

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	25 July 2017
<b>Subject:</b> Wood Street Police Station 37 Wood Street London EC2P 2NQ Erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use (Total new floorspace 2897sq.m GEA).	<b>Public</b>
<b>Ward:</b> Bassishaw	<b>For Decision</b>
<b>Registered No:</b> 17/00130/FULMAJ	<b>Registered on:</b> 17 March 2017
<b>Conservation Area:</b> NO	<b>Listed Building:</b> Grade II*

### Summary

Planning permission and listed building consent are sought for the erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use. This report deals with the relevant considerations for both applications.

The proposed development would provide additional accommodation for the City Police and facilitate the rationalisation of the three existing Police stations within the City of London. The services provided by the Police Station are strategically located at this site, in close proximity the Guildhall and other City administrative provisions.

The proposal would ensure the long term use of the site and provide a building of sufficient floorspace to enable the consolidation of the critical services of the City of London Police estate within one central location.

A Statement of Need has been submitted in support of the applications setting out the reasons for the proposed future rationalisation and consolidation of the City Police facilities.

The existing building provides 12,438sq.m of floorspace (GEA), the proposed development would provide 15,335sq.m of floorspace (GEA) an increase of 2897sq.m (GEA).

Three letters of objection have been received from the Friends of City Gardens and two members of the public in relation to the protection of a pair of kestrels nesting on the building.

Historic England is concerned that the extension would cause serious harm to the aesthetic value of the building. They considered that, provided a clear justification for the Police operational needs to alter and extend the tower extension could be demonstrated, and that it was shown why other sites were not suitable to accommodate a consolidated service, this harm could be partially mitigated through carefully detailed design.

The Twentieth Century Society objects to the proposals on the grounds that substantial harm would be caused to the Grade II\* listed building. The Society is not convinced that it has been demonstrated that the consolidation of the Police's use on this particular site has a public benefit that can outweigh this harm.

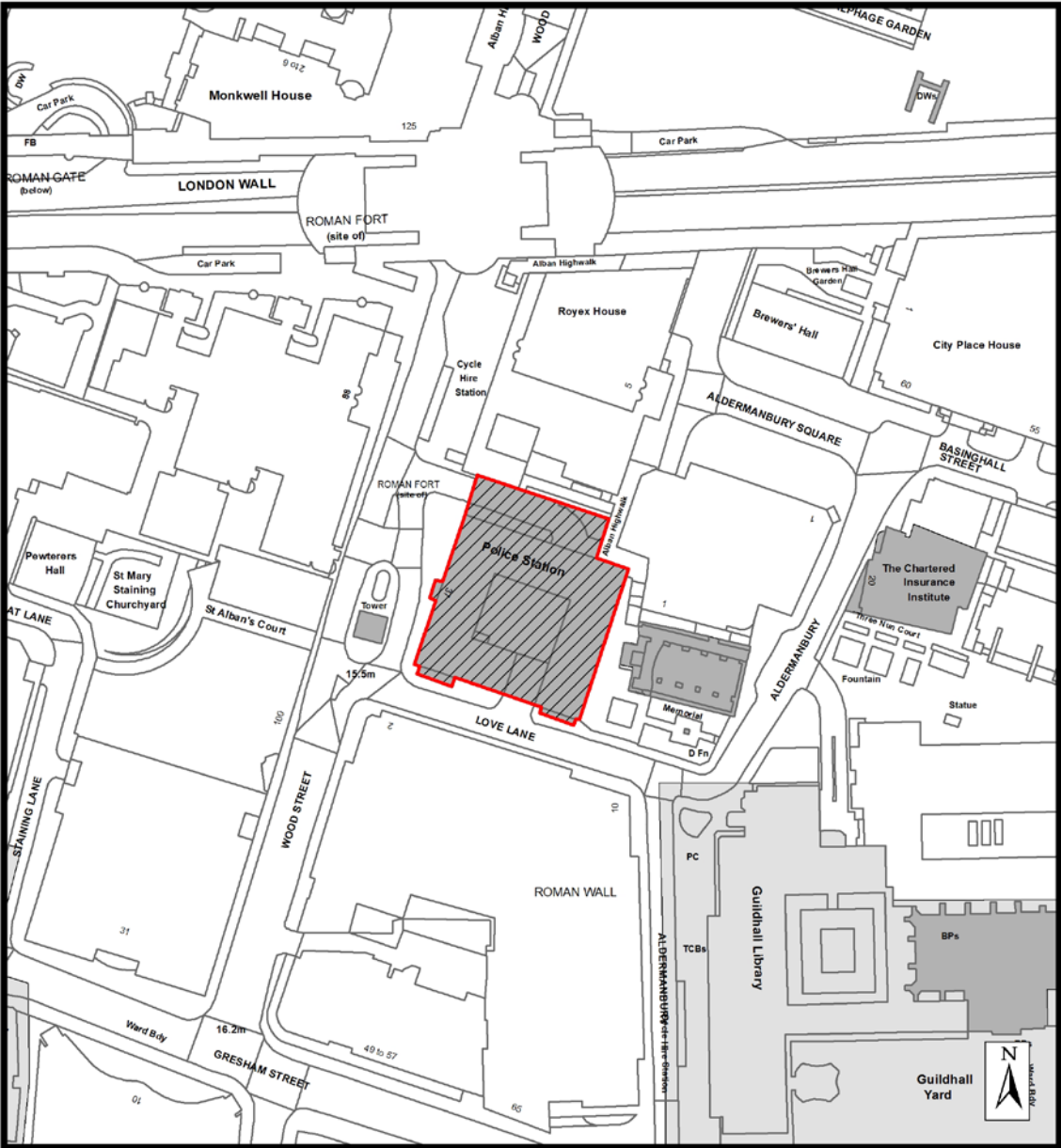
It is considered that the proposals would result in less than substantial harm to the special architectural or historic interest of the building in terms of its aesthetic significance. The harm is outweighed by the public benefits of the proposal which comprise the intensification of the use of building as the continued headquarters of the City of London Police in a form that allows local and national policing and security duties to be carried out in modern accommodation that meets current day requirements.

The National Planning Casework Unit has requested that applications sent to them for determination under Regulation 13 of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 are referred to them with an indication of what the decision of the City of London, as Local Planning Authority, would have been if it were determining the application. This applies to the listed building consent application and not the planning application.

## **Recommendation**




Planning permission be granted for the development referred to above in accordance with the details set out on the attached schedule.

# Site Location Plan



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ADDRESS:  
Police Station, Wood Street

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

CASE No.  
17/00130/FULL &  
17/00131/LBC



DEPARTMENT OF THE BUILT ENVIRONMENT



## **Main Report**

### **Site**

1. 37 Wood Street is owned by the City of London Corporation. The building was completed by architects McMorran and Whitby in 1966 as the City of London Police Headquarters. On 24 April 1998 the building was listed, Grade II\*. The City of London Police occupies the whole building. The building comprises a perimeter block wrapping around the central courtyard with three wings of four storeys' and a tower to the north-east of 13 storeys, constructed of Portland Stone.
2. The site is bounded by Wood Street to the west, Love Lane to the south, St Mary Aldermanbury Garden to the east and Aldermanbury Square further north beyond the adjacent building.
3. The vehicular access to the site is off Wood Street via a ramp that continues to the lower basement level. Pedestrian access is off Wood Street and centred on the primary elevation.
4. The Grade II\* listed St. Alban Tower, 35 Wood Street is adjacent to the site. St. Mary Aldermanbury Garden which contains the footings of the former Church of St Mary the Virgin, and the Monument to John Heminge & Henry Condell both of which are listed Grade II, is located to the east.
5. The building is not in a conservation area.

### **Proposals**

6. Planning permission and listed building consent are sought for the erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use. This report deals with the relevant considerations for both applications.
7. The proposed development would provide additional accommodation for the City Police and facilitate the rationalisation of the three existing Police stations within the City of London. The services provided by the Police Station are strategically located at this site, in close proximity the Guildhall and other City administrative provisions.
8. The proposal would ensure the long term use of the site and provide a building of sufficient floorspace to enable the consolidation of the critical services of the City of London Police estate within one central location.
9. A Statement of Need has been submitted in support of the applications setting out the reasons for the proposed future rationalisation and consolidation of the City Police facilities.

10. The existing building provides 12,438sq.m of floorspace (GEA), the proposed development would provide 15,335sq.m of floorspace (GEA) an increase of 2897sq.m (GEA).
11. The National Planning Casework Unit has requested that applications sent to them for determination under Regulation 13 of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 are referred to them with an indication of what the decision of the City of London, as Local Planning Authority, would have been if it were determining the application. This applies to the listed building consent application and not the planning application.

### **Consultations**

12. The views of other City of London departments have been taken into account in the consideration of this scheme.
13. Following receipt of the planning application and listed building consent the applications were advertised in the press, site notices were put up on the site, and statutory and non-statutory bodies were consulted.
14. Thames Water advises they have no objections to the proposals.
15. Historic England advise that the building is one of London's finest post-war classical buildings and although the interior of the building is generally of a much lower quality than the exterior, some interesting spaces survive, including some high quality communal rooms (Rolfe Hall and the Wakefield Mess), good staircases, and barrel-vaulted ceilings in the section house tower. Historic England supports the principal of retaining the building as a working police station and acknowledges that many of the elements of the proposals would result in little or no harm – or indeed enhancement – to the significance of the building. The principal issue for consideration (by HE) is the proposed tower. HE considers that the extension would cause serious harm to the aesthetic value of the building because it damages the original, very carefully considered, architectural composition of the building complex. However, following discussion of the proposals at pre-application stage with the architects, HE considered that, provided a clear justification for the Police's operational needs to alter and extend the tower extension could be demonstrated, and that it was shown why other sites were not suitable to accommodate a consolidated service, harm to the appearance of the tower could be partially mitigated through carefully detailed design which the applicant has sought to address.
16. Three letters of objection have been received from the Friends of City Gardens and two members of the public in relation to the protection of a pair of kestrels nesting on the building.
17. The Twentieth Century Society objects to the proposals on the grounds that substantial harm would be caused to the Grade II\* listed building. The Society is not convinced that it has been demonstrated that the consolidation of the Police's use on this particular site has a public benefit that can outweigh this harm.

18. Copies of the representations are appended in date order to this report, and should be referred to in order to appreciate the full extent of the points raised.

### **Policy Context**

19. 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.
20. Government Guidance is contained in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

### **Considerations**

21. The Corporation, in determining the planning application has the following main statutory duties to perform:-
22. To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
23. 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).
24. In considering whether to grant planning permission or listed building consent 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); the effect of the duties imposed by section 66(1) is to require decision-makers to give considerable weight and importance to the desirability of preserving the special architectural and historic interest of the listed building.
25. In considering the applications for planning permission and listed building consent 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.

### **Principal Issues**

26. The principal issues in considering this application are:
  - The extent to which the proposals comply with Government policy advice (NPPF).
  - The extent to which the proposals comply with the relevant policies of the Development Plan.



- The impact of the proposal on heritage assets.
- The need for the proposed rationalisation and consolidation of the City Police facilities on this site.

## **Heritage Considerations**

### **Identification of Heritage Assets and their significance**

27. Paragraph 129 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including the setting of any asset). The assessment of significance should be taken into account when considering the impact of a proposal.
28. The designated heritage assets of relevance in the consideration of this case are Wood Street Police Station, as well as the setting of: the Grade II\* listed tower of the former Church of St Alban Wood Street, the Grade II listed footings of the former Church of St Mary the Virgin, and the Grade II Listed Monument to John Heminge & Henry Condell within the former Churchyard of Church of St Mary Aldermanbury.
29. Wood Street Police Station was designed by Donald McMorran, a noted British architect practicing in the immediate post-war period. The particular interest of Wood Street Police Station is its refined neo-classical appearance, characteristic of the McMorran & Whitby practice, applied to a highly unusual pairing of a four storey palazzo element with a tower. The building is a very individual response to the prevailing international style of modern architecture that was being constructed across the country and particularly in the City in the late 1950s and early 1960s. The building is solely occupied by the City of London Police and contains offices, a custody suite, and stables for the police's Mounted Division, car parking, sports facilities and two principal rooms - the Rolfe Hall, and the Wakefield Mess.
30. The nearby heritage assets of the tower of the former Church of St Alban's in Wood Street, the footings of the former Church of St Mary the Virgin, and the monument to John Heminge & Henry Condell within the former Churchyard of Church of St Mary Aldermanbury, are all located adjacent to Wood Street Police Station which forms part of their immediate setting.
31. The City Police wish to retain the building in use as a police station by bringing the building up to modern police standards and to consolidate operations onto one site by addressing existing building inefficiencies, reconfiguring accommodation areas and extending the building to provide additional floorspace.
32. The major changes proposed are:
  - Infilling the central courtyard area creating space to allow the provision of a new custody suite at ground floor level, the creation of new circulation spaces around the building to address the current sequential circulation routes, providing additional floorspace lit by a

central atrium.

- Utilising the two existing basement levels currently in car park use as additional office or support functions. The atrium to the courtyard infill block would bring daylight down to these levels.
- The provision of a new tower on the site of the basement car park access ramp against the northern face of the existing tower. The extension would connect into and extend the existing narrow and inefficient floor areas of the existing tower and would rise from below ground up to Level 8, with plant accommodation above. The new tower element would have a significant impact on the external appearance of the building.

### **Heritage Policies**

33. Policy 7.8 of the Mayor's London Plan states that "Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail." Paragraph 7.31A of the supporting text states "Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits."
34. Policy CS12 of the Local Plan seeks to conserve or enhance the significance of the City's heritage assets and their settings by: safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.
35. Policy DM12.1 of the Local Plan relates to managing change affecting all heritage assets and ensuring that the proposals sustain and enhance heritage assets, their settings and significance. Policy DM12.3 relates to listed buildings and seeks to ensure that listed building consent is granted for the alteration of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. Furthermore that "Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings". (12.1.4)
36. Chapter 12 of the NPPF is relevant in this instance as it sets out key policy considerations for applications relating to designated heritage assets. Other relevant guidance is provided by Historic England including the documents Conservation Principles, Good Practice Advice Notes, including Note 3 - The Setting of Heritage Assets and Building in Context (HE/CABE).

37. The NPPF defines a heritage asset as “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.” Wood Street Police Station is Grade II\* Listed, a designation applied only to “particularly important buildings of more than special interest”.
38. Paragraph 134 of the NPPF states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use”.

**Extent to which the proposed development complies with the heritage policies of Development Plan**

39. The proposal has been assessed in relation to the relevant heritage policies of the London Plan and Local Plan. The proposed extensions and internal alterations to Wood Street Police Station would be of a high quality and sympathetic to the building in terms of form, materials, and appearance but would cause a degree of harm to the building. This harm would result from: Infilling the central courtyard area and creating new additional floorspace lit by a central atrium which would introduce significant changes to the building’s floorplan and circulation routes and would result in the loss of original fabric, and; the provision of a new tower against the northern face of the original tower element would significantly change the external appearance of the building. This harm is considered in the overall context of the scheme as set out below.

**Impact on the setting and significance of listed buildings**

40. The element of the proposals that would potentially have an impact on the three nearby listed buildings is the new tower extension on the north side of the building’s existing tower. The church tower of the former Church of St Alban’s in Wood Street is located in the centre of Wood Street adjacent to the south west corner of the police station building. The police station tower extension would be visible from only a short stretch of Wood Street, further north. There is, only one location from where the new police station tower and the listed church tower could be seen at the same time. In views from this location the new tower element would not be harmful to the setting to the listed church tower.
41. The proposals would not be harmful to the settings of the remains of the former Church of St Mary the Virgin, or the monument to John Heminge & Henry Condell within the former Churchyard of Church of St Mary Aldermanbury, as these two structures are located immediately east of Wood Street Police Station and none of the changes to the building would be apparent within their setting.

## **DESIGN**

### **Design policies**

42. Policy 7.4 of the London Plan states that “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.” Policy CS12 of the Local Plan sets out the City’s design policies: “To promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City...” and seeks to ensure that “...bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.” Whilst “Encouraging design solutions that make effective use of limited land resources. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces.”
43. Paragraph 3.10.8 “In assessing development schemes detailed consideration will be given to the bulk and massing and special characteristics of their locality. All development proposals are expected to have a high standard of design and detailing”. 3.10.13 “The design and execution of extensions and alterations to buildings, such as entrances and windows, are of considerable importance since they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated with the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building”.
44. Chapter 14 of the NPPF sets out the key policy considerations in relation to design. Paragraph 60 states “Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.”
45. NPPF paragraphs 63 and 64 state that “In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.” and “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

### **Extent to which the proposed development complies with the design policies of the Development Plan and NPPF Guidance**

46. The proposal has been assessed in relation to the relevant design policies of the London Plan and Local Plan and guidance in the NPPF. It is considered that the design of the proposed development would be high quality and although it introduces a significant degree of change to

the building, it also seeks to retain and enhance aspects of key significance.

47. At the outset of the project the building was carefully assessed to establish which elements of the structure were deemed to be of high, medium and low significance with the aim of minimising the impact of the proposals to radically update the building to meet the current accommodation requirements of the City Police. The areas identified as having particularly high importance are: the building's external envelope and massing composition, the main stair, the main reception area, the cell block, Rolfe Hall, the secondary stair and lobby to the Assembly Hall, the Wakefield Mess, and Levels 10, 11 and 12 as examples of the hierarchy of living accommodation provided. With the exception of the overall massing composition, these areas would be retained or refurbished in the proposals. Details of the principal changes are as follows:
48. Courtyard Infill. The central courtyard is an area of low significance and was originally designed to provide space for the preparation and mounting of police horses stabled in the building. The police horses will no longer be stabled on site and its function is therefore largely redundant. The courtyard provides an opportunity to expand the building whilst projecting natural light deep into the building through a glazed atrium. The provision of a new custody suite is fundamental to the continued use of the building as an operational police station. The existing cells do not meet current standards, due to restrictions imposed by Home Office standards and have to be replaced to sustain the long term use of the building as an operational police station. It has been established that a new and compliant custody suite can only be achieved by utilising the central courtyard space. The infill enables the existing constrained sequential circulation routes to be augmented. The courtyard infill structure would be effectively free-standing providing open plan accommodation from ground level to level three. The building's existing walls to the courtyard would be retained and existing external finishes would become internal walls, the new infill space being entered via enlarged window openings.
49. New Tower Extension. The relatively recent construction of the tall building at 5 Aldermanbury, immediately adjacent to the site has restricted views of the northern facades of the police station, whereby these parts of the building are visible in oblique views only from directly opposite 5 Aldermanbury and from the pedestrian route below the building. For this reason the northern facade of the existing tower has been selected as the most appropriate location for a major extension.
50. The present tower was constructed for residential use (police section house) and has a small footprint. Today the tower spaces are generally used for offices resulting in inefficient layouts that do not meet current needs. The extension would be located above the car park ramp with its western face in line with the west face of the tower. The height and massing of the proposed extension has been designed following a detailed examination of the proportions of the existing building. In order

to minimise the risk of harm to the existing building the extension has been designed to be deferential to the original design. The height has been designed to ensure that the needs of the police are met but the extension remains largely concealed from view. The extension would be separated from the tower by a glazed link to clearly differentiate it and ensure it reads as a subservient addition to the McMorran and Whitby composition.

51. The grid of the tower has been generated by the size and detailing of the fenestration and the vertical subdivision of alternate storey heights. Facing materials for the extension would be buff coloured brick with stone which references the material of the internal courtyard and which clearly contrasts with the Portland stone of the original tower. When viewed externally the extension would rise from a Portland Stone plinth. The proportion and grid of the tower's original fenestration is drawn through the extension to be repeated on its external facade. Larger height windows at the base and top of the tower, the centrally aligned fenestration on the east and west facades and the masonry detailing are all derived from the language and detailing on the original tower.
52. From the restricted area within Wood Street from which the tower would be visible the extension would be seen to rise above the building's existing rusticated base and vehicle entrance archways, becoming visible at Level 02. The new tower would rise to Level 09 with open plant above. Internally the new floor areas, accessed via enlarged window openings, would combine, via the glazed link, with the existing tower floors which would have their existing partitions removed, to provide two large open plan areas per floor. The existing tower walls enclosed by the glazed link would be retained and existing external finishes would become internal walls.
53. Basement Conversion. The building's two basement levels are large but are currently underused. Existing areas such as squash courts are no longer used for their original function and the Police do not require the same level of on-site parking. The atrium within the courtyard infill provides an opportunity to bring additional natural light down to the basement levels. It is intended that these areas are used for office or other support functions.
54. Other Internal Areas. The stable block, characterised by its white glazed brick interior, forms an important element connected to the past operation of the police station. The stable area would be retained with minimal changes and utilised for secure storage and archive facilities.
55. Within the building, Rolfe Hall and the Wakefield Mess, congregational and social spaces respectively, have undergone only a moderate degree of change since the building opened. These rooms will be retained and sympathetically refurbished to return them largely to their original appearance.
56. The public reception, principal stairs, secondary stairs and associated foyers, the remaining residential floors within the tower, and other areas

identified as having high significance will be retained and sympathetically refurbished.

57. Windows. The fenestration to Wood Street Police Station comprises the original single glazed windows in timber frames. They are predominantly vertical sliding sashes with centre pivot sashes onto circulation areas. The majority of windows have received retro fitted methods for protection against blast and overlooking from adjacent buildings. The methods employed to date do not meet the required standards for a modern police station operating under current threat levels. The existing frames and glass cannot accept the level of modification required to strengthen and re-glaze to a suitable standard.
58. It is proposed to retain and refurbish existing windows where they face into internal spaces. However, where windows are externally facing, it is proposed to remove the existing window frames and replace them with a wood faced aluminium framed specialist window system. This would ensure the windows would be suitable for preventing injury to occupants from bomb blast and forced entry through the use of laminated glazing, frame composition and fixing back to the surrounding structure. Details of these replacement windows would be conditioned to ensure that the appearance of any replacement windows would be substantively similar to the existing window designs.

### **Impact on Heritage Significance**

59. The proposed development has been designed to meet the current and future needs of the City Police. The proposed works within the courtyard and basement would not be visible from the surrounding streets. The external visual impact is limited to the new tower element visible from limited areas from Wood Street and Aldermanbury Place. Where it is visible, the new tower is of a form and massing that is subservient to the historical massing and has been designed to reflect the scale and proportions of the existing building whilst being clearly identifiable as a more recent intervention. Careful consideration has been given to the form and massing of the extension and the window proportions are derived from the rhythm of the existing facades. The vertical glazed slot provides a visual break between the new building and the historical facade enabling the original Portland stone facade to be clearly visible. Internal spaces have been carefully assessed to ensure that the areas of key significance have been retained.
60. Historic England's Conservation Principles document sets out a method for assessing systematically and consistently the heritage values that can be ascribed to a place by grouping them into four categories: Evidential value: the potential of a place to yield evidence about past human activity. Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present. Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place. And, Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

61. The building is perhaps the most notable designed by McMorran and Whitby and is of considerable aesthetic value for its connection with this practice. Despite the careful consideration given to the design and massing of the new tower extension, McMorran and Whitby's unique pairing of palazzo and tower elements would inevitably be compromised. The building has been relatively little altered since its construction and the proposals would lead to considerable internal change and loss of original fabric and so evidential value. However, the scheme results in the areas of least significance being the most altered. The building has considerable historic and communal value. The retention of the building as an operational police station and the retention and refurbishment of its key internal spaces retains the building's historic and communal value.
62. The building does have a truly singular appearance and form that is recognised as part of its Grade II\* listing. The proposals, due to their impact on the appearance of the building, the loss of original fabric, and the radical change to the internal floorplan and form of the accommodation, will result in harm to the building. However, there are elements of the proposals that would be of benefit to the building, for example; the refurbishment of the most significant of its internal spaces for example, the fact that its characteristic appearance and overall palazzo and tower form will still be clearly recognisable, and that its historic and communal value will be largely retained through it remaining in uses as an operational Police Headquarters building. The new extension would only be visible from a strictly limited area. These factors combined with the care and attention that has been given to the design of the new tower extension mean that although there will be harm to the heritage significance of Wood Street police station, this is considered to be less than substantial harm.
63. Paragraph 134 of the NPPF states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use".

### **Public Benefit**

64. The public benefits arising from the proposal have been set out in the document "Wood Street Police Station Operational Justification" set out below:  
***"Introduction***
65. *The redevelopment proposals for Wood Street Police Station are at the heart of establishing a new era for the City of London Police, its operational policing environment and the way it delivers its services to the public for the foreseeable future.*
66. *Without the successful delivery of transforming Wood Street Police Station into a modern, 21st Century operating facility, the City of London is at serious risk of increasing crime and threat from terrorist-related*



activities. The outcome being the City of London Police failing in its duty to protect the local community and the City's global status suffering. Failure to deliver the estate as now planned will severely impact upon the Force's ability to provide adequate policing within the city from a central location. Not only will there be a bigger crime response time, but a reputational damage to the Force.

67. This Operational Justification Statement sets out the City of London Police's reasons for why the proposed Wood Street Police Station redevelopment must be delivered. It explains the need behind the proposal, what the current operational situation is, the consideration of alternative sites in arriving at the Wood Street location, the proposal itself and finally the operational justification for the scheme.
68. This statement supports the detailed planning and listed building consent application and is to be used by the City of London Planning Authority in forming a balanced judgement against the proposal's potential impact on receptors such as the building's Grade II\* listed building status.

### **The Need for Redeveloping Wood Street Police Station**

69. Wood Street was designed and built in the 1960s as a police station. It has historically served as the Force Headquarters and provides a central location from which to police the City. The history and legacy of the building is important to the City of London Police and we are keen to remain at this site. However, the intended function of a police station in the 1960s focused on public access and as a place for the public to request assistance in person. Officers also attended these stations to parade prior to deployment and used them as a base for report writing and completion of notes. Wood Street is no longer fit for the purpose it was designed.
70. The police station was designed to serve the needs of the City of London Police and the City community almost 60 years ago. Today's Force operates within a different policing model, has significant national policing commitments and has to keep pace with new and evolving crime trends and security threats. The Force is also subject to the requirements and recommendations of a variety of external agencies including the Home Office, Her Majesty's Inspectorate of Constabulary and the Security Services.
71. A modern, 21st century police station is no longer seen as a focal point of physical access, neither does it provide local overnight sleeping accommodation as was previously built into the facility. The public engage with a modern Force in a variety of different ways now, including telephony and IT internet access. Officers require portable modern mobile technology at all times, whether on their person or in their vehicles, and this has to maintain a resilient and reliable connection back to a command and control centre to respond with appropriate resources as required. Our future facilities need to be the technological base of our operations, with sophisticated communication links to front-line officers, serious crime investigation units, forensics and a 'state of the art' custody environment.

72. *These requirements relate not only to standards around the delivery of local policing services and the physical security requirements of its police estate, but also to the Force's fulfilment of its national policing obligations - in areas such as anti-terrorism, public order and civil contingencies.*
73. *The City of London Police needs to operate within a sustainable and secure environment that can meet the future needs of, the requirements placed upon, and the threats faced by an operational police force from 2017 onwards. Some of the key objectives from the City of London Policing Plan include:*
- *The identified priorities for the Police accommodation review*
  - *Protecting our communities from terrorism or serious harm*
  - *Protecting the City of London and the UK from fraud*
  - *Responding to the business and resident community*
  - *Providing excellent value for money*
74. *The need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create is a material planning consideration which should weigh in favour in finding support for the proposed planning and listed building consent application.*

#### **Current Situation**

75. *The existing estate comprises three buildings spread across the City and one newer building within the Guildhall complex that was refurbished in 2014. The original three buildings are now not fit for purpose and this is placing the Force at risk.*
76. *The reasons for each of the three sites not being fit for purpose are as follow:*
1. *Bishopsgate*  
*Bishopsgate is located at the eastern end of the city and is limited in its operational capabilities. Lack of Policing and operational deployment from this site is seriously restrictive.*
  2. *New Street*  
*New Street is a leased office facility and not fit for purpose for City of London Police operations.*
  3. *Snow Hill*  
*Snow Hill is too small a facility for City of London operations with no vehicle parking available for the operational fleet.*

#### **Alternative Sites**

77. *In coming to the position that Wood Street Police Station presents the best option for delivering the City of London Police's operational requirements in the future, alternative options were considered. This was undertaken through an assessment of sites that are in the City of*

*London's ownership and sites that are not In the City of London's ownership but could accommodate the proposal. The findings are documented in Appendix A.*

- 78. The focus of the assessment was opportunities that the City already owns as this has the advantage that the building assets are within the City's control and so there is a far greater likelihood of successful delivery. Such sites are limited to only the Barbican Centre Exhibition Halls I and II, and Walbrook Wharf.*
- 79. The redevelopment of the Barbican Exhibition Centre Halls could deliver 81,355sqft. However, vertical extensions would be required to what is a Grade II Listed Building causing heritage impacts as well as potentially impacting the amenity of residents in this location. Other constraints would be a shortfall in floorspace and spreading across two buildings while there would also be a loss of valuable exhibition space. The site would present a much more constrained option than Wood Street.*
- 80. At 22,500sqft, Walbrook Wharf would only be able to accommodate a small proportion of the City of London Police's facilities, made more difficult by complex departmental space efficiency requirements. This option would clearly fail to meet the objective to locate facilities in a single place.*
- 81. In terms of sites outside of the control of the City of London, more than 100 live and expected planning applications and developments were reviewed. This number was reduced to some 20 sites' potential being assessed. All sites were discounted for various reasons, which are summarised as:*
  - Lack of floorspace capacity;*
  - Land assembly and transaction complexities;*
  - Longevity of existing leases;*
  - Land and building values;*
  - Poor location - periphery of the City;*
  - Viability posed by site constraints;*
  - Length of time to deliver site;*
- 82. Further to the list of reasons, the City does not control these assets and as such the likelihood of delivery is compromised. Likewise, it is also recognised that the City of London Police are not considered a 'good neighbour' for City occupiers and businesses and as such developers will not willingly consider allocating part of their investment schemes to the Force.*
- 83. The assessment concluded that:*
  - There are no alternative buildings in the City that can realistically accommodate the entire uniform and operational headquarter functions of the City of London Police;*
  - Creating the new Home Office compliant custody suite, but not*

*building the new tower extension above results in specialist Police functions being located elsewhere which significantly impacts the operational effectiveness of the City of London Police; and*

- *The new tower extension, as proposed, is an essential requirement to provide additional floor area and a modern fit for purpose headquarter building for the City of London Police.*
84. *Our priority must be the co-location and consolidation of operational areas within a central site. Out of the buildings in the existing estate, Wood Street is geographically clearly the prime location for the deployment and response of operational teams. Utilising alternative sites would cause the Force Headquarters to be located at the extreme west or east of the City. Operationally, that has been determined as too great a risk to the Force. S Operational Justification - Redevelopment of Wood Street.*

#### **Operational Justification – Redevelopment of Wood Street**

85. *The redevelopment proposals for Wood Street Police Station are at the heart of establishing a new era for the City of London Police, its operational policing environment and the way it delivers its services to the public for the foreseeable future.*
86. *Without the successful delivery of transforming Wood Street Police Station Into a modern, 21st Century operating facility, the City of London is at serious risk of increasing crime and threat from terrorist and other related activities. The outcome being the City of London Police failing in its duty to protect the local community with the City's global status suffering. Failure to deliver the estate as now planned will severely impact upon the Forces ability to provide adequate policing within the city from a central location. Not only will there be a bigger crime response time, but a reputational damage to the Force.*
87. *The expansion of Wood Street police station will enable the delivery of far more effective policing services within the City of London. Wood Street will represent an Iconic but, more importantly, central, secure facility in which to base all police operations. Police Forces face significant budget challenges for the foreseeable future and the ability to integrate operational teams and share resources across the Force will be greatly enhanced by locating all our key essential services in a central operational base. It will enable enhanced and more efficient sharing of knowledge, skills and expertise across policing functions that will improve how we work. That can only be achieved by consolidating our key operational teams working adjacently within one central core and safe location.*
88. *By providing policing services not from several localised and out-dated sites, but from a centrally located, modern police station, equipped with the latest technology and facilities and complying with existing standards, the City of London Police would be better placed to meet its policing requirements, provide a more positive working environment for its officers and staff, and deliver its vision of providing a world-class service to the public and the City.*

89. *Failure to expand the facility as proposed will place risks upon the Force that could result in another review of the proposals. Without the expansion and flexibility to integrate our operations within this site, we have to consider the alternative that the Force could not remain within the facility; it would simply not provide us with the necessary development space for our future operational requirements.*
90. *The basis for redeveloping the Wood Street site is that it is already recognised as the headquarters of the City of London Police. It sits at the heart of the 'square mile' and it is operationally critical that geographically our headquarters is positioned in this location to enable quick operational deployment to all parts of the City, within a cohesive command and control structure.*
91. *Since the original submission of the concept plans, further detailed work I evaluation of the designs has determined that the additional space is vital for the future operation of the Force within Wood Street. Without this additional space, the City of London Police would be faced with the decision that the proposals to expand the site are not sufficient and would compromise the Force beyond the possible tolerance level for modern policing. Thus, the need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create.*

#### **Planning Application Proposals**

92. *The planning and listed building consent application has been prepared following extensive consultation with the City of London Planning, Design, Conservation and Highways Officers, with technical specialists at Historic England and a range of other key stakeholders. This has also included a detailed space planning exercise by the Force themselves to evaluate and justify the proposed scheme.*
93. *The proposal has been driven by key fundamental requirements for the future estate, which include:*
  - *More efficient service models*
  - *Modern estate - sustainable for next 30+ years*
  - *Operational resilience for the Force*
  - *Robust and flexible I.T. infrastructure*
  - *Links to local and national Policing objectives*
94. *The main operational benefits and impact upon the space planning for the Wood Street facility have included:*
  - *Operational benefits for the safety and security of the City of London*
  - *Increased police presence and visibility, including more patrols within the City*
  - *Improved prisoner handling due to adjacently located operational teams within the new Wood Street design*

- *Improved 'business continuity' through fit-for-purpose, modern and secure headquarters*
  - *Relocation of key City of London Police resources within a centrally located position within the City*
  - *Relocation of the Force's vehicle fleet to London Wall to support operational deployments from the new Wood Street facility, improving officer access and response times*
  - *Co-location of front-line officers, community officers and CID -this will lead to improvements in response times, prisoner handling and overall efficiency*
  - *Establishing a central base for City of London officers to operate from will increase our mobilisation of front-line officers, including greater visibility of the streets*
  - *Enhanced / more immediate command and control availability in dealing with major incidents and terrorism*
  - *Responding to the current national threat levels that exist in relation to police forces and their respective officers and staff by providing secure operating facilities within one core building*
  - *Relocating the Joint Control / Contact Centre of the City of London Police and City of London Corporation into one secure operating area within the Wood Street design*
  - *Providing a safe and resilient base for response to any major incidents within the City from a core and secure location*
  - *More effective policing and prisoner handling with resources contained within one central site. Enhanced prisoner cell space within the new design will retain officers within the City of London Corporation footprint, thus reducing abstractions from front line operations and officer availability for local policing*
  - *Reduction in the national threats currently faced by City of London Police officers / staff by securely locating all operational teams within one central / secure location*
  - *Supporting our local and national terrorism and threat response and intelligence function by relocating operational response areas to a secure facility*
  - *Providing a modern, highly secure police building that meets the current standards of security requirements for the Force to operate from.*
95. *Plans have been carefully prepared for a comprehensive redevelopment including a new tower, infilling of the courtyard and lower levels within the building to create much needed*

### **Conclusion**

96. *In conclusion, Wood Street was designed to serve the needs of the City of London Police and the City community almost 60 years ago. Today's*

*Force operates within a different policing model, has significant national policing commitments and must keep pace with new and evolving crime trends and security threats. The Force is also subject to the requirements and recommendations of a variety of external agencies including the Home Office, Her Majesty's Inspectorate of Constabulary and the Security Services. The City of London Police engage with a number of national and international agencies. With the changing pace of modern policing, there are a number of urgent deadlines and requirements that must be completed with. Failure to do so will significantly impact upon the overall performance of the Force and severely damage our reputation in national policing.*

97. *The need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create is a material planning consideration which should weigh in favour in finding support for the proposed planning and listed building consent application.*
98. *This statement has demonstrated that any perceived harm to the listed building or loss of fabric is necessary to achieve the substantial public benefits that outweigh this perceived harm or loss and the planning application should be supported."*

### **Energy and sustainability**

99. The NPPF, London Plan and Local Plan seek to ensure that sustainability is integrated into designs for all developments.
100. The London Plan requires an assessment of the energy demand that demonstrates the steps taken to apply the Mayor's energy hierarchy to achieve carbon reductions and to use renewable energy sources.  
London
101. Plan policy requires non domestic buildings to achieve a 35% carbon emissions reduction over Part L (2013) of the Building Regulations. Policy CS15 of the Local Plan supports this approach.
102. An energy statement has been submitted in relation to the new build element of the proposed development. Energy consumption reduction would be achieved by design features and the use of energy efficient building measures. The building is currently connected to the Citigen district heating network (DHN), and it is proposed to maintain this connection.
103. The reduction in carbon emissions with the proposed energy efficient measures in place would result in a 53.9% carbon saving which exceeds the target set by the Mayor.
104. A BREEAM pre-assessment has been submitted which demonstrates the refurbishment and extension of the existing building would achieve a 'very good' rating. Policy CS15 has not been complied with and a condition is recommended for further details of a BREEAM assessment

to be submitted prior to demolition to demonstrate how an 'Excellent' rating could be achieved.

105. Two areas of green roof would be provided on the building. These would be extensive roofs providing the benefits of rainwater management and bio-diversity.

### **Access**

106. The existing pedestrian and vehicle access points to the site would be retained as existing. Access to the main entrance would be via the existing pedestrian ramp.
107. The accessibility of the building would be improved; all areas of the building will become fully accessible. The courtyard infill rationalises the internal circulation and removes the change in level which currently exists between the parts of the building which are accessed via the external courtyard. New lifts are to be installed which would be fully accessible and DDA compliant toilet facilities would be provided on all floors of the building.

### **Daylight & Sunlight**

108. A letter prepared by Delva Patman Redler has been submitted in support of this application which advises that there would be no material impact in daylight, sunlight and overshadowing of the nearby St. Alban Tower, or the St. Mary Aldermanbury Garden.

### **Transport, Servicing & Parking**

109. The existing police station is serviced partly from the courtyard and partly from the basement. It is proposed that in the new arrangement servicing would be from the street. This would increase the servicing on the surrounding streets but it is not clear by how much. The police have advised that the volume and nature of deliveries are confidential information for security purposes which would make a condition on a servicing and management plan unacceptable to them. On street servicing would normally be contrary to adopted planning policy DM 16.5, which sets out that "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". The proposed arrangement is necessary to deliver the floorspace requirements of the City of London Police.
110. The existing police station provides 75 car parking spaces, 8 motor cycle parking spaces and some cycle parking within the basement. The proposed scheme provides 17 car parking spaces and 8 motor cycle parking spaces. 153 cycle spaces are provided at basement level and this is in compliance with the London Plan and is conditioned.



111. The scheme results in a displacement of 58 car parking spaces from the building, it proposed that these spaces would be located within the police car parking areas of London Wall Car Park as part of the 80 spaces granted planning permission on 1 June 2017. To ensure that London Wall Car park is available to house the vehicles displaced from Wood Street Police Station a condition has been applied requiring this parking to be available before the proposed development is occupied.

### **Archaeology**

112. The site is in an area of significant archaeological potential, located within the Roman and medieval City Wall and the Roman fort. Investigations in the area have recorded Roman and medieval remains including Roman Cripplegate Fort, Medieval Alban's Church and evidence of medieval occupation.
113. The building has a double basement which extends across the entire site. The construction of this basement in the 1960s is likely to have removed all archaeological deposits and structures across the site, with the exception of any deeply cut features. The existing basements would be adapted but not extended. Due to the proposed construction of the new tower, sub-structure groundworks are likely to be required. The proposed development would have an impact on any archaeological remains and a condition is recommended to cover a programme of archaeological work and foundation design.

### **Security**

114. The threat to the City of London Police is considerable and complex with the existing location and constraints of the Wood Street Police Station adding to the challenges. The City of London Police's Counter Terrorism Unit have carried out a thorough review of the site and proposals, however the details of the measures to be implemented are not appropriate for the public domain. Any external or internal alterations required to the building, as a result of security measures proposed, may require separate applications for planning permission and listed building consent.

### **Representations**

115. Three letters of objection have been received from the Friends of City Gardens and two members of the public in relation to the protection of a pair of nesting kestrels on the building.
116. The 2015 and 2016 London bird reports indicate a pair of kestrels has been breeding on the site for a number of years. The applicant has agreed to a condition requiring the submission of an ecology assessment detailing measures to protect the pair of kestrels prior to demolition and construction works commencing.

117. The Twentieth Century Society have objected to the proposals on the basis that;
- i) No conservation management plan was in place prior to the proposals being developed which would have ensured a conservation led approach to the project.
  - ii) The proposed alterations would lead to substantial harm as; the new tower extension would substantially harm the composition of the built ensemble of the buildings, loss of the courtyard would be damaging in terms of the loss of the void/solid relationship, the conversion to open-plan offices would serve to increase the level of harm overall, and that the original timber windows would be replaced.
  - iii) The potential for alternative uses had not been fully explored.
118. In response to these points the applicant's submission material provides the following responses:
119. As a conservation management plan was not in place for the building, a comprehensive Statement of Significance was prepared to provide a detailed assessment of significance which then formed the basis of the design development of the proposals.
120. As outlined earlier in this report it is acknowledged that the proposals would cause a degree of harm to the building but it is considered that the alterations would cause less than substantial harm to the building, rather than substantial harm. Paragraph 133 of the NPPF states that where a proposal will lead to substantial harm to a designated heritage asset, local planning authorities should generally refuse consent. The tests for assessing whether public benefits could outweigh the harm are more onerous.
121. The applicants have provided additional information that clarifies that the windows require replacement not for reasons of being in poor condition but to meet current security specifications.
122. The potential for alternative uses has not been fully explored. The City of London Police requires the building to remain as an operational police station. The City of London Police Justification states that suitable alternative sites for the police to relocate to are not available.

### **CIL and Planning Obligations**

123. The proposed development would result in payment of the Mayoral Community Infrastructure Levy (CIL) to help fund the provision of Crossrail.
124. This contribution would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

125. The Mayoral CIL is payable as follows:

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	£135,550	£130,128	£5,422
Administration and Monitoring Charge	£3,500	-	£3,500
<b>Total liability in accordance with the Mayor of London's policies</b>	£139,050	£130,128	£8,922

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

126. The City of London is the Freehold Owner of the building. It is not possible for the LPA to enter into the usual format of section 106 Agreement as legally it is not possible to enter into an agreement or take enforcement action should it be required where both parties are the same legal entity. In some cases it is possible to enter into a unilateral undertaking. However, where matters can be dealt with by way of condition Planning Practise Guidance advises conditions should be used, which is the case in this application.

127. The scheme is not liable for City CIL, as stated in paragraph 14 of the City of London Planning Obligations SPD; development that is used wholly or mainly for the operational purposes of the emergency services, attracts a nil rate charge. Under the City's Planning Obligations SPD and Local Plan, affordable housing, and local training and skills Section 106 contributions are required for commercial and residential development. As the use class sought for this application is sui generis, and the development is for police operational purposes, this is not "commercial" or residential development and Section 106 contributions are not required.

## **Conclusions**

128. The proposal has been assessed in accordance with the relevant statutory duties, and having regard to the development plan and other relevant policies, and relevant advice including the NPPF. The proposals would result in less than substantial harm to the special architectural or historic interest of the building in terms of its aesthetic significance. The harm is outweighed by the public benefits of the proposal which comprise the intensification of the use of building as the headquarters of the City of London Police in a form that allows local and national policing and security duties to be carried out in modern accommodation that meets current day requirements.

## **Background Papers**

### Internal

Memo 24.04.17      Department of Markets and Consumer Protection

### External

Letter 31.08.16      Spectrum  
Letter 20.02.17      WYG  
Email 29.03.17      Thames Water  
Letter 05.04.17      Heritage England  
Letter 21.04.17      Dr Charles Fentiman  
Letter 21.04.17      Friends of City Gardens  
Letter 22.04.17      Mr Kenneth Murray  
Letter 02.05.17      Twentieth Century Society

Archaeological Desk-Based Assessment prepared by CgMS Consulting  
BREEAM New Construction 2014 Pre-assessment Report prepared by WYG  
Daylight and Sunlight Review prepared by Delva Patman Redler  
Explosive Ordnance Desktop Threat Assessment prepared by Dynasafe  
Extended Phase 1 Habitat Survey prepared by WYG  
Transport Assessment prepared by WYG  
Framework Travel Plan prepared by WYG  
Acoustic Assessment prepared by Spectrum Acoustic Consultants  
Energy Statement prepared by WYG  
Geo-Environmental Study prepared by BRD  
Flood Risk Assessment & Drainage Strategy (May 2017) prepared by WYG  
Air Quality Assessment (January 2016) prepared by PBA  
Air Quality Assessment Addendum (July 2017) prepared by PBA

## **Appendix A**

### London Plan Policies

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

Policy 3.1 Protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

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 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 5.12 Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 and address flood resilient design and emergency planning; development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible be set back from those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

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

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

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

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

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

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality

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

proposal is part of a strategy that will meet the criteria set out in this policy.

Policy 7.8 of the Mayor's London Plan states that "Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail."

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

## Relevant Local Plan Policies

### ***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.

### ***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.

### ***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.

### ***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.

### ***DM12.3 Listed buildings***

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

### ***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.

## **SCHEDULE**

**APPLICATION: 17/00130/FULMAJ**

**Wood Street Police Station 37 Wood Street London**

**Erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use (Total new floorspace 2897sq.m GEA).**

## **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 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.
- 3 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved

amendments thereto as may be agreed in writing by the Local Planning Authority.

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

- 4 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.

- 5 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.

- 6 Before any works hereby permitted are begun an Air Quality Assessment, that includes an assessment as to whether the

development is air quality neutral, shall be submitted to and approved in writing by the Local Planning Authority.

(a) If the development is not at least air quality neutral, a scheme to mitigate the air quality impact of the development shall also be submitted and approved in writing by the Local Planning Authority prior to any works taking place. The mitigation scheme shall prioritise mitigation on-site unless it can be demonstrated that on-site provision is impractical or inappropriate.

(b) Prior to changes to combustion plant or process conditions detailed in the approved Air Quality Assessment taking place, details shall be submitted in writing to and approved by the Local Planning Authority.

REASON: In order to positively address local air quality, particularly nitrogen dioxide and particulates PM10 in accordance with the City of London Air Quality Strategy 2015 and the following policy of the Local Plan: DM15.6 and policies 7.14B c and d of the London Plan.

- 7 Before any works including demolition are begun an ecology assessment detailing measures to protect the pair of Kestrels that are nesting on the building must be submitted to and approved by the Local Planning Authority and carried out in accordance with the assessment. REASON: To safeguard the habitat of nesting birds in accordance with the following policies of the Local Plan: CS15, DM19.2.

- 8 A pre-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 to and approved in writing by the Local Planning Authority prior to demolition. 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.

- 9 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work. REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

- 10 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.

- 11 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.
- 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, its aims and objectives and the flow control arrangements;
    - A Maintenance Inspection Checklist/Log;
    - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.
- REASON: To 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 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
  - (b) details of the proposed new facades including typical details of the fenestration;
  - (c) details of the new glazed link structure between the existing tower and the extension;
  - (d) details of refurbishment of existing windows and details of new windows;
  - (e) details of brick detailing and stone jointing of tower extension structure;
  - (f) details of all alterations to the existing facade;
  - (g) measures to be taken during the period of demolition and construction for the protection of the trees within St. Mary Aldermanbury Garden.
  - (h) details of the integration of plant, window cleaning arrangements, flues, fire escapes and other excrescences at roof level;
  - (i) details of plant and ductwork to serve the premises.
- 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.
- 16 Prior to the occupation of the building the car parking facility at London Wall Car Park, approved on 1 July 2017, must be completed and 58 car parking spaces shall be made available for police vehicles

displaced by the proposed development and shall be maintained as such thereafter.

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: DM16.1, DM21.3.

- 17 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.  
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 18 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.
- 19 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.  
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.  
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.  
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 20 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety
- 21 The vehicular parking provided on the site must remain ancillary to the use of the building and shall be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors.  
REASON: To ensure that the parking spaces provided remain ancillary to the use of the building in accordance with the following policy of the Local Plan: DM16.5.
- 22 Three car parking spaces 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.
- 23 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 153 pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 24 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 25 An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the approved Travel Plan (or any amended Travel Plan that may be approved from time to time by the Local Planning



Authority) for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period.

REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.

- 26 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.
- 27 Provision shall be made for disabled people to obtain access to the building via the principal entrance without the need to negotiate steps and shall be maintained for the life of the building.  
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.
- 28 There must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 29 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:  
Drawing No. 014100\_P110 proposed site plan Rev A A1  
014100\_P200-3 Proposed Floor Plans Level -02 Rev B  
Drawing No. 014100\_P201-3 Proposed Floor Plans Level -01 REV B  
Drawing No. 014100\_P202-3 Proposed Floor Plans Level 00 REV C  
Drawing No. 014100\_P203-3 Proposed Floor Plans Level 01 REV B  
Drawing No. 014100\_P204-3 Proposed Floor Plans Level 02 REV B  
Drawing No. 014100\_P205-3 Proposed Floor Plans Level 03 REV B  
Drawing No. 014100\_P206-3 Proposed Floor Plans Level 04 REV B  
Drawing No. 014100\_P207-3 Proposed Floor Plans Level 05 REV B  
Drawing No. 014100\_P208-3 Proposed Floor Plans Level 06 REV B  
Drawing No. 014100\_P209-3 Proposed Floor Plans Level 07 REV B  
Drawing No. 014100\_P210-3 Proposed Floor Plans Level 08 REV B  
Drawing No. 014100\_P211-3 Proposed Floor Plans Level 09 REV B  
Drawing No. 014100\_P212-3 Proposed Floor Plans Level 10 REV B  
Drawing No. 014100\_P213-3 Proposed Floor Plans Level 11 REV B  
Drawing No. 014100\_P214-3 Proposed Floor Plans Level 12 REV B  
Drawing No. 014100\_P215-3 Proposed Floor Plans Level 13 REV B

Drawing No. 014100\_P220 Servicing & Waste Management Strategy Rev B  
 Drawing No. 014100\_P250-2 Proposed Townscape South & West Rev C  
 Drawing No. 014100\_P251-2 Proposed Townscape North & East Rev C  
 Drawing No. 014100\_P255-2 Proposed Streetscape Elevation South onto Love Lane  
 Drawing No. 014100\_P256-2 Proposed Streetscape Elevation West onto Wood Street Rev C  
 Drawing No. 014100\_P257-2 Proposed Streetscape Elevations North Rev C  
 Drawing No. 014100\_P258-2 Proposed Streetscape Elevations East Rev C  
 Drawing No. 014100\_P260-3 Proposed Elevation South onto Love Lane Rev  
 Drawing No. 014100\_P261-3 Proposed Elevation West onto Wood Street Rev C  
 Drawing No. 014100\_P262-3 Proposed Elevation North onto Aldermanbury Place Rev C  
 Drawing No. 014100\_P263-3 Proposed Elevation East onto St Mary Aldermanbury Garden Rev C  
 Drawing No. 014100\_P264-3 Proposed Courtyard Elevation Rev B  
 Drawing No. 014100\_P265-3 Proposed Courtyard Elevation Rev B  
 Drawing No. 014100\_P270-3 Section A-A Proposed Rev A  
 Drawing No. 014100\_P271-3 Section B-B Proposed Rev A  
 Drawing No. 014100\_P272-3 Section C-C Proposed Rev A  
 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 Core Strategy/ Unitary Development Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

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

- 2 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.
- 3 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 4 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

#### Noise and Dust

(a)

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

(b)

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

(c)

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

(d)

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

#### Air Quality

(e)

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

#### Boilers and CHP plant

(f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO<sub>x</sub> emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO<sub>x</sub> technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)

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

(i)

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

## Standby Generators

(j)

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

(k)

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

## Cooling Towers

(l)

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

## Noise Affecting Residential Properties

(m)

The proposed residential flats are close to busy roads and are in an existing commercial area which operates 24 hours a day. The scheme should include effective sound proofing of the windows and the provision of air conditioning or silent ventilation units to enable the occupants to keep their windows closed to benefit from the sound insulation provided. This may need additional planning permission.

(n)

The proposed residential units are located in a busy City area that operates 24 hours a day and there are existing road sweeping, deliveries, ventilation plant and refuse collection activities that go on through the night. The units need to be designed and constructed to minimize noise disturbance to the residents. This should include acoustic treatment to prevent noise and vibration transmission from all sources. Sound insulation treatment needs to be provided to the windows and either air conditioning provided or silent ventilation provided to enable the windows to be kept closed yet maintain comfortable conditions within the rooms of the flat. This may need additional planning permission.

## Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these

ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

#### Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

(r)

From the 1 July 2007, the Health Act 2006 and associated Regulations prohibited the smoking of tobacco products in all enclosed or partially enclosed premises used as workplaces or to which the public have access. All such premises are required to provide signs prescribed by Regulations. Internal rooms provided for smoking in such premises are no longer permitted. More detailed guidance is available from the Markets and Consumer Protection Department (020 7332 3630) and from the Smoke Free England website: [www.smokefreeengland.co.uk](http://www.smokefreeengland.co.uk).

- 5     You are advised that 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.
- 6     This approval relates only to the details listed above and must not be construed as approval of any other details shown on the approved drawings.

17/00130/fuc

17 MAR 2017



# Wood Street Police Station Operational Justification





<b>1</b>	<b>Introduction</b>	<b>3</b>
<b>2</b>	<b>The Need for Redeveloping Wood Street Police Station</b>	<b>3</b>
<b>3</b>	<b>Current Situation</b>	<b>5</b>
<b>4</b>	<b>Alternative Sites</b>	<b>5</b>
<b>5</b>	<b>Operational Justification – Redevelopment of Wood Street</b>	<b>7</b>
<b>6</b>	<b>Planning Application Proposals</b>	<b>8</b>
<b>7</b>	<b>Conclusion</b>	<b>10</b>

## **City of London Police**

### **Operational Justification Statement**

#### **1 Introduction**

- 1.1 The redevelopment proposals for Wood Street Police Station are at the heart of establishing a new era for the City of London Police, its operational policing environment and the way it delivers its services to the public for the foreseeable future.
- 1.2 Without the successful delivery of transforming Wood Street Police Station into a modern, 21<sup>st</sup> Century operating facility, the City of London is at serious risk of increasing crime and threat from terrorist-related activities. The outcome being the City of London Police failing in its duty to protect the local community and the City's global status suffering. Failure to deliver the estate as now planned will severely impact upon the Forces ability to provide adequate policing within the city from a central location. Not only will there be a bigger crime response time, but a reputational damage to the Force.
- 1.3 This Operational Justification Statement sets out the City of London Police's reasons for why the proposed Wood Street Police Station redevelopment must be delivered. It explains the need behind the proposal, what the current operational situation is, the consideration of alternative sites in arriving at the Wood Street location, the proposal itself and finally the operational justification for the scheme.
- 1.4 This statement supports the detailed planning and listed building consent application and is to be used by the City of London Planning Authority in forming a balanced judgement against the proposal's potential impact on receptors such as the building's Grade II\* listed building status.

#### **2 The Need for Redeveloping Wood Street Police Station**

- 2.1 Wood Street was designed and built in the 1960s as a police station. It has historically served as the Force Headquarters and provides a central location from which to police the City. The history and legacy of the building is important to the City of London Police and we are keen to remain at this site. However, the intended function of a police station in the 1960s focused on public access and as a place for the public to request assistance in person. Officers also attended these stations to parade prior to deployment and used them as a base for report writing and completion of notes. Wood Street is no longer fit for the purpose it was designed.

- 2.2 The police station was designed to serve the needs of the City of London Police and the City community almost 60 years ago. Today's Force operates within a different policing model, has significant national policing commitments and has to keep pace with new and evolving crime trends and security threats. The Force is also subject to the requirements and recommendations of a variety of external agencies including the Home Office, Her Majesty's Inspectorate of Constabulary and the Security Services.
- 2.3 A modern, 21<sup>st</sup> century police station is no longer seen as a focal point of physical access, neither does it provide local overnight sleeping accommodation as was previously built into the facility. The public engage with a modern Force in a variety of different ways now, including telephony and IT internet access. Officers require portable modern mobile technology at all times, whether on their person or in their vehicles, and this has to maintain a resilient and reliable connection back to a command and control centre to respond with appropriate resources as required. Our future facilities need to be the technological base of our operations, with sophisticated communication links to front-line officers, serious crime investigation units, forensics and a 'state of the art' custody environment.
- 2.4 These requirements relate not only to standards around the delivery of local policing services and the physical security requirements of its police estate, but also to the Force's fulfilment of its national policing obligations - in areas such as anti-terrorism, public order and civil contingencies.
- 2.5 The City of London Police needs to operate within a sustainable and secure environment that can meet the future needs of, the requirements placed upon, and the threats faced by an operational police force from 2017 onwards. Some of the key objectives from the City of London Policing Plan include:
- The identified priorities for the Police accommodation review
  - Protecting our communities from terrorism or serious harm
  - Protecting the City of London and the UK from fraud
  - Responding to the business and resident community
  - Providing excellent value for money
- 2.6 The need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create is a material planning consideration which should weigh in favour in finding support for the proposed planning and listed building consent application.

### **3 Current Situation**

- 3.1 The existing estate comprises three buildings spread across the City and one newer building within the Guildhall complex that was refurbished in 2014. The original three buildings are now not fit for purpose and this is placing the Force at risk.
- 3.2 The reasons for each of the three sites not being fit for purpose are as follow:
1. *Bishopsgate*  
Bishopsgate is located at the eastern end of the city and is limited in its operational capabilities. Lack of Policing and operational deployment from this site is seriously restrictive.
  2. *New Street*  
New Street is a leased office facility and not fit for purpose for City of London Police operations.
  3. *Snow Hill*  
Snow Hill is too small a facility for City of London operations with no vehicle parking available for the operational fleet.

### **4 Alternative Sites**

- 4.1 In coming to the position that Wood Street Police Station presents the best option for delivering the City of London Police's operational requirements in the future, alternative options were considered. This was undertaken through an assessment of sites that are in the City of London's ownership and sites that are not in the City of London's ownership but could accommodate the proposal. The findings are documented in Appendix A.
- 4.2 The focus of the assessment was opportunities that the City already owns as this has the advantage that the building assets are within the City's control and so there is a far greater likelihood of successful delivery. Such sites are limited to only the Barbican Centre Exhibition Halls I and II, and Walbrook Wharf.
- 4.3 The redevelopment of the Barbican Exhibition Centre Halls could deliver 81,355sqft. However, vertical extensions would be required to what is a Grade II Listed Building causing heritage impacts as well as potentially impacting the amenity of residents in this location. Other constraints would be a shortfall in floorspace and spreading across two building while there would also be a loss of valuable exhibition space. The site would present a much more constrained option than Wood Street.

- 4.4 At 22,500sqft, Walbrook Wharf would only be able to accommodate a small proportion of the City of London Police's facilities, made more difficult by complex departmental space efficiency requirements. This option would clearly fail to meet the objective to locate facilities in a single place
- 4.5 In terms of sites outside of the control of the City of London, more than 100 live and expected planning applications and developments were reviewed. This number was reduced to some 20 sites' potential being assessed. All sites were discounted for various reasons, which are summarised as:
- Lack of floorspace capacity;
  - Land assembly and transaction complexities;
  - Longevity of existing leases;
  - Land / building values;
  - Poor location – periphery of the City;
  - Viability posed by site constraints;
  - Length of time to deliver site;
- 4.6 Further to the list of reasons, the City does not control these assets and as such the likelihood of delivery is compromised. Likewise, it is also recognised that the City of London Police are not considered a 'good neighbour' for City occupiers and businesses and as such developers will not willingly consider allocating part of their investment schemes to the Force.
- 4.7 The assessment concluded that:
- There are no alternative buildings in the City that the can realistically accommodate the entire uniform and operational headquarter functions of the City of London Police;
  - Creating the new Home Office compliant custody suite, but not building the new tower extension above results in specialist Police functions being located elsewhere which significantly impacts the operational effectiveness of the City of London Police; and
  - The new tower extension, as proposed, is an essential requirement to provide additional floor area and a modern fit for purpose headquarter building for the City of London Police.

- 4.8 Our priority must be the co-location and consolidation of operational areas within a central site. Out of the buildings in the existing estate, Wood Street is geographically clearly the prime location for the deployment and response of operational teams. Utilising alternative sites would cause the Force Headquarters to be located at the extreme west or east of the City. Operationally, that has been determined as too great a risk to the Force.

**5 Operational Justification – Redevelopment of Wood Street**

- 5.1 The redevelopment proposals for Wood Street Police Station are at the heart of establishing a new era for the City of London Police, its operational policing environment and the way it delivers its services to the public for the foreseeable future.
- 5.2 Without the successful delivery of transforming Wood Street Police Station into a modern, 21<sup>st</sup> Century operating facility, the City of London is at serious risk of increasing crime and threat from terrorist and other related activities. The outcome being the City of London Police failing in its duty to protect the local community with the City's global status suffering. Failure to deliver the estate as now planned will severely impact upon the Forces ability to provide adequate policing within the city from a central location. Not only will there be a bigger crime response time, but a reputational damage to the Force.
- 5.3 The expansion of Wood Street police station will enable the delivery of far more effective policing services within the City of London. Wood Street will represent an iconic but, more importantly, central, secure facility in which to base all police operations. Police Forces face significant budget challenges for the foreseeable future and the ability to integrate operational teams and share resources across the Force will be greatly enhanced by locating all our key essential services in a central operational base. It will enable enhanced and more efficient sharing of knowledge, skills and expertise across policing functions that will improve how we work. That can only be achieved by consolidating our key operational teams working adjacently within one central core and safe location.
- 5.4 By providing policing services not from several localised and out-dated sites, but from a centrally located, modern police station, equipped with the latest technology and facilities and complying with existing standards, the City of London Police would be better placed to meet its policing requirements, provide a more positive working environment for its officers and staff, and deliver its vision of providing a world-class service to the public and the City.

- 5.5 Failure to expand the facility as proposed will place risks upon the Force that could result in another review of the proposals. Without the expansion and flexibility to integrate our operations within this site, we have to consider the alternative that the Force could not remain within the facility; it would simply not provide us with the necessary development space for our future operational requirements.
- 5.6 The basis for redeveloping the Wood Street site is that it is already recognised as the headquarters of the City of London Police. It sits at the heart of the 'square mile' and it is operationally critical that geographically our headquarters is positioned in this location to enable quick operational deployment to all parts of the City, within a cohesive command and control structure.
- 5.7 Since the original submission of the concept plans, further detailed work / evaluation of the designs has determined that the additional space is vital for the future operation of the Force within Wood Street. Without this additional space, the City of London Police would be faced with the decision that the proposals to expand the site are not sufficient and would compromise the Force beyond the possible tolerance level for modern policing. Thus, the need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create.

## **6 Planning Application Proposals**

- 6.1 The planning and listed building consent application has been prepared following extensive consultation with the City of London Planning, Design, Conservation and Highways Officers, with technical specialists at Historic England and a range of other key stakeholders. This has also included a detailed space planning exercise by the Force themselves to evaluate and justify the proposed scheme.
- 6.2 The proposal has been driven by key fundamental requirements for the future estate, which include:
- More efficient service models
  - Modern estate – sustainable for next 30+ years
  - Operational resilience for the Force
  - Robust and flexible I.T infrastructure
  - Links to local and national Policing objectives
- 6.3 The main operational benefits and impact upon the space planning for the Wood Street facility have included:
- Operational benefits for the safety and security of the City of London
  - Increased police presence and visibility, including more patrols within the City

- Improved prisoner handling due to adjacently located operational teams within the new Wood Street design
- Improved 'business continuity' through fit-for-purpose, modern and secure headquarters
- Relocation of key City of London Police resources within a centrally located position within the City
- Relocation of the Force's vehicle fleet to London Wall to support operational deployments from the new Wood Street facility, improving officer access and response times
- Co-location of front-line officers, community officers and CID – this will lead to improvements in response times, prisoner handling and overall efficiency
- Establishing a central base for City of London officers to operate from will increase our mobilisation of front-line officers, including greater visibility of the streets
- Enhanced / more immediate command and control availability in dealing with major incidents and terrorism
- Responding to the current national threat levels that exist in relation to police forces and their respective officers and staff by providing secure operating facilities within one core building
- Relocating the Joint Control / Contact Centre of the City of London Police and City of London Corporation into one secure operating area within the Wood Street design
- Providing a safe and resilient base for response to any major incidents within the City from a core and secure location
- More effective policing and prisoner handling with resources contained within one central site. Enhanced prisoner cell space within the new design will retain officers within the City of London Corporation footprint, thus reducing abstractions from front line operations and officer availability for local policing
- Reduction in the national threats currently faced by City of London Police officers / staff by securely locating all operational teams within one central / secure location
- Supporting our local and national terrorism and threat response and intelligence function by relocating operational response areas to a secure facility
- Providing a modern, highly secure police building that meets the current standards of security requirements for the Force to operate from.

6.4 Plans have been carefully prepared for a comprehensive redevelopment including a new tower, infilling of the courtyard and lower levels within the building to create much needed additional space and reflect the unique operational requirements of the Force.



## **7      Conclusion**

- 7.1** In conclusion, Wood Street was designed to serve the needs of the City of London Police and the City community almost 60 years ago. Today's Force operates within a different policing model, has significant national policing commitments and must keep pace with new and evolving crime trends and security threats. The Force is also subject to the requirements and recommendations of a variety of external agencies including the Home Office, Her Majesty's Inspectorate of Constabulary and the Security Services. The City of London Police engage with a number of national and international agencies. With the changing pace of modern policing, there are a number of urgent deadlines and requirements that must be completed with. Failure to do so will significantly impact upon the overall performance of the Force and severely damage our reputation in national policing.
- 7.2** The need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create is a material planning consideration which should weigh in favour in finding support for the proposed planning and listed building consent application.
- 7.3** This statement has demonstrated that any perceived harm to the listed building or loss of fabric is necessary to achieve the substantial public benefits that outweigh this perceived harm or loss and the planning application should be supported.

**Ian Dyson**

**City of London Police Commissioner**

## **APPENDIX A: Wood Street Alternative Options - February 2017**

1. Following the request of Historic England, the following report sets out the alternative scenarios that have been considered to address the City of London Police ("CoLP") space requirements, bearing in mind the Grade II\* Listed significance of Wood Street Police Station and specifically the impact the proposed extension may have on the existing building.
2. Two scenarios have been considered in addition to the proposed Wood Street solution. These are as follows:

**Scenario 1:** An alternative headquarters in the City for the CoLP; and

**Scenario 2:** Wood Street is retained without a new tower extension but still includes the new Custody suite at ground level (requiring at least 20,000 sq ft of operational Police space elsewhere).

### **City of London Police Operational Continuity**

3. A core element of the Police Accommodation Strategy is to retain the main uniform headquarters in Wood Street Police Station, for three reasons:
  - Wood Street is the original historic home of the CoLP;
  - Its central location cannot be equalled in the City; and
  - It is the only CoLP building that has current potential to be upgraded to a modern, fit for purpose Police headquarters building; there simply is not enough space at either Bishopsgate or Snow Hill to accommodate the complex operational requirements, even if these buildings were capable of being extended.

### **Third Party Opportunities**

4. The City has reviewed all live and expected planning applications and developments, amounting to over 100 that would deliver a sufficient size building within the City of London. The most likely opportunities are summarised under scenario 1 in this report, however, they are all highly valuable, purpose built investment assets and it is unlikely that they will be available for sale or occupation by the CoLP.
5. The City does not control these assets and as such the likelihood of delivery is compromised. It is also recognised that the CoLP are not considered a 'good neighbour' for City occupiers and businesses and as such developers will not willingly consider allocating part of their investment schemes to the CoLP.

### **City Opportunities**

6. The main focus of the scenarios considered are opportunities that the City already owns as this has the advantage that the building assets are within the City's control and so there is a far greater likelihood of successful delivery.

Summary of alternative City owned opportunities:

Scenario	Best Options	NIA sq ft	Comment
1	<b>Barbican Centre Exhibition Halls I &amp; II</b> (Major re-development)	Ex Hall I 39,075 Ex Hall II 42,280 <u>Total 81,355</u>	Requires vertical extensions to increase size to sufficient level – high planning risk (Grade II listed), impacts residents, too small and split across 2 buildings.
2	<b>Walbrook Wharf</b> (Entire front office)	<u>22,500</u>	Complex departmental space efficiencies required, which are not viable. Insufficient space.

7. The outcome of this exercise confirms that there are no alternative headquarter options available. Whilst smaller opportunities exist within the City's control, these have been discounted due to Police operational reasons; as it is confirmed elsewhere, the centralisation of key Police teams within a single, modern headquarter building is fundamental to improving operational effectiveness.

### Conclusion

The City of London Corporation has reviewed alternatives to refurbishing and extending Wood Street Police Station, however, it has concluded that:

- There are no alternative buildings in the City that the can realistically accommodate the entire uniform and operational headquarter functions of the City of London Police;
- Creating the new Home Office compliant custody suite, but not building the new tower extension above results in specialist Police functions being located elsewhere which significantly impacts the operational effectiveness of the City of London Police; and
- The new tower extension, as proposed, is an essential requirement in order to provide additional floor area and a modern fit for purpose headquarter building for the City of London Police.

### Alternative Headquarter Options (Excl. Wood Street)

Property
Headquarter replacement (inc. 20 parking bays)
Guildhall Yard East
Parking (c. 102 bays)
Satellite & Misc. Facilities

### Potential City Solutions

Property	NIA (approx. sq ft)	Comments	Suitable Alternative
<b>Barbican Centre Exhibition Halls I &amp; II (Development opportunity)</b>	Ex Hall I 39,075 Ex Hall II 42,280 <u>Total</u> 81,355	Technical refurbishment and fit out costs could be high and to get requires physical, vertical extension to increase footprint to 110,000 sq ft. Site benefits from parking facilities immediately below. Poor floor to ceiling height. Both halls are Grade II listed. Potential conflict with residents.	<b>No</b> <i>Too small, availability unclear, impact on local area, split buildings.</i>
<b>65/65a Basinghall Street &amp; CII (Development opportunity)</b>	c.100,000	Long term development potential but City do not own entire site. Space planning to relocate existing occupants of 65 & 65a required. Parking solution below. High opportunity cost and high planning risk.	<b>No</b> <i>Requires site assembly with adjoining owner. Likely to be too small in any event.</i>
<b>21 New Street &amp; Bishopsgate Police Station (Development opportunity)</b>	c. 500,000	Long term development (10 years to deliver and occupy). Requires purchase of New Street (recently sold to third party) and Victoria Avenue (subject to 7 years unexpired lease) to realise full potential. Car parking an issue due to Crossrail tunnels 30m below site.	<b>No</b> <i>timing site assembly issues - 21 New St - Victoria Ave 7 year leases unexpired</i>
<b>Baynard Castle Car Park</b>	Significant	Long term development potential reliant on negotiated transaction with BT (lease expiry 2078). Parking solution.	<b>No</b> <i>Timeline unlikely, third party transaction required</i>
<b>Minorities Car Park</b>	Significant	Long term development potential reliant on joint scheme with adjoining China Minshing Bank (previously Soc Gen) building. Parking solution.	<b>No</b> <i>Timeline unlikely, third party transaction required</i>

**Potential City Solutions (continued)**

<b>Property</b>	<b>NIA (approx. sq ft)</b>	<b>Comments</b>	<b>Consider Further?</b>
<b>Farringdon East, Lindsay St.</b> (Development opportunity)	89,000	Currently Crossrail site. Development proposal of modern office space; available c.2019. City own 20% of freehold. Other owners interest in deal with CoLP unlikely. Complexities of lease / purchase to be considered. Parking issue as railway lines run directly below, however, facilities at Smithfield may offer potential solution. Leaves 20,000 sq ft shortfall.	<b>No</b> <i>too small lease, purchase cost and impact on area</i>
<b>Leith House, 55 Gresham St.</b> (Development opportunity)	120,000	Subject to long lease (168 years unexpired – lease extension ongoing). Modern office space available 2018/19. Complexities of lease / purchase (and high cost) to be considered.	<b>No</b> <i>opportunity cost lease / purchase cost tenant type and impact on area</i>
<b>Museum of London (MoL) &amp; Bastion House</b> (Development opportunity)	650,000	Long term development potential (10 years to deliver and occupy, assuming no delay relocating MoL). Substantial investment required to realise potential. Requires relocation of MoL and vacant possession of Bastion House (currently occupied). Car parking solution to remain at LWCP. Only available from 2022.	<b>No</b> <i>Timing and impact on other infrastructure delivery</i>
<b>Fleet Street Estate</b> (Development opportunity)	400,000 GIA	Full feasibility assessment yet to be undertaken. High cost to deliver as well as high opportunity cost. Parking requirement likely to be an issue.	<b>No</b> <i>no parking, impact on area and opportunity cost</i>
<b>Calcutta House Site</b> (Development opportunity)	500,000	Current lease commitments expire 2026. Requires further site assembly to deliver estimated 500k sq ft. Located on far eastern City boundary. CoLP use would sterilise entire development potential.	<b>No</b> <i>availability 2026 location lease / purchase cost opportunity cost</i>
<b>Creechurch Place</b>	275,000	High quality office development available now. Long lessee unlikely to consider CoLP as desirable tenant. Complexities of lease / purchase (and high opportunity cost) to be considered.	<b>No</b> <i>Reliant on 3rd party, impact on area and opportunity cost</i>
<b>60 to 70 St. Mary's Axe</b> (Can of Ham)	300,000	High quality office development available 2019. Long lessee unlikely to consider CoLP as desirable tenant. Complexities of lease / purchase (and high cost + opportunity cost) to be considered.	<b>No</b> <i>Reliant on 3rd party, impact on area and/ opportunity cost</i>

### Potential External Solutions

Property	NIA (approx. sq ft)	Comments	Consider Further?
<b>120 Moorgate, EC2</b>	128,000	Earliest completion 2020. Demolition of existing and creation of 105,000 sq ft office & 23,000 sq ft of ground and basement retail over 10 floors (consented not commenced).	<b>No</b> <i>Not viable / not in City control to deliver</i>
<b>One Braham</b> 1 Braham Street, E1	300,000	Earliest completion 2018/19. Planning granted for the construction of a new 18 storey office building. Located to far east beyond City boundary (consented not commenced).	
<b>Shoreditch Estate</b> Shoreditch High Street, E1	320,000	Earliest completion 2019. Proposal to retain and refurbish the existing buildings for a commercially led mixed use scheme, ranging from 4 to 13 storeys, provision of off-street parking included in current proposal (consented not commenced).	
<b>Aldgate Union</b> 10 Whitechapel High Street,	310,000	Earliest completion 2017. Floor by floor refurbishment of the building (planning being worked up).	
<b>City Place House</b> 55 Basinghall Street, EC2	170,000	Potential future scheme. Earliest completion 2020 (potential future scheme).	
<b>City Gate House</b> 39 Finsbury Square, EC2	178,000	Earliest completion 2019. Potential refurbishment when Bloomberg exits in 2018 (potential future scheme).	
<b>41 Tower Hill, EC3</b>	190,000	Earliest completion 2022. CoL freehold of the car park (potential future scheme).	
<b>Boardwalk House</b> 5 Appold Street, EC2	332,000	British Land reviewing options for site (potential future scheme).	
<b>Tenter House</b> 45 Moorfields, EC2	200,000	Earliest completion 2020. Architects currently working up a revised scheme of circa 200,000 sq ft (revised planning being worked up).	
<b>20 Old Bailey, EC4</b>	240,000	Earliest completion 2017. Recladding and extension of the existing building to provide 235,000 sq ft (under construction / space available).	

21 FEB 2017



Our Ref: A090129-72

Planning Portal Ref: PP-05133921

Date: 20<sup>th</sup> February 2017

### SUBMITTED VIA PLANNING PORTAL

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



Dear Mr Chipperfield,

**PLANNING AND LISTED BUILDING CONSENT APPLICATION**  
**PROPOSED REDEVELOPMENT OF 37 WOOD STREET, LONDON, EC2P 2NQ**

Further to our recent pre-application meetings, please find attached a planning and listed building consent application for the following development proposal at 37 Wood Street, London submitted on behalf of our client the City of London Corporation:

*"Erection of a new 9 storey tower, infill of the courtyard, internal refurbishments and conversion of basements to provide additional office floorspace; car and cycle parking; refuse and recycling storage; and associated works at 37 Wood Street".*

Accordingly, please find enclosed the following:

- Application forms and certificates
  - CIL Form
  - Planning Statement prepared by WYG ✓
  - Design and Access Statement prepared by Seven Architecture ✓
  - Heritage Assessment prepared by Seven Architecture
  - Drawing No. 014100\_P100 Site Location Plan Rev A3
  - Drawing No. 014100\_P109 Existing Site Plan Rev A1
  - Drawing No. 014100\_SK200 Existing Floor Plans Level -02 Rev B A1
  - Drawing No. 014100\_SK201 Existing Floor Plans Level -01 Rev B A1
  - Drawing No. 014100\_SK202 Existing Floor Plans Level 00 Rev B A1
  - Drawing No. 014100\_SK203 Existing Floor Plans Level 01 Rev B A1
  - Drawing No. 014100\_SK204 Existing Floor Plans Level 02 Rev B A1

100 St John Street, EC1M 4EH, London,  
Tel: +44 (0)20 7250 7500 Email: [chris.tennant@wyg.com](mailto:chris.tennant@wyg.com) [www.wyg.com](http://www.wyg.com)

WYG Environment Planning Transport Limited. Registered in England & Wales Number: 3050297  
Registered Office: Arndale Court, Headingley, Leeds, LS6 2UJ



creative minds safe hands



- Drawing No. 014100\_SK205 Existing Floor Plans Level 03 Rev B A1
- Drawing No. 014100\_SK206 Existing Floor Plans Level 04 Rev B A1
- Drawing No. 014100\_SK207 Existing Floor Plans Level 05 Rev B A1
- Drawing No. 014100\_SK208 Existing Floor Plans Level 06 Rev B A1
- Drawing No. 014100\_SK209 Existing Floor Plans Level 07 Rev B A1
- Drawing No. 014100\_SK210 Existing Floor Plans Level 08 Rev B A1
- Drawing No. 014100\_SK211 Existing Floor Plans Level 09 Rev B A1
- Drawing No. 014100\_SK213 Existing Floor Plans Level 11 Rev B A1
- Drawing No. 014100\_SK214 Existing Floor Plans Level 12 Rev B A1
- Drawing No. 014100\_SK215 Existing Floor Plans Level 13 Rev B A1
- Drawing No. 014100\_P250-1 Existing Townscape South & West Rev B A1
- Drawing No. 014100\_P251-1 Existing Townscape North & East Rev B A1
- Drawing No. 014100\_P255-1 Existing Streetscape Elevation South onto Love Lane Rev B A1
- Drawing No. 014100\_P256-1 Existing Streetscape Elevation West onto Wood Street Rev B A1
- Drawing No. 014100\_P257-1 Existing Streetscape Elevations North Rev B A1
- Drawing No. 014100\_P258-1 Existing Streetscape Elevations East Rev B A1
- Drawing No. 014100\_P260-1 Existing Elevation South onto Love Lane Rev B A1
- Drawing No. 014100\_P261-1 Existing Elevation West onto Wood Street Rev B A1
- Drawing No. 014100\_P262-1 Existing Elevation North onto Aldermanbury Place Rev B A1
- Drawing No. 014100\_P263-1 Existing Elevation East onto St Mary Aldermanbury Garden Rev B A1
- Drawing No. 014100\_P264-1 Existing Courtyard Elevation Rev B A1
- Drawing No. 014100\_P265-1 Existing Courtyard Elevations Rev B A1
- Drawing No. 014100\_P270-1 Section A-A Existing Rev A A1
- Drawing No. 014100\_P271-1 Section B-B Existing Rev A A1
- Drawing No. 014100\_P272-1 Section C-C Existing Rev A A1
- Drawing No. 014100\_P110 Proposed Site Plan Rev A A1
- Drawing No. 014100\_P200-3 Proposed Floor Plans Level -02 Rev B
- Drawing No. 014100\_P201-3 Proposed Floor Plans Level -01 REV B
- Drawing No. 014100\_P202-3 Proposed Floor Plans Level 00 REV C
- Drawing No. 014100\_P203-3 Proposed Floor Plans Level 01 REV B
- Drawing No. 014100\_P204-3 Proposed Floor Plans Level 02 REV B
- Drawing No. 014100\_P205-3 Proposed Floor Plans Level 03 REV B
- Drawing No. 014100\_P206-3 Proposed Floor Plans Level 04 REV B
- Drawing No. 014100\_P207-3 Proposed Floor Plans Level 05 REV B
- Drawing No. 014100\_P208-3 Proposed Floor Plans Level 06 REV B
- Drawing No. 014100\_P209-3 Proposed Floor Plans Level 07 REV B
- Drawing No. 014100\_P210-3 Proposed Floor Plans Level 08 REV B
- Drawing No. 014100\_P211-3 Proposed Floor Plans Level 09 REV B
- Drawing No. 014100\_P212-3 Proposed Floor Plans Level 10 REV B
- Drawing No. 014100\_P213-3 Proposed Floor Plans Level 11 REV B
- Drawing No. 014100\_P214-3 Proposed Floor Plans Level 12 REV B
- Drawing No. 014100\_P215-3 Proposed Floor Plans Level 13 REV B
- Drawing No. 014100\_P250-2 Proposed Townscape South & West Rev C
- Drawing No. 014100\_P251-2 Proposed Townscape North & East Rev C
- Drawing No. 014100\_P255-2 Proposed Streetscape Elevation South onto Love Lane Rev C
- Drawing No. 014100\_P256-2 Proposed Streetscape Elevation West onto Wood Street Rev C
- Drawing No. 014100\_P257-2 Proposed Streetscape Elevations North Rev C
- Drawing No. 014100\_P258-2 Proposed Streetscape Elevations East Rev C
- Drawing No. 014100\_P260-3 Proposed Elevation South onto Love Lane Rev C
- Drawing No. 014100\_P261-3 Proposed Elevation West onto Wood Street Rev C
- Drawing No. 014100\_P262-3 Proposed Elevation North onto Aldermanbury Place Rev C





- Drawing No. 014100\_P263-3 Proposed Elevation East onto St Mary Aldermanbury Garden Rev C
- Drawing No. 014100\_P264-3 Proposed Courtyard Elevation Rev B
- Drawing No. 014100\_P265-3 Proposed Courtyard Elevation Rev B
- Drawing No. 014100\_P270-3 Section A-A Proposed Rev A
- Drawing No. 014100\_P271-3 Section B-B Proposed Rev A
- Drawing No. 014100\_P272-3 Section C-C Proposed Rev A
- Drawing No. 014100\_P200-2 Demolition Floor Plans Level -02 REV B
- Drawing No. 014100\_P201-2 Demolition Floor Plans Level -01 REV B
- Drawing No. 014100\_P202-2 Demolition Floor Plans Level 00 REV C
- Drawing No. 014100\_P203-2 Demolition Floor Plans Level 01 REV B
- Drawing No. 014100\_P204-2 Demolition Floor Plans Level 02 REV B
- Drawing No. 014100\_P205-2 Demolition Floor Plans Level 03 REV B
- Drawing No. 014100\_P206-2 Demolition Floor Plans Level 04 REV B
- Drawing No. 014100\_P207-2 Demolition Floor Plans Level 05 REV B
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- Drawing No. 014100\_P211-1 Demolition Floor Plans Level 09 REV B
- Drawing No. 014100\_P212-2 Demolition Floor Plans Level 10 REV B
- Drawing No. 014100\_P213-2 Demolition Floor Plans Level 11 REV B
- Drawing No. 014100\_P214-2 Demolition Floor Plans Level 12 REV B
- Drawing No. 014100\_P215-2 Demolition Floor Plans Level 13 REV B
- Drawing No. 014100\_P260-2 Demolition Elevation South onto Love Lane Rev A
- Drawing No. 014100\_P261-2 Demolition Elevation West onto Wood Street Rev A
- Drawing No. 014100\_P262-2 Demolition Elevation North onto Aldermanbury Place Rev A
- Drawing No. 014100\_P263-2 Demolition Elevation East onto St Mary Aldermanbury Garden Rev A
- Drawing No. 014100\_P264-2 Demolition Courtyard Elevation Rev A
- Drawing No. 014100\_P265-2 Demolition Courtyard Elevation Rev A
- Drawing No. 014100\_P270-2 Section A-A Demolition Rev A
- Drawing No. 014100\_P271-2 Section B-B Demolition Rev A
- Drawing No. 014100\_P272-2 Section C-C Demolition Rev A
- Archaeological Desk-Based Assessment prepared by CgMS Consulting ✓
- BREEAM New Construction 2014 Pre-assessment Report prepared by WYG
- Daylight and Sunlight Review prepared by Delva Patman Redler ✓
- Explosive Ordnance Desktop Threat Assessment prepared by Dynasafe ✓
- Extended Phase 1 Habitat Survey prepared by WYG ✓
- Transport Assessment prepared by WYG ✓
- Framework Travel Plan prepared by WYG ✓

Due to file size, the following documents are unable to be submitted via the Planning Portal and will follow by post on a CD.

- Acoustic Assessment prepared by Spectrum Acoustic Consultants ✓
- Energy Statement prepared by WYG
- Flood Risk Assessment & Drainage Strategy prepared by WYG ✓
- Geo-Environmental Study prepared by BRD
- Drawing No. 014100\_SK212 Existing Floor Plans Level 10 Rev B A1

The statutory fee for this planning application has been calculated to be £14,245.00 and an internal recharge has been arranged.



I would be grateful if you could confirm receipt of this planning application and we look forward to confirmation that it has been validated. If you have any queries, please contact me or my colleague, Rochelle Fleming, at this office.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'wyg', is positioned above the printed name.

**Christopher Tennant MRTPI**  
**Director & Head of Planning – London**  
For and on behalf of WYG Environment, Planning & Transport

Enc

17/03/2017

Ref: PJB7891/15389

Date: 31 August 2016

**SPECTRUM**  
Acoustic Consultants

Andrew Charalambous  
WYG  
100 St John Street  
London  
EC1M 4EH



Dear Andrew

**ACOUSTIC ASSESSMENT OF MECHANICAL PLANT INSTALLATION FOR CITY OF LONDON POLICE STATION, 37 WOOD STREET, EC2P**

WYG are assisting the City of London Police to modernise their existing Police Station including the formation of a new tower as well as in-filling and adapting the courtyard to provide accommodation that meets the Service's current needs. The proposed re-development includes new mechanical plant equipment to meet the HVAC requirements of the building.

Spectrum Acoustic Consultants prepared an assessment of noise from mechanical plant in February, 2016 (ref. PJB7723/15389). Since that time a number of revisions to the proposed scheme have taken place, necessitating updating of the noise assessment. This letter provides the new analysis and recommendations for this purpose.

WYG are aware that the installation of the plant must comply with the City of London's standard requirements for plant noise levels. The purpose of this technical letter is to analyse the environmental noise emission from the proposed plant and to determine whether suitable noise levels can be achieved for nearby noise-sensitive premises in accordance with the Council's standards requirements.

**1. PLANT NOISE - CRITERION FOR ACCEPTABILITY**

Spectrum Acoustic Consultants have made contact with Garry Seal, an Environmental Health Officer in the Pollution Team of City of London's Department of Markets & Consumer Protection. He advised the following in respect of his department's requirements for the development.

Prior to your formal pre-app on 23rd November I can advise that the main concern for the Pollution Team would be that the noise from the new plant [should] not increase the noise levels in the area and this would normally be [controlled] by condition:

*(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.*

*(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.*

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Registered in England No. 2378475

*(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.*

Spectrum have previously been in contact with this department to question whether the requirement to meet 10 dB below background applied at nearby office areas because these receptors are not 'residential areas' as assessed by BS4142. At that time, the Pollution Team confirmed that assessment at office receptor locations was the department's requirement in order to prevent creeping background. As a result, the allowable noise level from plant at this site is 10 dB below background noise at the nearest residential or office window.

City of London's normal practice requires that the assessment is undertaken for the quietest time when plant may be required to run. In addition, the survey of background noise can be conducted with any existing plant running, so that any existing plant noise is considered to be a characteristic of the overall noise environment.

## **2. SITE DESCRIPTION AND PROPOSALS**

The City of London Police Station is located at 37 Wood Street in the City of London. It is bounded by Wood Street to the west, Love Lane to the south, Aldermanbury to the east and the multi-storey office building at 5 Aldermanbury Square to the north. The existing premises is a 4-sided building enclosing a central courtyard. In general, the building comprises 2 levels of basement with 4 storeys above ground level and a double pitched roof. However, in north east wing of the building includes a tower which extends to 13 storeys (and roof level plant space) with gabled ends and a double pitched roof. There is also a flat roof above the 4<sup>th</sup> storey along the southern wing extending from the roof ridge to level with the courtyard.

Other local features surrounding the site include office buildings opposite Love Lane to the south, opposite Wood Street to the west and on the north side of St Mary Aldermanbury's Garden. In general, these buildings are taller than the main City of London Police (CoLP) station, although the CoLP tower is taller than most nearby buildings, except 5 Aldermanbury Square to the North.

There is a single residence within the former Saint Alban Church Tower, located between the north and south bound carriageways of Wood Street, immediately to the west of the CoLP building.

A location plan is shown in Attachment 1.

The proposals include infilling the central courtyard while maintaining lightwells down to Basement Level 1. A new tower is to be located north of the existing tower, extending to 9 storeys in height. A number of key floor plan, elevation and section drawings are shown in Attachment 2.

### **2.1 Plant proposals**

All existing plant is to be stripped out. New plant will be located at a number of locations throughout the building. However, in many cases, these will not be in open-air locations and will be remote from the location at which air enters or exits and where, consequently, noise could be emitted from the building. In summary, the 'externally audible' plant locations are:

- A. Horizontal meshed air intake 1m above Love Lane street level in the south east corner of the building.
- B. 2 Trane Flex 180 Z Chillers within a new plant well on the 4<sup>th</sup> floor, southern side. The existing flat roof above is to be stripped out and replaced by a horizontal louvre above the chillers. Air to discharge vertically through these louvres.
- C. Air intake to the chillers through the northern face of the south wing of the building, through existing window apertures (6 No.).
- D. Air intake for an air handling unit within the west wing 4<sup>th</sup> floor through existing east-facing window apertures (4 No.). These overlook the central courtyard.
- E. Toilet extract discharging through a penthouse louvre located on the flat roof over level 4 south wing.

- F. Air handling unit exhaust discharge through the (existing) chimney on the south west corner of the building.
- G. Air intake for an air handling unit within the east wing 4<sup>th</sup> floor through the roof hip on the north eastern corner of the wing of the existing building.
- H. AHU exhaust discharge through the (existing) chimney on the south east corner of the building.
- I. 22 Daikin condensing units within a compound on the newly formed flat roof above the central courtyard, surrounded by a 2.2m high barrier.
- J. 3 Trane Flex 180 Z chillers within a compound on the newly formed flat roof above the central courtyard, surrounded by a 2.2m high barrier.
- K. Condenser compound on the existing 4<sup>th</sup> floor roof – north eastern corner (6 individual units), surrounded by a 2.2m high barrier.
- L. Condenser compound on the existing 4<sup>th</sup> floor roof – between the eastern and northern wings (1 unit), surrounded by a 2.2m high barrier.
- M. Air inlet louvres on the eastern face of the new tower at Level 07 to Level 09.
- N. Exhaust air discharge louvres on the eastern face of the new tower at Level 05 to Level 07.
- O. Condenser compound on the roof of the new tower (6 individual units).
- P. Toilet extract discharging through a louvre located on the flat roof over the new tower extension.
- Q. AHU fresh air supply louvre through the southern roof pitch of the existing tower.
- R. AHU exhaust air louvre through the southern roof pitch of the existing tower.

The location of these external features are noted in Attachment 2.

Noise levels around the site are controlled by road traffic on surrounding and distant roads, as well as existing plant noise.

## 2.2 Plant operation

The plant can operate continuously (24 hr) but would be demand controlled and, therefore, wouldn't operate at full duty in the quietest part of the night. The highest load upon the system is likely to occur during the daytime / afternoon period.

## 3. BACKGROUND NOISE SURVEY

### 3.1 Date, location and equipment

Ambient noise measurements were carried out during a site survey between 6 and 10 November, 2015, consisting of automatic unattended noise measurements on the site at two locations as shown in Attachment 1. These locations were:

- Location 1      At ridge level (5<sup>th</sup> floor) extended on a pole level with the western (Wood Street) façade. This location is used for the assessment of the residence to the west.
- Location 2      At gable level (13<sup>th</sup> floor) extended on a pole above and to the east of the existing tower over St Mary Aldermanbury's Garden. Results at this location are representative of ambient conditions for nearby offices.

In both cases, the microphones were in free field conditions. The locations were nearby office and residential windows on either side of the site. Therefore, the measured noise levels are representative of the ambient noise conditions for receptors located generally around the building.

The following equipment was used during the survey:

- Bruel & Kjaer Type 2250 Sound Level Meter s/n 2739650
- Bruel & Kjaer Type 4189 Microphone s/n 2983518
- Bruel & Kjaer Type 4231 Acoustic Calibrator s/n 2730221

- Bruel & Kjaer Type 2250 Sound Level Meter s/n 3000713
- Bruel & Kjaer Type 4189 Microphone s/n 2780512
- Bruel & Kjaer Type 4231 Acoustic Calibrator s/n 3001598
- 2 No. Bruel & Kjaer Type UA 1404 Outdoor microphone attachments, and
- 2 No. Bruel & Kjaer Type AO 0441 10m microphone extension cables

Before and after the survey, the sound level meters were field-calibrated in accordance with the manufacturer's guidelines. Drift was less than 0.1 dB and therefore acceptable. The meters, microphones and field calibrators are laboratory calibrated biennially in accordance with UKAS procedures or to traceable National Standards.

The weather during the survey period was mainly dry with little wind, although there were periods of short sharp showers during the survey, which were not considered sufficient to adversely elevate the minimum measured background noise level. This represents acceptable conditions for measurements undertaken.

Measurements have been summarised into contiguous 5 minute periods to present the noise profile throughout the period of noise monitoring. Noise metrics consisted of equivalent continuous ( $L_{Aeq}$ ) noise levels and maximum ( $L_{Amax}$ ) noise levels as well as statistical noise levels (termed  $L_n$ , where  $n$  is the percentage of time the level is exceeded during the measurement period). This included  $L_{A90}$  levels. Measurements were stored for later analysis.

### 3.2 Results

The results of the measurements are shown graphically in Attachment 3. The results have been summarised into relevant daytime (08:00-20:00 hours) and night-time (23:00-07:00 hours) periods, coinciding with relevant assessment periods for plant operation.

BS 4142:2014 *Methods for rating and assessing industrial and commercial sound* states that

*'The monitoring duration should reflect the range of background sound levels for the period being assessed. In practice, there is no "single" background sound level as this is a fluctuating parameter. However, the background sound level used for the assessment should be representative of the period being assessed. To obtain a representative background sound level a series of either sequential or disaggregated measurements ought to be carried out for the period(s) of interest, possibly on more than one occasion. A representative level ought to account for the range of background sound levels and ought not automatically to be assumed to be either the minimum or modal value.'*

BS4142 provides an example statistical analysis of background sound levels taken from a long-term survey. A similar approach has been adopted here to obtain these values.

Table 1 below summarises the representative measured daytime and night time background noise levels for assessment purposes.

Location	Daytime (0800-2000)	Night-time (2300-0700)
	$L_{A90}$ (10 minute) dB	$L_{A90}$ (10min) dB
1	58	50
2	58	52

**Table 1:** Summary of the measured day and night time background noise levels

These are the levels used within the assessment reported here to specify the criteria for acceptability from plant.

#### 4. TECHNICAL REQUIREMENTS FOR CONTROL OF MECHANICAL PLANT NOISE.

The CoL standard requirements are that the details of the plant and equipment to be used within the plant areas be provided and approved, along with an assessment to indicate that noise from the plant complies with the Council's limits as well as a description of any mitigation required to ensure this. It also specifies that noise from the operation of this plant should be at least 10 dB(A) below the background noise level outside any nearby noise sensitive property with all equipment operating together.

Accordingly, the noise targets for assessment purposes are as shown in Table 2, below.

Location	Daytime (0800-2000) LA90 (10 minute) dB	Night-time (2300-0700) LA90 (10min) dB
1	48	40
2	48	_note 1

**Table 2:** LAeq plant noise limits for compliance with plant noise condition.

**Note 1:** Offices are not occupied during the night-time period therefore no noise criterion applies here.

#### 5. PLANT NOISE LEVEL PREDICTION METHOD

##### 5.1 Available plant information and assessment approach

Attachment 2 indicates the external locations of proposed plant from which plant noise could be emitted. At present, general information is available about the plant that will be used within the building, but not detailed information such as plant selections, manufacturers, duct design, flow rates, etc. Accordingly, the precise information that is needed to predict noise from the plant proposals is unavailable. This is wholly in keeping with the design development process. That is, this type of detail is rarely available at the planning stage.

As a result, it is not possible to calculate the likely noise level from the plant specifically for the purposes of specifying noise mitigation requirements, if any.

Even so, it is still possible to provide information which is relevant to a planning stage assessment and which can accompany the planning application for the proposals. This is done in the following way.

Given that we know the locations around the building from which noise can be emitted, it is possible to calculate the limiting sound power at each of these location in order that the Table 2 limits will not be exceeded. This results in a list of sound power limits at each of these plant locations. These limits can then form the basis for a planning condition for the plant and serve as plant noise limits for the mechanical equipment specification. Subsequent mechanical system design can then include noise control measures to meet these limits.

##### 5.2 Calculation of plant noise emission

The proposals result in a number of noise sources that are located at various locations around the building which will undergo varying degrees of screening, distance attenuation and reflection to nearby receptors. In addition, there are a number of noise-sensitive receivers at varying heights and locations.

Accordingly, the analysis method which is appropriate to use is a numerical noise model of the building and surrounding area. This uses information about the noise emission, propagation path difference, screening, diffraction, reflection, etc. to calculate the component noise level for a number of noise sources at a number of receptor locations. These can then be accumulated and / or ranked for each receptor as a guide to the significance of each source at each receiver and as an aid to noise control design.

The particular noise prediction model that has been used for this analysis is Bruel & Kjaer's Type 7810 'Predictor' software. This acoustic model implements the procedures set out in ISO 9613-2:1996 "Acoustics – Attenuation of sound during propagation outdoors Part 2: General method of calculation to determine noise levels". Plant noise sources have been modeled as individual point sources, area sources or line sources, as appropriate for the type and source of external element at the locations shown in the Attachment 2 drawings. The proposed buildings have been modeled as solid bodies, around which sound can diffract. Receptor positions representing the most affected office and residential windows have been modeled as being 2m above the internal floor level.

A layout plan and 3D visualisation of the Predictor noise model showing external plant element locations, roof plant, buildings and receptors is shown in Attachment 4.

The 'at source' noise levels from all plant operating together are then adjusted to ensure that the predicted noise from plant operation complies with the noise limits set out in Table 2, above, for all receptor locations.

## 6. PLANT NOISE LEVEL PREDICTION RESULTS AND NOISE MITIGATION MEASURES

### 6.1 Results

The numerical noise model prediction results for the proposed plant are shown in Attachment 5.

This shows that the highest predicted noise level at any location surrounding the development does not exceed  $L_{Aeq}$  48 dB during the daytime or at  $L_{Aeq}$  40 dB at Saint Alban Tower in Wood Street at night. This complies with both the 'daytime' noise level limit and the 'night-time' limit in Table 2.

The sound power limits that are necessary for each individual external element of the plant scheme are as shown in Table 3. The 'plant item' in the first column relates to the description of each item in Section 2.1.

Plant Item	Daytime $L_{WA}$ limit (dB)	Night-time $L_{WA}$ limit (dB)
A	73	73
B	77 (total for 2 chillers)	70 (total for 2 chillers)
C	69 per window	64 per window
D	65 per window	60 per window
E	73	68
F	64	57
G	69	69
H	69	69
I	80 (total for 22 condensers)	74 (total for 22 condensers)
J	80 (total for 2 chillers)	72 (total for 2 chillers)
K	75 (total for 6 condensers)	68 (total for 6 condensers)
L	74 (1 condenser)	69 (1 condenser)
M	67	67
N	67	67
O	73 (total for 6 condensers)	73 (total for 6 condensers)
P	71	71
Q	75	65
R	75	65

**Table 3.** Sound power limits to comply with allowable noise levels



## 6.2 Noise control

As discussed above, it is not possible to indicate whether the 'base plant' as installed would comply with these noise limits or if additional noise control would be required in order to meet them. This is because the 'at source' plant information and details of the noise propagation path within the building are not known at this stage.

Even so, the following general comments can be made.

The louvre sound power levels in the new tower are quite low. It is likely that some noise control would be required in order to meet these limits. Nevertheless, the louvres are a long distance away from the plant within the building, offering ample opportunity to include, for example, in-line silencers within the duct between the plant and the louvre to meet these limits.

The chiller sound power limits above are lower than would be expected from standard plant. However, the design of the plant well allows for silenced inlet and discharge. As regards noise from the top of the chiller units, attenuation can be achieved by the use of an acoustic louvre across the top of the well or by silencers attached to the top of the chiller units. As regards air intake noise through the northern façade of the plant well, this can be achieved by acoustic louvres within the window apertures.

All of the air intake and exhaust louvres for air handling equipment can be readily fitted with in-line silencers or acoustic louvres in order to meet the targets above.

Condenser compounds can acoustically screened by enclosures comprised of acoustic louvres.

## 6.3 Discussion

It needs to be borne in mind that, in carrying out this assessment, a number of cautious assumptions about noise emission from the plant have been included within the model. These are:

- All of the equipment operates at its full rated duty. In fact, the operation of the plant will be demand-based and will 'ramp up or down' according to thermostatic, speed and timing controls. As described in this report, the maximum duty is likely to occur at peak periods of demand which are typically during late afternoons during working periods when heat loads in the server room are at their highest.
- All equipment items operate together. This would rarely be the case.
- This 'worst case' operating condition has been compared with the representative lowest measured LA90 noise levels, i.e. those that occur when activity in the surrounding area is at its lowest. Therefore, the noisiest plant operating condition and the quietest ambient condition are compared. These two situations would generally not be expected to coincide.
- The assessment is based on external noise levels, not internal levels. Noise levels inside offices, where people could be disturbed, will be much lower due to the sound insulation of the building envelope.

However, even taking these conservative assumptions into account the predicted noise levels are at or below the allowable level for the daytime and night-time periods and therefore comply with the guideline for acceptability established within this assessment.

## 7. CONCLUSION

In summary, suitably low levels of plant noise can be provided for the offices and for the residence nearby the proposed plant in accordance with the normal requirements of the City of London. This takes into account the changes to the building introduced in the latest scheme proposals (August 2016)

I would recommend that a copy of this document be forwarded to the Council for their consideration. If you have any questions or require further information, please don't hesitate to contact me.

Yours sincerely



**Phill Banks**  
**Principal Consultant**

1. DO NOT SCALE WEIGHT THUS DETERMINED - USE MEASURED DIMENSIONS ONLY.
2. TO BE READ IN CONJUNCTION WITH ALL OTHER CONSULTANTS' SPECIFICATIONS. REPORT ANY DISCREPANCIES AFFECTING AFFECTED WORK COMPONENTS.

ALL SETTING OUT DIMENSIONS TO BE CHECKED ON SITE BY CONSULTATION BEFORE WORK COMMENCES



### Noise monitoring location 1

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1:1250  
City of London Police  
**Site Location Plan**

Ref	WY3
Project	City of London Police Wood Street
Drawing title	Sky Location Plan
Drawing number	014100_SK_100
Section	
Drawing status	Planning
Scale	1:1250 @ A3
Date	02/20/15
Drawn by	Author
Checked by	Checker

seven

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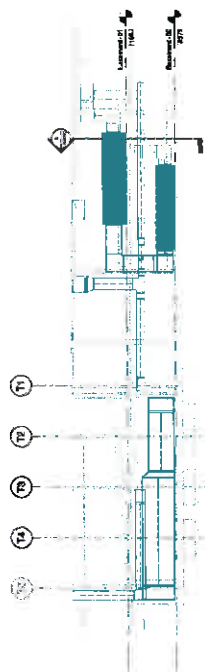
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F11 128-8628

Golden House, NEW YORK, NY 10028  
F14 202-739-8067

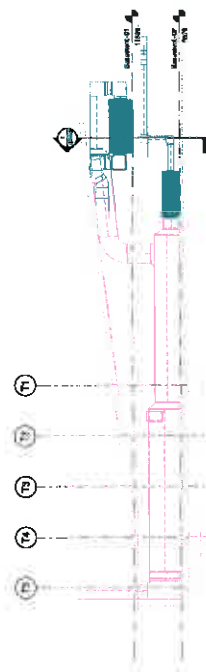
Golden House, LONDON, ENGLAND  
0203 638-0971

Merle D. Von Wagoner, President, 1135 190  
N. 12th Ave. and 28th

DO NOT SIGN, CHECK OR INITIAL ANY INFORMATION ON THIS FORM



2 Basement Plantroom Section A  
1 : 1500



**3** Basement Plinth Section B  
1 : 100

**Legend - Ventilation**



M - Legend - Ventilation  
1:50

**FOR INFORMATION ONLY**

[illegible]

601P WOOD ST. POLICE STATION



3900 157 JEFFERSON STREET,  
CHICAGO  
ILLINOIS 60644  
TEL: 312 467-7200 FAX: 312 467-7201  
TELETYPE: 312 467-7202  
CABLE: 312 467-7203

**Product Address**

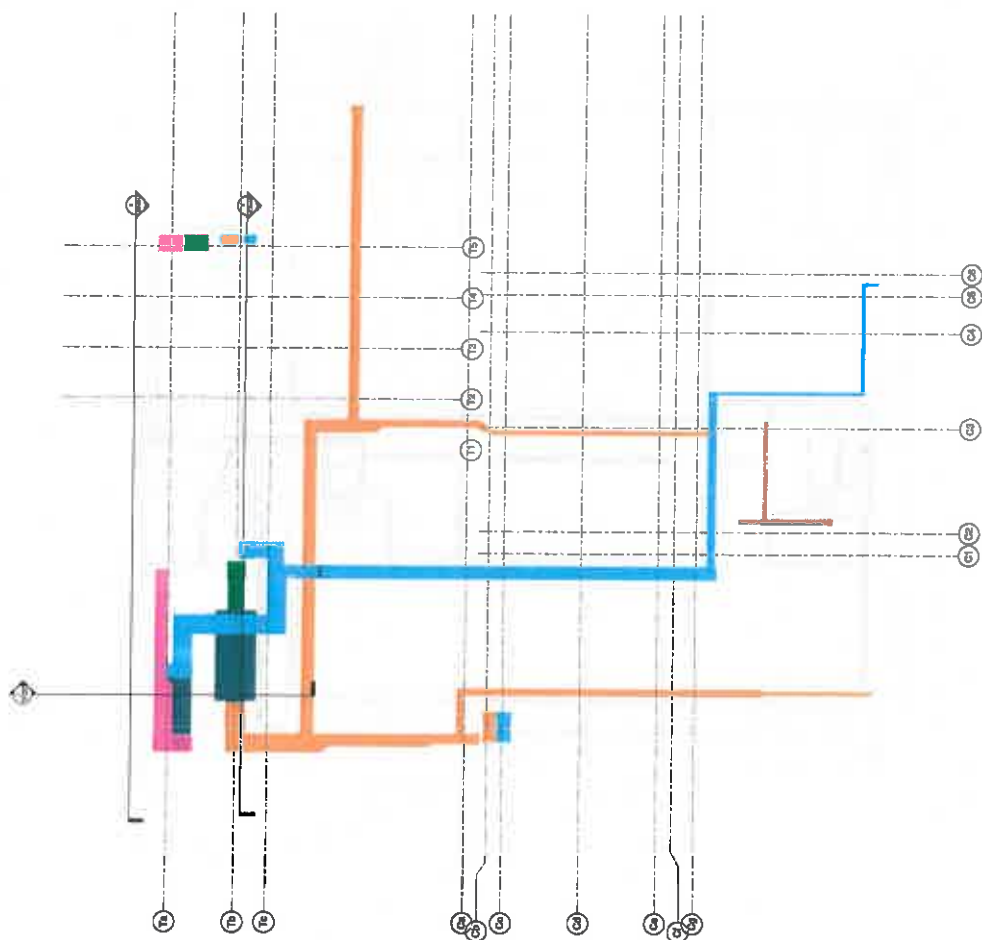
CITY OF LONDON POLICE, WOOD ST. POLICE STATION

1992

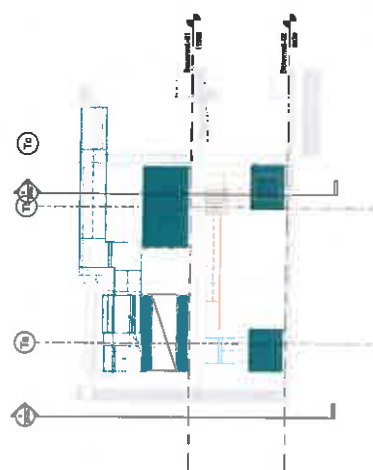
FIVE - 02 - VENTILATION LAYOUT

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Page 10 of 10



1  
1:100  
Ventilation Layout - Basement -01



2 Basement Plan Room Section C  
1:50

**Legend - Ventilation**




 M - Legend - Ventilation  
 1:50

**FOR INFORMATION ONLY**

Item	FOR INFORMATION ONLY	APPROVAL	DATE
	Description	Appr'd/Rev	Date

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[illegible]

2002

CITY OF LONDON POLICE, WOOD ST, POLICE STATION

10

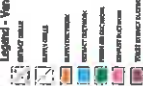
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Order #	Order Date	Order Date	Approved Date
AD88592	11-18-11	11-18-11	11-20-11
Signature	Print Name	Print Name	Print Name
	M		

20

**Item A**

**Legend - Variation**



1 - Legend - Ventilation

8:7

**FOR INFORMATION ONLY**

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**CLAY WOOD ST. POLICE STATION**



**HIS BOOK**  
**LOOKS LIKE**  
AND SET AGAINST THEM,

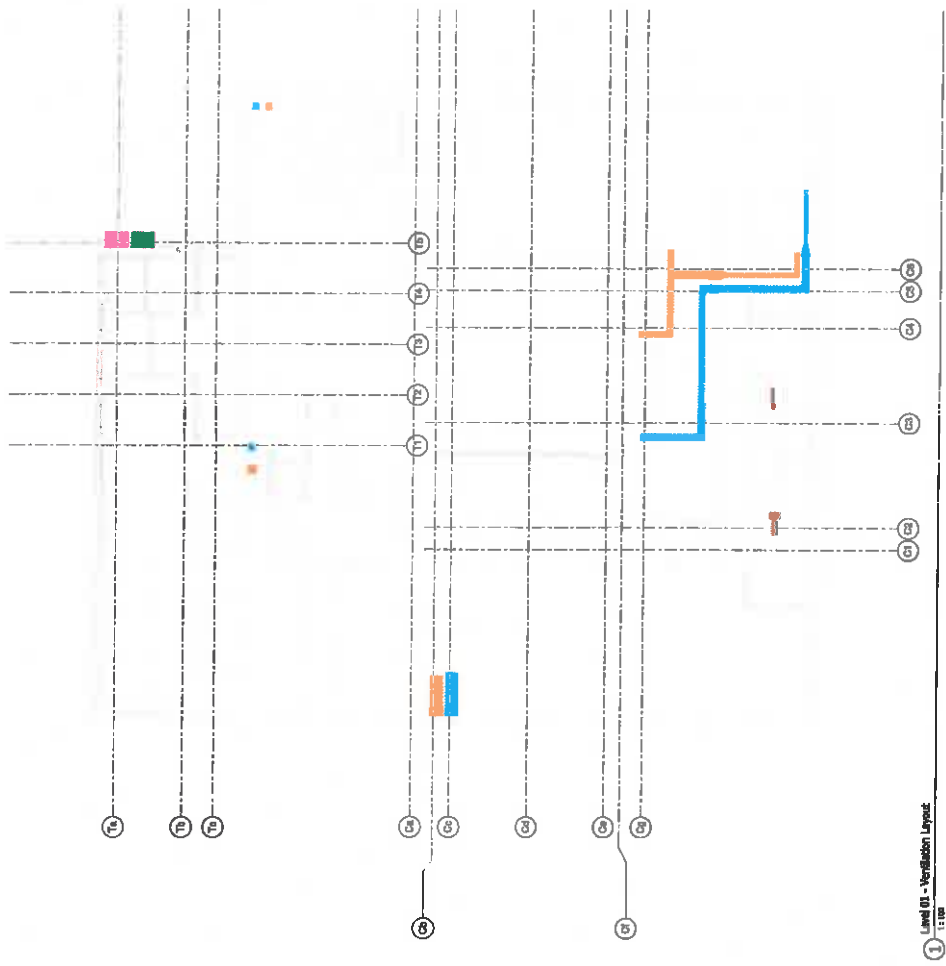
Project: 44-38861-1  
CITY OF LONDON POLICE, WOOD ST. POLICE STATION

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LEVEL 01 - VENTILATION LAYOUT

Make & as indicated	Deliver to	Date 22 JUL 94	Check'd by	Date 24 JUL 94	Approved by	Date 24 JUL 94
A086592		Type M	Grouping (57)004			

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Level 01 - Ventilation Layout

18





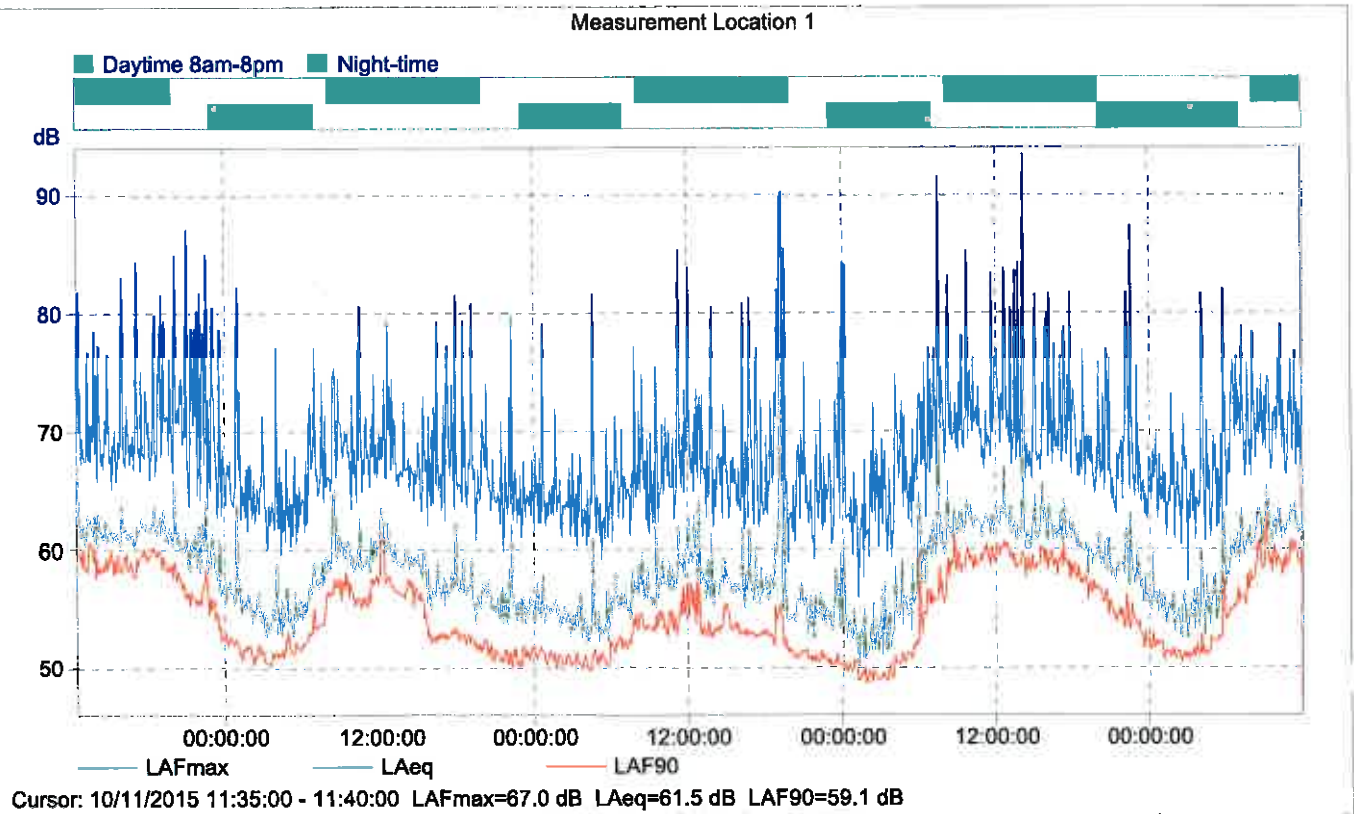






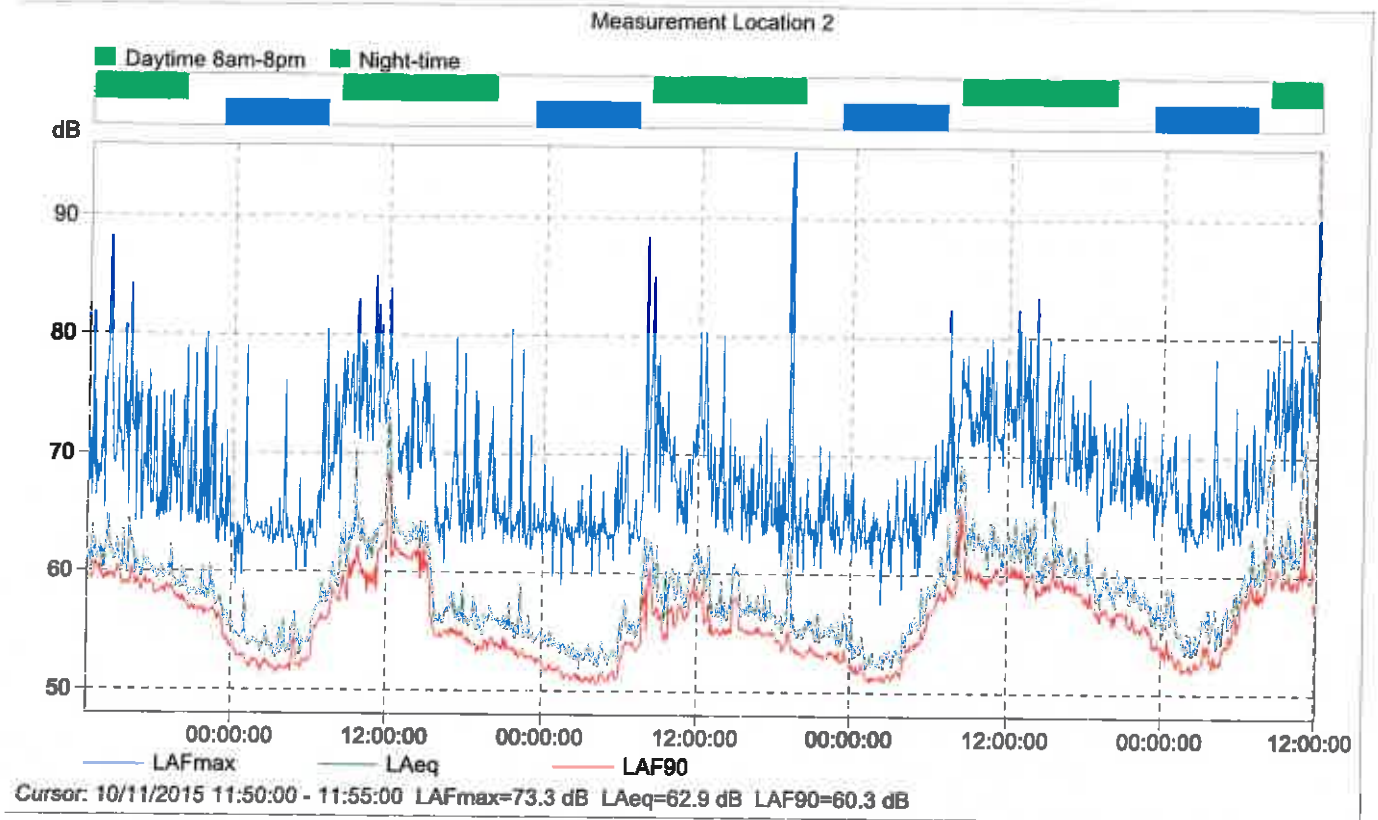






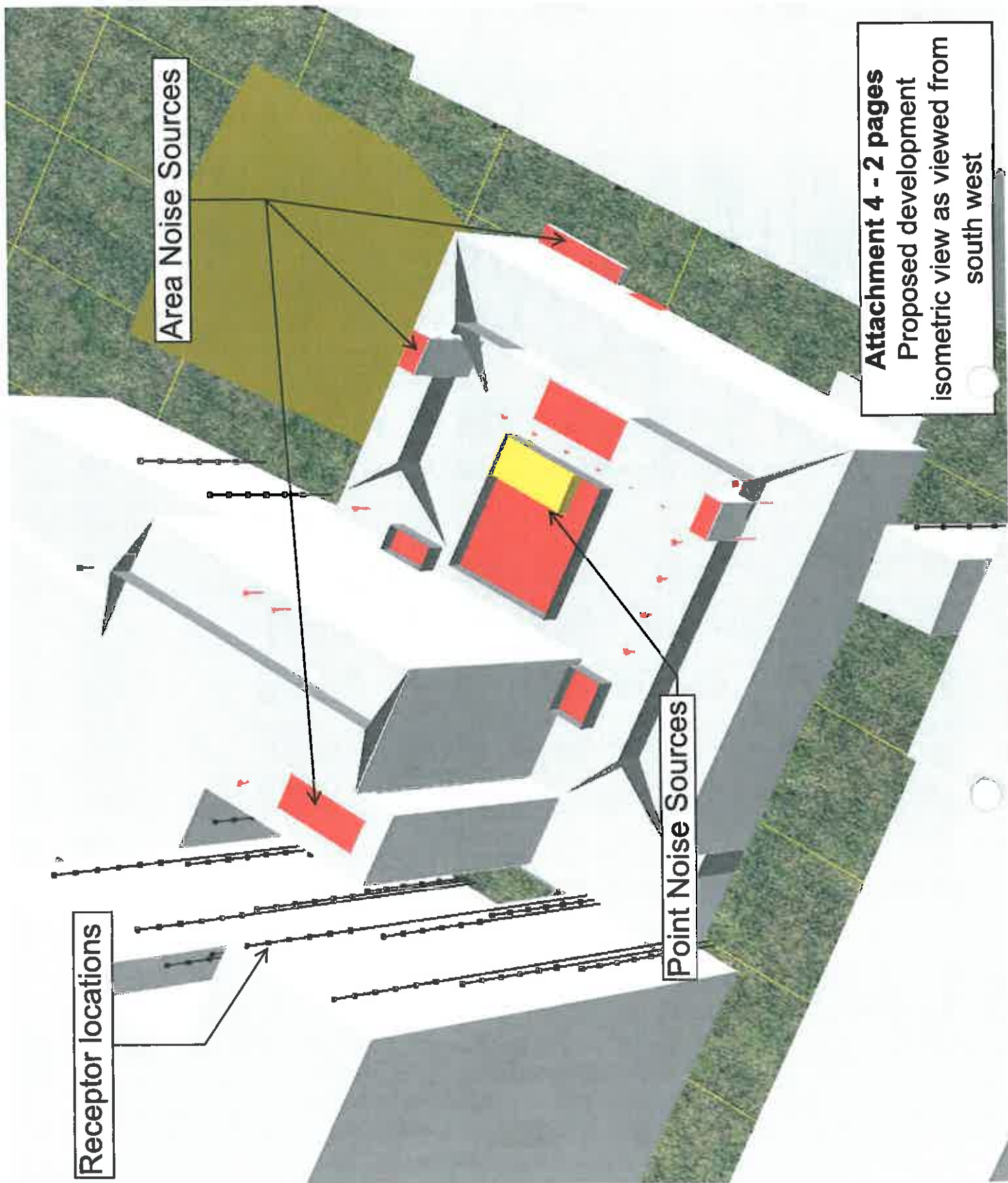
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Unmarked	06/11/2015 12:25:40	13:07:17	91.5	61.6	59.1	51.4
(All) Daytime 8am-8pm	06/11/2015 12:30:00	47:10:00	93.4	63.2	61.2	54.1
(All) Night-time	06/11/2015 22:55:00	35:05:00	87.4	59.5	56.6	50.7
Daytime 8am-8pm	06/11/2015 12:30:00	7:30:00	84.3	63.6	61.8	58.8
Daytime 8am-8pm	07/11/2015 08:00:00	12:00:00	81.5	61.8	59.2	53.2
Daytime 8am-8pm	08/11/2015 08:00:00	12:00:00	90.2	60.5	60.4	53.2
Daytime 8am-8pm	09/11/2015 08:00:00	12:00:00	93.4	64.0	62.4	58.5
Daytime 8am-8pm	10/11/2015 08:00:00	3:40:00	79.0	64.5	62.4	59.1
Night-time	06/11/2015 22:55:00	8:05:00	82.2	59.0	56.3	51.4
Night-time	07/11/2015 23:00:00	8:00:00	81.6	57.7	54.9	50.6
Night-time	08/11/2015 23:00:00	8:00:00	84.2	59.5	56.4	49.7
Night-time	09/11/2015 20:00:00	11:00:00	87.4	60.6	57.7	51.7

Attachment 3 - 2 pages

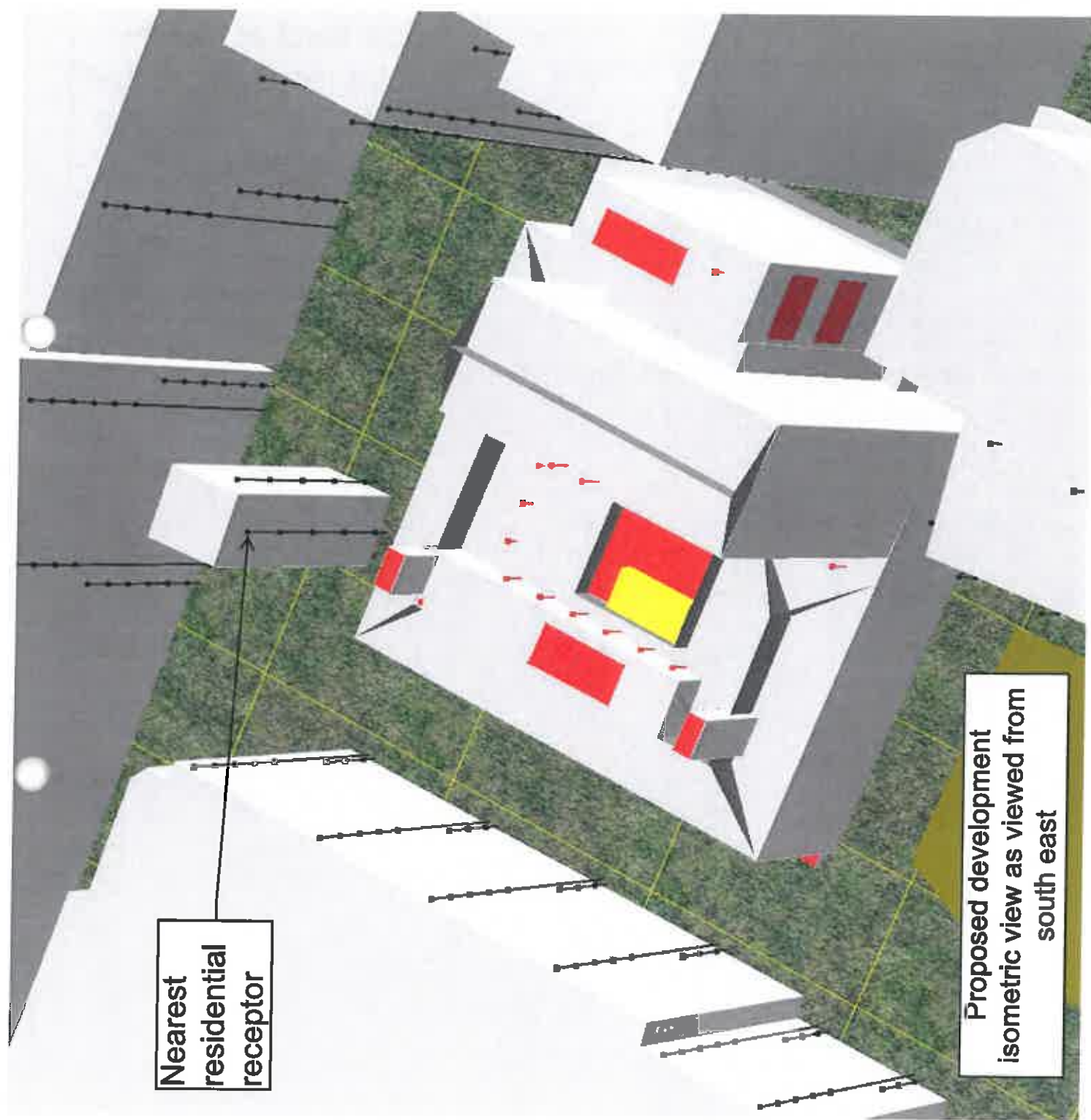


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(All) Night-time	06/11/2015 23:00:00	32:00:00	79.0	58.1	55.5	51.8
Daytime 8am-8pm	06/11/2015 12:50:00	7:10:00	88.1	62.4	61.1	58.7
Daytime 8am-8pm	07/11/2015 08:00:00	12:00:00	84.9	64.7	62.5	55.0
Daytime 8am-8pm	08/11/2015 08:00:00	12:00:00	95.6	61.1	61.1	55.0
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Daytime 8am-8pm	10/11/2015 08:00:00	3:55:00	81.0	69.7	65.3	59.6
Night-time	06/11/2015 23:00:00	8:00:00	79.0	57.2	55.0	52.2
Night-time	07/11/2015 23:00:00	8:00:00	70.7	56.0	54.0	51.3
Night-time	08/11/2015 23:00:00	8:00:00	71.5	58.6	55.6	51.7
Night-time	09/11/2015 23:00:00	8:00:00	78.3	59.3	56.7	52.9









Nearest  
residential  
receptor

Proposed development  
isometric view as viewed from  
south east

City of London Police Wood Street Station Redevelopment  
Plant Noise Model

Noise sources specified as  
Limiting Sound Power Levels

Report: Table of Results  
Model: Plant Noise Model - V4  
LAeq: total results for receivers  
Group: (main group)  
Group Reduction: Yes

**Attachment 5 - 3 pages**  
**Predicted overall plant**  
**noise level at nearby**  
**receptor locations sorted**  
**from highest to lowest**  
**(Daytime)**

Name				
Receiver	Description	Height	Day	Night
S_High_4_E		27.00	48	
NE_2_F		17.00	48	
N_Hi_5_A		38.00	48	
N_Mid_5_F		35.00	48	
S_High_5_E		27.00	48	
S_High_4_D		24.00	48	
S_High_3_E		27.00	48	
N_Mid_0_D		36.00	48	
N_Hi_6_A		38.00	48	
N_Mid_6_F		35.00	48	
N_Mid_2_D		36.00	48	
N_Mid_0_E		39.00	48	
NE_2_E		14.00	48	
E2_F		20.00	48	
S_High_5_D		24.00	48	
S_High_3_D		24.00	48	
N_Hi_3_A		38.00	48	
N_Mid_2_E		39.00	48	
N_Hi_5_B		41.00	47	
N_Hi_4_A		38.00	47	
N_Hi_3_B		41.00	47	
N_Mid_0_F		42.00	47	
S_High_4_C		21.00	47	
N_Hi_6_B		41.00	47	
N_Mid_2_F		42.00	47	
N_Hi_0_A		45.00	47	
N_Hi_2_A		45.00	47	
S_High_6_E		27.00	47	
N_Hi_4_B		41.00	47	
N_Hi_3_C		44.00	47	
N_Mid_1_D		36.00	47	
N_Hi_2_B		48.00	47	
N_Hi_0_B		48.00	47	
N_Hi_0_C		51.00	47	
Castle2_E		22.00	47	40
N_Mid_1_E		39.00	47	
S_High_3_C		21.00	47	
N_Hi_3_E		50.00	47	
N_Hi_5_C		44.00	47	
S_High_5_C		21.00	47	
N_Mid_1_B		30.00	47	
S_High_6_D		24.00	47	
N_Hi_3_F		53.00	47	
N_Mid_1_C		33.00	47	
N_Hi_3_D		47.00	46	
N_Hi_4_C		44.00	46	
N_Hi_6_C		44.00	46	
N_Mid_1_F		42.00	46	
N_Hi_2_C		51.00	46	
N_Hi_1_A		45.00	46	

All shown dB values are A-weighted

Predictor V11.00

**City of London Police Wood Street Station Redevelopment**  
**Plant Noise Model**

Noise sources specified as  
**Limiting Sound Power Levels**

Report: Table of Results  
 Model: Plant Noise Model - V4  
 LAeq: total results for receivers  
 Group: (main group)  
 Group Reduction: Yes

Name				
Receiver	Description	Height	Day	Night
N_Mid_1_A		27.00	46	
NE_2_D		11.00	46	
S3_Low_B		5.00	46	
N_Hi_0_D		54.00	46	
N_Mid_3_F		35.00	46	
Castle1_E		22.00	46	40
N_Hi_5_E		50.00	46	
N_Hi_6_E		50.00	46	
N_Hi_1_B		48.00	46	
N_Mid_2_C		33.00	46	
N_Hi_5_D		47.00	46	
N_Hi_4_E		50.00	46	
N_Hi_4_D		47.00	46	
S_High_2_E		27.00	46	
N_Hi_6_D		47.00	46	
NE_1_F		17.00	46	
NW_Lo_1_F		24.00	46	
S3_Low_C		8.00	46	
E2_E		17.00	46	
N_Hi_6_F		53.00	46	
N_Hi_1_C		51.00	46	
S_High_6_C		21.00	46	
N_Hi_5_F		53.00	45	
N_Hi_4_F		53.00	45	
N_Hi_0_E		57.00	45	
W_High_2_F		35.00	45	
N_Mid_2_B		30.00	45	
S_High_1_E		27.00	45	
N_Hi_2_D		54.00	45	
W_High_2_E		32.00	45	
N_Mid_2_A		27.00	45	
NW_Lo_1_E		21.00	45	
S_High_4_B		18.00	45	
S_High_2_D		24.00	45	
N_Hi_1_D		54.00	45	
S_High_3_B		18.00	45	
S3_Low_A		2.00	45	
NE_1_E		14.00	45	
S_High_1_D		24.00	45	
N_Mid_4_F		35.00	45	
N_Hi_0_F		60.00	45	
NW_Lo_2_F		24.00	45	
E3_F		20.00	45	
W_High_2_D		29.00	45	
W_High_3_F		35.00	45	
N_Mid_6_E		32.00	45	
W_High_3_E		32.00	45	
N_Hi_1_E		57.00	45	
N_Mid_0_C		33.00	45	
W_High_3_C		26.00	45	

All shown dB values are A-weighted

Predictor V11.00

**City of London Police Wood Street Station Redevelopment**  
**Plant Noise Model**

Noise sources specified as  
Limiting Sound Power Levels

Report: Table of Results  
Model: Plant Noise Model - V4  
LAeq: total results for receivers  
Group: (main group)  
Group Reduction: Yes

Name				
Receiver	Description	Height	Day	Night
NE_0_F		17.00	44	
W_High_2_C		26.00	44	
Castle3_E		22.00	44	38
NE_2_C		8.00	44	
S_High_3_A		15.00	44	
S_High_5_B		18.00	44	
N_Hi_2_E		57.00	44	
W_High_3_D		29.00	44	
S_High_2_C		21.00	44	
N_Hi_1_F		60.00	44	
NE_0_E		14.00	44	
W_High_3_B		23.00	44	
N_Mid_3_E		32.00	44	
S_High_4_A		15.00	44	
NE_1_D		11.00	44	
N_Hi_2_F		60.00	44	
S_High_1_C		21.00	44	
N_Mid_5_E		32.00	44	
NW_Lo_2_E		21.00	44	
W_High_4_E		32.00	44	
S4_Low_C		8.00	44	
S4_Low_B		5.00	43	
W_High_4_F		35.00	43	
S_High_6_B		18.00	43	
W_High_2_B		23.00	43	
S_High_2_B		18.00	43	
W_High_1_F		35.00	43	
S2_Low_C		8.00	43	
W_High_4_D		29.00	43	
S2_Low_B		5.00	43	
NE_0_D		11.00	43	
NW_Lo_1_D		18.00	43	
N_Mid_0_B		30.00	43	
E3_E		17.00	43	
S_High_2_A		15.00	43	
NW_Lo_0_F		24.00	43	
NE_2_B		5.00	43	
N_Mid_0_A		27.00	43	
S_High_5_A		15.00	43	
S_High_1_B		18.00	43	
E1_F		20.00	43	
W_High_1_E		32.00	43	
W_High_4_C		26.00	43	
E2_D		14.00	43	
NE_1_C		8.00	43	
Castle1_D		17.00	42	36
NW_Lo_2_D		18.00	42	
NE_0_C		8.00	42	
N_Mid_3_D		29.00	42	
S_High_1_A		15.00	42	

All shown dB values are A-weighted

Predictor V11.00

**Hassall, Pam**

**From:** Pln - CC - Development Dc  
**Subject:** FW: PLN FW: 3rd Party Planning Application - 17/00130/FULMAJ COL:05092461

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

From: [BCTAdmin@thameswater.co.uk](mailto:BCTAdmin@thameswater.co.uk) [<mailto:BCTAdmin@thameswater.co.uk>]  
Sent: 29 March 2017 08:12  
To: PlanningQueue  
Subject: 3rd Party Planning Application - 17/00130/FULMAJ

Corporation of London  
54940  
Department of Planning & Transportation  
17/00130/FULMAJ  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Our DTS Ref:

Your Ref:

29 March 2017

Dear Sir/Madam

Re: WOOD STREET POLICE STATION, 37 WOOD STREET, LONDON, EC2P 2NQ



Waste Comments

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

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

Legal changes under The Water Industry (Scheme for the Adoption of private sewers) Regulations 2011 mean that the sections of pipes you share with your neighbours, or are situated outside of your property boundary which connect to a public sewer are likely to have transferred to Thames Water's ownership. Should your proposed building work fall within 3 metres of these pipes we recommend you email us a scaled ground floor plan of your property showing the proposed work and the complete sewer layout to [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) to determine if a building over / near to agreement is required.

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.

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.

'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

On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.

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.

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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[devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)

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





Historic England



LONDON OFFICE

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

Direct Dial: 020 7973 3707

Our ref: P00565849

5 April 2017

Dear Mr Chipperfield

**Arrangements for Handling Heritage Applications Direction 2015 &  
T&CP (Development Management Procedure) (England) Order 2015  
WOOD STREET POLICE STATION 37 WOOD STREET LONDON EC2P 2NQ  
Application No 17/00130/FULMAJ**

Thank you for your letter of 28 March 2017 notifying Historic England of the application for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

#### **Recommendation**

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

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

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

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



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
HistoricEngland.org.uk



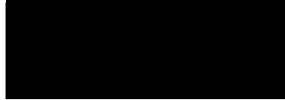




Historic England

LONDON OFFICE

Yours sincerely



**Jane Cook**  
Business Officer  
E-mail: [jane.cook@HistoricEngland.org.uk](mailto:jane.cook@HistoricEngland.org.uk)



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



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

## Broughton, Helen

---

**From:** PLN - Comments  
**Subject:** FW: Comments for Planning Application 17/00130/FULMAJ

**From:** PLN - Comments  
**Sent:** 21 April 2017 15:01  
**To:** PLN - Comments  
**Subject:** Comments for Planning Application 17/00130/FULMAJ

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

Comments were submitted at 3:01 PM on 21 Apr 2017 from Dr Charles Fentiman.

### Application Summary

**Address:** Wood Street Police Station 37 Wood Street London EC2P 2NQ

**Proposal:** Erection of a nine storey tower, infill of existing courtyard, internal refurbishment, conversion of basements to provide car and cycle parking; refuse and recycling storage; and associated works for police station (sui generis) use (Total new floorspace 2752sq.m GEA).

**Case Officer:** Rob Chipperfield

[Click for further information](#)

### Customer Details

**Name:** Dr Charles Fentiman  
**Email:**  
**Address:** 31 Nutham Lane Southwater Horsham

### Comments Details

**Commenter Type:** Member of the Public

**Stance:** Customer objects to the Planning Application

**Reasons for comment:** - Residential Amenity

**Comments:** The proposed development at the Wood Street Police Station has been brought to my attention and having led the City Breeding Bird Surveys in the last two years I find it very disappointing that the long term presence of a pair of nesting Kestrels on the building has not been considered in the planning so far and the Extended Phase 1 Habitat Survey by WYG Environmental Planning Transport Ltd has completely missed this, rather well-known nest site. This survey was completed in November 2015, which was the first year of the current survey, but the existence of this nest was well know before we started this survey in April 2015. I am a Chartered Engineer, so I am rather

disappointed that the report signed off by two Chartered Ecologists who failed to become aware of this, however this was clearly a desk study rather than a field report. The data of our surveys, collected sightings have been added to the GIGL database, but it is possible that the most recent findings had not yet been entered by the date of the report, which is therefore out of date.

These reports in collaboration with FOCG can be found on the Friends of City Gardens website.

<http://www.friendsofcitygardens.org.uk/Breedingbirds15.pdf>

<http://www.friendsofcitygardens.org.uk/Breedingbirds16.pdf>

The survey is continuing through the 2017 breeding season and the pair are nesting again, and to date both display and mating have been seen at the nest entrance. The nest site is easy to see from the East, and it is the left hand portal at the top of the tower.

The Extended Phase 1 Habitat Survey does point out (page 15 section 5.3.1) "However, noise or vibration caused by construction could make the adult leave an active nest and result in the death of the young. This could be interpreted as an offence under the Wildlife and Countryside Act 1981." In fact it would be an offence since it is a known nest site of a scarce BoCC Amber listed species.

I should explain that breeding sites of many raptor species such as Kestrels are traditional (owned by the pair and used year after year, until the death or old age of one of the pair when a replacement takes over). So should the pair be disturbed to the extent of abandoning this nest then the City of London is very likely to lose the only breeding pair of this scarce species. There are no other nest sites known in the City.

In describing the field work, Peregrine Falcon is mentioned, but they have not been observed at the Police Station other than occasionally flying past. It is perhaps the case that the professional ecologist misidentified the species of falcon present, but in Urban London the Peregrine Falcons are now probably more numerous than the Kestrel.

The report does conclude (page 17) that "It is recommended that any work which may impact birds are timed to avoid the nesting season". I believe that this is essential!

In fact, a specific plan should be created to safeguard this pair and their nest site. This should be a condition of Planning and this plan should be open to scrutiny to ensure that it minimises the risk of losing the only nesting Kestrels in the City.

I am also concerned about the potential for disturbance of other nesting bird species, such as Black Redstarts. These are known to nest in the immediate area, and we have records that show that territories extend to include the Police Station, so measures to avoid disturbing them, and perhaps enhancements to the building to help this rare species would be most welcome. The City population of Black Redstarts is significant in terms of the UK status of this rare species (BoCC Red Listed).

Dr Charles Fentiman, CEng, PhD, FIMMM

**We wish to object to the Planning Application to Wood Street Police Station based on the following comments**

**17\_00130\_FULMAJ**

**Sarah Hudson, Chair, on behalf of Friends of City Gardens**

**Comments on Habitat Survey**

1. The ecology assessment is dated November 2015, more than 17 months old. This means that it does not take into account data on species logged with GiGL for the 2015 and 2016 Breeding Birds Survey

(<http://www.friendsofcitygardens.org.uk/Breedingbirds15.pdf> and <http://www.friendsofcitygardens.org.uk/Breedingbirds16.pdf>)

And more recent bird surveys (RSPB Big garden Birdwatch 2016 and 2017 and nest box cleaning surveys 2015, 2016 and 2017).

Before final Planning Approval is sought the Ecological Survey should be updated as much of the information contained within it is now outdated and inaccurate.

2. Ref. Table 1 - this is now outdated. Postman's Park is now a SLINC under the City's BAP 2016 - 2020 and Noble Street has been recommended for upgrading to SBINC status. The proximity of all these sites to Wood Street Police Station indicates the importance of keeping disturbance to a minimum during the construction process and ensuring that no physical interference in St Mary's Aldermanbury is allowed. This garden is an important green space as part of a green corridor that stretches across the City.

3. Ref. 2.5 The current BAP 2016 - 2020 has an updated target species list.

**4. Ref. 4.3.2 Nesting Birds**

A pair of kestrels (*Falco tinnunculus*) have nested on the east elevation of the tower for at least two years and raised young. The pair is currently nesting (April 2017). These are the only kestrels that have been observed in the City.

The Kestrel is an Amber listed species of Conservation Concern and is protected under the Wildlife and Countryside Act 1981, which makes it an offence to damage or destroy an active nest or its contents.

It is very important that a detailed plan is agreed by a qualified ecologist, appointed by the City of London Planners (i.e. not the construction company), to ensure minimum disturbance to the nest site and to provide an additional nesting site on the new tower - facing out over the adjacent St Mary Aldermanbury garden and not overlooked by any windows. It is essential that building work is not carried out in the nesting season while the existing nest is occupied and that since the male has been observed guarding the nest site throughout the rest of the year that the nest itself is not disturbed and that during the construction phase measures are put in place to ensure there is the minimum amount of noise and disruption for this bird.

5. There is no evidence that Peregrine falcon have nested here.

6. The Police Station is within the territory of at least one pair of breeding Black Redstarts, a red list species of Conservation Concern. The City is home to between 16 and 44% of the UK breeding population of Black Redstarts, based on the RSPB/BTO estimate of 19 to 44 pairs.

7. As noted in the report it is very important that the nests and habitats of the BoCC species, Kestrel and Black Redstart, are not disturbed through the breeding season. Any opportunity to enhance the environment for these birds should be taken as part of the building works - as noted in the report - with the installation of nest boxes/ledges and provision of suitable habitat, such as perching posts and a green roof at the top of the new tower.

8. Ref 5.4.1 In addition to installing nest boxes for House sparrow, the creation of a suitable habitat in the form of a green roof for Black Redstarts would be welcome.

9. The built up nature of the surroundings to the Police Station make it a hazardous environment for swifts that often come to grief by crashing into windows and providing nest boxes on any building that is not on the Thames corridor should not be encouraged.

#### **Comments about disturbance to St Mary Aldermanbury Garden**

10. There are two specimen trees close to the east wall of the Police Station - a mature Magnolia grandiflora and a Swamp Cypress (*Taxodium distichum*). The latter is a fine specimen and one of only two of this species in the City (the other being a poor specimen in Cleary garden). Apart from general disturbance of noise and dust to the garden during building works, it is very important that these two trees are not damaged and that scaffolding or hoardings are not erected round the building in a way that damages existing planting in any way, including by preventing watering or natural watering from rainfall.

11. The St Mary Aldermanbury garden has two nest boxes, both of which were used by Great Tits in 2016 to raise young. The nest boxes in this garden have been consistently occupied for the last five years. It is important that noise and disturbance during the nesting season is kept to a minimum and that there is no direct disturbance to the nest boxes or the garden itself, which is an important area for foraging birds. Shrub species in this garden have been carefully selected to provide forage and cover for birds and the garden attracts a number of species including wrens, goldfinches, great and blue tits, blackbirds, carrion crows, magpies, dunnocks and robins, some of which are likely to have nests in the dense hedges and shrubbery.

12. The garden is also used by migratory species, such as Common White throat, Black Cap, Garden Warbler and Willow Warbler as a refuelling point and it is very important that disturbance does not rob these species of a valuable, safe refuge to rest and forage.

### **Friends of City Gardens**

[www.friendsofcitygardens.org.uk](http://www.friendsofcitygardens.org.uk)

Is a volunteer community group based in the City with over 200 members. We support the City Gardens team and our aims are to enhance biodiversity in the City and to encourage more residents, City workers and visitors to enjoy the City's green spaces. We carry out hands on biodiversity enhancements, surveys (including the summer breeding birds survey 2014, 2015, and 2016, RSPB Birdwatch 2013 - 2017 and Nest Cleaning reports (2011 to 2016) and organise volunteering opportunities for adults and activities for children. We contribute over 4,000 volunteer hours a year.

**Broughton, Helen**

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**From:** PLN - Comments  
**Subject:** FW: Comments for Planning Application 17/00130/FULMAJ

**From:** PLN - Comments  
**Sent:** 22 April 2017 09:25  
**To:** PLN - Comments  
**Subject:** Comments for Planning Application 17/00130/FULMAJ

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

Comments were submitted at 9:25 AM on 22 Apr 2017 from Mr Kenneth Murray.

### **Application Summary**

**Address:** Wood Street Police Station 37 Wood Street London EC2P 2NQ

**Proposal:** Erection of a nine storey tower, infill of existing courtyard, internal refurbishment, conversion of basements to provide car and cycle parking; refuse and recycling storage; and associated works for police station (sui generis) use (Total new floorspace 2752sq.m GEA).

**Case Officer:** Rob Chipperfield

[Click for further information](#)

### **Customer Details**

**Name:** Mr Kenneth Murray

**Email:**

**Address:** 45 Newlands Rd. Woodford Green, London/Essex

### **Comments Details**

**Commenter Type:** Member of the Public

**Stance:** Customer objects to the Planning Application

**Reasons for comment:**

**Comments:** The proposed development could severely impact the breeding site of the 'City of London's' only breeding pair of Kestrel, as they annually occupy the top floor access to the tower between Feb/March through to Sep/Oct. Being a schedule 1 protected species, their occupancy at this site is of "real" significance, when one considers their general demise nationally over recent decades. I would urge caution with this project regarding the species wellbeing in the face of the planning application.

Regards

Ken Murray

4 02 MAY 2017  
**TWENTIETH  
CENTURY  
SOCIETY**



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

Sent by email: [rob.chipperfield@cityoflondon.gov.uk](mailto:rob.chipperfield@cityoflondon.gov.uk)

02 May 2017

Our ref: 98 04 29

Dear Rob Chipperfield,

**17/00131/LBC and 17/00130/FULMAJ Erection of a new 9 storey tower, infill of the courtyard, internal refurbishments and conversion of basements to provide additional office floor space; car and cycle parking; refuse and recycling storage; and associated works at Wood Street Police Station, 37 Wood Street, London EC2P 2NQ**

Thank you for consulting the Twentieth Century Society on the above listed building consent and planning applications. These were discussed at our April casework committee. Members strongly **objected** to the proposals, and the letter below sets out the views of the committee.

#### **Significance**

Wood Street Police Station, designed by McMorran and Whitby and completed in 1966 is a Grade II\* listed building. It was McMorran's last major project before he died in 1965 and is considered to be his masterpiece. According to Historic England, it is his 'best-known building: he specialised in police stations and this was his last and largest'. Architectural historian and writer Gavin Stamp, writing in the Spectator in 1990 called this building 'one of the most imaginative modern classical buildings in the City of London'.

It is the only listed post-war police station, and is one of only 5.8% of listed buildings nationally to achieve the high accolade of II\* listing, which categorises it as 'more than special interest'. It is largely unaltered, and when the Society undertook a site visit in 2016 we were impressed with the quality of the spaces, the original materials and the finishes.

The building has been studied in the monograph publication by Edward Denison, published by English Heritage, The Twentieth Century Society and RIBA in 2009. This book describes Wood Street Police Station as the 'greatest success of his [McMorran's] lifetime (p102)'. The author goes on to state that, "The City Police Station is an original masterpiece, a work of art that defines McMorran's philosophies succinctly. It is an Italianate composition harking back to his favourite architect, Michele Sanmicheli, yet is rooted firmly in Britain and in the 20<sup>th</sup> century" (p 107). There are also clear

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ

[www.c20society.org.uk](http://www.c20society.org.uk)



architectural links to their nearby work at the Central Criminal Court Extension, in the City of London also grade II\* listed, which was built in 1960-72.

## **Proposals**

### *Pre-application feedback*

Plans have been prompted by the desired consolidation of the entire City of London police force onto one site. The Society was consulted by the applicants at the pre-application stage. The scheme presented in 2016 involved the construction of a tower extension, the partial infill of the courtyard, the conversion of the office and residential spaces into open plan, and the replacement of the majority of the original windows, although we were unable to see detailed drawings or demolition plans for security reasons. The Society had a number of significant concerns, as follows:

1. No conservation management plan was in place which could ensure a conservation led approach.
2. Concern that the proposals would cause substantial harm.
3. Insufficient justification. We did not consider that enough information had been provided to assess whether the building could be better protected through alternative uses.

We therefore advised the applicant to re-think their approach to the proposals, and welcomed the opportunity to comment on the detail of any revisions to the scheme ahead of formal submission.

### *Current proposals*

Committee members did not consider that any of our initial concerns had been addressed. In particular, it was felt that the lack of a conservation management plan (CMP) meant that the proposals had not been informed from the outset by a robust understanding of significance, as is essential when dealing with a Grade II\* listed building. With this in mind, the main proposals will be taken in turn:

1. The tower. The committee considered that this was the most harmful of the proposals and that it would substantially harm the composition of the built ensemble, which is fundamental to the overall architectural quality of the police station. It is an ensemble defined by the presence of a single vertical element. The proposed linked addition would not only compromise the fabric and destroy the impression of tapering windows to the northern elevation of the tower, but would also impact the careful balance and legibility of the form. This would be particularly harmful when viewed from Wood Street.
2. Infilling the courtyard. A new atrium would be formed within the courtyard, with timber detailing and a glazed perimeter where the new floors abut historic fabric, and with new walkways around the perimeter, affixed to existing walls. Members found it difficult to appreciate the full impact of this proposal through plans provided, but expressed concern over the loss of the void/solid relationship and the courtyard typology.
3. Open plan offices. The committee considered that there may be potential to convert some of the spaces into open plan, but that the full impact of this could not be currently appreciated due to the lack of a CMP, and that taken in combination with the above proposals would only serve to increase the level of harm overall.

4. Replacement of all external windows. The Historic England guidance on Traditional Windows states that 'Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.' (p. 62) There is no window condition survey to demonstrate that the windows are beyond repair. In any case, there is no obligation to bring historic buildings up to modern thermal standards, and in these terms we consider the removal of windows are unjustified.

In regards to our third area of concern, the Society urged that the potential for alternative use was fully explored. We do not consider that the applicants have properly demonstrated that the building could not be better conserved through a change of use. We agree with Historic England in their letter of the 2 December 2016 that the supporting documentation of this nature is 'little more than speculation... and certainly insufficiently robust to support the currently proposed seriously harmful intervention', although we acknowledge Historic England have retracted their judgement of 'substantial harm' since the tower has been reduced in height.

### Policy

Paragraph 133 of the NPPF states that 'Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible
- the harm or loss is outweighed by the benefit of bringing the site back into use

The Society considers that the proposals will cause substantial harm to a Grade II\* listed building. The committee was not convinced that it has been demonstrated that consolidating in this way on this particular site has a public benefit that can outweigh this substantial harm. Members also did not consider that any of the above tests had been met. We therefore strongly urge that the application is refused consent.

Should your Planning and Transport Committee be minded to grant consent, we will request that the Secretary of State exercise their powers under Section 77 (1) of the Town and Country Planning Act 1990 and require the application to be referred to them for determination, as we consider that this would conflict with national policies on the protection of a heritage asset of national importance. The Society therefore copies this letter to the Department of Communities and Local Government and the National Planning Casework Unit.

I trust that these comments are of use to you. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,

Tess Pinto

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ

**Conservation Adviser**  
**Twentieth Century Society**

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

cc. National Planning Casework Unit, [REDACTED]

cc. Sue Lovelock, [REDACTED]

cc. Mike Dunn, [REDACTED]