identifies the area as suitable for the provision of new residential accommodation, including student accommodation, to sit alongside commercial and other land uses. There is a need for student accommodation and this site offers a suitable location for its delivery.

The provision of 619 rooms of student accommodation would meet the City's Annual Targets for a period of four years, which is considered to be a substantial benefit of the proposal.

44. Urbanest have indicated that the growing demand for purpose built student accommodation and the agreement with King's College London to occupy the site mean there is a quick development timescale, with commencement on site anticipated for autumn 2017 and completion and occupation by September 2021.
45. The supplementary information submitted with the application, including the Student Management Plan, indicates that the site would be well managed. Staff would be on site 24/7 to oversee the running of the accommodation and ensure that students do not congregate outside the building. Running the site in accordance with the Student Management Plan would ensure that the development would not detrimentally increase the current levels of noise and disturbance in the area and thereby protect residential amenity.
46. The applicant has indicated that the student accommodation would employ approximately 30 full time staff to manage the facility. From experience on other sites within London, Urbanest has indicated that staff are typically from the local area.
47. The mix of uses, combined with the management of the student accommodation would ensure that the development would be in accordance with Local Plan Policy DM 21.7 (Student housing and hostels).

### **Café/Shop**

48. A café would be located on ground and lower ground floor levels, accessible from a dedicated entrance on Vine Street as well as from the student accommodation and incubator space. The café would overlook the Roman Wall exhibition space and could be made available for events associated to the Roman Wall in the evening. The facility is considered to be a complementary facility to the office, student accommodation, Roman Wall Exhibition and incubator space. Its delivery would be in accordance with Local Plan policy DM 20.3.
49. The site previously incorporated a wine bar/restaurant and a night club located at basement level. During pre-application discussions, the replacement of these use classes was considered but it was concluded that this would have the potential to give rise to greater noise and disturbance to neighbouring properties and that an A1 use would be more appropriate.

## **Roman Wall**

50. The buildings on the site incorporate a significant section of the Roman and medieval London defensive wall (11m), which is a scheduled ancient monument. The monument consists of the wall, foundations of a former bastion or tower attached to it and possibly elements of the original Roman defensive ditch. The monument is within the modern party wall between the two properties and is a visible feature in the basements of Emperor House and Roman Wall House. It is one of the locations identified in the Museum of London 'London Wall Walk' and marked by a blue ceramic Wall Walk plaque. The 2nd century wall survives to a height of 2 metres above the Roman ground level and the later, 4th century, rectangular bastion extends 5.4 metres from the face of the wall. The monument is a good example of Roman construction techniques and is well preserved.
51. The scheme would create an attractive exhibition space, curated in partnership with the Museum of London provided access to the Roman Wall. The space would be located at the basement of the building and would be a triple height space, accessible from an entrance on Jewry Street and from the proposed café. It would be visible 24/7 through a glazed wall from the new pedestrian link route running from Jewry Street to Vine Street, with the line of the Roman Wall marked on the pavement. The exhibition space would be open seven days a week, free of charge and would provide a new cultural and visitor attraction within the City. It is proposed that the space could be used for events, sponsored or managed by; Urbanest UK Ltd, City of London Corporation, or King's College London (or other University partner). Each sponsor or manager would be limited to 10 events, with no more than 40 events per year. The space would be made available for school visits on Wednesday mornings. Details of this would be secured by S106 agreement.
52. The cost of delivering the exhibition space would be £10-15 million, in addition to the on-going running and insurance costs and is considered to be a positive contribution and substantial benefit to the City of London which would preserve, protect, safeguard and enhance an ancient monument in its setting, in accordance with policies CS12 and DM 12.4. Furthermore, the provision of an exhibition facility would deliver a very high quality, cultural visitor attraction, which would increase awareness of the City's cultural heritage assets, in accordance with policy CS11.

## **Design**

53. The proposed buildings comprise 14 storeys at ground floor and above, with two basements. Plant is incorporated within the building at 14th floor level and in the basement. The facades would be predominantly glazed in a curtain wall system. Photovoltaic panels and green roofs would be incorporated into the proposal.

54. The overall design of the building, including its height, bulk and massing were originally considered for an office development at the site, consented in 2014 (Ref. 13/00166/FULMAJ).

### Bulk, Height and Massing

55. The height, bulk and mass of the building corresponds with the extant planning permission and was at that time informed by a number of considerations which have not altered since that time. The proposal is designed to ensure that the development would not harm the views of the Tower of London from the key vantage points from the south bank of the river and from Tower Bridge and from within the Tower itself.
56. At 14 storeys (60.275AOD), the scheme would be taller in relation to its immediate neighbours which vary in height from four to eight storeys. The scheme would have a typical floor to floor height of 3.3m in the office space and 2.85m in the student accommodation. Consequently, the office building would be ground plus 11 storeys and the student accommodation ground plus 13, whilst fitting within the envelope of the extant permission. The proposed height of the building continues to be considered appropriate for the following reasons:
- The site is at the junction of three roads which could accommodate a building with more prominence and scale to give robust support to this corner. Jardine House on the western end of the street block currently fulfils a similar role as it rises towards the corner. There are a number of taller buildings in the surrounding area, such as America Square to the south and buildings on Minories to the east.
  - In comparison with the existing building, the development line would be brought forward by 3m which would extend over the existing hard landscaped area on Vine Street. This area makes little contribution in townscape terms and appears incongruous, particularly given the line of the building on the opposite side of Vine Street, close to the edge of the pavement. The proposed re-alignment of the building line would ensure a better sense of definition to Vine Street (which was historically the case) as well as re-defining and enclosing the square as a coherent urban space.
  - On the corner of Jewry Street and India Street, the proposal includes an attractive area of public realm.
57. The proposed height and bulk of the building is considered appropriate.

### Architectural Approach

58. The design of the scheme is characterised by the interplay between the dynamic curving roof form on Vine Street and the strong 'bookend' elevation on India Street and its distinctive arched roof profile. Despite the irregular shape of the site, the various elements complement each other resulting in an appropriate sense of architectural unity for the building.

59. The design of the curved roof is effective in minimising the bulk of the building in views along Vine Street and the eaves line of the curved roof would relate satisfactorily with the scale of buildings in Vine Street. The northern corner of the building is cut away, which would result in a more dynamic, vertically proportioned north elevation and would break up the bulk of the building on the corner of Vine Street and India Street.
60. The curved roof form would result in a strong visual termination of the building and would enclose and conceal plant. The building's maintenance units would be set within the western roof. Conditions have been recommended to ensure that these are concealed from view.
61. The building would make a 'bookend' statement to India Street. At this point, the north façade cantilevers over the principal office entrance, creating a small pedestrian piazza; the generous 8.1m height of this space would mean that the building would not appear over-bearing on this narrow street.
62. The Vine Street elevation is set back at its southern end, breaking down the scale of this elevation and providing a clear and convincing definition to the square on Vine Street.
63. The ground floor elevations would be glazed resulting in a vibrant frontage.
64. The building would include large elements of glazing, particularly to the office development. There would be fritting at lower levels and to the Vine Street elevation of the office building in order to provide privacy. Louvres are proposed to the elevations to provide solar shading. The Student Accommodation would have a slightly adapted design from the office accommodation and previously approved development because of reduced floor to ceiling heights and would incorporate glazing, fritting, louvres and perforated aluminium panels which would complement the design of the office building.
65. The new uses proposed for the site have resulted in some design amendments to the consented scheme. Namely:
  - Student accommodation requires a shallower plan form and a new slot through the centre of the scheme with a glazed link bridge.
  - A new vertical design, facing onto the Jewry Street approach.
  - Incorporation of proposed 7 storey Emperor House South/Crosswall building.
  - New pedestrian route at ground level.
  - New landscaped space on Jewry Street.
  - Review of façades.
66. The Emperor House South/Crosswall building has been incorporated into the scheme with six storeys of student accommodation above the incubator entrance off Crosswall. The elevations follow the principles set out in the main building but on a smaller scale, using the same material palettes.

## The London Views Management Framework and Protected Vistas

67. Policy CS13 of the City's Core Strategy seeks to implement the Mayor's London View Management Framework (LVMF) SPG, to manage designated views of strategically important landmarks (St Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views. The site falls outside the Protected Vistas.
68. Verifiable wire-line outlines have been submitted to ensure a thorough assessment of the proposal's wider impact on two key LVMF views, from the area around City Hall and from Tower Bridge, both focussing on the Tower of London. In these views, the scheme would be almost completely concealed from view. The proposal would not harm these or other LVMF viewpoints.

## Setting of the Tower of London World Heritage Site

69. The proposal has been assessed in relation to its impact on the key relevant views from and to the Tower of London. The development would be almost wholly concealed from view, located behind existing building on the skyline. The proposal would not harm the setting, appreciation of or the Outstanding Universal Value of the Tower of London World Heritage Site.

## Impact on the setting of Listed Buildings

70. Policy CS12 of the Local Plan seeks to safeguard the City's listed buildings and their settings. The development is directly opposite the Grade II listed Sir John Cass College (David Game College), a red brick and Portland stone faced building of 1899 (architect, A W Cooksey). The proposal would not harm the setting of this building. Although much taller than the six storey listed building, it would not be over-scaled or overbearing in relation to it. The development would provide a prominent backdrop to the listed building in views southwards along Crutched Friars. The relationship of modest scaled historic buildings, viewed against taller modern buildings is characteristic of this part of the City and the classical gravitas of the listed building would ensure it remains a prominent listed building on Vine Street.
71. Moving the building line on Vine Street eastwards would result in the south elevation of Sir John Cass College (David Game College) being partly obscured in views northwards along Vine Street. Historically the building line of Vine Street was further east and Sir John Cass College would have been sited originally in a tight grain of comparatively narrow streets. In view of this and of the better sense of enclosure and definition of Vine Street resulting from the proposed realignment of the east elevation, the impact of the development obscuring more of the south elevation of the listed building in views along Vine Street is considered acceptable.

72. From the Monument, a listed building and Scheduled Ancient Monument, the proposal is located a considerable distance to the east and would not be at a height or have a visual impact which would harm views of any important landmarks or other designated or undesignated heritage assets viewed from the Monument. In addition, the proposed development would not harm views of or an appreciation of the Monument from surrounding viewpoints.

#### Impact on the setting of Conservation Areas

73. Policy CS12 of the Core Strategy seeks to preserve and enhance the City's Conservation Areas. The development site does not lie within or adjoin any Conservation Areas. The Lloyd's Avenue and Fenchurch Street Station Conservation Areas are located to the west. The views from both Conservation Areas looking north-eastwards along Crutched Friars are dominated by Jardine House and although the development would be visible in the backdrop of this corner building, its impact on the Conservation Areas would not be significant. The proposal would not harm the character and appearance of either the Lloyd's Avenue or Fenchurch Street Station Conservation Areas.

#### London Wall Scheduled Ancient Monument

74. The proposals include the display of the Roman Wall monument in a dedicated space, with public access from Crutched Friars, Vine Street, the café and reception area. It is proposed to make the monument a prominent and central feature of the basement, ground floor and public realm in a triple height space clearly visible from the surrounding streets, proposed ground floor and pedestrian route. The monument would be viewed with a series of displays of objects excavated from the site prior to construction of the existing building and at America Square, information about the history of the area from the Roman period to the present day, including trades carried out on the site. A graphic wall on the north elevation of the pedestrian route would be seen in conjunction with a display of artefacts on the north wall of the basement display, and this would visually link the ground floor and basement areas. It is proposed to suspend a silhouette above the monument to indicate its original scale and form.
75. It would be possible to view the monument in the round and appreciate the internal and external sides of the wall and bastion. The monument and displays would be visible in views from Crutched Friars and Vine Street, the proposed new pedestrian route and the proposed ground floor, placing it within a prominent position within the building and surrounding townscape. It is proposed to mark the line of the wall at ground and basement level which would indicate the scale of the wall and link the streetscape with the monument visible at ground and basement floors of the new building. The 'London Wall Walk' plaque would be re-sited at ground level.

76. The setting, presentation and public access to the monument within the proposed building would be considerably enhanced by the proposals. The proposals to mark the line of the wall and display material would provide information to set the wall in its archaeological and historic context and its place within the modern townscape. This would enliven the ground floor elevations of the building in Vine Street and India Street and raise understanding and awareness of the monument as a place to visit.
77. The detailed design of the proposal to mark the line of the wall, display cases and other explanatory materials would be covered by conditions.
78. Conditions as well as any necessary Section 106 agreements are recommended to cover the proposed display, presentation and public access to the Roman and medieval wall at basement and ground levels, including displays along the new pedestrian route and open space on the north side of the site, explanatory materials, design of the basement and ground floor finish including marking the line, scale and form of the wall.

### **Archaeology**

79. The site is in an area of important archaeological potential. Where not removed by the existing double basements on the site, and outside the area of the scheduled ancient monument, there is potential for buried or obscured archaeological remains to survive on the site. There is potential for remains of the lower levels of the medieval and later city ditch to survive. There are areas where localised sections of London wall, including fabric from the Roman period to the 17th century, may survive in the modern party wall construction, which follows the historic alignment of the wall. A Historic Environment Assessment has been submitted with the application and archaeological evaluation has been carried out.
80. The proposed development would have basements at the same depth and to the same footprint as the existing buildings. There would be no ground reduction below the existing basement levels with the exception of areas of new piled foundations and in some areas these would have an impact on potential archaeological remains. A scheme for the protection of the monument during demolition and construction has been submitted.
81. Conditions are recommended to cover a programme of archaeological work, basement and foundation design and protection of the monument during demolition and construction.

## **Access**

82. The proposals would comply with access requirements and would provide:
- 2 disabled parking spaces with electric vehicle charging points, on-street within the courtyard area on Vine Street; and
  - 5% of student rooms would be fully accessible and a further 5% are capable of conversion.
83. The new pedestrian route through the site is considered to be a major benefit to the proposal but there is a 1.5m change in levels between the western and eastern parts of the site. Extensive pre-application discussions were held to consider the most appropriate way to address the change in level and unfortunately, a pedestrian ramp would not be appropriate owing to the steep gradient. An external lift has therefore been proposed. The ongoing quality and maintenance of the lift by the occupier would be secured by the S106 agreement. Subject to the S106 agreement, the proposed development would be in accordance with policy DM 10.8.

## **Landscaping**

84. The development seeks to deliver an enhanced public realm and a landscape strategy has been submitted with the application. A dedicated large planter with surrounding seating is to be installed on Crutched Friars, which would be visible in views when travelling down Crutched Friars from Aldgate. 'Avenue Trees' would be planted along Vine Street and living roofs would be installed at levels three, four, five, six, 11 and 13. In these respects, the proposed development would comply with policies DM 10.2 and DM 10.4.

## **Residential Amenity**

85. Local Plan Policy DM 21.3 relates to protecting the amenity of existing residents. The site is in close proximity to residential building. The impact of the development on privacy, daylight and sunlight and noise and disturbance must be considered.

## **Noise and Disturbance**

86. Local Plan policy DM 21.3 relates to the residential environment and seeks to protect the amenity of existing residents by:
- Resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements;
  - Requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

87. The potentially noise generating uses proposed by the development are the exhibition space, café and the student accommodation. The proposed office and incubator accommodation are unlikely to generate noise disturbance apart from the proposed 10th floor roof terrace. A condition has been included restricting hours of use in order to protect residential amenity.
88. Officers are satisfied that the proposed hours of use of the exhibition space and café which would be secured via the S106 agreement would ensure the use would not give rise to detrimental noise and disturbance to surrounding dwellings. In fact, the provision of the free facility is likely to encourage people inside the building rather than walking tours which currently stand outside and so there could be an improvement to the existing situation.
89. The proposed student accommodation has the potential to increase pedestrian movements around the site at a range of times and therefore potential for noise and disturbance to neighbouring properties. The applicant has submitted a Student Management Plan with the application, the details of which would be secured by the S106 agreement. The on site management, restricting loitering outside the building would ensure any potential disturbance would be mitigated. Mitigation measures proposed can be summarised as follows:
- Building would be managed by on-site team.
  - Management team would be on duty from 08.00-20.00 Monday-Sunday
  - Overnight security staff and retained resident student wardens and night wardens
  - Visible on-duty staff at main entrance reception desk.
  - Noise and disturbance generated by groups loitering outside the site would be enforced against under the terms of student residents' individual tenancy agreements.
  - Move-In Strategy – this would be staggered over three weekends. Students are allocated a day and 30-minute time slot for arrival and drop-off at the property. Where necessary, Urbanest has agreed to liaise with the City police, Transport for London, The City Corporation highways management and local residents.
  - Students will be provided with details of car parks within a 10-15 minute walk.
  - Form an ongoing Community Liaison Group
90. Residents have raised concerns about the proposed pedestrian access route. The applicant proposes to install anti-skateboarding measures and also suggested installing roller shutters and closing the route through from 10pm -6am. Improved accessibility and enhancing connectivity is a strategic aim of the Local Plan. The route would be well managed by the Student Housing development and because the route

offers 24 hours views down to the Roman Wall exhibition space, there is some reluctance to restrict access. The applicant has indicated that they would be happy to close the route if Members considered it appropriate and necessary in order to protect the amenity of nearby residential properties and this could be secured by condition.

91. In regards to noise from plant, an acoustic report has been submitted with the application. This indicates that plant could be operated without detrimentally impacting on neighbouring properties in respect of noise and disturbance. Conditions have been included with the recommendation.
92. The conditions and S106 agreement would ensure that the development should not detrimentally impact on residential amenity in respect of noise and disturbance.

### Overlooking

93. Privacy to nearby neighbouring residential properties from the proposed uses would be achieved by the installation of fritting on windows of the office building facing towards Vine Street and the layout of rooms with the inclusion of louvres used to ensure that only oblique, glimpsed views to the neighbouring properties would be possible from the Student Accommodation.

### Daylight and Sunlight

94. A daylight and sunlight impact assessment has been carried out in accordance with the Building Research Establishment Report (BRE) 'Site Layout Planning for Daylight and Sunlight 2011' to test the impact of the proposals on the following surrounding residential buildings:
95. Residential properties which were assessed are:
  - 60 Vine Street
  - 8 India Street
  - 136-138 Minories
  - 128-129 Minories
  - 124-127 Minories and 50 Vine Street
  - 3 America Square
  - 27 Minories
  - 140 Minories
96. Three methods have been used to calculate the impact on daylight:
  - Vertical Sky Component (VSC) – the general test of potential for daylight to a building by measuring light on the outside plane of

windows

- No-Sky Line (NSL) – indicating distribution of daylight within a room
  - Average Daylight Factor (ADF) assessing the quality and distribution within a defined room area.
97. In preparing the assessment, the applicant has undertaken a comparative analysis between:
- I. the existing situation on site and the proposed building, and
  - II. the consented proposal against the proposed building.
98. The previously approved scheme recognised that the impact of the development on surrounding properties would have an adverse impact on the daylight and sunlight to a number of the residential and short term let properties in Vine Street, although all those units (apart from two short let studio apartments at 8 India Street) would receive daylighting levels which would meet the minimum recommended ADF levels. It was concluded that although the reduction in daylighting would detrimentally affect the residential amenity of these units they would still retain compliant levels of daylight. In regards to sunlight, the proposal would detract from residential amenity although it is largely the nature of City developments, in particular because of their size and close proximity of the buildings, that the recommended sunlight levels are not always reached.
99. The updated assessment, submitted with this application demonstrates that the proposed development, taking into account the minor design alterations proposed, would result in a negligible difference to VSC, NSL and ADF compared to the extant scheme. There are a number of examples where the results see a minor improvement to VSC, NSL and ADF values.
100. There would be no difference in impact to sunlight when compared to the permitted scheme.
101. Officers are satisfied that the impact on daylight and sunlight compared to the permitted scheme would be imperceptible to the human eye when compared to the consented scheme would be minor adverse and the development would therefore comply with BRE Guidance and Local Plan policies DM 10.7 and DM 21.3.

### Impact on Services

102. Residents have raised concerns about the impact of the development on local amenities and services. Many students' needs are principally met by their University. For example, all full time students are required to register with their University Doctor and so would not impact on local services. The increased population has the potential to enhance the provision of other services such as shops in the locality.

## Highways

103. A Transport Assessment has been submitted which examines the transport impact of the proposed scheme. No car parking or motor cycle parking is proposed, other than the provision of two fully marked out accessible car parking spaces on Vine Street. These should be served by electrical charging points and this would be secured by planning condition.
104. The development would deliver an overprovision of cycle parking compared to policy requirements. Table 2 below details the proposed level of cycle parking by land use and by type as well as the London Plan requirement. Shower facilities are proposed in the office element but is not considered necessary in the student accommodation owing to the proposed use.

Use	Number of spaces by Cycle Parking Type					Total	London Plan
	Fold up	Two Tier	Semi-vertical	Sheffield Stands	External Sheffield stands		
Student Accommodation	140	N/A	181	3	17	<b>341</b>	339
Office	N/A	44	45	2	N/A	<b>91</b>	91
Incubator	N/A	N/A	12	1	3	<b>16</b>	14
Café	N/A	N/A	N/A	3	10	<b>13</b>	11
<b>Total</b>	<b>140</b>	<b>44</b>	<b>238</b>	<b>9</b>	<b>30</b>	<b>461</b>	<b>455</b>

**Table 2: Proposed Cycle Parking Provision**

105. It is proposed that 140 cycle parking spaces would be lockers for fold away bikes. The developer would provide the bikes for student use/hire at no charge. Transport for London raised objections about the provision of lockers with fold away bikes, requesting the provision of standard bicycle racks and a £210,000 financial contribution to the Mayor's Cycle Hire Scheme to reduce pressure on the existing cycle hire network.
106. Officers consider that the proposed cycle parking would be appropriate to the development. Urbanest's experience of managing student accommodation indicates that a number of students are from abroad and are therefore unlikely to bring a full size bicycle with them. The provision of folding bikes would make cycles available to students who would not otherwise use them and is considered to be a good design solution to meet the specific needs of this scheme. In respect of the financial contribution to the cycle hire scheme, this is not considered to be appropriate in this case because the student accommodation would not place pressure on the existing cycle hire scheme as the use by students is likely to fall outside of peak hours by office users. Furthermore, by providing a free cycle hire facility on site, through the fold up bikes, this would also reduce pressure on the Mayor's Cycle Hire Scheme.

107. Interim Office and Student Travel Plans have been submitted with the application. It is also recommended that a Cycle Action Plan be secured by S106 to encourage cycling and detail the management of cycling facilities on site. These would be secured by S106 agreement and submitted once occupiers of the offices are identified.

### Servicing and Deliveries

108. The development would replace the two existing service yards that serve Emperor House (service yard 1) and Roman Wall House and Jardine House (service yard 2) with a single on-site service yard to serve the new development and Jardine House. Access would be from Crutched Friars and would be designed to enable all vehicles to enter and exit in a forward gear and can accommodate 7.5 tonne Light Goods Vehicles. This level of provision has been calculated to be suitable for the servicing requirements of the new development and Jardine House. The servicing management plan indicates that the office element is anticipated to have 16 deliveries a day, the student accommodation would have 10 deliveries per weekday and 1-2 deliveries at the weekend. The café is expected to generate 1-2 deliveries per day. Waste would be stored and collected from the service yard.
109. The applicant has undertaken a review of an existing Urbanest facility at King's Cross which has 669 student bedrooms. This receives 10 deliveries per day (that are known about and recorded). Additional ad-hoc deliveries are made by bicycle and motorbike. These do not remove capacity from the loading bay or the highway network. The existing single yellow line outside the site, at the Vine Street student entrance permits loading/unloading and would be managed by staff on the site.
110. The co-ordination of servicing and deliveries is detailed in a preliminary Delivery and Servicing Management Plan. This Plan would be finalised and submitted for approval by the City of London prior to occupation and once tenants are known.

### Construction

111. The applicant has prepared a Construction Management. This would be secured by condition.

### Wayfinding

112. The applicant has agreed through discussions with TfL to make a financial contribution of £10,000 towards the updating of Legible London signage in the area.

### Other Legal Agreements

113. The upper floors of the development would oversail the highway at 9.2m above the public highway and would be subject to a separate S177 Licence.
114. A small element of stopping up to the public highway is required on Vine Street.
115. An area of tree planting/ landscaping would be subject to section 142 Highways Act 1980 Licence.

### Sustainability

116. The London Plan (2016) climate change policies require development proposals to make the fullest contribution to mitigating climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply and incorporating low and zero carbon energy technologies. All developments are required to make the fullest contribution to London's adaptation to climate change by managing flood risk and by reducing the urban heat island effect through sustainable design and urban greening.
117. The applicant has prepared an Energy Statement and a Sustainability Statement. The supporting statement shows that the site could achieve BREEAM 'Excellent' for the development. A post completion assessment is recommended and included as a condition.
118. The Energy Statement demonstrates the development could achieve a 24.2% improvement in carbon emissions compared with 2010 Building Regulations. This falls short of the 35% improvement over Building Regulations. The scheme includes:
  - Installation of on-site CHP (this must comply with air quality requirements) 'be clean'
  - High efficiency condensing gas boilers 'be lean'
  - Photovoltaic panels 'be green'
119. In order to meet carbon reduction targets, a Carbon Offset payment is included in the S106 Agreement. The financial contribution is only an estimate at this stage and could change if further carbon savings can be made during the design process.
120. In support of the application, the applicant has prepared an Air Quality Impact Assessment, which indicates that the development would be air quality neutral, in accordance with policy DM 15.6.

### Secured by Design

121. The proposed development would comply with the principles of Secured by Design. The introduction of active ground level frontages encourages natural surveillance. Sensitively designed lighting to enhance the design

characteristics of the building would enhance visibility around the site and the development would be monitored by CCTV.

122. On-site measures such as fob access, 'air lock' door systems and on-site security would enhance security within the buildings.

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

123. 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.

124. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

125. The CIL contributions are set out below.

#### Mayoral CIL

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
Mayoral Community Infrastructure Levy payable	£693,050	£665,328	£27,722
Mayoral planning obligation net liability*	£0	£0	-
Administration and Monitoring Charge	£3,500	-	£3,500
<b>Total liability in accordance with the Mayor of London's policies</b>	<b>£696,550</b>	<b>£665,328</b>	<b>£31,222</b>

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

#### City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
City CIL	£1,039,575	£987,596	£51,979
City Planning Obligation Affordable Housing	£277,220	£274,448	£2,772

City Planning Obligation Local, Training, Skills and Job Brokerage	£41,583	£41,167	£416
City Carbon Offsetting	£123,480	£122,245	£1,235
Legible London	£10,000	£9,900	£100
City Non-Financial Monitoring Charge	£3,750	-	£3,750
<b>Total liability in accordance with the City of London's policies</b>	<b>£1,495,608</b>	<b>£1,435,356</b>	<b>£60,252</b>

### City's Planning Obligations

126. The obligations set out below are required in accordance with the City's 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.

- 1) Affordable Housing Contribution (£277,220)
- 2) Carbon Offsetting Contribution (£123,480)
- 3) Delivery and Servicing Management Plan (Consolidated Deliveries)
- 4) Highway Schedule of Conditions and other Remedial Highway Works (S278 agreement)
- 5) Incubator Offices – ensuring their provision in perpetuity, quality of fit out and rents
- 6) Incubator Accommodation – restricting quantum and length of occupation to 51 weeks per annum
- 7) Incubator Business and Management Plan
- 8) Free public access to Scheduled Ancient Monument Exhibition Space
- 9) Lift Access (Public Realm) – ensuring maintenance
- 10) Legible London Wayfinding Contribution (£10,000)
- 11) Local Training, Skills and Job Brokerage Strategy (Demolition)
- 12) Local Training, Skills and Job Brokerage Strategy (Construction)
- 13) Local Training, Skills and Job Brokerage Contribution
- 14) Local Procurement Strategy
- 15) Monitoring Costs Contribution
- 16) Schedule Ancient Monument / Exhibition Space Management Plan
- 17) Student accommodation – must be linked to a university

- 18) Students living in the accommodation must attend a HEFCE Institution
- 19) Student Management Plan
- 20) Travel Plan
- 21) Cycling Action Plan
- 22) Tree Planting on Vine Street
- 23) Public Realm Access and Pedestrian Route – provision and maintenance
- 24) Utility Connections to the Development

127. Officers request that they be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

#### Monitoring and Administrative Costs

128. 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.
129. 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

130. 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

131. The proposed development would deliver a high quality mixed use development which would contribute to the delivery of Grade A office accommodation suitable for SMEs and specialist incubator office accommodation for start-up businesses, enlivening and regenerating this part of the City.
132. The incubator space would be funded through the delivery of 619 student housing units. The student housing would contribute to the mix of uses in this part of the City, support the on-going growth of higher education in London and introducing a new working population to the City as well as contributing to the City's overall housing targets.
133. The scheme would achieve significant improvements to the setting of and public access to the remains of the Roman London Wall by

providing an exhibition space with free access to the public, secured by S106 agreement. The design and location of the proposed café would offer an attractive space to enjoy views over the Roman Wall.

134. The proposed improvements to the public realm, including new open space on Jewry Street and the new east-west pedestrian route through the site would enhance the character of this location.
135. By utilising the design and mass of the previously approved scheme, the bulk and mass of the development would ensure that neighbouring properties would receive minimum BRE recommended ADF levels. Utilising a Student Management Plan on the site would ensure there would be no detrimental noise or disturbance to surrounding properties.
136. The development is designed to achieve a reduction in carbon emissions, would achieve off street servicing and would provide a fully accessible building.

## BACKGROUND PAPERS

### Internal

Email from Kelly Wilson (Market and Consumer Protect) dated 02 June 2017

### External

Memo from Gary Surridge – 18.04.2017  
Memo from Mrs Julie Devonshire – 18.04.2017  
Letter from Tower Hamlets – 21.04.2017  
Historic England Letter Ref. P00567314 – 28.04.2017  
Memo from Ms Paloma Lisboa – 29.04.2017  
Memo from Mr Neil Pama – 03.05.2017  
Email from Thames Water – 08.05.2017  
Memo from Mr Ralph Luck – 09.05.2017  
Memo from Mr Archibald Hunter – 10.05.2017  
Memo from Mr John Harding – 11.05.2017  
Letter from PCU3ED dated 16.05.2017  
Objection letter from Steve Parvitt – Flat 7 Fenchurch House, 136-138  
Minories 31.05.2017  
Objection email from Kate Aspinall – 05.06.2017  
Objection email from Brian Noone – Flat 11 Fenchurch House 136-138  
Minories 05.06.2017  
Memo from Mr Robert Buchele – 05.06.2017  
Objection email from Christopher Murphy – 06.06.2017  
Email from Susan Davis – 06.07.2017  
Letter from Gerald Eve – 06.07.2017

Air Quality Impact Assessment prepared by AECOM;  
Applicant's Supporting Statement prepared by Urbanest;  
Building / Student Management Plan prepared by Urbanest;  
Daylight and Sunlight Report prepared by Point2 Surveyors;  
Daylight and Sunlight Report Updated June 2017 prepared by Point2  
Surveyors;  
Delivery and Servicing Management Plan prepared by Caneparo Associates;  
Demand Analysis Report prepared by JLL;  
Design and Access Statement prepared by Hopkins Architects, David Bonnett  
Associates, Metaphor, and Townshend Landscape Architects, including  
Townscape and Visual Impact Assessment prepared by Peter Stewart  
Consultancy;  
Draft Construction Management Plan prepared by Balfour Beatty  
Energy Statement prepared by MTT;  
Environmental Noise Survey prepared by Hann Tucker Associates;  
Flood Risk Assessment and SUDS Strategy prepared by Robert Bird Group;  
Historic Environment Assessment prepared by Museum of London  
Archaeology;  
Noise Impact Assessment

Office Economic (Viability) Assessment prepared by Gerald Eve;  
Office Market Report prepared by BNP Paribas;  
Planning Statement prepared by Gerald Eve LLP;  
Roman Wall House & Emperor House, Roman Wall Display Exhibition, Stage 2 Report, dated 10 March 2017  
Statement of Community Involvement prepared by Quatro;  
Sustainability Statement (including BREEAM Pre-Assessments) prepared by MTT;  
Transport Assessment prepared by Caneparo Associates;  
Workplace Travel Plan prepared by Caneparo Associates  
Economic Assessment Report prepared by GVA dated July 2017

Memo: Transport for London Response Note. File Ref. N03-DB-TfL  
Response Note Vine Street (170515) May 2017.

Gerald Eve Note - Planning Benefits Case and Relevant Material  
Considerations

## **LONDON PLAN POLICIES**

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

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

Policy 3.8 Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that new developments offer a range of housing choices.

Policy 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;  
Support the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity;  
Promote London as a suitable location for European and other international agencies and businesses.

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

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

Policy 4.10 Support the new and emerging economic sectors including supporting the provision of specialist accommodation.

Policy 5.1 Mitigate climate change by achieving an overall reduction in London's carbon dioxide emissions of 60% below 1990 levels by 2025.

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 5.10 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 5.13 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 6.9 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 6.10 Developments should ensure a high quality pedestrian environment.

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 7.4 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 8.2 Development proposals should address strategic as well as local priorities in planning obligations.

## 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.

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

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

### ***CS8 Meet challenges facing Aldgate area***

To regenerate the amenities and environment of the Aldgate area for businesses, residents, workers, visitors and students, promoting development and investment.

### ***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.

### ***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.

### ***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.

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

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

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

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

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

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

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

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

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

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

### ***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.

### ***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.

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

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

### ***DM3.2 Security measures***

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

### ***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.

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

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

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;

- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

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

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

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

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

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

#### ***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.

#### ***DM12.4 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.

#### ***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.

### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

### ***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.

### ***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.

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

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

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

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

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;

- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

### ***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.

### ***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.

### ***DM20.4 Retail unit sizes***

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

### ***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.

### ***DM21.7 Student housing and hostels***

1. Proposals for new student accommodation and hostels will be refused where it would:
  - a) prejudice the primary business function of the City;
  - b) result in the loss of office buildings or sites, contrary to policy DM 1.1;
  - c) result in an excessive concentration of student housing and/or hostels;
  - d) have an adverse impact on the residential amenity of the area;
  - e) involve the loss of permanent residential accommodation.
2. Proposals for student housing must be supported by identified further or higher educational institutions operating in the Central Activities Zone and provide accommodation for their own students.
3. Self-contained student housing will be expected to contribute to the supply of affordable housing in accordance with Policy CS21.

4. The loss of existing student housing and hostels will be resisted unless:

- a) the accommodation is required to meet residential needs as part of a published strategy by a local service provider;
- b) it is vacant and has been actively marketed as student or hostel accommodation at reasonable terms and there is no demand from another organisation for a hostel in that location.

## SCHEDULE

APPLICATION: 17/00239/FULMAJ

### Emperor House 35 Vine Street London

**Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.**

## 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 Before any works including demolition 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.
- 3 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in

respect of individual stages of the development 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: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

- 4 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.

- 5 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:

(b) details of the proposed new facade(s) including detailed elevations, cross sections and plans of doors and windows at scale 1:10 with cross-sections of all external frames and glazing at scale 1:1;

(c) details of design, type and position of fitting to windows;

(d) details (including 1:10 elevations, plans and cross-sections) of louvres, plant screens and photovoltaic panels;;

(e) details of ground floor elevations including details of gates/shutters to service bay;

(f) details of soffits, lighting, hand rails and balustrades;

(g) details of junctions with adjoining premises;

(h) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level

(i) details of plant and ductwork to serve the [A1] use(s);

(j) details of ventilation and air-conditioning for the [A1] use(s);  
(k) details of external surfaces within the site boundary including hard and soft landscaping;

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

- 6 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.  
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 7 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.  
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 8 All Parish Markers and commemorative plaques on the existing building shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained for the life of the building on the new building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.  
REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.
- 9 Unless otherwise agreed in writing with the Local Planning Authority, works including monitoring of the London Wall monument, method statement for the conservation works, safe removal of the existing modern structures adjacent to the monument and all works to protect the monument for the duration of the implementation of the scheme shall be carried out in accordance with the 'Roman Wall Protective Works' dated March 2017, hereby approved.

REASON: To ensure the protection of the significance and setting of the scheduled ancient monument and that the Local Planning Authority may be satisfied with the detail of the proposed works and to ensure a satisfactory appearance in accordance with the following policies of the Core Strategy and Unitary Development Plan 2002: CS10, CS12, ARC2 and ARC3

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

- a. details of any proposals arising from any condition and structural surveys of the London Wall;
- b. details of protection measures to the London Wall following completion of the development;
- c. details of basement level, ground level and all finishes in the area of the display space of the London Wall;
- d. details of the marking out of the line, scale and form of the London Wall on internal and external surfaces of the basement display area, ground floor and basement floors of the building;
- e. details of the directional information and interpretative material on the ground floor and external elevations, including the new external landscaping and the new pedestrian route;
- f. details of the display wall and cases within the proposed basement display and ground floors, to a scale of not less than 1:5, including materials of the display walls, cases, objects and wording;
- g. details of the reinstatement of the 'London Wall Walk' plaque

REASON: To ensure the protection of the significance and setting of the scheduled ancient monument and that the Local Planning Authority may be satisfied with the detail of the proposed works and to ensure a satisfactory appearance in accordance with the following policies of the Core Strategy and Unitary Development Plan 2002: CS10, CS12, ARC2 and ARC3

11 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.

- 12 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.  
REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.
- 13 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: green roofs, bio-retention areas, attenuation tanks, rainwater pipework, hydrobrakes, pumps, design for system exceedance; surface water flow rates shall be restricted to no greater than stated in Flood Risk Assessment Issue 5, provision should be made for an attenuation volume capacity capable of achieving this should;  
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.  
(c) Evidence that Thames Water have been consulted and consider the proposed discharged rate to be satisfactory.  
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: CS18, DM18.2, DM18.3.
- 14 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) A Lifetime Maintenance Plan for the SuDS system to include:  
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;  
- A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To 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: CS18, DM18.2, DM18.3.

- 15 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.
- 16 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 321 pedal cycles and 140 fold up bikes in lockers. 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.
- 17 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.  
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. 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.
- 18 No live or recorded music shall be played that it can be heard outside the premises or within any residential or other premises in the building.  
REASON: To safeguard the amenity of the adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 19 No servicing of the premises shall be 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. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

- 20 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.

- 21 No boilers that have a dry NO<sub>x</sub> emission level exceeding 40 mg/kWh (measured at 0% excess O<sub>2</sub>) 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.

- 22 (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 LA<sub>90</sub> (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.

- 23 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.

- 24 2 car parking spaces with electric vehicle charging facilities, suitable for use by people with disabilities shall be provided on the premises in accordance with details to be submitted to and approved in writing by the Local Planning Authority before any works affected thereby are begun, and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking.  
REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
- 25 The roof terraces hereby permitted shall not be used or accessed between the hours of 21.00 on one day and 07.00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 26 The public highway(s) known as Vine Street and Crutched Friars shall remain fully open and unobstructed until such time as the necessary Stopping-up Order has come into effect.  
REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.
- 27 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: UVS\_3000\_P1, UVS\_3100\_P1, UVS\_3101\_P1, UVS\_3102\_P2, UVS\_3103\_P2, UVS\_3104\_P2, UVS\_3105\_P2, UVS\_3106\_P2, UVS\_3107\_P2, UVS\_3108\_P2, UVS\_3109\_P2, UVS\_3110\_P2, UVS\_3111\_P2, UVS\_3112\_P2, UVS\_3113\_P2, UVS\_3114\_P2, UVS\_3115\_P2, UVS\_4100\_P1, UVS\_4101\_P1, UVS\_4102\_P1, UVS\_4103\_P1, UVS\_4104\_P1, UVS\_5000\_P1, UVS\_5001\_P1, UVS\_5002\_P1, UVS\_5003\_P1, Roman Wall Protective Works, dated March 2017  
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## INFORMATIVES

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

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

a full pre application advice service has been offered;

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

- 2 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 3 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.
- 4 Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a nonreturn valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.
- 5 There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.

Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover)

- 6 Thames Water would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what

measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwqriskmanagement@thameswater.co.uk](mailto:wwqriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality).

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Gary SurrIDGE

Address: Museum of London 150 London Wall London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: For the reasons described in our letter (dated 18 Jan 2017) the Museum of London supports this application.

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mrs Julie Devonshire

Address: Entrepreneurship Institute Bush House Aldwych, London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:

AM



PLANNING TRANSPORTATION	
PSDD	PPD
TPD	LTP
OM	SSE
NO	PP
FILE	DD
28 APR 2017	
128848	

17/00239

A Hayes  
 City of London  
 P O Box 270  
 Guildhall  
 London  
 EC2P 2EJ

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

**Application Number:** PA/17/01025  
**Your ref:** 17/00239/FULL

**Enquiries to:** Simon Westmorland  
**Tel:** 0207 364 7511  
**Email:** Simon.Westmorland@towerhamlets.gov.uk

21 April, 2017

Dear A Hayes,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
 DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

**Location  
 Proposal**

Emperor House, 35 Vine Street, London EC3N 2PX  
 Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (class b1), incubator offices (class b1), a shop/ cafe unit (class a1), student/ incubator tenant accommodation and ancillary facilities (sui generis), and exhibition space associated with a scheduled ancient monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works

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

The London Borough of Tower Hamlets raises no objection to this application.



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

Yours sincerely,



**Owen Whalley, Divisional Director - Planning and Building Control**



LONDON OFFICE

Ms Alison Hayes  
City of London  
Guildhall  
PO BOX 270  
London  
EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	28 APR 2017	LTP
OM		SSE
No		PP
FILE		DD

Direct Dial: 020 7973 3739

Our ref: P00567314

Dear Ms Hayes

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015  
EMPEROR HOUSE 35 VINE STREET LONDON EC3N 2PX  
Application No 17/00239/FULL**

Thank you for your letter of 7 April 2017 notifying us of the application for planning permission relating to the above site. We do not wish to comment in detail, but offer the following general observations.

**Historic England Advice**

The scheme is located on a site incorporating the Scheduled Monument identified as **London Wall: section in Roman Wall House, Crutched Friars (SM LO26F)**. The monument comprises a section of the Roman wall at Crutched Friars which forms part of the property boundary of Emperor House to the east and Roman Wall House to the west and is visible within their basements. It represents part of the eastern side of the London Wall circuit and includes a fragment of walling, 11m in length, with an additional section of its core to the south (located behind C20 party walling) and the remains of a bastion extending from the eastern face of the Wall. The scheduled area includes a 2m buffer around the wall and its bastion for the support and protection of the monument.

The proposed scheme concerns the demolition of the existing buildings and redevelopment to provide a new mixed use building which includes offices, a shop/ cafe unit, student/ incubator tenant accommodation and ancillary facilities, and exhibition space associated with a Scheduled Ancient Monument , arranged over basement, lower ground and ground floors. This application follows a previous scheme that was granted planning permission incorporating our advice and subject to the conditions of Scheduled Monument Consent (SMC) which was granted on 21st September 2015 (Ref: S00116004).

The present applicant has, over several months, engaged with us with regard to the new plans for the site and, in particular, those affecting the Scheduled Monument. We are content that the new scheme retains the positive elements regarding the



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
HistoricEngland.org.uk





Historic England

LONDON OFFICE

conservation, protection and public display of the remains of London Wall that were discussed and agreed for the previous scheme and for which SMC was granted. The existing SMC covers the proposals as outlined in the new planning application and, as such, the new scheme will also be subject to the conditions included within that consent as per the 1979 Ancient Monuments and Archaeological Areas Act (as amended).

We would expect to be continually consulted as this project progresses, as per the conditions of the consent, and also with regard to a future Conservation Management Plan for the site. This will look to safeguard the ongoing conservation and maintenance of the site and the monument and will be expected to work in conjunction with a Section 17 Management Agreement to be agreed with Historic England.

**Recommendation**

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

Please note that this response relates to Scheduled Monument matters only. If there are any non-designated archaeological implications to the proposals it is recommended that you contact the Assistant Director for the Historic Environment (City of London), Kathryn Stubbs, for further advice.

Yours sincerely

[REDACTED]  
**Iain Bright**  
Assistant Inspector of Ancient Monuments

[REDACTED]  
cc Kathryn Stubbs



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
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# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Ms Paloma Lisboa

Address: 165 Great Dover Street London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Dear Sirs,

I am writing in support of Urbanest's proposed scheme at Vine Street.

Kings College London houses students at Urbanest Westminster Bridge in Lambeth and also at Urbanest Tower Bridge, 52 Minories in The City Corporation. The reasons we choose to work with Urbanest are based around the excellent specification of their properties, the location and most importantly, the overall management of the properties. The Urbanest team is on-site 24/7 working closely with our students, managing all elements of student life in a well-structured and organised fashion.

Their teams on-site are well trained, diligent and meet frequently with us to keep us updated on the student experience in the property. As a result, we are keen to work with Urbanest again on the proposed scheme at Vine Street because of their track record of managing residences in such a professional manner.

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Niel Pama

Address: 31 Jewry Street London

## Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity

Comment: David Game College occupies a 58,000 sqft building alongside the proposed development. Although, we appreciate that there will be some noise from the demolition of the existing building, we are very supportive of the amenities that this new development will provide and these far outweigh the possible, short term inconvenience.

We have been very pleased with the amount of information that we have been given regarding the proposed development and how Urbanest plans to mitigate the noise and the dust that will result from the building works.

Urbanest, will as a result of this new build be able to support us in our ambitions of providing the complete student experience for our students. The UK has great standards of education but for too long has it lagged behind the likes of Canada, USA, Australia etc. in the facilities it provides for its students. It is our intention to work with our new neighbour and their state of the art creation, so that we will be able to combine the best of London, the best of British education and the best facilities available and as a result, put us and this part of London on a better footing to compete on the global stage.

The plans for the restoration and exhibition of the section of the Roman Wall under the existing premises, will enhance the local historical attractions of the area and link Tower Hill nicely with the landmarks in and around Aldgate. At present the route that stretches between the two is devoid of much for tourists to see, but this will all change with their plans to reveal the wall and have a

permanent exhibition open to the public.

We hope that their development plans are given the go ahead.

**From:** COL - Contact Centre  
**To:** Pln - CC - Development Dc  
**Subject:** FW: PLN FW: 3rd Party Planning Application - 17/00239/FULMAJ COL:05094185  
**Date:** 09 May 2017 08:21:43

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

From: [BCTAdmin@thameswater.co.uk](mailto:BCTAdmin@thameswater.co.uk) [mailto:[BCTAdmin@thameswater.co.uk](mailto:BCTAdmin@thameswater.co.uk)]  
Sent: 08 May 2017 13:11  
To: PlanningQueue  
Subject: 3rd Party Planning Application - 17/00239/FULMAJ

Corporation of London  
DTS Ref: 36020  
Department of Planning & Transportation  
Ref: 17/00239/FULMAJ  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Our  
Your

8 May 2017

Dear Sir/Madam

Re: EMPEROR HOUSE, 35 VINE STREET, LONDON, EC3N 2PX

#### Waste Comments

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover)

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

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwgriskmanagement@thameswater.co.uk](mailto:wwgriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

#### Water Comments

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and

minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Yours faithfully  
Development Planning Department

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

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# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Ralph Luck

Address: King's College London 57 Waterloo Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: King's College strongly supports this application particularly in respect of the student residences aspect and the innovation space. it will add vitality to the area and assist the growth of education and business.

# Comments for Planning Application 17/00239/FULMAJ

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Case Officer: Alison Hayes

## Customer Details

Name: Mr Archibald Hunter

Address: Newcombe House London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: We occupy the serviced apartments at India Street and America Square which are close to the application site and write in respect of the above planning application for the redevelopment of Emperor House and Roman Wall House, Vine Street, London EC3.

We operate more own brand, award-winning serviced apartments in London than any other operator - over 1,300 and growing. Our buildings range from boutique schemes in cobbled streets and sympathetic refurbishments of historic buildings to the very best of modern architecture. Apart from our own serviced apartments, we work with a growing network of like-minded operators who pride themselves on the quality of their accommodation and the supporting services they provide - all carefully selected and managed by our partnership team.

We think therefore that the redevelopment would be a valuable enhancement to the this part of the Eastern area of the City close to Aldgate and the Eastern City boundary with Tower Hamlets. We consider that the mixed-use scheme is appropriate in this part of the City and will replace an obsolete office building which currently does little to enliven the area.

The design is of high quality and we note the provision of the incubator office accommodation, Roman Wall exhibition and public realm commitments which are important to creating focus and interest and will make the site more permeable.

We are of the view that the student population created by the scheme will make a helpful contribution to the economic and physical vitality of the Square Mile.

Our schemes at India Street and America Square close to the site would provide useful short term

accommodation for visiting parents and academic staff and our schemes can therefore support the proposed uses - we are familiar with Urbanest's model and this seems an ideal solution to a fairly difficult site. The orientation of the scheme with its entrance along Vine Street is to be particularly commended

In conclusion, we fully support the planning

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr John Harding

Address: Daniel Watney LLP 165 Fleet Street London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I am the Surveyor to The Saddlers' Company and write on their behalf in their capacity as freeholder of part of the site, in respect of the planning application for Emperor House and Roman Wall House, Vine Street.

I have reviewed the submitted planning application and discussed the proposals with the applicant. Accordingly, I am pleased to support these proposals. I consider that this mixed use scheme is appropriate in this part of the City of London and will make a welcome addition to the fabric of the City.

I also consider the proposals represent a high quality design, which integrates the uses in a well thought out way; the provision of the incubator office accommodation and Roman Wall exhibition is to be particularly commended. The applicant's commitment to the public realm is welcome.

I consider that the student population created by the scheme will make a valuable contribution to the vitality of the Square Mile.

In summary I fully support this planning application and would be grateful for our views to be relayed to the Members of the Planning and Transportation Committee.

Response from Program Planning Professionals Ltd trading as Pcubed planning application 13/00166/FULMAJ:  
Emperor House, Vince Street & Roman Wall House, Crutched Friars

Ms Alison Hayes  
Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London, EC2P 2EJ

16 May 2016

**Ref: Planning Application: 17/00239/FULMAJ**

**Emperor House & Roman Wall House, 35-36 Vine Street & 1-2 Crosswall, London EC3**

Dear Ms Hayes,

I'm contacting you on behalf of Program Planning Professionals Ltd, also trading as Pcubed, in respect of the above planning application submission by Urbanest to officially register our response.

As freehold owners of the adjoining property, Lutidine House, we will be enveloped by the proposed building site with all the health, safety and operational issues this will inevitably entail. There also exists a party wall and these issues will be separately addressed through the provisions within the Party Wall Act, 1996.

Pcubed occupy all 7 floors and the basement of our site at Crutched Friars which is our EMEA head office; of our 180 UK based staff, 70 are regularly based in Lutidine House, with periodic increases in this number.

### **London's Continued Prosperity & Brexit**

We understand that the City of London Planning Department, Department of the Built Environment and the City of London Corporation in general will be keen to support all investment that contributes to London's long-term prosperity and future as a global economic centre of excellence, especially post Brexit.

Private investment in the City is always a sign of confidence in London's continued status as a global centre for commerce, home to many internationally renowned leading academic institutions and research centres, a cultural and historic centre and a major tourist destination.

Where space can be better utilised and modernised it can only improve the general area and this regeneration, multi-use proposal would be in line with these aspirations.

That said, any developments within the City of London should also make consideration of the impact of these major construction projects on existing, established, rate-paying companies, especially the operational and financial burden this may place upon incumbent businesses.

Developers, residents, corporations and businesses owners rely on The Department of the Built Environment and Planning teams to balance all these considerations on behalf of all parties concerned in a consistent, fair and open forum.

## **Urbanest Application**

The Urbanest proposal is well considered; it addresses student accommodation, business diversity and community betterment and future investment – not to mention guaranteed business revenues for the City of London.

Initial engagement with the senior stakeholder Urbanest team and Pcubed has been positive and in good faith.

## **Concerns**

There are, however, certain assurances we seek and, provided these matters are dealt with, we can see a positive and mutually beneficial co-existence.

Our primary concerns in respect of this development fall into four main categories;

1. Health and safety
2. Potential impact on our business operations, including financial impact
3. Access to our building
4. Framework for effective resolution forum,

We would seek assurances from the applicant and CoL with specific reference to the items below:

### **1. Emergency Egress**

There are currently two emergency egress routes that are facilitated by access via Roman Wall House; under the proposed scheme this building is scheduled for demolition.

Our primary concern is the loss of the roof top escape, which currently takes evacuees onto the roof of Roman Wall House and down an external metal staircase to the rear of that building, through the ground floor office and out into the loading bay, then into Crutched Friars.

Urbanest have indicated that there are two sets of plans; their preferred option illustrates no physical link between the adjoining properties.

- i. Urbanest have submitted a statement of intent to fund an upgrade to Pcubed's existing L3 fire alarm system and to advise upon, research and implement a self-contained fire safety solution.

The exact solution is yet to be determined and agreed as further technical research is required.

- ii. The alternative scheme submitted by the applicant indicates a fire escape into the student accommodate block.

Whilst this latter solution is not ideal for either parties, it is the fall-back option in the event the first option is not technically possible.

Response from Program Planning Professionals Ltd trading as Pcubed planning application 13/00166/FULMAJ:  
Emperor House, Vince Street & Roman Wall House, Crutched Friars

Further liaison between the respective fire safety experts and fire system providers is required and discussions are now underway.

Accordingly, and in the absence of any legally binding obligation from Urbanest, we do need to reserve the position while the parties are actively engaged in resolving the matter. We will notify you as soon as any such resolution occurs.

### **2 & 3 Noise and dust pollution, vibrations and employee wellbeing.**

Health and safety is of paramount importance to all parties concerned in this process. Given the proximity of the build to Pcubed premises and the immediate impact on their staff, visitors, and their working environment, we are concerned about the impact upon the health & safety and well-being of our staff.

It is a given that all building works will generate considerable noise, dust and ground shaking vibrations. The main concerns here are;

- the scale and duration of the works and the long-term impact on the health and safety of our staff
- the increased maintenance to the lift, air conditioning and heating system and the increased cleaning regime throughout the building
- the impact of noise and vibrations of heavy machinery, heavy goods vehicles and crane operations on our employees and our normal business operations
- The ability for Pcubed to use its current meeting room facilities throughout the works and to work under these conditions for a prolonged period – this is scheduled to be a four-year build
- Increased traffic and safe and uninterrupted access to Lutidine House

Urbanest and Pcubed representatives met on 12<sup>th</sup> May, 2017; it was agreed that equipment to monitor the noise, dust and vibration levels would be installed.

It is understood much of the heavy goods will initially enter through the Vine Street entrance. However, increased traffic and especially large construction vehicles, will pose increased safety issues, including carbon monoxide emissions.

We would ask that in addition to the that equipment to monitor the noise, dust and vibration levels, a carbon monoxide monitor be placed inside the ground level of Lutidine House.

### **4. Asbestos**

We are confident Urbanest and their team will make us aware of any pertinent safety issues relating to this specific topic and that their construction partners and safety experts have extensive experience and are qualified to deal with this as legally required.

### **5. Establish framework of co-operation and escalation process**

Engagement with Urbanest has been positive, informative and gives us confidence we are dealing with an ethical and considerate neighbour. That said, even good neighbours can sometimes have issues that require arbitration.

Notwithstanding the legal and mandatory requirements of the HSE construction practice guidelines, City of London Code of Practices for Deconstruction and Construction Sites, the Considerate Constructors Scheme Code of Practice, Pcubed seek assurances that concerns or issues that arise during the term of this project will be speedily addressed and resolved to everyone's satisfaction within an agreed co-operation framework forum.

This applies also for Urbanest and it will be to everyone's advantage to agree a process and lines of communication so interruptions and inconvenience are mitigated, and hopefully avoided altogether.

The issues should include, but not be confined to,

- compensations for power outage and data / server interruptions
- in the case of Pcubed, damage to Party Wall(s) or building
- extermination of vermin (prior to non-existing activity) during the excavations
- contamination of water table

This forum should comprise of named persons representing the developers, official health & safety advisors, and City of London officials to discuss issues that may arise with a view to achieving resolution within the agreed framework process.

We are confident of Urbanest's support in this objective and seek assurances and engagement from the principal Planning Officer in this regard.

### **Summary**

In short, provided there is a viable fire escape solution to replace the loss of the roof top egress, general health and safety concerns are suitably managed and Urbanest remain open to discussions in respect of Pcubed's increased maintenance costs, we support this planning application

We are supportive but must reserve our position until the fire escape issue is fully resolved in a manner that is capable of legal enforcement or dealt with as part of the planning process.

Yours faithfully,

Susan Davis  
Facilities Manager

## Addendum

### Emergency Access Routes

6<sup>th</sup> Floor internal  
Fire Exit Door

Internal stairwell  
from 6<sup>th</sup> floor to Roof  
Fire Exit

Route from Pcubed roof  
towards external  
stairwell & LRP demise



External stairwell from roof

External Stairwell from LRP demise to loading bay exit  
ground floor

Response from Program Planning Professionals Ltd trading as Pcubed planning application 13/00166/FULMAJ:  
Emperor House, Vince Street & Roman Wall House, Crutched Friars



To :

Annie Hampson – Director of Planning : City of London Authority

Alison Hayes – Planning Officer : City of London Authority

From :

Steve Pavitt. Flat 7 Fenchurch House. 136-138 Minories. LONDON. EC3N 1NT

OBJECTION to Urbannest UK Ltd. Planning Application : Emperor House and Roman Wall House

REF : 17/00239/FULMAJ

DATE : 31<sup>st</sup> May 2017

Annie / Alison, I am OBJECTING to the planning application that has been submitted by Urbanest and am requesting that planning permission is DENIED. I have three key objections :

1. **The City of London have a stated policy to promote and retain office space in the City of London. This development is student accommodation led and a huge deviation from this policy stance.**

Urbanest have sought to prove that office space in this part of the city of London is not a viable proposition, I would like to raise the following reasons why they are wrong.

- Urbanest present the marketing efforts of Savills over a 3 month period, which included Christmas, as some sort of evidence that there is not a major demand for office space in the area. On the contrary, this very short period of activity generated 5 bids, 3 of which were for office space based schemes, this is a clear majority of the bidders. If a proper period of marketing had been undertaken then I'm sure additional bids would have emerged as well.
- Urbanest also present an economic assessment report from Geraldeve. I'm not exactly sure what the purpose of this report is as it was commissioned by Urbanest to suit their own purposes and it was published after they had already purchased the site so they clearly didn't use it to inform a buying decision. The report content shows that a redeveloped site would provide a greater return than a refurbished site, this is hardly news! The report basically goes on to state several points which prove there is no independence at all in this report and it is entirely self-serving on behalf of Urbanest. This report should be dismissed.
- The City of London have recently approved a new office development at 80 Fenchurch Street, probably less than 100 metres from the proposed development on Vine Street. It consists of 14 floors of office space. I note that the CoL were happy to approve this and the developers felt there was a viable market for the property. This is contrary to all the nonsense I have heard from Urbanest about this area and their empty claim that there is no demand for office space. 80 Fenchurch House is in the same area, the same quadrant, the same sector, there can be no silly claims about it not being a relevant example as to why Urbanest are wrong about the economic viability of 100% office space on Vine Street
- I'm actually confused about Urbanest's position on the viability of office space generally. Their proposed planning application contains space for 600 office space occupants. This is a significant amount of office space, it is not an add-on, an afterthought or just a few incubator places. It is a significant office footprint which they are very reluctant to talk

about. So, if a very significant 600 person office space proposal is economically viable, then the already approved 100% office scheme is also viable.

**2. The scale of the student accommodation proposal is extremely large and overbearing**

- The site proposes around 750 bedrooms some of which could have more than one occupant if people stay together which course some will choose to do. The last population count in the city of London was a little over 8,000 people. So the City of London would be allowing a planning application through which would increase the whole of the CoL population by 10% on just one site which is smaller than a football pitch! The quadrant which Urbanest are so keen to discuss in relation to office space probably has less than 100 residents at present, this would increase to nearly 1,000. This is a massive and overbearing imposition of a huge population of people in an area where there are quite frankly hardly any amenities.

**3. The Extreme loss of light**

- The Prescription Act of 1832 states that the owner of a building with windows that have received natural daylight for 20 years or more is entitled to forbid any construction or other obstruction that would deprive him or her of that illumination. Neighbors cannot build anything that would block the light without permission
- The shocking loss of 60% of light that residents of Fenchurch House are expected to suffer as a result of this development should not be allowed, it goes directly against the Prescription Act and it is an unacceptable burden for residents
- If an office scheme is to go ahead a new re-designed and smaller proposal should be submitted

**So to summarise :**

**My key 3 points of objection :**

**CoL 'Office Space First' Policy :** The Urbanest reports questioning the economic viability of a 100% office space development can be dismissed as they are not independent

**CoL 'Office Space First' Policy :** The City of London clearly disagree with Urbanest on economic viability for a 100% office scheme as they approved a 14 storey office development at 80 Fenchurch Street which is in the same area and quadrant

**CoL 'Office Space First' Policy :** Urbanest themselves think a 600 person office development is viable, this is a significant size and proves the whole site is economically viable as office space

**Overbearing Population Increase :** A 10% increase in the City of London's population on a small football pitch sized site at the expenses of economically viable office space is an overbearing increase in population and a serious loss of economic capacity to the City of London

**Extreme Loss of Light.** 60% loss of light to residents in direct contravention of the Prescriptions Act of 1832 is unacceptable

I look forward to details of the planning meeting on the 23<sup>rd</sup> of June, my partner and I would like to attend.

Thanks, Steve Pavitt

**Hassall, Pam**

---

**From:** PLN - Comments  
**Subject:** FW: Objection to the application for Emperor House (17/00239/FULMAJ)

**From:** Kate Aspinall [mailto:]  
**Sent:** 05 June 2017 09:04  
**To:** PLN - Comments  
**Subject:** Objection to the application for Emperor House (17/00239/FULMAJ)

Dear Alison,

I am writing to OBJECT to the application for Emperor House (17/00239/FULMAJ). am requesting that planning permission is DENIED.

My husband and I live in the residential building across the street from the proposed site, 136-138 Minories. We are excited about the area and enthusiastic about the revival to this historic district.

I hope that in weighing this decision, which will alter this area greatly for better or worse, that you take into account residents – the documents in support of the application seem to come largely from business owners and universities not in the neighbourhood who stand to profit from the student housing.

Here is a brief summary of my issues with the application:

1. **Scale** – to better reflect the character of the area: height to conform to surrounding area better
2. **Change of use** - influx of students creates an undesirable surge in type of consumer pressure & countering City of London policy to promote and retain office space
3. **Extreme loss of light** – we stand to lose a dramatic amount of light to all of our living spaces; this FAILS three of the four BRE categories according to the Daylight and Sunlight Analysis by Delva Patman Redler (SG/sg/10047, Nov 2013) – please could this and the height be reconsidered.
4. **Design/Beautification** – I request that even if scale and historic character must be disproportionate then the Council require the developers to spend money on public art, to be administered by local residents – a true aesthetic boon to the community.
  - a. **Passageway** – the passageway proposed would increase noise – of gates opening and closing, etc – as well as generate more pedestrian traffic which includes smoke that funnels up into our windows, etc. Please could provisions be made to protect morning and evening noise levels if current plans go ahead
  - b. **Non-demolition of historic buildings** - Roman Wall House on Jewry Street is in keeping with historic character of the surrounding streets, to demolish it would be to lose a bit more of what makes the area an historic and aesthetic draw to workers, locals and tourists alike

I look forward to discussing the matter further.



Sincerely,

Kate Aspinall

Flat 11, Fenchurch House

136-138 Minories

EC3N 1NT

K/T

To :  
Annie Hampson – Director of Planning : City of London Authority  
Alison Hayes – Planning Officer : City of London Authority

From :  
Brian Noone  
Flat 11, Fenchurch House  
136-138 Minories  
LONDON EC3N 1NT

5 June 2015

**OBJECTION to Urbannest UK Ltd. Planning Application : Emperor House and Roman Wall House**

**REF : 17/00239/FULMAJ**

Dear Annie and Alison,

I am writing to **OBJECT** to the application for Emperor House.

My wife and I live in the residential building across the street from the proposed site, 136-138 Minories, and we are enthusiastic residents of Aldgate, looking forward very much to the continued revival of this historic district.

I note that the documents in support of the application come largely from business owners and universities not in the neighbourhood who stand to profit from the student housing: they are, for the most part, not residents and are not invested in making Aldgate into one of London's great neighbourhoods.

I am objecting to the application on several grounds, detailed below in sections.

I look forward to discussing the matter further.

Sincerely,  
Brian Noone

#### **SUMMARY**

I **OBJECT** to the proposed development and wish planning permission to be **DENIED** on the following grounds. If the proposal is accepted, I request the following conditions/changes be implemented.

#### **1. BUILDING HEIGHT**

##### **1.1 SCALE**

- I request the reconsideration of the height of the new building as regards the integrity of the character of the surrounding neighbourhood

##### **1.2 LIGHT**

- I request the reconsideration of the height of the new building as regards the dramatic (60%+) loss of light that will be suffered by the development's only residential neighbours

##### **1.3 REDEVELOPMENT POSSIBILITIES**

- I request the height of the new development to be reconsidered, as the Economic Assessment presents positive profits for all possible uses, including keeping the building at its current height.

## 2. CHANGE OF USE

-I request the rejection of the current proposal on the grounds that accommodation for transient students harms the character of the neighbourhood, and this change of character is not compensated by the change of profitability (which, according to the Economic Assessment is a difference of 3.8%).

-At the very least, I request that before approval a thorough assessment is undertaken to understand the impact of such a dramatic increase in residents in such a small area with, at the moment, few of the necessary services and restricted road access.

## 3. DESIGN

### 3.1 PASSAGE

-I request the "public link" NOT be included in the revised proposal on the grounds of privacy and noise.

-If the public link is retained, I request enforceable conditions on the noise and the cigarette smoke generated.

### 3.2 BEAUTIFICATION

-Since the developer's only justification for the proposed building's extreme height is aesthetic, I request that the Council require the developers to spend money on public art, to be administered by local residents – a true aesthetic boon to the community.

## 1. BUILDING HEIGHT

I urge the Council to reconsider the height of the proposed development. I understand the Council approved a project in 2014 with a similar height (13/00166/FULMAJ), but I don't believe the objections were adequately put forth or responded to.

### 1.1 SCALE

Firstly, the height of the proposed building is disproportionate to the surrounding buildings. "The height of the immediate surrounding buildings vary from 4 upwards to 8 storeys," according to the Design Observations document from the first application 13/00166/FULMAJ (23 Dec 2014). The proposed building is 11 storeys tall, in no way proportionate to the existing structures, including a Grade II-listed heritage building.

Aldgate is an area of significant growth potential – a mixed-use district with an exceptionally rich history and a target for incoming funds and attention. Retention of heritage-scale buildings is crucial to retaining the character of the neighbourhood, to ensure that it is not just another quarter of high-rises (which could be located anywhere) but instead is a historically-sensitive, beautiful place that draws people to it.

Aldgate has not been a focus for Londoners or visitors for years because it has not heeded this advice. As the Aldgate Masterplan by Tower Hamlets council says on the opening page of its report, speaking of Aldgate:

"A legacy of poorly designed, large scale office blocks detracts from the quality of the public realm."

Do not let this legacy continue with another poorly designed, large scale building that doesn't take into account the needs or vision of the community.

The only justification given by the developers is summed up in that same Design Observations document (23 Dec 2014), relating to the previous application (13/00166/FULMAJ). The extreme height of the newly proposed building is justified in the following manner:

"The site is a 'bookend' site on the junction of three roads which justifies a building with more prominence and scale in townscape terms to robustly visually support the corner."

This is not bourn out by the rest of the City. The most prominent "bookend" site in the City of London is arguably No 1 Poultry, which is 5 or 6 storeys tall, and it robustly visually supports the corner very well. (For years, you will remember, there was a proposal to put an 18-storey tower on that site at Poultry – a proposal that failed, to the benefit of the cityscape.)

There is absolutely no aesthetic grounding for the extreme height of the proposed building. Height is more profitable, certainly, but it is not more visually robust, and it is if anything a detriment to the historic neighbourhood.

## 1.2 LIGHT

The Daylight and Sunlight Analysis by Delva Patman Redler (SG/sg/10047, Nov 2013) for the previous project forecasts a dramatic reduction in light for the only neighbouring residential building, 136-138 Minories – a reduction that is very similar to the new proposal.

To begin, the assessment includes only 4 of the 5 floors of the building (there is a flat on floor 5 not mentioned in the report) – an oversight that one hopes is not an indication of the overall competence of DPR.

The amount of light reduction forecast by DPR is dramatic – to take only one flat as an example (other flats are worse):

VSC (Vertical Sky Component):

Window 1: -60.98%

Window 2: -61.90%

Window 3: -62.38%

Window 4: -62.41%

These "do not meet the BRE recommendations" according to the report. All windows in the building "fail".

NSL (No Sky Line)

Window 1: -59.35%

Window 2: -58.09%

Window 3: -55.62%

Window 4: -69.98%

These also "do not meet the BRE recommendations" according to the report. All windows in the building "fail".

ADF (Average Daylight Factor)

Window 1: -43.07%

Window 2: -43.66%

Window 3: -43.91%

Window 4: -43.89%

Average Probable Sunlight Hours

Window 1: -72.41%

Window 2: N/A (bedroom)

Window 3: N/A (bedroom)

Window 4: -61.54%

These also "do not meet the BRE recommendations" according to the report. All windows in the building "fail".

The numbers for the revised Daylight/Sunlight Report (22 March 2017) do not differ significantly from any of the above.

The development will dramatically reduce the amount of the light in flats at 136-138 Minories by more than 60%.

This is unacceptable planning: it is the creation of a tower where none is needed that not only harms the neighbourhood's character but also harms the very few permanent residents that it already has. In addition to diminishing their experience in their own homes, it also devalues their properties due to loss of light – a double impact that seems hard to justify.

### 1.3 REDEVELOPMENT

The report prepared by Gerald Eve on behalf of Urban Nest regarding the change of use – Emperor House and Roman Wall House Economic Assessment (A Lifecycle Cost - Benefit Analysis) (17 May 2017, dated January 2017) – demonstrates no need for the change of use, let alone for the redevelopment at all.

The report compares three possible uses of the site:

- 1) refurbishment of current premises
- 2) the 2014 office redevelopment
- 3) the 2017 student resident redevelopment.

The conclusion is, in short: all three would be profitable.

They are profitable to different degrees, but all three would bring profits to developers. So the question for the Council is: How much profit is the right amount, and who should benefit?

I contend that the primary beneficiary should be the neighbourhood: the historic character of the area is under threat from overdevelopment and retaining the scale of the surrounding buildings should be paramount.

As the Aldgate Masterplan notes about Aldgate on its opening page,

"A legacy of poorly designed, large scale office blocks detracts from the quality of the public realm."

The fewer tall buildings, the better off the public realm – and that is good for everyone in the neighbourhood.

### 2. CHANGE OF USE

If the height of the building must be retained, then the only concern here is, according to the Gerald Eve analysis, a choice between:

- 2) the 2014 office redevelopment
- 3) the 2017 student resident redevelopment.

The difference in this case is between an estimated profit of 12.7% (2) and an estimated profit of 13.2% (3).

The difference of estimated profit represents a figure for the office that is just 3.8% lower than the figure for the student residence, meaning the profits of the office would be 96.2% as high as the profits of the student residence. This is quite a small difference.

The primary beneficiary should be Aldgate and the City. Would transient students bring enough of a benefit (and not too many costs) to the neighbourhood, as compared to offices?

Having lived near students for years, I think the benefits of short-term students (increased restaurant revenue, perhaps also retail) are heavily outweighed by the costs: namely, noise, disrespect for local amenities and community, and the increased number of criminals who enter the neighbourhood looking to prey on naïve students.

The report also makes questionable assumptions about foreign students' willingness to come to the UK. The lack of serious attention to the influence of Brexit on student numbers in the report has me questioning the profitability figures.

What's more, there appears to be no serious enquiry into the effects of increasing the City's resident population by approx. 6.8%. This is a substantial increase (11,000 + 750), and it remains unclear whether the narrow streets that surround the site would be suitable for the all-hours foot, bicycle and automobile traffic that would be involved in the new development. It would seem irresponsible to approve the student housing project before investigating its most serious potential ramifications.

For these reasons, I urge you to reject the change of use for the premises.

### 3. DESIGN

Several aspects of the revised design introduce new problems for neighbours.

#### 3.1 PASSAGE

The proposed passage, separating the office and residential blocks and running between Vine Street and Crutched Friars, is called a "public link" in the design. It is best visible on page 30 of the Design and Access Statement (labelled (3)).

The passage in effect creates a new street directly outside 136-138 Minories, perpendicular to the residential windows. This directly:

- A) reduces privacy
  - Only a sliver of the residential space can be seen from the public roadway at the moment. With the passage, that will increase significantly
- B) increases pedestrian noise
  - More people, especially people in transit, will mean more noise at all hours when the passage is open to the public
- C) increases traffic noise
  - At the moment, very little traffic noise from Crutched Friars reaches 136-138 Minories, but if the passage is constructed, traffic noise will increase significantly thanks to its unobstructed transmittance through the passage.
- D) passage gate noise
  - For safety reasons the proposal was refined to restrict the opening hours of the passage. Presumably the passage will have some type of gate that requires opening and closing at the exceptional hours of 6am and 10pm. The gate will likely make noise – noise at hours when many people sleep – and this needs to be accounted for.
- E) increases the amount of pedestrian traffic, which will increase the cigarette smoke
  - This is already problematic with the current gap between the buildings and likely only to become worse with such a dramatic increase in the number of residents and office workers in the building, as well as the narrowing of the gap

The Environmental Noise Survey by Hann Tucker Associates that accompanies the application makes no reference to these noises, and nowhere in the application is the privacy of the residents of 136-138 Minories considered.

I request that the design be modified to exclude the passage.

If the passage is retained, I request conditions on the passage that limit the potential for noise: conditions such as the decibel level acceptable for the gate mechanisms and on-duty staff in the new development who can be held accountable for excess noise and whose details are made available to neighbours.

### 3.2 BEAUTIFICATION

In the Design Observations document (23 Dec 2014), relating to the previous application (13/00166/FULMAJ), the extreme height of the newly proposed building is justified in the following manner:

**"The site is a 'bookend' site on the junction of three roads which justifies a building with more prominence and scale in townscape terms to robustly visually support the corner."**

This is an aesthetic argument. Yet nowhere else in the Design and Access Statement is serious consideration given to the public realm. A modest Public Realm Strategy is offered in section 6.0 of the Design and Access Statement, but it does little to contend with the developing diversity and beauty of Aldgate.

Public art is a notable and effective way to further beautify an area beyond its architecture. I request that the proposal be amended to include permanent provision for public art, paid for by the project developers but implemented by the citizens of Aldgate – those who live and work here. More than extending the height of the building skyward, the deployment of public art could genuinely give the corner and district more prominence and more robust visual support.

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Robert Buchele

Address: Finsbury Circus House 15 Finsbury Circus London

## Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: We write on behalf of BCDH Capital Holding FC Sarl who are the freeholders of Friary Court, 65 Crutched Friars. We have reviewed the submitted planning application and discussed the proposals. We welcome the proposed mixed-use development and we are pleased to support the application.

We believe that a mixed-use scheme is appropriate for this area of the Eastern Fringe of the City. The Hopkins designed scheme represents a high quality addition to Crutched Friars which at present is adversely impacted by the existing buildings that have been empty for some time. The improved frontage and entrance to the proposed incubator accommodation on Crosswall will also be a much-welcomed addition.

It would appear that the mix of uses are integrated well and that the development will animate the area positively and the creation of a new public walkway linking Vine Street to Crutched Friars / Jewry Street alongside the Roman Wall should be commended.

## Hayes, Alison

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**From:** PLN - Comments  
**Subject:** FW: Objection :- Urbannest Planning Application Emperor House 17/00239/FULMAJ

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**From:** Murphy, Chris []  
**Sent:** 06 June 2017 16:47  
**To:** Hampson, Annie; Hayes, Alison  
**Subject:** Objection :- Urbannest Planning Application Emperor House 17/00239/FULMAJ

Annie/Allison,

For the attention of the Committee ~ below I set out my objections to the revised planning application:-

### Student accommodation

The previous planning approval for, 'substantial office accommodation', was based on the City planners desire to provide office accommodation in this area of the City i.e. proximate to Ledenhall and Fenchurch street, and Aldgate itself, where similar developments already exist or are in the process of construction. I have not seen any subsequent evidence proving that there is now a justification for providing student accommodation in this particular location on the basis that there is no current demand for business accommodation.

To allow the proposed planning application will be to provide very expensive accommodation for wealthy students who do not study in the City itself, with the consequence of increasing the population of the city by approximately 10%.

In turn there is no proposal to provide the necessary support services.

Currently there are a number of people living in Emperor House, and even with a relatively small number of people living in the building there is a negative effect on the resident of Fenchurch House, from lights being on throughout the night, 7 days a week. Imagine the overall effect of p to 1000 individuals living opposite Fenchurch House.

The addition transport usage will no doubt contribute negatively to 'pollution' in the city.

It is appreciated that the area is one of significant historical interest and that Vine Street will attract additional tourism with the opening up of the view of the Roman Wall. Tourism in this area should be a priority. The mix of offices and increased tourist presence is understandable. The addition of a significant increase in the residential population on top of the increase in tourism is excessive and inappropriate. What is appropriate is a reasonably large office block that is not so detrimental to the existing residents.

### Noise

Vine street is already a popular place for inventive, 'Ripper tour' guides to bring their customers to and in order to moderate the noise level in this narrow street where noise reverberate, I would request that the insertion of a 'public link' is rejected, should this planning application be approved in its current form. I understand that the provision of such a 'link' is not at the behest of the developer but at the request of the Planning Authority itself.

### Loss of light ~ Daylight/Sunlight Report 22/03/17

The substantial loss of light to the Fenchurch house residential accommodation of 60%, should lead to a review of the building design, as it seems excessive to reduce the level of light which has been enjoyed by the residents for decades, so dramatically.

Regards

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Christopher Murphy  
Flat 8 Fenchurch House

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**Adjei, William**

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**From:** Hayes, Alison  
**Sent:** 10 July 2017 11:54  
**To:** Adjei, William  
**Subject:** FW: URGENT - Fire Safety Concerns  
**Attachments:** RE PLN FW Urbanest Planning Application Ref 1700239FULMAJ PP-05850410 COL05094511

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**From:** Davis, Susan [REDACTED]  
**Sent:** 06 July 2017 15:02  
**To:** Hayes, Alison  
**Subject:** URGENT - Fire Safety Concerns

Dear Alison,

**Re: Planning Application 17/00239/FULMAJ, Emperor & Roman Walls Houses, 35 – 35 Vine Street & 1 – 2 Crosswall**

As you know, our company's submission to the CoL Planning team in respect of the above development was positive and in principle remains so, provided our safety and operational concerns are properly addressed.

The primary assurance we sought was a viable and safe alternative should Urbanest remove the existing roof access exterior emergency egress and through their network of agents commissioned a fire safety study based on a single stairwell solution.

That was prior to the Grenfell Tower tragedy and, in light of these terrible events, our Directors have asked that I commission an independent fire safety study. We have contacted a company called M10 Fire Consultants and we are now awaiting their report.

If their findings support the conclusions of the prior studies, we will agree a heads of terms with Urbanest. This will effectively a guarantee to bear the upgrade costs for these works.

However, if the M10 report differs in its recommendations we will need to ask the Planning & Dept. of the Built Environment to consider Urbanest's alternative planning submission that illustrates a physical link/ corridor connecting both Lutidine House and the new development.

This email is just to make you aware that the second plan may need to be considered. Is there anyone in your team of CoL that would be able to read both the fire study reports and input into the planning application hearing?

Regards,

Susan.

**Susan Davis**  
Facilities Manager  
PCU3ED

Program Planning Professionals Ltd.  
3-5 Crutched Friars | London | EC3N 2HT | United Kingdom (England-3025947)

**ACKNOWLEDGED**



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**GERALDEVE**

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Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ  
FAO: Alison Hayes

6 July 2017

Our ref: NJB/JRA/HFA/J7740  
Your ref: 17/00239/FULMAJ

Dear Madam,

**Emperor House and Roman Wall House**  
Ref: 17/00239/FULMAJ

We write further to the recent letters of objection to the above planning application, received from residents of Fenchurch House, 136-138 Minories. For reference, I have set out below the objections to which this letter responds:

- Letter of objection from Mr Pavitt dated 31 May 2017
- Letter of objection from Mr Noone dated 5 June 2017
- Letter of objection from Mrs Aspinall dated 5 June 2017
- Letter of objection from Mr Murphy dated 6 June 2017

Our consultation programme has included regular engagement with the residents of Fenchurch House throughout the planning process. Specifically, we have met Mr Pavitt and Mr Murphy on the following occasions:

- 25 November – Public Exhibition
- 13 February – Briefing day
- 20 April – 1 to 1 late night tour of Urbanest's Westminster Bridge Road development (Mr Pavitt)
- 04 May – 1 to 1 late night tour of Urbanest's Hoxton development (Mr Pavitt and Mr Murphy)

On every occasion we have sought to address the concerns which have been raised by residents, and have been open and transparent in presenting the full details of the proposed scheme.

We wrote to Mr Murphy and Mr Pavitt in February this year following our briefing meeting to provide clarification and address the issues which had been raised, particularly in relation to issue of

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mature tree planting along Vine Street and to confirm that there wouldn't be any outdoor balcony areas accessible to students.

Invitations to attend both the public exhibition in November, and the Briefing Day in February were extended to Mr Noone and Mrs Aspinall, though we did not receive any comments from them on the proposals prior to the application.

The objection letters raise similar issues which can be broadly summarised as follows:

- Loss of office floor space and the viability of the site for office use;
- Design and scale of the proposed building;
- Scale of proposed student accommodation and concern of the impact on amenity and the local area;
- Daylight and Sunlight;
- New pedestrian link

We respond to the above points of objection raised in the letters as follows:

#### **Office Floorspace**

The application documents include a detailed analysis of the viability of the site for office development. There is no prospect that that extant planning permission for office redevelopment will come forward in the long term, given amongst other things the location of the site and market conditions.

Savills have confirmed to us that their marketing period included advertising in the property press and direct marketing, plus presentations to over 200 UK and International investors, which generated 25 property inspections. We understand that a number of office and other commercial developers were interested in the Site when it came to the market, however no commercial developers could ultimately make the redevelopment scheme a viable proposition (as was the case for London & Regional who were selling the site, and who are a specialist commercial developer).

Mr Pavitt raised the point that the marketing of the Site was insufficient. Urbanest did not market the Property for office development. This was conducted by the vendor's agent, Savills a respectable and national marketing agent. The marketing period took place in Q3 2015. Urbanest viewed the site in October 2015 and was invited by the vendor to make an offer by 18 November 2015. There is no evidence from Savills which indicates that a longer market period would have resulted in additional bids. Also, the marketing period was prior to the EU Referendum in June 2016, in arguably a stronger market. If this exercise was repeated now, there would be an even lower prospect of success.

As is required by the City's validation requirements for an application of this nature the applicant submitted an Economic Assessment, in support of the planning application. Whilst the report was prepared following the purchase of the site, the report does reflect inputs, which are in Urbanest's own appraisals and informed the pre-purchase decisions. This report is being independently

assessed by GVA, a professional, reputable and experienced advisor who have been appointed by the City of London.

80 Fenchurch Street is cited by Mr Pavitt as a recent example of office redevelopment in the vicinity of the Site. 80 Fenchurch Street is located in a more core position with a more commercially favourable address. That said, this site has currently been mothballed, with no recent site activity. It is noted that the planning application for this site was submitted in 2008. Six years after the submission of an application for detailed planning permission, the City of London granted conditional approval following the completion of a Section 106 Agreement on 11th November 2014. Despite being sold in 2014, the scheme has still not come forward. This illustrates the fragility of the office market in this part of the City.

Urbanest has always envisaged a mixed use, student and office scheme for this site. This reflects other recent Urbanest schemes which are truly mixed use. Unlike commercial developers considering the site for a large floorplate office redevelopment, Urbanest were able to consider a scheme based on the floorspace of the approved scheme, which meant a viable redevelopment could be proposed. Indeed, it is only because there is a prior commitment with King's College London (KCL) for the student accommodation element of the scheme that Urbanest can offer the proposed office floorspace in this location. Given the market and viability concerns relating to the location of the site, even the quantum of office floorspace being proposed is economically challenging, and it is not considered sustainable to provide traditional office floorspace.

Urbanest has designed the office element of their scheme to specifically meet the market in this peripheral location, and ensure it is deliverable. The proposed office element of the scheme will comprise 6,806 sqm (GIA) spread across eleven upper floors with floorplates ranging from 350-500 sqm. The office floorspace has been designed to respond to the requirement for SME office space in the 300-1000 sqm range, as identified in the City of London's 'Clusters and Connectivity' research report (2016). Given the floorplate sizes and location of the building, it is expected the building will be multi-let and offer an opportunity for potentially circa 12+ SME companies. This is in addition to the incubator office space of 911 sqm (GIA) which is being offered at peppercorn rent and will be taken up by King's College.

The applicant has taken care to ensure this element of the scheme is designed to meet the expectations of the market to ensure that the proposals will come forward immediately, should the City of London grant planning permission. The proposed office accommodation has been designed to specifically meet the requirements of the SME market, which is suitable for this part of the City. The provision of the new office building and incubator space would accord with the City's objectives to meet the specific requirements of SMEs and start-ups as promoted by policy. The scheme will result in a smaller quantum, but a higher quality of office accommodation, which is considered to be sustainable and deliverable to the market and which will add to the mix of commercial uses in the area.

Urbanest have been open about their ambitions for a mixed use development for the site throughout the pre-application process and have not been reluctant to discuss the commercial elements of the scheme.

#### **Student Accommodation**

In total the proposed development will include 619 student rooms, spread across a range of different room types including studios, ensuite rooms, non-ensuite rooms and twin-share rooms. 26

(4%) of the rooms will be twin share rooms. All other rooms will be single occupancy rooms. As with all of their other schemes across central London, Urbanest will strongly enforce their policy of not allowing sharing or sub-letting rooms. This will be included in the Student Management Plan, which will be enforceable through the S106 Agreement. The total number of students renting rooms would therefore be a maximum of 643, significantly less than the numbers cited in the letters of objection and not an increase in the population of the City by 10%.

In the context of this highly accessible central London location, this is not considered to be an excessive population of students. Urbanest have an excellent track record of owning and operating student residences of this scale across central London. A Student Management Plan submitted with the application demonstrates how Urbanest would operate the student accommodation, including details relating to security and management of anti-social behaviour. Urbanest provide 24/7 on-site management for all of their buildings, and would maintain a regular dialogue with local residents in order to address any concerns, should they arise.

Evidence of how Urbanest developments are operated and managed was provided to Mr Pavitt and Mr Murphy. At their request Urbanest arranged two late night tours which they attended where they were able to experience first-hand the professional way in which the buildings are operated by the on-site management team. There was no indication of anti-social behaviour at any point on these visits, and it is notable that no examples were referred to in the objection letters. Urbanest work very closely with their university partners to actively manage their accommodation, and as a result have developed a reputation among universities as London's premier student accommodation provider.

A Student Demand Analysis report, prepared by JLL, was submitted with the application which demonstrates that there is considerable demand for additional student accommodation and a shortage of supply in central London. Indeed, only one student housing development has been delivered in the City in the last 10 years. The proposed student accommodation will support and enhance the City's role as an international centre of learning, as well as its economic function. Those who have studied in the City may be more willing to work there in the future.

The development will not have adverse impacts on local amenities and services. Student's amenities' will primarily be served by their University. The area is well served by healthcare services, and the introduction of student accommodation will not have a significant impact. All full time students are required to register at their respective university GP and, as a result, there will be no requirement to register at a practice local to their accommodation.

We do not consider that the proposed development will result in significant additional effects on the local transport and highway networks. This is, principally, because the proposed development would result in a significant reduction in trips during the weekday AM and PM peak periods and per day compared to the consented office development, which will be beneficial to the highway and transport networks. The proposed development is car-free, with the exception of disabled parking, and provides cycle parking in excess of London Plan standards. In terms of servicing, the proposals would result in a reduction in the number of deliveries to the Site when compared to the extant planning permission for office-led redevelopment. The proposals include a dedicated servicing bay which is accessed from Crutched Friars, some distance from the nearest residential properties.

It should also be noted that the scheme is considered likely to have positive social and economic impacts on the local economy, through increased local spend from students and office workers, and by bringing a vacant site back into use.

The student bedrooms will be let by King's College London to their students. The development will provide a range of different room types including studios, ensuite rooms, non-ensuite rooms and twin-share rooms. This will ensure that rooms are available at a range of different price levels. We would also note that it is proposed that a small number of the student bedrooms in the development could be made available to tenants of the incubator accommodation. Bedrooms in the southern 'Crosswall' part of the building (comprising 59 bedrooms) could be let either to students or qualifying tenants of the incubator accommodation, with rooms priced to match the weekly rents paid by students, providing incubator tenants with affordable accommodation in the City.

### **Design, Height and Massing of Proposed Building**

The height and massing of the proposed building has previously been considered acceptable by the City of London under planning permission 13/00166/FULMAJ which is a material consideration in the determination of this application and remains valid until 29 June 2019. The proposed development represents a high quality design, which responds effectively to the opportunities and constraints of the site.

Given the extant planning permission, it would be erroneous to think that if the current scheme were unsuccessful a future scheme would be "re-designed and smaller" as stated by Mr Pavitt. We also note that the principle of demolition of both existing buildings has been established by the extant planning permission.

The proposal will contribute to the improvement of local amenity through the provision of a new area of public realm on Jewry Street, which exceeds that provided by the extant planning permission. In terms of cultural offer, the proposals will also provide public access to Roman Wall and a new exhibition, curated by Museum of London, at a cost to the applicant of approximately £10-15m. We would point out that the Roman Wall exhibition is proposed as a central part of a genuinely mixed use building, and its educational and cultural function is well suited in this context. It is unlikely that a wholly commercial scheme would be able to incorporate the Roman Wall exhibition in this way.

The proposed Roman Wall exhibition and new public realm are public benefits which will enhance the local area. It is not considered reasonable for the scheme to additionally provide public art.

### **Daylight and Sunlight**

In terms of daylight and sunlight, the form of the proposed scheme is almost identical on the northern portion of the site to the scheme approved by the City in 2013. In that instance, the members of the Planning and Transportation Committee concluded that the impact was acceptable.

The Proposed Development has been designed within the same external envelope as the extant planning permission on the northern part of the site, which was previously considered acceptable by the City of London. Where massing has changed in the Proposed Development compared to the previously approved scheme, it has been purposely located as far away from surrounding residential accommodation as possible, the primary change being to the Emperor House South element of the development fronting Crosswall.

The submitted Daylight and Sunlight Report demonstrates that in the small number instances where there is a change in the levels of daylight and sunlight amenity to surrounding buildings

when compared against the extant planning permission, these changes would be imperceptible to the occupants of those buildings.

#### **Pedestrian Link**

The proposed pedestrian route linking Jewry Street to Vine Street would provide a significant public benefit to the area in improving permeability and accessibility. The route would also provide a 'picture window' with excellent views overlooking the remnants of the City Wall below, which would be a further public benefit. The pedestrian link was discussed with local residents throughout the consultation process and in response to feedback anti-skateboard measures have been incorporated as well as an offer to close the route from 10pm-6am if necessary. The pedestrian link would be maintained and managed by Urbanest's on-site management team.

The pedestrian link would not lead to a significant increase in noise, either from road traffic or additional pedestrians.

#### **Conclusion**

In summary, the current proposals have been carefully considered. The Proposed Development comprises a truly mixed-use scheme consisting of offices, incubator accommodation, student accommodation, retail and public exhibition space. The viability analysis relating to the loss of the existing offices on the Site and the analysis relating to the extant permission, satisfactorily demonstrates that the continued use of the buildings and Site for full office use would not be viable. It is considered that the loss of the existing buildings would not have a detrimental impact on the provision for office development and the demand for long term employment growth in accordance with Policy CS1.

The proposed office accommodation designed for this specific location, and unlike the consented scheme and other developments in the locality, is deliverable. The combined area of the offices and incubator space measures 7,717 sqm GIA. Whilst the proposed office accommodation represents a slightly smaller quantum than the existing provision, the accommodation will be of a high quality and more efficient than the existing buildings.

In total the proposed development will include 619 student rooms. In accordance with policy the Proposed Development is supported by King's College London. The accommodation will be fully managed by Urbanest, and will not result in an overbearing increase in the local population.

The daylight and sunlight impacts are very similar to that previously approved by the City.

We trust that the above responses are helpful in addressing the issues raised by objectors and can be taken into consideration.

Yours faithfully,



**Gerald Eve LLP**