

Committee:	Date:
Planning and Transportation	20 February 2018
Subject: 21 Moorfields, Land Bounded By Moorfields, Fore Street Avenue, Moor Lane & New Union Street London EC2P 2HT Construction of a mixed use development above and around the new Crossrail station entrance to provide office (Class B1) space[63,008sq.m GEA], retail (Use Class A1/A3/A4) space [182sq.m GEA], a replacement City Walkway, a new urban square, cycle parking, servicing, storage, plant, landscaping [12,587sq.m GEA] and associated works. [Total 75,777sq.m GEA]	Public
Ward: Coleman Street	For Decision
Registered No: 17/01095/FULEIA	Registered on: 27 October 2017
Conservation Area:	Listed Building: No

Summary

This planning application amends previous schemes for the site which were approved in 2015 and 2017, to deliver a development that provides trading floors and accommodation for Deutsche Bank to meet its requirements for a City headquarters, which is significant in supporting the City's role as a world financial centre.

The alterations to the scheme involve reducing the size and height of the western building onto Moor Lane and increasing the size and, in parts, the height of the eastern building.

The design approach accords with the previous schemes and is informed by the surrounding buildings and the requirement to span the underground station and lines below. The site has been cleared and works carried out in respect of the previous approved schemes which are considered implemented.

The scheme would provide an enhanced City Walkway along the southern edge of the site (accessed by escalators, stairs and lifts) which would run from Moorfields to the Barbican and Barbican Centre over Moor Lane. There would be a publicly accessible square at the western end of the site which would be landscaped.

There would be a reduction in the quantity of open space and retail on the site necessitated by Deutsche Bank's space requirements. Although this would be

contrary to policy, it is a change welcomed by the majority of respondents to the proposal due to an anticipated reduction in potential noise and disturbance.

This scheme differs from the two previous approved schemes by accessing the service yard from Moor Lane rather than Fore Street Avenue. This is the main ground of objection from neighbouring residents. It is a requirement of Deutsche Bank that this is achieved in order to meet its delivery management and security requirements.

The impact of this change has been mitigated by negotiations through restricting the number of service vehicles to 85 through consolidation (of which five are anticipated to be HGVs), by noise mitigation measures and by allowing no vehicular access to the service area from this point other than between 7am and 9pm Monday to Friday, between 9am and 6pm on Saturday and not at all on Sunday or Bank Holidays. Limited deliveries, motorbike and cycle couriers will access a 'Post room' facility on Fore Street Avenue.

The site was previously serviced from Moor Lane before its demolition and, while the use of Moor Lane in this case is not in accordance with previous approvals, it is considered that, through the agreed mitigation measures, the impact on the amenity of neighbouring residential occupiers would not be significant and would not warrant a refusal on this ground. The location of the service area would not prevent the agreed enhancement scheme for Moor Lane being implemented.

There were 51 respondents from neighbouring residential and commercial occupiers; 47 objected, two were neutral and two supported the scheme.

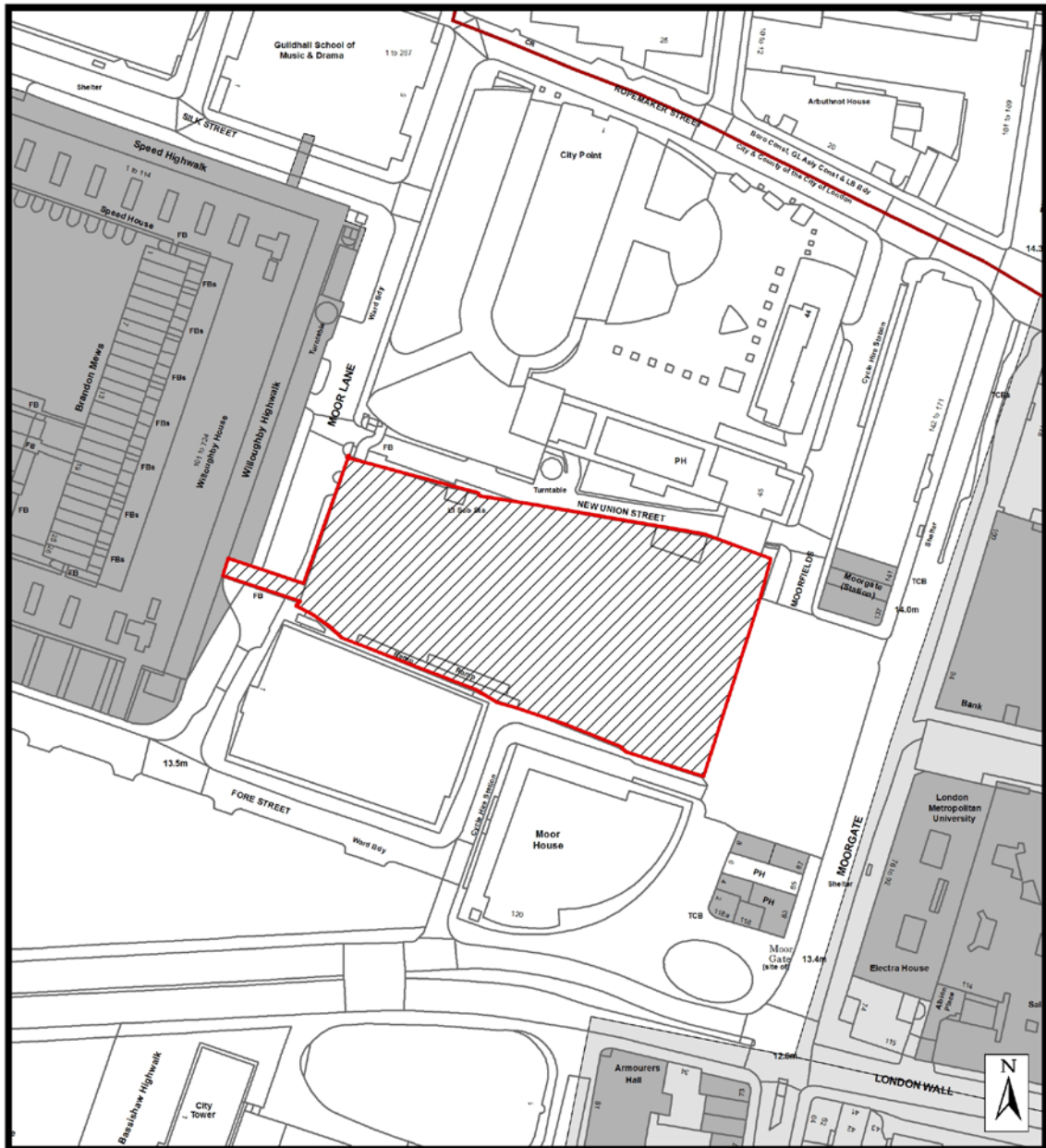
Changes to the City Walkway will require separate approvals in respect of declaration and in relation to maintenance. Legal agreements related to those approvals and reports will be placed before your Committee at the appropriate times.

On balance, the proposals are in substantial compliance with the development plan policies that relate to it. In particular, through the retention of a major European bank with 7,000 employees in London, and supports the objective of promoting the City as the leading international financial and business centre. The impact of the scheme has been assessed and it is concluded that the proposal overall is acceptable subject to conditions and to a Section 106 agreement being entered into to cover the matters set out in the report.

Recommendation

- (a) Planning permission be GRANTED for the above proposal in accordance with the details set out in the attached schedule subject to planning obligations and other agreements being entered into in respect of those matters set out in the report, the decision notice not to be issued until such obligations have been executed;
- (b) That your officers be instructed to negotiate and execute obligations in respect of those matters set out in the report under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.
- (c) That the draft statement set out at Appendix A and in the report are agreed as the Reasons for Grant and the Reasoned Conclusion of the Local Planning Authority on the significant effects of the proposals.


City of London Site Location Plan



© Crown copyright and database rights 2018 OS 100023243

ADDRESS:
21 Moorfields

CASE No.
17/01095/FULEIA

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



DEPARTMENT OF THE BUILT ENVIRONMENT

21 Moorfields, Pre-demolition



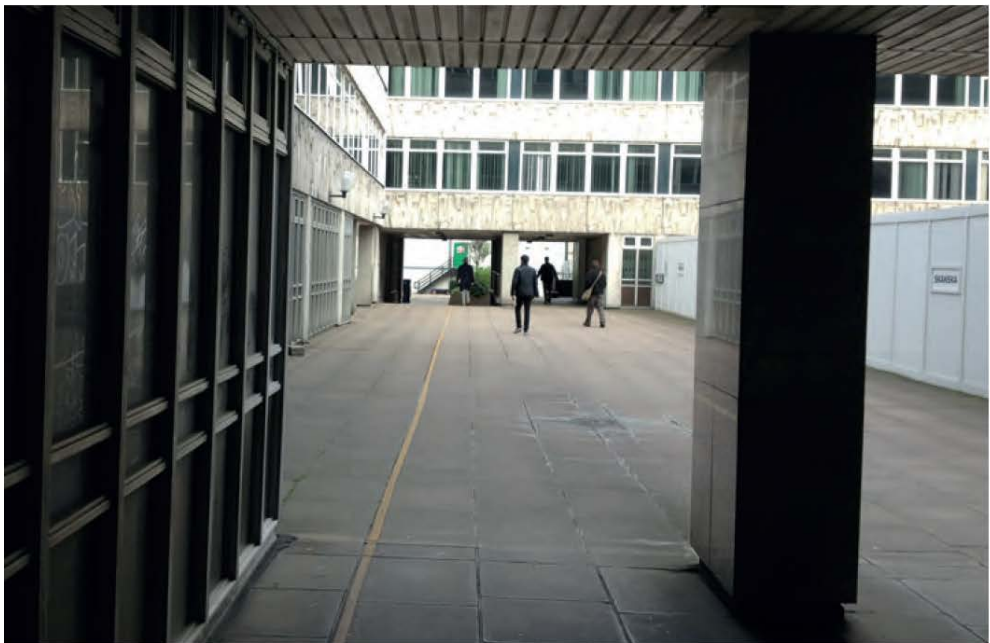
Moorfields looking north



Moor Lane towards New Union Street

Case No. 17/01095/FULEIA

21 Moorfields, Pre-demolition



Case No. 17/01095/FULEIA

Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - a. To examine the environmental information;
 - b. To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination;
 - c. To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - d. If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. The local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to at paragraph 3(b) above is up to date.

The draft statement attached to this report at Appendix A sets out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions set out in the statement are up to date.
5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also forms part of the environmental information before your Committee.
6. The Environmental Statement is available in the Members' Room, along with the application, drawings, relevant policy documents and the representations received in respect of the application.

Site and Surroundings

7. The proposal site is bounded by Moorfields to the east, New Union Street to the North, Moor Lane to the west and Fore Street Avenue/Fore Street to the south:
 - Moorfields is a busy commercial street that provides access to Moorgate Underground Station. On completion of the Crossrail works, the southern end, from London Wall to just north of the station entrance, will become pedestrianised subject to timed access for service vehicles.
 - New Union Street is a privately owned street that provides servicing access to the developments at City Point and Tenter House. There is also some pedestrian usage.
 - Moor Lane has a mixed character. Post-War, the whole of the eastern side has been characterised by large commercial office developments. The western side, in contrast, is defined by the residential buildings of the Barbican - one of four areas (Barbican, London Wall, Paternoster Square and Golden Lane) compulsorily purchased and designated for large-scale, precinct like redevelopment, as part of the plan for the 'Reconstruction of the City of London' by Holden & Holford in 1947. It should be noted that the Barbican Estate is currently being assessed for conservation area status.
 - Fore Street Avenue provides servicing access for the large office developments of Moor House and Moorgate Exchange. It is currently a cul-de-sac pending completion of the Crossrail and related over site development of 21 Moorfields. Following completion of these developments it will provide a significant street level pedestrian route from Moorgate Station to the Barbican and the western part of the City.
8. This proposal site is currently a construction site that was previously occupied by an office building (21 Moorfields), part of Moorgate Underground Station and several retail units at ground and Highwalk levels. The previously existing building on the site was relatively small and access to the offices was obtained from the podium level above Moorgate Station. The servicing yard was accessed from Moor Lane. The frontage to Moorfields will form part of the Crossrail station for the Elisabeth Line at Moorgate/Liverpool Street and is part of the Crossrail construction site and Underground station.
9. The site includes areas previously occupied by Moorfields Highwalk, leading to the Barbican, together with the stairs and escalators adjacent to Moorgate Station and a ramp in Fore Street Avenue (all now demolished).

10. Prior to demolition the total commercial floorspace on the site was:
 Offices (B1) - 21,346sq.m (GEA)
 Retail (A1/A3) - 1,715sq.m (GEA)
11. On the western side of Moor Lane is Willoughby House in the Barbican. This has 7 floors above the second floor podium and is in residential use. The Barbican is listed (grade II).
12. On the eastern side of Moorfields there are 137/141 Moorgate, 101-107 Moorgate and 2, 4 & 8 Moorfields. 137/141 Moorgate and 2, 4 & 8 Moorfields are 19th century listed buildings (Grade II) with ground and 3 to 5 upper floors. 101-107 Moorgate is currently part of the Crossrail work site. Planning permission was granted in March 2012 for over site development at 101-107 Moorgate with a building containing ground, mezzanine and six upper floors for office and retail uses.
13. To the north and south there are the following buildings:
 - City Point - Ground and 34 upper floors; office and retail uses. Extensively refurbished in 1998-2001;
 - Moor House - Ground and 17 upper floors; office and retail uses. Completed in 2005;
 - Tenter House - Ground and 10 upper floors office and pub uses (built in 1960s). Outline planning permission was granted in 1997 (renewed three times) to construct a new 10 Storey office and retail building. The last permission has now expired. There is a current application to provide an 18 storey office building with ground floor retail together with works to the two basements and the ground floor level with associated servicing, waste storage and plant facilities, cycle parking and public realm improvements at City Point Plaza and New Union Street [29,221sq.m GEA];
 - Moorfields House - Ground and 7 upper floors in office use. Built in 1960s;
 - Moorgate Exchange, Fore Street – Ground and 12 upper floors in office and gymnasium/fitness centre use. Built in 2012-13.
 - London Wall Place, bounded by London Wall, Fore Street and Bread Street is nearing completion. This development will provide two buildings. The east building, 121 London Wall, is 14 storeys, 74.9m, high providing 41,785sq.m of office floorspace and 1,020sq.m of retail floorspace. The west building, 123 London Wall, is 18 storeys, 91.37m, high, providing 26,030sq.m of office floorspace and 225sq.m of retail floorspace.

Relevant Planning History

14. In 1997 planning permission was granted subject to a Section 106 agreement for redevelopment of 21 Moorfields with offices, a new

station entrance and retailing. This agreement was not completed until 4th July 2001, when the planning permission was issued.

15. The building approved in 2001 had ground and 6 upper floors on Moorfields and ground and 5 floors on Moor Lane, setting back and rising in 2 and 3 storey steps to ground plus 11 floors at the centre of the site. The approved uses were offices - 51,122sq.m and retail - 1,751sq.m.
16. In 2008 planning permission was granted for two new office buildings at 21 Moorfields with a broad pedestrian way provided in an atrium between them. The approved uses were offices (55,494sq.m) and retail (2,737sq.m).
17. The combined new buildings were similar in height and form to the development approved in 2001 but, by reducing floor to floor heights, it was possible to incorporate one more floor. A replacement high level City Walkway was included along the southern edge of the new buildings, with new bridges over Moor Lane and Fore Street Avenue. Lifts, stairs and an escalator were proposed on Moorfields and stairs and a lift on Moor Lane.
18. These planning permissions were not implemented and the time limits for commencement have expired.
19. Approval has been given under the Transport & Works Act for a single storey structure on Moorfields to form a new station entrance. Three angled folds of blue glass would frame the ticket hall entrance creating a visual marker in views along Moorfields. Escalators and stairs to the Highwalk were approved to replace those that had existed. The replacement escalators and stairs would be on the corner of Moorfields and Fore Street Avenue. They would be independent of the new ticket hall and London Underground operations and would be operated and maintained by the City.
20. On 25th November 2015 planning permission (application no. 14/01179/FULEIA) was granted for the demolition of the existing building and structures to ground slab level and construction of a mixed-use development above and around the new Crossrail station entrance to provide office (Class B1) space [64,683sqm GEA], retail (Class A1/A3/A4) space [1,156sqm GEA], a replacement City walkway, a new public square, cycle parking, servicing, storage, plant, landscaping and associated works. [Total 65,839sqm GEA]. All existing structures on the site were demolished and this permission was partially implemented and as such remains valid.
21. On 10th November 2017 planning permission (application no. 16/00883/FULEIA) was granted to enable minor material amendments to the scheme approved in 2015 including: (1) retention of the west building piles; (2) alterations to the external envelope including a reduction in the massing of the west building and an additional storey to the east building; and (3) alterations to the internal layout [Revised GEA 62,543sq.m]. The proposals were a response to site investigations and enabling works. As an amendment to the previous

scheme, this permission is also considered implemented and is referred to in this report as the “extant” or “previous” scheme.

Proposal

22. The current scheme proposes several alterations to that approved in November 2017 to reflect the requirements of a significant pre-let tenant; Deutsche Bank.
23. The principal aspects in the current proposals which vary from the previously approved scheme are:
 - The east building (fronting Moorfields) would be extended westward to provide larger floorplates to accommodate trading floors.
 - The east building would vary in height between 8 and 16 storeys (including mezzanines levels) above podium level with the top two storeys enclosing mechanical plant (93.465m AOD – an overall increase of 3.365m);
 - The west building (fronting Moor Lane) would be reduced in height from 8 storeys (51.95m AOD) to three storeys above podium level (37.59m AOD);
 - There would be no accessible terrace spaces on the western building onto Moor Lane;
 - Terraces for use by the office occupiers would be provided at level 11 on the eastern elevation and levels 9, 10, 12 and 13 on the western elevation of the east building. A small terrace would also be provided at level 14 on the south elevation;
 - The publicly accessible route through the building at podium level would not be included;
 - The publicly accessible urban square to the west of the podium level would be reduced in size from 980sqm to 521sqm and the number of retail units reduced to one;
 - An improved public route through the south side of the site would be provided;
 - The loading bay and servicing area would be accessed from Moor Lane with a secondary “Post Room” provision for couriers on Fore Street Avenue.
24. The London Underground ticket hall at ground level and the structures and station at basement levels do not form part of the application and are unaltered by this proposal.
25. There would be no basements in the new building as all the land below ground level is occupied by the Underground station and tunnels.
26. The office lobby for the eastern building would be at podium level with stair, escalator and lift access from ground level in Moorfields. There would be a secondary entrance from the new urban square.

27. Access to the western building would be at podium level from the new urban square.
28. The proposed floorspace is:
Offices – 63,008sq.m GEA
Retail – 182sq.m GEA
City Walkway, urban square, landscaping, plant, etc. - 12,587sq.m GEA
29. The existing Highwalk escalators and stair on Moorfields are to be replaced by new escalators, stairs and a lift in lieu of the existing ramp in Fore Street Avenue. On Moor Lane there are existing stairs and a lift that would no longer be used. These would be replaced by a new lift and stairs. The Highwalk bridge over Moor Lane is proposed to be increased in width and the bridge over Fore Street Avenue would be altered to meet changes in levels.
30. The scheme would be serviced from a service area in Moor Lane and from a secondary on-street 'post room' facility on Fore Street Avenue. Other than a single parking bay within the loading area for people with disabilities, no car or motor cycle parking is proposed. Pedal cycle parking and changing facilities would be provided on site.

Consultations

31. A Statement of Community Involvement has been submitted with the application outlining the developer's engagement with the statutory authorities, other interest groups and with residents, building owners and occupiers in the surrounding area. A public exhibition was held at St. Giles Cripplegate Church, Fore Street, on the 26th and 27th September 2017 attended by approximately 102 people.
32. A total of 43 written responses were submitted during the public exhibition. Analysis of the submissions indicated that the majority of respondents felt neutral to positive about the proposals while approximately a quarter responded negatively:

Response	Tally	%
Positive	16	37%
Neutral	15	35%
Negative	11	26%
No responses provided	1	2%
Total	43	100%

33. Following receipt of the planning application by the City the application has been advertised and widely consulted upon. Following receipt of

additional information under Regulation 25 of the EIA Regulations the application was re-advertised and all previous consultees re-consulted. Copies of all letters and e-mails making representations are attached in your separate bundle.

34. The views of other City of London departments have been taken into account in considering the redevelopment scheme. Some detailed matters remain to be dealt with through conditions and the provision of an agreement under Section 106 of the Town and Country Planning Act 1990.
35. The Greater London Authority (GLA) has assessed the details of the application and concludes that the level of amendment to the previously approved scheme does not give rise to any new strategic issues. Therefore, the City is free to determine the application without further reference to the Mayor of London.
36. The Surveyor to the Fabric of St. Paul's Cathedral questioned why, as part of a substantial redesign of the scheme, the applicant did not take the opportunity to completely remove the area that breaches the protected view of St. Paul's Cathedral from Westminster Pier (LVMF view 8A.1).

In response the applicants have provided the Surveyor to the Fabric with details of the technical constraints that have informed the new design. It is noted that the impact from both the current proposal and the extant approved scheme on the protected view would be identical. That impact was previously agreed by the City, the GLA, and the Cathedral to be minimal (not visible to the naked eye from the view point) and acceptable. No further comments have been received.

37. No response has been received from Crossrail. To deal with this issue the conditions imposed on application no. 16/00883/FULEIA would be carried forward.
38. Historic England advises that they do not wish to offer any comments on this proposal.
39. The Environment Agency considers that there are no environmental constraints that fall under their remit.
40. Natural England has no comment on the application.
41. Thames Water recommended that a number of conditions and Informatives be attached to the planning permission if approved.
42. The London Borough of Lambeth raises no objection.
43. The City of Westminster did not wish to comment on the application.
44. The Residents Committee of the Heron building, 5 Moor Lane, raised concerns in relation to the lack of provision of street level pedestrian routes through the site from Moorfields to the Barbican, the lack of active frontages at street level on Moor Lane and suggested that as a result the proposals do not adequately respond to the City's Culture Mile aspirations. In response, the constraints of the site including the underground structures and the need to provide for sufficient servicing,

cycle parking, shower/changing facilities and plant areas to enable the development to function appropriately mean that the ability to provide additional routes through the site is extremely limited.

However, on completion of the currently proposed development there would be a narrow pedestrian route from Fore Street Avenue to Moor Lane between the south elevation of 21 Moorfields (the treatment and lighting of which will be subject to condition) and the north elevation of Moorgate Exchange. There are existing pedestrian routes to the north along New Union Street and through City Place to Moor Lane and to the south through Fore Street Avenue to Fore Street and onward to Moor Lane and the Barbican. As noted below, the reduction of retail and active frontages within the development has been welcomed by the Barbican Association and many of the individual residents from the Barbican who have commented on the proposals.

Therefore, the addition of retail and active frontages at street level on Moor Lane is unlikely to be welcomed. The facade treatment and greening of the street level facade on Moor Lane will be subject to condition.

45. The Barbican Association welcomes the site having such a prestigious tenant, the lowering of the west building, the reduced 'piazza' and consequential reduction in the number of bars, the increased distance to the first terrace from the Barbican, assurances in relation to light spillage, the wider bridge link and the lift from street level. However, the Association objects to the proposed location of the servicing entrance on Moor Lane on the following grounds:
- a) Noise nuisance generated by "80 lorries a day";
 - b) It is incompatible with the Moor Lane Enhancement Scheme approved in 2011 – "...some 220 lorries servicing City Point, 21 Moorfields and Tenter House would be a tragic addition to the plans";
 - c) Increased numbers of service vehicles will impact on the safety of cyclists using the north south cycle highway system (Quiet Cycleways) as "*Lorries cutting across a continuous stream of cyclists will not be safe.*"

These issues are dealt with in the relevant sections of this report.

46. Representations have been received from 49 residents in the Barbican. Their full comments are attached to this report. The table below summarises the concerns raised:

Topic	Objection	Response
Noise	<ul style="list-style-type: none">Changing service access point to Moor Lane increases noise.Increase in noise due to traffic, especially as Moor	<ul style="list-style-type: none">See paragraphs 229-240See paragraphs 229-240

	<p>Lane has unique acoustics.</p> <ul style="list-style-type: none"> • Ventilation ducts opening onto Moor Lane would create additional noise. • Due to listed status of Barbican estate, all windows are single glazed, exacerbating noise issue. 	<ul style="list-style-type: none"> • Noise from plant controlled by condition. • A number of residents have installed appropriate double-glazing modules or secondary glazing (LBC required)
Residential Amenity	<ul style="list-style-type: none"> • Moor Lane previously identified for improvement for local community, with pedestrian space and pocket park. • Loss of natural light due to overshadowing. • Proposed building blocks air movement north of New Union Street. • Overlooking residential building. • Loss of views. • Aluminium curtail walling could be more beneficial as 'green wall'. • Light pollution. • Motion sensor lights should be installed to reduce light pollution. • Decrease in safety of pedestrians & cyclists on Moor Lane. • Planned seating area on footbridge will cause noise & disturbance. • Undermines Local Plan to integrate street level 	<ul style="list-style-type: none"> • See paragraphs 249-251 • See paragraphs 179-211 • Development would have little impact on local wind micro-climate. See paragraphs 225-228 • Principal facade 47m away • There is no right to, or protection of, private views • See paragraph 105 • See paragraphs 212-218 • See paragraph 217 • See paragraph 251 • The seating has been removed from the proposal • See paragraph 44

	<p>contact between Barbican Centre, residences and new retail developments.</p> <ul style="list-style-type: none"> • Hours of use. 	<ul style="list-style-type: none"> • See paragraphs 159-166
Traffic	<ul style="list-style-type: none"> • Increase of additional 80 lorries per day down Moor Lane created by relocation of service access point is inappropriate for residential road. • Delivery trucks will likely have to wait for delivery slot down Moor Lane, creating more traffic. • Relocating of access point will add to traffic already caused by City Point. • Limits means of access to residents' homes. • Increase in air pollution. • Increase in traffic means more difficulty in parking. 	<ul style="list-style-type: none"> • This is incorrect. The anticipated number of lorries (HGVs) is five. See paragraph 164-165 • All deliveries scheduled with no waiting on Moor Lane • See paragraphs 159-166 • All deliveries scheduled with no waiting on Moor Lane • See paragraphs 241-248 • All deliveries scheduled with no waiting on Moor Lane
Other Material Considerations	<ul style="list-style-type: none"> • If moving access point from Fore Street Avenue to Moor Lane was for security reasons, the move puts residents at risk. • Proposed design of building unattractive & out of scale. • Turning the development into a shopping centre/ office complex will create too much pedestrian traffic, impeding access to Moorgate Station. • Impact on the historic environment, listed buildings or conservation 	<ul style="list-style-type: none"> • See paragraphs 160-162 and 168-171 • See paragraphs 98-109 • The proposed development reduces the quantum of both retail and office. • See paragraphs 114-131

	areas.	
Other Non-Material Considerations	<ul style="list-style-type: none"> • Moor Lane access point could have negative effect on Willoughby House property prices. 	<ul style="list-style-type: none"> • Impact on property values is not a material planning consideration.

No further representations were received following the re-consultation in respect of the additional information submitted under Regulation 25 of the EIA Regulations.

47. Two letters of support were received:

The landowner of Moor Place welcomed the proposal to relocate the service area to Moor Lane, avoiding conflict with their main entrance and 2,000 staff.

Moor House Management Service Ltd. welcomed the proposal to relocate the service area to Moor Lane “the location of the original loading bay for Lazards” as it would avoid additional congestion in Fore Street Avenue. They stated, “It will become impossible to service the buildings and keep pedestrians safe when using street level from Moorgate station should the loading bay be positioned in Fore Street Avenue”.

48. Two neutral comments were received from Barbican residents. Concerns raised have been incorporated into the table above for completeness and are addressed within the body of this report.

Policy Context

49. The development plan consists of the London Plan, the Draft London Plan (out for consultation) and the Local Plan. The London Plan, draft London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report. Relatively little weight should be afforded to the Draft London Plan as it is at an early stage prior to adoption.
50. Government Guidance is contained in the National Planning Policy Framework (NPPF).

Considerations

Introduction

51. The Corporation, in determining the planning application has the following main statutory duties to perform:

To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);

To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004);

For development 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) and;

For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

52. The NPPF states at paragraph 2 that:

“Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
53. Paragraph 14 states that “at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking For decision-taking this means: approving development proposals that accord with the development plan without delay...”
54. It states at paragraph 7 that sustainable development has an economic, social and environmental role.
55. Paragraph 131 of the NPPF advises, “In determining planning applications, local planning authorities should take account of:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable development;
 - communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.”
56. In considering the planning application before you, account must be taken of the environmental information including the Environmental Statement, the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
57. The Environmental Statement is available in the Members’ Room, along with the application, drawings and the representations received in respect of the application.
58. 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 London Plan and the Local Plan.
- The impact of the proposals on neighbouring residential occupiers.
- The impact of the proposals on heritage assets.
- The impact on nearby buildings and spaces, including daylight/sunlight and amenity.

Economic Development

59. The National Planning Policy Framework establishes a presumption in favour of sustainable development and places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
60. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £45 billion in economic output (as measured by Gross Value Added), equivalent to 13% of London's output and 3% of total UK output. The City is a significant and growing centre of employment, providing employment for over 450,000 people.
61. London's status as a world city is founded to a substantial degree on its concentration of international service activities and, most noticeably, by the clustering of financial and business services in the City of London.
62. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can still provide a significant competitive advantage.
63. The City's dense Financial Services (FS) business cluster allows firms to benefit from access to a large pool of specialist labour, skilled workers, and support services (accounting, legal services, actuarial etc), as well as supporting demand in those businesses.
64. In 2016 the FS Industry provided 182,000 FS jobs in the City with 60,000 of these being in Banking. Large FS firms in the City employ 75% of workers in the financial services sector compared to 25% in SMEs.
65. The City Supply Chains research, based on its important cluster of SMEs found that 63% of firms in the City buy from other firms within the City. Whilst a similar proportion (68%) sold to other firms in the City, highlighting the importance of those local trade relationships and the

importance of the presence of large FS firms for other City firms and SMEs.

66. Some of the key reasons given for purchasing within the City included the proximity of businesses, speed of delivery and the expertise and reputation of the firms found in the concentrated industry clusters around the business district. The effect of sales to other City firms by SMEs surveyed showed that more than one third of SME respondents' sales to City firms accounting for more than half of their annual trading income. (City of London and Bone Wells Urbecon, 2013, <https://www.cityoflondon.gov.uk/business/economic-research-and-information/research-publications/Pages/City-SME-supply-chains-.aspx>)
67. The importance that is attached to the maintenance and enhancement of the City's role as one of the world's leading financial and business centres is reflected in the policies of the London Plan and Local Plan.
68. The City of London lies within the Central Activities Zone (CAZ), which is London's geographic, economic and administrative core and contains London's largest concentration of financial and business services. The London Plan 2016 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy 2.10). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and policies 2.11 and 4.3 provide for exemptions from mixed use development in the City in order to achieve this aim.
69. The contribution of the banking sector to public finances in 2017 was £35.4bn, comprising £17.3bn from foreign banks and £18.1bn from UK banks. This is equivalent to almost a quarter of the FS sector's total tax contribution. Foreign-based banks make up almost 3% of the UK's total tax receipts. (City of London, Total Tax contribution of UK financial services, 2017)
70. Foreign-based banks account for over half of all employment taxes generated by banks (UK Finance total tax study, 2017). Of the £18.4bn, 53.7% was paid by foreign-headquartered banks, which employed 25.3% of the employees in the study.
71. The London Plan projects future employment growth across London, projecting an increase in City employment of 151,000 between 2011 and 2036, a growth of 35.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
72. Strategic Objective 1 in the City of London Local Plan is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to

provide for an expected growth in workforce of 55,000. Local Plan Policy DM1.2 encourages the provision of large office schemes.

73. The provision of a substantial office development in this location has been established by the extant planning permissions for the site. It meets the aims of policy CS1 in delivering a significant growth in both office floorspace and employment. The current application provides for an additional increase in floorspace and employment in line with the requirements of the Local Plan.
74. The proposed development would result in an additional 41,662sq.m gross of Class B1 office floorspace compared to the previously existing buildings on the site and 1,545sq.m more than the extant 2017 permission, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and deliver approximately 3.62% of the additional office floorspace sought in Local Plan policy CS1.
75. Using the London Plan's assumed density of one person per 12sq.m Net Internal Area (NIA) the number of office workers in the new building could be 4,305 compared to approximately 791 in the previously existing buildings. It is noted that many businesses within the FS sector operate at higher densities and a rate of one person per 8sq.m NIA would result in up to 6,458 new office employees. Deutsche Bank have indicated an anticipated 5,000 employees would work on the site.
76. The proposed development includes large uniform floor plates maximising internal usable areas and addressing the needs of international business in accordance with Local Plan policy DM1.2 and could provide flexible floor space for a variety of occupiers.
77. This site is ideally located to benefit from the proximity of the Crossrail/Elizabeth Line now nearing completion. Office use on this site would complement the core business function of the City by taking advantage of the substantial public transport improvements created by Crossrail and realise the potential for rejuvenation of the area, in accordance with CS5, North of the City Key City Places strategy.

Deutsche Bank

78. Deutsche Bank is a German global banking and financial services company and has more than 100,000 employees in over 70 countries, and has a large presence in Europe, the Americas, Asia-Pacific and the emerging markets. It employs 7000 people in a number of London locations. As of June 2017, Deutsche Bank was the 16th largest bank in the world by total assets.
79. Having Deutsche Bank based in the City means that any exports of their financial services globally count as part of London's contribution to UK trade – London contributes around 56% of Britain's financial service exports (not including insurance and pension services)
(<http://colresearch.typepad.com/colresearch/2017/05/londons-trade-contribution-to-the-economy.html>)

80. Large firms such as Deutsche Bank make a significant contribution to City of London business rates. The City accounts for around 3% of England's total business rate revenue, and similar properties to that currently occupied by DB have a rateable value in the region of £3-4m.
81. The present scheme has been redesigned to meet the bespoke requirements for Deutsche Bank's occupation as its new London HQ. Deutsche Bank has agreed to take a 25-year lease of the building, subject to obtaining planning permission. Deutsche Bank is currently in occupation of a number of City buildings at Winchester House, Throgmorton Avenue, 1 Appold Street, 30 Fenchurch Street, Pinners Hall and 10 Bishops Square with a combined area of over 60,000sqm.
82. The decision to occupy 21 Moorfields would see all their remaining City assets consolidate into a single building. This would allow Deutsche Bank to complete the rationalisation of its property portfolio which has recently seen them occupy space in Victoria (9,000sqm) for its asset and wealth management functions and 35,000sqm at 10 Upper Bank Street, Canary Wharf to provide back office support.
83. Deutsche Bank has undertaken an extensive review of properties available for occupation as a new HQ building in 2023 when most of their existing City leases expire. There were no other options that are available in the Square Mile that would fulfil their specific needs.
84. When reviewing the City options available and choosing this site, Deutsche Bank has confirmed that the following factors were pertinent to their decision-making process:
- This is the only site in the City that could offer unimpeded trading floorplates of circa 5,000sqm; The scheme provides four such floors.
 - The proximity to their current principal office at Winchester House would allow existing commercial links to be retained and encourage staff retention;
 - The ability to deliver the building by autumn 2021 to allow fit out work to commence and guarantee relocation prior to expiry of existing leases; and
 - The sites excellent public transport connections.
85. The site would provide Deutsche Bank with the quantum of floorspace and floorplates required in the appropriate timeframe. As outlined above, this is the only City site that can meet the bank's requirements and, therefore, if planning permission were not achieved for this site Deutsche Bank would, of necessity, review its non-City options which could lead to it moving its operations out of the Square Mile.

Retail

86. The previously existing retail provision on the site comprised a wine bar on the Highwalk and a cafe on Fore Street Avenue and several shops on the Moorfields frontage. The total floorspace was 1,715sq.m GEA.

87. The retail provision proposed in the partially implemented 2017 scheme was 1,079sq.m GEA.
88. The retail provision now proposed would be 182sq.m GEA, 897sq.m less than previously approved on the site. This is contrary to policy DM20.3 which seeks to resist the loss of retail uses outside Principal Shopping Centres and Retail Links that form an active frontage, particularly Class A1 units near residential areas, unless it is demonstrated that they are no longer needed.
89. No evidence has been provided to demonstrate that the replacement of the previously approved retail provision is no longer needed.
90. Residential neighbours in the Barbican Estate, concerned with the potential for noise generation, have welcomed the reduction in retail provision.
91. The retail unit would face onto the proposed publicly accessible square at Highwalk level. The square is separated from Moor Lane and the Barbican Estate by the western building, helping to minimise any potential noise disturbance from the retail use.
92. The proposed retail unit, whilst not replacing the existing floorspace, would provide amenity for workers, residents and visitors and complement the nearby Moorgate PSC.
93. The supporting text to policy DM20.3 states “When considering proposals to change from shops to other retail uses or for the loss of retail uses, particular consideration will be given to the contribution that individual units make to the locality, having regard to:
 - the composition and distribution of retail uses locally.
94. There are additional factors to consider where there are existing retail facilities but in this instance, as the last remaining units on the site were demolished in early 2016, these are not considered relevant to the considerations of this case.
95. The site is just outside the Moorgate Principal Shopping Centre (PSC) and within walking distance of both the Liverpool Street and Cheapside PSCs. To the north of New Union Street are City Point and Tenter House which provide several bars, cafes and restaurants. To the north of the Barbican Estate is Whitecross Street with numerous shops, bars, restaurants, market stalls and a supermarket. To the east of the Estate is Smithfield Market with extensive surrounding retail provision. The Barbican Estate also contains a number of bars and restaurants.
96. There is no opportunity to provide retail on Moorfields because of the requirements of the station entrance, office entrance and escalators, stairs and lift to the Highwalk.
97. The composition and distribution of retail uses locally indicates that the area around the proposal site is well served by a variety of retail uses. It is considered that, on balance, the reduced level of retail provision

within the site is acceptable in relation to policy DM20.3 and its supporting text.

Underground Railway and Crossrail

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

Design

99. The height and massing of the proposal, as with the previous permissions, is informed by the commercial buildings to the east, north and south and the lower residential buildings to the west. The height is constrained by the location of the site within the background consultation area of the Protected Vista from Westminster Pier to St. Paul's Cathedral and local views from Finsbury Circus.
100. The current scheme differs from the permitted scheme in a number of respects. There would be a significant reduction in height along Moor Lane while the east building would rise to a greater height towards the centre of the site. There is an increase in height in elements of the eastern end of the building but not in a manner which would additionally impact on the Protected Vista. Of greater significance is the omission of the public square and its replacement with a smaller courtyard pocket park.
101. The taller eastern element has been designed to respond to the scale and character of the commercial buildings in the vicinity. The street facade would be seven storeys high above podium level and be similar in height to the existing Tenter House. Above that, the building would set back and rise another seven storeys towards the taller Moor House which would also relate satisfactorily with the height of Moorgate Exchange. These upper floors would have an inclined fully glazed facade to differentiate it from the street facade and to address local views.
102. The design approach is similar to the permitted scheme with the cantilevered form of the building and the diagonal structural truss bracing expressed on the elevation with glazed curtain walling behind contrasting with the calmer crystalline glazed upper storeys. There would be a recessed glass screen above the station box to mark the office foyer. The glass screen would provide a 'street frontage' with the Crossrail ticket office building remaining a separate identifiable structure distinguished by its blue glazed portal. The light glass screen would extend to ground level in the north-east corner of the site, beyond the station entrance, where it would enclose an undercroft containing escalators and a stair up to the office foyer.
103. The design of the proposed development is strongly influenced by the need to over-sail Crossrail and the existing Underground infrastructure as well as the provision of need the City Highwalk. This places severe limitations on where foundations can be located, and the structures need to span the whole railway. The architectural approach is therefore informed by structural railway architecture.

104. The palette of facing materials on the principal facades is silver and grey including bead blasted stainless steel, glazing with a significant degree of reflectivity and a dot fritted finish. The building maintenance and cleaning cradles are discreetly located at roof level, generally concealed from surrounding viewpoints.
105. The Moor Lane elevation is lower than the permitted scheme by three storeys and comprises a fully glazed elevation at podium level with dark bronze coloured metal vertical fins on the upper two storeys. This visually separates the two parts of the building and relates satisfactorily to the adjacent Barbican. The glazing would incorporate fritting to reduce the extent of clear glass and mitigate any light spillage.
106. As part of the greening strategy it is proposed to introduce vertical/hanging planting from podium level onto the Moor Lane elevation as well as on the upper facades of the east elevation of the west building facing the new urban square. The planting would relate to the greenery of the Barbican and the planting proposed on the pedestrian bridge over Moor Lane. The strategy is continued across the site with vertical greening, climbers and trailing planting, on walls and wires. There would be planters and trees on the pedestrian routes at podium level as well as large areas of green roof.
107. It is proposed to reinforce the importance of the Highwalk pedestrian route between Moorgate Station, the Barbican, the Cultural uses in the Barbican and to the west by introducing a light artwork installation on the wall fronting the Highwalk, details of which will be conditioned. A lighting strategy highlighting key architectural elements and the pedestrian routes would enliven the scheme and the public realm during the hours of darkness. The lighting scheme would be designed to reduce light spillage.
108. The roofscape is considered acceptable with areas of roof terraces, green roofs and roof level plant screened from view by louvres.
109. Although there are concerns over the reduction in the amount of publicly accessible space, retail units and the removal of the central pedestrian route approved as part of the previous permissions for the site, it is recognised that these changes would enable the development to meet Deutsche Bank's floorspace and layout requirements.
110. It is considered that the proposed scale and design of the scheme would contribute to the dynamism and hierarchy of scale in the area. In that respect the scheme is considered broadly in accordance with policies CS10 and DM 10.1 of the Local Plan, policy 7.6 (Architecture) in the London Plan 2015 and the guidance set out in paragraphs 56 to 68 of the National Planning Policy Framework.

London Views Management Framework

111. The London View Management Framework (LVMF) provides a London wide policy framework to protect and manage strategically important views of London and its major landmarks. The eastern part of the site falls within the background assessment area of the Protected Vista of St. Paul's Cathedral from Westminster Pier (view 8A.1).

112. The proposed building would be marginally visible to the left of the south west tower of the Cathedral when trees are not in foliage. The proposal would otherwise be concealed by the cathedral and is considered to have very little impact on the views.
113. In accordance with paragraph 170 of the Visual Management Guidance in the LVMF, the development would preserve the viewer's ability to recognise or appreciate the dome, peristyle and south-west tower of St. Paul's Cathedral, ensuring these elements retain a backdrop of clear sky. The development does not harm the Protected Vista and is in accordance with policy 7.12 of the London Plan 2015 and policy CS13 of the Local Plan.
114. No other LVMF views would be affected.

Impact on the Significance of the Finsbury Circus Conservation Area

115. Finsbury Circus was laid out in 1815-17 by William Montague to the designs of George Dance the Younger. The garden has tall plane trees and, until it became a Crossrail worksite, had serpentine paths from the 19th century layout, with a bowling green that was laid in the centre in 1909. An impressive range of buildings encircle the gardens which form the central character of the conservation area and an important townscape group. There are long views of significant 19th century buildings along the external elevations of the conservation area.
116. The effects of the proposed development on Finsbury Circus have been studied using accurate visual representations (AVRs) from within the Circus. In many of these views the development would be obscured by foreground buildings in the Circus and heavy tree foliage. It would be visible from the western side of the Circus as the viewer exits towards Moorgate where much of the proposed building would be obscured by the approved development at 101 Moorgate. The visible upper levels of the development would be angled glazing to relate formally to Finsbury Circus and provide an appropriate closure to the view.
117. It is considered that the proposed building would not have a detrimental effect on the significance of the Finsbury Circus Conservation Area.

Impact on the Significance of the Bank Conservation Area

118. The Bank Conservation Area is the commercial heart of the City of London, focused on Bank junction, extending to the north, west, east and south to include the radiating historic streets, yards and interlinking alleys. It is an area where buildings and streets are harmonised by their predominant use of solid masonry facades with regular punched architectural openings, enriched by abundant classical modelling and surface detail. The area contains several nationally significant and well-known buildings.
119. The proposed building would be visible from few locations within the Bank Conservation Area. It would be visible from the edge of this conservation area in Coleman Street and London Wall. In these views the proposed development would have a similar impact on the

significance of the conservation area to the existing high buildings at Moor House and City Point.

120. It is considered that the proposed building would not have a detrimental effect on the significance of the Bank Conservation Area.

Impact on the Significance and Setting of Listed Buildings

121. The impact of the development on the setting and significance of listed buildings is considered in the Heritage Assessment forming part of the Environmental Statement. The assessment considers 17 listed buildings which have the potential to be affected. The impacts would be very similar to the permitted scheme.
122. Barbican (Grade II). There will be a relationship between the listed Barbican complex and the western element of the proposed building across Moor Lane. The immediate street frontage of the development would be of a similar scale to the previously existing building and to other frontages on Moor Lane. The office buildings on the eastern side of Moor Lane are modern and vary in appearance. The proposed building would continue this run of modern commercial buildings and would not have an adverse effect on the setting or significance of the Barbican.
123. The Highwalk pedestrian bridge over Moor Lane is proposed to be retained and widened by the addition of a lightweight cantilevered structure on its southern side so that there would be a sufficiently wide pedestrian space next to the new lift on the Moor Lane frontage. The proposed design would be subject to condition and will need technical approval from the City as part of the rescinding and declaration of walkway. The bridge is attached to the Barbican Highwalk but is not part of the listed structure of the Barbican and the alterations would not have a material impact on the setting or significance of the Barbican.
124. 137-141 Moorgate (Grade II). This is a six storey corner building built in 1900 for the Underground railway. It has modern taller buildings immediately to its north, south (the site of the proposed Crossrail over site development) and west (Tenter House and City Point). The proposed building would change the setting of this listed building by the addition of another building of considerable height and mass in the background views. However, this listed building is of a robust Victorian/Edwardian design in a tight urban location and although the setting would be altered by the proposed development it would not be in a way that would be detrimental to the listed building's significance.
125. 87 Moorgate (Grade II) was constructed as a terraced house in the early 19th century with later changes. The building adjoins the site of the proposed Crossrail over site development at 101 Moorgate and will be significantly lower than its new neighbour. The proposed building at 21 Moorfields would increase the general scale on Moorfields but would be diagonally opposite this listed building where it would be seen only in oblique views with the new 101 Moorgate in the foreground. The effect on the setting and significance of the listed building is considered negligible.

126. The Globe Public House, Fox's Umbrellas and 2 Moorfields (Grade II). These three buildings form a group of attractive Victorian buildings with good detailing, including Fox's shopfront and fascia which is a later addition dating from the 1930s. The large commercial buildings at City Point and Moor House form the backdrop in views of these buildings from the southeast. The proposed development would add another larger building and would obscure City Point in the background. The setting would be changed but not in a way that would be detrimental to the significance of the listed buildings.
127. 4 and 8 Moorfields (Grade II) were constructed as two terraced houses dating from the early 19th century with later changes. The current setting of these buildings is determined principally by the large commercial building of Moor House and the pedestrian area in front of them. On completion of Crossrail it will include the over site development at 101 Moorgate. The proposed building would increase the general scale on Moorfields but would be slightly further away from these small listed buildings. The setting would be changed but not in a way that would be detrimental to the significance of the listed buildings.
128. 80 Coleman Street (Grade II) and 81 Coleman Street (Grade II* and Scheduled Monument) are fine buildings constructed in 1840 and the mid-18th century respectively. The setting of these buildings includes the taller modern developments of Moor House and 1 Coleman Street. Moor House will largely obscure views of the proposed development and any impact on their setting and significance would not to be detrimental.
129. 63-73 Moorgate (Grade II) were constructed as terraced houses built in the 1830s. They are detached from the larger scale development to the north by the major junction of London Wall with Moorgate. However, in views from the south-east of the junction their setting is strongly influenced by Moor House. The proposed development would be visible in these views but its distance would result in a negligible effect on the setting and significance of these listed buildings.
130. Lutyens House (Grade II*), Salisbury House and Electra House (Grade II) are robust City buildings in the classical style. They occupy the southern and western sides of Finsbury Circus and have frontages to the surrounding streets. The upper parts of the proposed development would be seen above the roofscape of these buildings in various westward views from around the Circus, although in most views this would be mitigated by significant levels of tree cover (even when not in leaf). The westward setting of these buildings is dominated by Moor House and the tower of City Point. The approved 101 Moorgate building would sit in the foreground of the axial view (see section on Finsbury Circus Conservation Area above). In this respect, the proposed scheme would not be detrimental to the setting of these listed buildings.
131. Park House, Finsbury House and London Wall Buildings, (Grade II) are on the east, north and south-east sides of Finsbury Circus. There is no

clear visual connection between them and the proposed development. The effect on their setting and significance would be negligible.

Impact on the Significance of Historic Parks and Gardens

132. Finsbury Circus and the Barbican Open Spaces are Registered Historic Parks and Gardens. The proposal would have a minor effect on views out of these two gardens but is not considered to be detrimental to their setting or significance. In this respect the scheme is in accordance with policy DM 12.5 of the Local Plan.

Public Realm

133. The previously permitted scheme included a generous public square (980sqm) framed by retail units accessed by two pedestrian routes from the east and west which were intended to replace the previously existing, and larger, areas of public open space on the Highwalk which had not provided a public realm of high quality. The current scheme proposes a further reduction in publicly accessible space necessitated by the requirements of Deutsche Bank.
134. The current scheme provides a smaller publicly accessible urban square (521sqm) on the western end of the scheme. Approximately half of the square would be located under the cantilevered upper storeys of the main east building. There would be a single retail unit on the eastern side of the square. The remaining elevations comprise office floorspace which includes the 'Wellness Centre' for the office occupiers. The square would include raised planters with low level planting and trees which, combined with the vertical greening on the western elevations, would appear as an attractive green soft landscaped area.
135. The square has been assessed for wind and sunlight levels and, given the high-density context, these would be acceptable in terms of BRE and Lawson Criteria (see paragraphs 222 – 225).
136. the covered piazza area at the eastern end of the Highwalk located over the underground entrance, would be landscaped with planters and would include a small retail kiosk to assist in enlivening this area.
137. The publicly accessible square and private realm would be controlled and maintained by the developer under terms to be agreed through the Section 106 agreement.
138. Although reduced in size, the landscaping of the proposed publicly accessible square would be of high quality. Together with reduced retail activity, it would provide for a quieter green space for the benefit of office workers and members of the public and has been welcomed by the Barbican Residents Association and a number of individual Barbican residents. The proposals are considered to be in accordance with paragraph 73 of the NPPF which recognises the health and well-being contribution of access to high quality open spaces, and policy 7.5 of the London Plan which seeks landscape treatment and infrastructure of the highest quality that contributes to the easy movement of people through the space.

City Walkway and Escalators

139. The proposals reflect the extant permission to build a new upper level walkway along the southern side of the new building connecting the bridge over Moor Lane with the escalators, stair and a lift on the corner of Moorfields and Fore Street Avenue. The lift would provide an accessible link to the Highwalk in lieu of the previously existing ramps which did not meet the appropriate standards.
140. The new City Highwalk route to the Barbican and Barbican Centre would be on the southern edge of the site and provide a direct line of sight between Moor Lane and Moorfields. It would be 1m wider than previously approved (typically 4m - 4.2m wide) improving permeability and legibility and, reinforcing the importance of the Highwalk as a pedestrian route between Moorgate Station, the Barbican and the Cultural uses in the Barbican. The northern edge of the City Walkway would be fronted by a covered plaza, the flank wall of the building (including clear glazed areas giving views into the building) and the new publicly accessible urban square.
141. On Moor Lane there would be a new stair and lift between the Highwalk and street levels. This would make the bridge over New Union Street and the adjacent stairs and lift at City Point redundant. The proposal would provide a more direct route and would be an improvement over the City Point stairs and lift, which are poorly located next to New Union Street.
142. The bridge over New Union Street and the staircase are proposed to be demolished by the applicants in agreement with the owners of City Point. A separate planning application would be submitted to make good the facade of City Point.
143. The position of the lifts, stairs and escalators would create good links between ground level and the Highwalk and would encourage its use. Overall, the proposal would create a high-quality link.
144. The escalators and stairs on the Moorfields/ Fore Street Avenue corner form part of the Crossrail proposal. The proposed development requires space for under floor services above the Crossrail box. This causes the new Highwalk to be 0.4m higher than the existing level in this area. The new escalators and stairs would therefore need to be longer than those previously proposed by Crossrail. Crossrail and the applicant have entered into a separate S106 legal agreement for the provision of the escalators as part of the extant permission.
145. The northern end of the bridge over Fore Street Avenue will need to be raised by 0.4m to the new walkway level. The gradient of the slope would be 1:85.
146. As with the extant permission, the escalators and stairs would be covered by the overhang of the new building. This would create an open, visible marker to encourage the public use of the Highwalk as a link to the Barbican Centre and the Culture Mile.

- 147. All escalators, stairs, lifts and Highwalk routes will be required to be available before occupation.
- 148. The improved permeability, legibility and quality of the pedestrian routes through the site would be in accordance with policies CS5 and DM16.2 of the Local Plan and policy 7.5 of the London Plan.

Temporary Highwalk works

- 149. All previously existing Highwalk areas within the site have been demolished as part of the implementation works. As previously agreed the applicants have provided route marking to help pedestrians move around the area.
- 150. The nearest replacement pedestrian routes between Moorgate Station and the Barbican are via Moorfields/City Point plaza/Moor Lane, Moorfields/Ropemaker Street/Silk Street or Fore Street Avenue/Fore Street/Moor Lane. There are alternative public lifts at the Moor Lane/Silk Street junction and 125 London Wall. The additional lift proposed as part of the redevelopment of St. Alphage Highwalk (London Wall Place) is proposed to become available (subject to technical approvals) in the first quarter of 2018.

Transport and Servicing

Trip Generation

- 151. The site is located in an area with a Public Transport Accessibility Level (PTAL) rating of 6b. This is the highest level of accessibility and rated as “Excellent”.
- 152. The submitted transport assessment predicts that the proposed development would generate a total of 1,434 two-way person trips during the AM peak and 1,250 trips during the PM peak; this represents an increase of 987 trips during the AM and 886 trips for the PM when compared with the previously existing buildings on the site. The figures represent a reduction in AM and PM peak trips of 477 and 173 respectively when compared to the extant permission which reflects the reduction in office floorspace.
- 153. The majority of trips are expected to be made by public transport (89%), walking (5%) and cycling (4%). TfL advised that it did not expect the previously proposed development to have any significant impact to the local highway network. The GLA/TfL have reiterated that this proposal raises no new strategic issues.
- 154. A Travel Plan will be required under the Section 106 Agreement.

Parking

- 155. In accordance with Local Plan policies, no car or motor cycle parking is proposed other than a single accessible parking bay within the loading area. There are existing accessible parking bays on Moor Lane and Fore Street (Currently suspended during construction works).

156. The proposal includes a total of 830 long-stay cycle parking spaces within the building which would be accessed from Moor Lane. This level of provision is fully compliant with the London Plan 2016 and would provide approximately 98.6% of the long-stay cycle parking spaces identified as a requirement in the draft London Plan.
157. A total of 830 lockers and 60 showers would be provided to facilitate cyclists commuting to and from the site. The shower provision would be below the City's recommended ratio of 1:10 cycle spaces but given the site constraints and lack of basement space it is considered acceptable in this instance.
158. For a development of this scale table 6.3 of the London Plan requires a minimum of 29 short-stay cycle parking spaces for visitors to the office and retail facilities. No short-stay cycle parking is proposed within the site as the development covers 100 percent of the site and there is no street level curtilage available on which short-term cycle parking spaces could be provided (cycles are prohibited from City Highwalks by Byelaw and these areas would not be available for such use). Security concerns prevent the provision of access for the visiting public to the internal cycle parking areas and all unbuilt space around the site, including the City Highwalk, is required to facilitate pedestrian circulation.
159. The proposed long-stay cycle parking provision accords with policies 16.3 of the Local Plan and 6.9B(a) of the London Plan. The lack of short-stay provision would be contrary 6.9B(a) of the London Plan but is mitigated by a contribution of £60,000 to the operation of the Mayor's Cycle Hire Scheme which has previously been agreed with TfL and would be secured through the S106 agreement. Given the limitations of the site and the broad compliance with the relevant standards and policies, it is considered that the proposed cycle parking provision is acceptable in this particular case.

Servicing

160. A servicing area with loading bays for two HGVs and two panel vans, an accessible parking space and two refuse compactors would be provided. This would be accessed from Moor Lane and is sufficient for the size of the proposed development.
161. The servicing area for the previously existing development on the site was accessed from Moor Lane (see image below). The previously approved scheme would be accessed from Fore Street Avenue. Due to the proximity of the site to the Barbican, the City's officers have sought to encourage the new servicing area to be accessed from Fore Street Avenue. The City are advised that the specific delivery management and security requirements of Deutsche Bank prohibit this arrangement being continued into the current proposals.



162. As part of Deutsche Bank's delivery management strategy, it is proposed to use a number plate recognition system to identify scheduled vehicles. This is more easily achieved on Moor Lane where there is clearer line of sight. On Fore Street Avenue, which is a Cul-de-sac, any unscheduled vehicles would be required to turn in the eastern arm of the street in order to proceed south towards Fore Street and London Wall. On Moor Lane unscheduled vehicles could continue southbound towards Fore Street and London wall or northbound to Silk Street and Chiswell Street without having to make any turning manoeuvres.
163. In terms of security, the applicant's structural engineers have stated that the retained deck above Moorgate Station was designed specifically for vehicular access from Moor Lane and ramps down in this location for this reason. It is also more structurally robust in this area than on Fore Street Avenue. Due to the 90 degree turn required to access the service area in Moor Lane, vehicle speeds approaching the servicing area would be reduced meaning that the rating of the security blocker would need to be sufficient to withstand a 7.5t vehicle travelling at 30mph. In Fore Street Avenue vehicles would approach the service entrance in a straight line and at potentially higher speeds, therefore, the security blocker would need to be of a much higher rating to be able to withstand a 7.5t vehicle travelling at 50mph. The force applied to the retained deck at Fore Street Avenue would also be a much greater force. This, in combination with the reduced robustness of the structure in this area, could lead to the deck not being able to withstand the applied load of a vehicle impacting the blocker. To address this on Fore Street Avenue, any appropriately rated security blocker would need to be sited outside of the site boundary within the highway. This would not be acceptable in highway terms.

164. To mitigate any potential noise impacts on the nearby residential occupiers from the operation of the loading bay the following measures are proposed:
- Hours of operation would be limited to a 14 hour period between 7am and 9pm from Monday to Friday;
 - Hours of operation would be limited to a 7 hour period between 9am and 6pm on Saturdays with no servicing on Sundays or Bank Holidays;
 - All deliveries to the site would be pre-booked to ensure that all deliveries could be accommodated within the four loading bays within the servicing area;
 - Any out of hours (before 7am or after 9pm Monday to Friday and 9am and 6pm on Saturdays) vehicular deliveries (limited to two) and all cycle and courier deliveries would be via a secondary on-street facility on Fore Street Avenue;
 - The gate to the servicing area would be set back approximately 27m from Moor Lane and all loading and unloading activity and compaction would take place only when the exterior doors were closed and would cease once they were opened;
 - All vehicles would enter and leave the loading bay in a forward gear to ensure no reversing on-street;
 - A Banksman would be positioned at the loading bay access during the hours of operation controlling access to and egress from the loading bay.
165. The anticipated composition of vehicles servicing the building has been forecast based on survey data of Deutsche Bank's existing operations and is laid out below:

Delivery Vehicle Type	Proportion of Deliveries	Number of Deliveries per day
Heavy Goods Vehicles (HGVs)	6%	5
Medium Goods Vehicles (MGVs)	3%	3
Cars and Light Goods Vehicles (LGVs)	88%	74
Other	3%	3
Total	100%	85

166. This means that 88% of vehicles would not be HGVs or lorries, contrary to concerns set out in residents' comments.
167. In compliance with policy DM16.5 of the Local Plan the proposed on-site servicing area is of sufficient size to meet the requirements of the building and allow refuse collection and service vehicles to be loaded and unloaded conveniently and enter and leave in a forward gear. Potential impacts on residential amenity from the operation of the servicing area are addressed in the Noise & Vibration and Air Quality sections below.

Stopping-Up

168. A small area of public highway on the north end of the Moorfields frontage would be affected by the edge of the steps to the office entrance at podium level (the main office lobby would have stair, escalator and lift access from ground level in Moorfields) and would need to be stopped-up to allow these steps to be provided. The total area that would need to be stopped up is 6.2sqm (0.34m wide by 15.3m long, plus the projection of three handrails which equates to a combined projection distance of 0.915m). The footway is approximately 4m wide at this point and the reduction in its width is not considered to be problematic. This was agreed as both the 2015 and 2017 approvals.

Security

169. The building will be designed to withstand attack from a hostile vehicle. However, due to the location above an active major transport hub, there may be a need for additional on-street hostile vehicle mitigation (HVM) measures, in the form of bollards.
170. Details of HVM measures incorporated within the building would be required by condition.
171. Any on-street installations would be subject to S278 negotiations.
172. The appropriate implementation of security measures would make the building less vulnerable to, and therefore, less attractive to, a potential hostile vehicle attack.

Sustainability and Energy

173. The applicants have submitted a Sustainability Statement, including a BREEAM new construction 2014 pre-assessment and an Energy Assessment.
174. By utilising passive design and energy efficiency measures, the development is estimated to achieve 26.9% carbon emissions savings over a Building Regulations 2013 compliant baseline scheme. The intention is to connect the development into the local district heating network, whereby Citigen would provide a proportion of the development's heat demand for the offices and retail uses. This would achieve a further 9.6% carbon emissions savings. No renewable or low carbon technologies are proposed due to constraints imposed by the location of the Underground station underneath the building and resulting roof plant requirements.

175. The submitted energy strategy demonstrates that the development has the potential to achieve a 36.5% carbon emission reduction over a Building Regulations compliant building.
176. The BREEAM pre-assessment for the commercial element of the building indicates a likely rating of “Excellent” is achievable. A condition has been attached to request post construction confirmation that this rating has been achieved.
177. The sustainability statement addresses climate change and sustainable design of the development, including energy efficiency, sustainable materials, conserving water resources, waste management, pollution, urban greening and biodiversity.
178. The proposed landscaping strategy includes planting in the public realm areas and green roofs on the upper terraces of the east building, thereby enhancing site ecology and biodiversity compared to the existing situation. Implementation of the landscaping strategy would be subject to appropriate conditions to ensure the size, quality, maintenance and diversity of the landscaping and green roofs.
179. Subject to conditions in respect of the green roofs, Citigen connection and post construction BREEAM the proposed range of climate change and sustainable design measures are considered to be in accordance with policies CS15, DM15.5, DM10.2 and 19.2 of the Local Plan and policies 5.10 and 5.11 of the London Plan.

Residential amenity

Daylight and Sunlight

Introduction

180. An assessment of the impact of the development on daylight and sunlight to surrounding residential dwellings (Willoughby House, Andrewes House, 83 Moorgate and 85 Moorgate) has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to Policies 7.6 and 7.7 of the London Plan and DM10.7 and DM21.3 of the Local Plan.
181. The assessment of daylight and sunlight is a comparative one measured against a baseline condition. In this case the buildings on the proposal site have been demolished and the residential units within the Barbican currently enjoy increased levels of both daylight and direct sunlight. However, there is an extant permission (application no. 16/00883/FULEIA) for development of the site which has been implemented and for which the impacts on daylight and sunlight have been tested and approved. If the current proposals were not to be implemented, the extant permission would be built out to completion. Therefore, the extant permission provides the “Future Baseline” against which any impacts on daylight and sunlight generated by this development should be measured.

Policy Background

182. Local Plan Policy DM10.7 Daylight and Sunlight resists development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines. The policy requires new development to provide acceptable levels of daylight and sunlight for occupiers. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Unusual existing circumstances, such as the presence of balconies or other external features which limit the daylight and sunlight that a building can receive, will be taken into account. Policy DM21.3 of the Local Plan requires development proposals to be designed to avoid overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation.
183. London Plan policies 7.6 (Architecture) and 7.7 (Tall and Large Buildings) seek to ensure that development does not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate and additionally, in the case of tall and large buildings, noise, reflected glare, aviation, navigation and telecommunication interference.
184. BRE guidelines consider several factors in determining the impact of development on daylight and sunlight on existing dwellings:
- Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with a proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
 - Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by No Sky Line, which separates the areas of the room (usually measured in Sq.ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.
 - Sunlight: sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important

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

185. Average Daylight Factors (ADF) may also be considered. ADF is the ratio of internal light level to external light level. BRE advise that ADF is not generally recommended to assess the loss of light to existing buildings, therefore, ADF has not been assessed in this case.
186. The applicant's assessment has been carried out in accordance with the Building Research Establishment (BRE) guidelines "Site Layout Planning for Daylight and Sunlight 2011, A Guide to Good Practice".
187. The impact of the development upon the daylight amenity to residential rooms is considered by the consultants to be minor adverse in situations where:
- despite VSC alterations to the windows serving the room, the NSL alteration to the room is fully BRE compliant;
 - despite NSL alterations to the room, the VSC alteration to all windows serving the room is fully BRE compliant; or
 - all VSC and NSL alterations applicable to the room are either less than 30% of their baseline values and/or the windows and room retain VSC or NSL levels of at least 70% of the BRE recommended minimums.
188. It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels can appear to have a disproportionate impact. To give a more complete picture the same level of change can be described in two ways:
- Percentage change - 10% reduced to 8% = 20% reduction
- Actual change - 10% reduced to 8% = 2% reduction

Daylight

189. There are 346 windows serving 235 residential rooms surrounding the site that require assessment. These have been assessed in terms of both VSC and NSL.

Vertical Sky Component

190. In terms of VSC the development would have a negligible impact (less than a 20% reduction) on:
- 31 of 42 windows within Andrewes House
 - 214 of 295 windows within Willoughby House

191. There would be a minor adverse impact (20% to 29.9% reduction)
- 8 of 42 windows within Andrewes House
 - 66 of 295 windows within Willoughby House
192. Of the remaining windows, 3 at Andrewes House and 15 at Willoughby House would experience reductions greater than 30% of existing VSC levels with 4 of the windows at Willoughby House subject to reductions of more than 40%.
193. The BRE guidelines recommend a minimum existing VSC level of 27%. The 18 windows that would experience a greater than 30% "Percentage" change have very low baseline VSC values of between 1.71% and 4.73%. Therefore, the very small "Actual" change in VSC of between 0.57% and 1.64% results in a disproportionate percentage reduction which would, in reality, be unlikely to be noticed by the occupants.
194. BRE guidance states, *"Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations, without the balcony in place this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light."*
195. Calculations have been carried out and the results show that without balconies all the windows within Andrewes House and Willoughby House would meet the BRE guidelines for VSC with the proposed development in place. This demonstrates that the design of the existing building, rather than the proposed development, is the principal factor in the relative loss of light in terms of VSC.

No Skyline

196. In terms of NSL the development would have a negligible impact (less than a 20% reduction) on:
- 21 of 21 rooms within Andrewes House
 - 203 of 208 rooms within Willoughby House
197. There would be a minor adverse impact (20% to 29.9% reduction)
- 1 of 208 rooms within Willoughby House
198. The remaining 4 rooms at Willoughby House would experience reductions of 36.5% - 47.9% of the existing NSL level. These rooms serve bedrooms which the BRE guidelines consider to be of less importance than living rooms, dining rooms and kitchens in terms of

NSL daylight distribution. It is noted that in this case daylight would still penetrate to approximately 43% - 57% of the rooms.

Sunlight

199. There are 341 windows serving 231 residential rooms surrounding the site which are relevant for sunlight amenity assessment. These have all been assessed in terms of the annual probable sunlight hours (APSH).

Annual Probable Sunlight Hours

200. BRE guidance states that “...*the sunlighting of the existing building may be adversely affected...if the centre of the window receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.*”
201. On this basis, the impact to the sunlight amenity of the following number of rooms within the surrounding properties would be negligible, with an overall sunlight compliance rate of 96%:
- All rooms within Andrewes House;
199 of the 208 rooms within Willoughby House; and
All rooms within 85 Moorgate.
202. Of the nine rooms within Willoughby House which would experience APSH alterations greater than outlined in the BRE guidance in terms of total APSH, two would not meet the winter APSH guideline levels.
203. The nine rooms within Willoughby House which would experience sunlight amenity alterations greater than outlined in the BRE guidelines are all located beneath large balconies serving the upper floors. As a result of their location the majority of these rooms already have baseline APSH values below the BRE recommended minimums. The actual APSH alterations that the windows serving the rooms would experience result are, therefore, disproportionate in percentage terms. The impact to the sunlight amenity of the nine rooms is, considered to be moderate adverse to substantial in nature.
204. BRE guidance states that, “*Balconies and overhangs above an existing window tend to block sunlight, especially in the summer. Even a modest obstruction opposite may result in a large relative impact on the sunlight received. One way to demonstrate this would be to carry out an additional calculation of the APSH, for both the existing and proposed situations, without the balcony in place...this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of sunlight.*”
205. This calculation has been carried out and the results show that, without balconies, all windows within Willoughby House would meet the BRE guidelines for APSH with the proposed development in place. This demonstrates that the structure of the existing building, rather than the

proposed development, is the principal factor in the relative loss of sunlight in terms of APSH.

206. Without balconies, therefore, there would be no sunlight amenity impact to any of the surrounding residential rooms which are greater than negligible in nature.

Daylight and Sunlight Conclusions

207. Despite the dense urban location of the Site, the vast majority of alterations to the daylight and sunlight amenity of the surrounding residential properties are either in full compliance with BRE guidance or are considered to be no greater than minor adverse in nature.
208. The BRE guidelines, state that they are “...*purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location... Though it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances, the developer or the planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.*”
209. In respect of the few residential rooms that do experience effects which depart from BRE guidance, these are predominantly located under large balconies serving rooms to the floors above them.
210. BRE guidance states that existing windows with balconies above them typically receive less daylight and sunlight because the balcony reduces visibility of the top part of the sky. As such, even a modest obstruction opposite these windows may result in a large relative impact upon on the VSC, APSH and NSL. The BRE suggests that, in order to demonstrate that it is the presence of the balcony rather than the size of the new obstruction that is the main factor in the relative loss of daylight and/or sunlight, additional daylight and sunlight calculations should be carried out for both the existing and proposed situations without the balconies in place.
211. These assessments were carried out and, as indicated by the BRE, they demonstrated that it is the presence of the balconies, rather than the size of the proposed development that is the main factor in the relative loss of daylight and/or sunlight.
212. By virtue of the limited impact of the proposed development on the daylight and sunlight received by the neighbouring residential occupiers, as indicated by the BRE assessments, it is considered that the proposals are in compliance with policies DM10.7 and DM21.3 of the Local Plan and policies 7.6 and 7.7 of the London Plan.

Light Pollution

213. The building design takes into account residents’ concerns both passively, through the facade composition, materials and density, and actively, through modern lighting controls, fittings and management.

214. The proposed building frontage to Moor Lane would be reduced in height in comparison to the extant scheme and is proposed to be used as a 'Wellness' centre for the office occupiers and has been designed to predominantly face onto the square at podium level rather than Moor Lane. As such, the west building facade to Moor Lane would have significantly less glazing than the previous proposals. There would be no facade lighting on the Moor Lane with external lighting restricted to the lift entrance and stairs connecting to the Highwalk, as well as local low-level lighting to landscape planters and the Highwalk bridge. Except for the lift entrance, all lighting levels on the western façade of the west building would be lower than the existing levels of street lighting along Moor Lane.
215. The east building of the Proposed Development is largely of a similar height compared to the Consented Scheme and set back behind the west building.
216. The east building is 47m from the window line of Willoughby House. At this distance the potential for light pollution from proposed uses on the site would be low i.e. the intensity of light emitted would have to be strong for light pollution nuisance to occur. There would be no facade lighting on the western face of the east building facing Moor Lane, and internal lighting levels within offices would be controlled through design to minimise potential for light spillage.
217. Vertical fins on the outside of the western facades would also reduce visible light from within the offices when viewed obliquely along the street. These would have a black finish to help absorb light and the glazing would have a translucent (semi-opaque) finish to further reduce light spillage.
218. the internal lighting systems within the office buildings will be of a modern design, incorporating controls to minimise visible light, and reduce energy consumption. Movement sensors, light sensors and timer controls (as part of the Lighting Control System) in association with zoning will be used to ensure lighting is minimised and only switched on as required.
219. The external materials and details would be controlled by conditions as they are part of the external design and a condition is included on the schedule. The internal measures fall outside planning control but many of the measures are required to satisfy Building Regulations in terms of energy use and have been agreed by the applicant.

Terraces

220. As part of the considerations of the extant scheme it was proposed to have two terraces on the west building, one at level 6 (approximately 30m away from Willoughby House) and one on level 7 (approximately 35m from Willoughby House)
221. To mitigate concerns raised by Barbican residents in respect of potential noise and overlooking from use of the roof terraces facing Moor Lane conditions were imposed limiting hours of use and

prohibiting music and the use of public address systems on the terraces.

- 222. The current proposals omit any terraces on the west building and provide terraces at levels 9, 10, 12 and 13 on the western elevation of the east building and at level 11 on the eastern elevation. A small terrace would also be provided at level 14 on the south elevation. These would be used by office occupiers and it is likely that they would be used more during the working day than in the evenings. They are not to be used for public restaurants, clubs or venues. Such uses would require specific planning permission.
- 223. At their nearest points the west facing terraces would be approximately 51.2m, 55.4m, 64.8m and 85.3m from the window line of Willoughby House, which are very considerable distances.
- 224. In terms of overlooking, the terraces do not provide any greater possibility than office windows. Planting, landscaping and balustrading is proposed on the terraces to provide screening and to help reduce overlooking.
- 225. Although there is a greatly increased level of separation between the terraces and the nearest noise sensitive receptors in the Barbican, it is proposed to impose similar restrictions on the hours of use and restrict amplified music and the use of public address systems on the terraces through condition. The west facing terraces at levels 9, 10, 12 and 13 would be limited to no use after 9pm with the smaller terraces on the east and south elevations available until 10pm.

Wind Microclimate

- 226. The likely effect of the development on wind microclimate in the immediately surrounding area has been assessed using the Lawson Pedestrian Comfort Criteria.
- 227. At ground and walkway levels during the windiest season the wind conditions around the proposed building would be within the 'Sitting' and 'Standing/entrance' levels which is good and appropriate for the proposed use.
- 228. The terraces, which are not public, would have slightly windier conditions than desired in the summer season which is for the occupier to address through an appropriate landscaping scheme.
- 229. In that it would not cause harm to the amenity of the surrounding area in terms of wind microclimate, it is considered that the development complies with policy DM10.1 of the Local Plan and policies 5.3 and 7.9 of the London Plan.

Noise and Vibration

- 230. Moor Lane is a vehicular access route between Fore Street to the south and Silk Street, Ropemaker Street and Chiswell Street to the north. It provides access/egress to New Union Street (a private service road) and the Barbican carpark ramp beneath Willoughby House.

There is a timed restriction for through traffic between the hours of 11pm and 7am Monday to Friday.

231. It is proposed to service the new development from a service area on Moor Lane. As detailed above (paragraphs 157-164) it is anticipated that there would be a total of 85 service vehicles across the proposed operational period of 7am to 9pm (14 hours). Of these, five would be HGVs. A comprehensive booking system is proposed to ensure an even spread of deliveries during the operational period (6 vehicles per hour) with any out of hours deliveries (limited to two) and all cycle and courier deliveries via a secondary on-street facility on Fore Street Avenue.
232. The applicants have provided details of a noise assessment that sets out the noise levels that would be experienced at Willoughby House in a worst-case scenario i.e. with 10 vehicles per hour including two HGVs.
233. During the period 7am to 9pm the hourly average (L_{Aeq} , 1 hour) background noise level when measured over a full seven day period on Moor Lane varies between 55dB and 64dB. Taking account of vehicle arrivals and departures only, the noise level from 10 servicing vehicles averaged over a one hour period would be 40dB, substantially below the measured hourly ambient noise level.
234. To mitigate against break-out noise from the loading area, acoustic absorption materials will be applied to the soffit of the loading area. This will form part of a Noise Management Plan (NMP) that will include details of all the mitigation measures to be implemented to manage break-out noise from the loading area.
235. When account is taken of break-out noise levels from the loading area, (noise from use of the compactors, gate and blockers) the overall predicted hourly noise level increases from 40dB to 43dB (L_{Aeq} , 1 hour) which would remain substantially below the prevailing ambient noise level.
236. Although the predicted average noise levels would be below the existing ambient noise levels, this does not take account of short duration "event" noise levels, particularly those associated with the arrival and departure of HGVs. To address this, the worst-case scenario derives the predicted event noise level ($dB L_{Aeq,T}$) which is the predicted noise level while a vehicle arrives/leaves rather than an average over a one hour period and the maximum noise level (L_{Amax}) generated from two HGV events occurring concurrently. The predicted maximum increase in noise level during such an event would be 4dB above the prevailing ambient noise levels ($dB L_{Aeq,T}$). The predicted results fall within the range of existing L_{Amax} events measured on Moor Lane during the proposed hours of operation of the servicing area. The City's Markets & Consumer Protection, Pollution Team advise that *"It is commonly accepted that for the average person a change of 1 dB is just perceptible under controlled conditions. A change of 3 dB is noticeable, 6 dB obvious and a change of 10 dB is significant"*. It is

noted that these events would be infrequent (once per hour in a worst-case scenario) and, that they would be perceptible and more discernible during the early morning and evening periods when ambient noise levels are lower.

- 237. The number of service vehicles resulting from this development would, in a worst-case scenario, during the “event” have a minor adverse impact on prevailing noise levels in Moor Lane and experienced by the residents of Willoughby House. However, the low number of proposed HGVs (approximately one every 2hrs 45mins) suggests that the worst-case scenario of two concurrent HGV events would be unlikely to occur and that event noise levels (dB LAEQT) would generally be lower than reported, particularly with non-HGV service vehicles.
- 238. The number and timing of service deliveries would be controlled through the proposed delivery and servicing arrangements, and restricted by condition in respect of hours of operation, in order to ensure that the use of Moor Lane for the provision of servicing does not cause unacceptable harm to residential occupiers and to the surrounding area.
- 239. Noise and vibration during construction would be subject to compliance with details to be approved under conditions which would deal with the management of all freight vehicle movements to and from the site and include a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects attributable to the development.
- 240. Noise levels from mechanical plant in the completed development would be required to comply with the City of London’s standard requirement that there would be no increase in background noise levels and approved under planning conditions to ensure there would not be an adverse effect on the surrounding area.
- 241. The impacts on noise and vibration would be managed through conditions and provisions in the S106 agreement to control any adverse effects.

Air Quality

- 242. The EIA includes an assessment of the likely changes in air quality as a result of the construction and operational phases of the development and has been considered having regard to the relevant national, regional and local guidance including the NPPF Planning Practice Guidance 2014, policy 7.14 of the London Plan and policy CS15 of the Local Plan.
- 243. During construction dust emissions would increase and would require to be controlled through the implementation of good practice mitigation measures in the Construction Method Statements to be approved for each phase of the development under conditions attached to this planning permission.
- 244. The air quality assessment states that estimated construction traffic, 80 to 90 two-way vehicle movements per day during the peak construction

phase (Quarter 4 of 2020), would lead to a small increase in the number of vehicles on the local highway network. Emissions would be relatively small compared to existing road traffic emissions on London Wall (16,859 daily vehicles including 1,077 (6.39%) HGVs) and Moorgate (14,279 daily vehicles including 2,108 (14.76%) HGVs). The overall impact would not be considered sufficient to cause a significant adverse effect at any of the nearby local air quality receptors.

245. All construction plant must now comply with the London Low Emission Standards set out for Non-Road Mobile Machinery (NRMM). Therefore, it is considered that there would be no significant effect on air quality from the construction plant.
246. The impact of service vehicles on air quality has not been assessed as the number of vehicles falls below the level that would require an air quality assessment under the Institute of Air Quality Management (IAQM) guidelines. It should be noted that the City will be completely within the Mayor of London's ultra-low emission zone (ULEZ) from April 2019. Subject to daily charges for non-compliant vehicles (detailed below), this will restrict access to all but the cleanest diesel/petrol vehicles (Euro 6/Euro 4). When the proposed building is operational in 2023, it is expected that all delivery and service vehicles visiting the site will meet the low emission standards. This, together with the distance to the nearest residential units (30m), indicates that the air quality impact of the operation of the servicing bay on local residential units is likely to be negligible.
 - Petrol vehicles that do not meet Euro 4 standards and diesel vehicles that do not meet Euro 6 standards will have to pay a ULEZ daily fee (£12.50 for cars, vans and motorbikes; £100 for buses, coaches and HGVs) to drive in the zone, 24 hours a day, 365 days a year. The ULEZ will apply to all vehicle types, except black taxis. It is estimated that introducing ULEZ in central London will result in nearly a 50 per cent reduction in road transport NOx emissions by 2020.
247. For the completed scheme the assessment predicts that the effect on air quality due to the increase in air pollutants from road traffic and plant emissions would be negligible.
248. Deutsche Bank are exploring the potential for using electric vehicles which would further reduce emissions.
249. The air quality neutral assessment submitted demonstrates that the development will be air quality neutral, as described in the Mayor of London's SPG on Sustainable Design and Construction.

Moor Lane Enhancement Scheme

250. An enhancement scheme for Moor Lane was approved by the Streets and Walkways Sub-Committee in July 2011. The proposals included a widened footway on the western side of Moor Lane and the creation of a linear garden incorporating sustainable urban drainage. The works

would result in a narrowing of the carriageway by 4m providing a two-way carriageway of 6m.

- 251. Vehicle access to and from the proposed service area would not be compromised by the carriageway alterations and, as a result, the proposal to provide a servicing area accessed from Moor Lane would not prejudice the enhancement scheme.
- 252. The applicants have stated that, in addition, all delivery and servicing associated with the 21 Moorfields development would be managed by a Banksman to oversee vehicle manoeuvres and provide additional visibility assistance to drivers turning into the service area, in particular in relation to pedestrians, cyclists and other vulnerable road users.

Archaeology

- 253. An archaeological assessment has been submitted which concludes that the potential for surviving archaeological remains is low across the site, due to extensive disturbance by construction of the station and railway lines, which are in a cutting.
- 254. The proposed scheme will require new foundations which may have an archaeological impact on the southern perimeter of the site. An archaeological watching brief to record the proposed foundation positions was approved on 5th May 2016 (application no. 16/00313/MDC). The archaeological recording has commenced but is not complete. Conditions are recommended to cover the archaeological recording and foundation design. The site is outside the City wall in the area of the Moorfields marsh and Upper Walbrook valley. This would allow a record to be made of any archaeological remains revealed in accordance with Policy 12.4 of the Local Plan and current standards and guidance. A record would be made of any archaeological remains revealed in accordance with Policy DM12.4 of the Local Plan and current standards and guidance.

Planning Obligations and Community Infrastructure Levy

- 255. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City's environment and facilities. It would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
- 256. The applicants have applied for an abatement against their CIL contributions in respect of the previous existing buildings on the site which has been accepted. The abatement applies to CIL only and does not affect S106 contributions.
- 257. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
- 258. The planning obligations and CIL contributions are set out below.

Mayoral CIL and planning obligations

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
Mayoral Community Infrastructure Levy payable	£2,852,700	£2,738,592	£114,108
Mayoral planning obligation net liability*	£7,582,320	£7,582,320	£3500
Total liability in accordance with the Mayor of London's policies	£10,435,020	£10,320,912	£117,608

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

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£4,279,050	£4,065,098	£213,953
City Planning Obligation Affordable Housing	£1,492,260	£1,477,337	£14,923
City Planning Obligation Local, Training, Skills and Job Brokerage	£223,839	£221,601	£2,238
City Planning Obligation Monitoring Charge	£4,000		£4,000
Total liability in accordance with the City of London's policies	£5,999,149	£5,764,036	£235,113

City's Planning Obligations

259. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and Highways obligations

- S278 agreement
- Delivery and Servicing Management Plan and monitoring
- Noise Management Plan
- Travel Plan
- Local Training, Skills and Job Brokerage Strategy (Construction)
- Local Procurement
- Carbon Offsetting
- Utility Connections
- Publicly Accessible Area
- City Walkway Bridges and maintenance
- TfL Cycle Hire Scheme Contributions (£60,000)
- TfL Bus Capacity Mitigation (£180,000)
- Light Pollution mitigation
- Development Programme
- Public Lift and Escalator
- Alternative route during construction
- Regular liaison meetings with the local community during the construction and operational phases of the development

Public Realm Access and City Walkway

260. The proposal includes new City walkways and publicly accessible space. Public access rights, operation and maintenance of the proposed public lifts, escalators and City Walkways (including maintenance for planting) will be secured through the section 106 covenants subject to a detailed regime for public access to be only prevented or temporarily restricted or limited to enable cleansing, maintenance and security. The details of this regime are yet to be finalised and negotiations with the developer are in progress.

Delivery and Servicing Management Plan

261. The developer would be required to submit for approval a Delivery and Servicing Management Plan prior to occupation, and to adhere to the plan as approved. The plan would be required to include details of the freight consolidation operation and centre and the delivery and servicing booking and management systems that are necessary to achieve compliance with the maximum vehicle numbers required by the planning obligation. In the event of a breach of the Management Plan, the developer would be required to resubmit a revised document. Should the developer default on this requirement, the City would be given the ability to provide a replacement plan. The operation of the

Delivery and Servicing Management Plan would be subject to an annual review.

262. To ensure that the potential adverse impacts of servicing vehicles are removed, and that the four proposed servicing bays (two for HGVs and two for van deliveries) are appropriate, the following should be secured either through condition or obligations within the S106 agreement as appropriate:
- No goods shall be accepted from or dispatched onto or into any motor vehicle (except a motorcycle on Fore Street Avenue) other than one waiting for that purpose wholly within the servicing area within the building; other than within the permitted hours 5.00am and 7.00am and 9pm and 11pm, when goods may be accepted from or dispatched onto or into motor vehicles waiting for that purpose on Fore Street Avenue (limited to two).
 - All motorcycle and bicycle deliveries shall use the post room facilities
 - The servicing area within the building shall only be in use and available to be accessed between the hours of 7.00am and 9.00pm from Monday to Friday and 9.00am to 6.00pm on Saturdays.
 - No more than 83 motor vehicles (not including motorcycles) shall be permitted access to the servicing area within the building during the 14 hours per day (from 7.00am to 9.00pm from Monday to Friday) that the servicing area is in use, and no more than 85 motor vehicles in total (not including motorcycles) shall service the building over a 24 hour period including any on-street servicing from Fore Street Avenue.
 - When the development is operational, no more than 40 motor vehicles shall be permitted access to the servicing area within the building during the 7 hours period (from 9.00am to 6.00pm on Saturday) that the servicing area is in use.
 - An online delivery booking system shall be operated to ensure that all deliveries, both those coming from the off-site consolidation centre and all other deliveries, are appropriately scheduled so that the number and size of vehicles needing access to the servicing area within the building does not at any time exceed the capacity of the four loading bays within that servicing area. This delivery booking system shall be available for the City of London to inspect at all times.
 - All vehicles entering and exiting the servicing area within the building from or to Moor Lane shall do so in the forward direction and in a forward gear.
 - A Noise Management Plan (NMP) that includes details of the mitigation measures to be implemented to manage acoustic noise levels from the loading bay and servicing area on Moor Lane (as detailed within the Regulation 25 Statement dated 4th January 2018).

- A delivery and servicing plan (DSP) shall set out in detail how the building will be serviced, including deliveries, collection of wastes, management of facilities management vehicles and use of the disabled parking bay, in full conformity with all of the requirements set out above. It shall be submitted to the City for its review, comment and approval and shall be kept under review and amended as may be appropriate from time to time, particularly as may be needed to continue to exemplify sustainable logistics best practice.

Monitoring and Administrative Costs

263. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
264. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

265. The City will use CIL to mitigate the impact of development and provide necessary infrastructure but in some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are still yet to be fully scoped.
266. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Phasing of Development and CIL Payments

267. In line with the previous agreements the CIL payment will be linked to 2 phases of the development. Phasing of CIL payments is specifically provided for under the CIL regulations. Any payments made against the extant permission will be credited.

Conclusions

Economic Activity

268. The proposed development would result in an additional 41,662sq.m of Class B1 office floorspace over the previously existing buildings on the site and could accommodate an additional 5,667 office workers. This would further consolidate the nationally significant cluster of economic activity in the City and contribute to its attractiveness as a world leading international financial and business centre. It would deliver approximately 3.62% of the additional office floorspace sought in Local Plan policy CS1.
269. Deutsche Bank is a global banking and financial services company and has more than 100,000 employees in over 70 countries. It is the 16th Largest Bank in the World (by total assets) and employs 7,000 people in London and its contribution to the City is significant.

270. Foreign-based banks account for 53.7% (approximately 9.88bn) of all employment taxes generated by banks and make up almost 3% of the UK's total tax receipts.

The impact of the proposals on neighbouring residential occupiers and the local area

271. Concerns have been raised by Barbican residents, particularly in relation to traffic noise and air quality impacts attributable to the location of the servicing area on Moor lane. Additional issues raised include noise from the office terraces, light emission, loss of daylight & sunlight and loss of views. These impacts have been mitigated through negotiations and agreement with the applicant as far as possible while still facilitating the potential tenant's requirements for the site.
272. The use of the Servicing area on Moor Lane will be restricted to protect residents from potential noise disturbance neighbours during the quieter hours.
273. The anticipated number of vehicles using the service area would be 85. Of these only five would be HGVs with 74 (88%) cars and light vans.
274. Assessment of the service vehicle traffic noise indicates that average noise levels would be below the existing ambient noise levels but that in a worst case scenario there would be a minor adverse impact on peak noise levels (4dB above background level) in Moor Lane and experienced by the residents of Willoughby House.
275. The low number of proposed HGVs indicates that the worst-case scenario (two concurrent HGV events) would be unlikely to occur and that peak noise levels would generally be lower than reported.
276. The City will be completely within the Mayor of London's ultra-low emission zone (ULEZ) from April 2019. When the proposed building is operational (2023), it is expected that all delivery and service vehicles visiting the site will meet the low emission standards. This, together with the distance to the nearest residential units indicates that the air quality impact from the use of the servicing area on local residential units is likely to be negligible.
277. At their nearest points the west facing terraces would be approximately 51.2m, 55.4m, 64.8m and 85.3m from the window line of Willoughby House. Conditions will be imposed limiting hours of operation and prohibiting music or the use of public address systems.
278. There would be reductions in sunlight and daylight to some residential premises. Assessments were carried out and, as indicated by the BRE guidance, they demonstrated that it is the presence of the existing balconies, rather than the size of the proposed development that is the main factor in the loss of daylight and/or sunlight. The applicants have demonstrated how they intend to minimise light emission at night and restrictions are proposed on the use of the office terraces at night.
279. There is no right to, or protection of, private views.

- 280. The new City Highwalk and changes to City Walkway bridges over Moor Lane and Fore Street Avenue would provide appropriate replacements for the previous arrangements.
- 281. There would be a significant reduction in the quantity of publicly accessible space when compared to the extant scheme to meet the trading floor floorspace requirements of the proposed tenant, Deutsche Bank. The economic case for retaining Deutsche Bank in the City is laid out within the body of this report. Nevertheless, the landscaping of the proposed publicly accessible square would be of high quality and would provide for a quiet green space for the benefit of office workers and members of the public.
- 282. Rescission and changes to the City Walkway are subject to existing legal agreements. Declaration and maintenance will be subject to separate agreements to be placed before your Committee at the appropriate times.

The impact of the proposals on heritage assets

- 283. The proposed development has been assessed in terms of its potential impact on nearby heritage assets. Utilising the relevant guidance, the assessment indicates that any impact would not be detrimental to the setting and significance of listed buildings, conservation areas and historic parks and gardens in the vicinity.

Compliance with Policy and Guidance

- 284. In relation to sustainable economic growth, creating jobs, prosperity and maintaining the City of London as a strategically important, globally-oriented financial and business services centre, the proposals accord with the National Planning Policy Framework, the London Plan and the Local plan.
- 285. In that it would not have a significant detrimental impact on the local area or residents in terms of noise, air quality, daylight and sunlight and light pollution, the proposal is in substantial compliance with the development plan policies that relate to it. In particular policies DM10.1, DM10.7 and DM21.3 of the Local Plan and policies 7.6 and 7.7 of the London Plan.
- 286. In that it would not have a detrimental impact the setting or significance of heritage assets in the vicinity the proposal is in compliance with the development plan policies that relate to it. In particular policies DM12.1, DM12.3 and DM12.5 of the Local Plan and policies 7.8 and 7.11 of the London Plan.

Conclusion

- 287. This scheme amends previous approvals on the site to meet the needs of a major City occupier.
- 288. The economic benefits of the development in terms of employment, maintaining local supply chains and retaining a significant foreign bank within the City are key considerations that must be weighed against any potential negative impacts on residential neighbours. There would

be some impacts on neighbouring residential occupiers but, as has been demonstrated through the relevant assessments of noise, air quality and daylight and sunlight, any impacts would not be significant. The proposal is in substantial compliance with the guidance of the NPPF and policies of the London Plan and the Local Plan.

289. This is a significant development for the City, which facilitates occupation by a major City occupier who has expressed a willingness to work with, and to minimise the impact on, residents.
290. The scheme is recommended to you for planning permission subject to conditions and a Section 106 agreement being entered into to cover the matters set out in the report.

Background Papers

Internal

Email 09.11.2017 Open Spaces Department

Email 22.11.2017 Barbican Centre and Guildhall School of Music & Drama

External

Representations:

Name	Address	Date
David McArthur	15 Finsbury Circus House	12/01/2018
Madeleine Pugh	Moor House 120 London Wall	13/12/2017
Michael Swash	106 Willoughby House	06/12/2017 29/11/2017
Residents Committee of the Heron	C/o Apartment 1407, 5 Moor Lane	02/01/2018 06/12/2017
Margaret Berer	114 Speed House	26/11/2017 12/11/2017
Beatriz Phipp	83 Speed House	29/11/2017
Peter Prynn	124 Willoughby House	29/11/2017
Eileen Hall	509 Willoughby House	30/11/2017
F Hogan	525 Willoughby House	29/11/2017 29/11/2017
E Hirst	724 Willoughby House	28/11/2017
John Ponting	532 Willoughby House	29/11/2017
Karen Goodison	718 Willoughby House	01/12/2017
Nazar Sayigh	301 Willoughby House	30/11/2017
Kathryn Gray	508 Willoughby House	30/11/2017
Ian Williams	111 Willoughby House	29/11/2017
Renu Gupta	534 Willoughby House	29/11/2017
Nina Strangeway	301 Willoughby House	29/11/2017
Edward McEneaney	110 Willoughby House	29/11/2017
Natalie Robinson	7 Andrewes House	29/11/2017
Simon Ebbins	501 Willoughby House	29/11/2017
Caroline Swash	106 Willoughby House	29/11/2017

Sarah Guy	109 Willoughby House	29/11/2017
Amanda Davenport	710 Willoughby House	29/11/2017
R Starrett	105 Willoughby House	28/11/2017
Lindy Hemming	105 Willoughby House	28/11/2017
Richard Haynes	705 Willoughby House	28/11/2017
Stephanie Gamble	328 Willoughby House	28/11/2017
Hilary Sunman	124 Willoughby House	28/11/2017
The Barbican Association	C/o 403 Willoughby House	27/11/2017
Katherine Jarrett	504 Willoughby House	27/11/2017
Nicholas Redman	113 Willoughby House	27/11/2017
Jorge Rodrigues	401 Willoughby House	16/01/2018
Tim O'Hara	708 Willoughby House	27/11/2017
Maria Granowska	51 Willoughby House	27/11/2017
Lila Rawlings	719 Willoughby House	27/11/2017
David Archer	721 Willoughby House	26/11/2017
Trevor Kavanagh	55 Speed House	26/11/2017
Martin Gilday	519 Willoughby House	26/11/2017
Tim Bishop & Ian Loudon	84 Speed House	26/11/2017
Ian Dixon	407 Gilbert House	25/11/2017
Nicola Holmes	523 Willoughby House	21/11/2017
Dr Steve Nicholson	540 Willoughby House	22/11/2017
Peter Smart	715 Willoughby House	22/11/2017
Graham Webb	318 Willoughby House	20/11/2017
Nick Astbury	522 Willoughby House	20/11/2017
John Hodges	336 Willoughby House	19/11/2017
Lucy Hall	336 Willoughby House	19/11/2017
Christopher Allen & Sandra Hickey	516 Willoughby House	17/11/2017
Geraint Lewis	713 Willoughby House	15/11/2017
Katherine Green	711 Willoughby House	14/11/2017
K Bradshaw	303 Willoughby House	14/11/2017
Aleksei Gornoi	307 Willoughby House	13/11/2017
Richard Gaskell	402 Mountjoy House	12/11/2017

Statutory Consultees

Letter 13.11.2017 Historic England
Letter 15.11.2017 Westminster City Council
Email 20.11.2017 Thames Water
Email 21.11.2017 Natural England
Email 21.11.2017 Environment Agency
Email 22.11.2017 St. Paul's Cathedral
Letter 08.12.2017 Greater London Authority
Letter 12.12.2017 LB Lambeth

Application Documents:

Planning Statement by GVA rec'd 27.10.2017
Environmental Statement Volume 1: Main Text by Waterman Group rec'd 27.10.2017
Environmental Statement Volume 2: Townscape, Heritage and Visual Impact Assessment by Richard Coleman Citydesigner rec'd 27.10.2017
Environmental Statement Volume 3: Appendices by Waterman Group rec'd 27.10.2017
Environmental Statement Volume 4: Figures by Waterman Group rec'd 27.10.2017
Environmental Statement Volume 5: Non-Technical Summary by Waterman Group rec'd 27.10.2017
Design & Access Statement by Wilkinson Eyre rec'd 27.10.2017
Transportation Assessment by Momentum Transport Planning rec'd 27.10.2017
Flood Risk Assessment by Waterman Group rec'd 27.10.2017
Light Pollution Advice Note by Waterman Group rec'd 27.10.2017
Landscape Statement by Andy Sturgeon Design rec'd 27.10.2017
Sustainability Statement by Cundall rec'd 27.10.2017
Energy Statement by Cundall rec'd 27.10.2017
Statement of Community Involvement by Hulme Brophy rec'd 27.10.2017
Regulation 25 Extra Information Note by Waterman Group Energy Statement by Cundall rec'd 04.01.2018
Letter of Clarification by Deutsche Bank rec'd 11.01.2018
Drainage Strategy by Cundall rec'd 01.02.2018
Design Note – 21 Moorfields Blocker by Robert Bird rec'd 01.02.2018
Drawing nos. 00873-WEA-XX-XX-P-0002, 0049, 0050, 0051, 0052, 0053,

0054, 0055, 0056, 0057; 540_P_00_111 Rev. P04, 540_P_01_111 Rev. P06,
540_P_RF_111 Rev. P05.

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report as summarised in the Conclusions section of the report

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the cap on servicing trips and other elements of the Delivery and Servicing Management Plan.

Appendix B

London Plan Policies

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

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

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

Policy 2.12 Identify, protect and enhance predominantly residential neighbourhoods within CAZ and develop sensitive mixed use policies to ensure that housing does not compromise CAZ strategic functions elsewhere in the zone.

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 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;

Support the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity;

Promote London as a suitable location for European and other international agencies and businesses.

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

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

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

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

Policy 4.7 Support a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres.

Policy 4.8 Support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need and the broader objectives of the spatial structure of this Plan, especially town centres.

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

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

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

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

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

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

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

Policy 5.12 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 5.18 Encourage development waste management facilities and removal by water or rail transport.

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

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

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

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

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

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

Policy 7.1 Development should be designed so that the layout, tenure, mix of uses interface with surrounding land will improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.

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 7.5 London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Policy 7.6 Buildings and structures should:

- a. Be of the highest architectural quality
- b. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c. Comprise details and materials that complement, not necessarily replicate, the local architectural character
- d. Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

- e. Incorporate best practice in resource management and climate change mitigation and adaptation
- f. Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g. Be adaptable to different activities and land uses, particularly at ground level
- h. Meet the principles of inclusive design
- i. Optimise the potential of sites.

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

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

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

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

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

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

Policy 7.18 Resist the loss of local protected open spaces unless equivalent or better quality provision is made within the local catchment area.

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

Policy 7.21 Trees should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced.

Relevant Local Plan Policies

CS5 Meet challenges facing North of City

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

CS1 Provide additional offices

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

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
 - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
 - b) reasonable gas and water supply considering the need to conserve natural resources;
 - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
 - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
 - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;

- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces.

Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

- a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM12.1 Change affecting heritage assets

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

DM12.4 Archaeology

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

CS13 Protect/enhance significant views

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

DM15.1 Sustainability requirements

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

DM15.2 Energy and CO2 emissions

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

DM15.3 Low and zero carbon technologies

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

DM15.4 Offsetting carbon emissions

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

DM15.5 Climate change resilience

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

DM15.7 Noise and light pollution

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

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by

maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

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

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

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

DM18.2 Sustainable drainage systems

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

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
 - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
 - b) provide a high quality environment;
 - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
 - d) have regard to biodiversity and the creation of green corridors;
 - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

DM20.3 Retail uses elsewhere

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

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 17/01095/FULEIA

21 Moorfields, Land Bounded By Moorfields, Fore Street Avenue, Moor Lane & New Union Street London

Construction of a mixed use development above and around the new Crossrail station entrance to provide office (Class B1) space[63,008sq.m GEA], retail (Use Class A1/A3/A4) space [182sq.m GEA], a replacement City Walkway, a new urban square, cycle parking, servicing, storage, plant, landscaping [12,587sq.m GEA] and associated works. [Total 75,777sq.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 In the event that further site contamination is found when carrying out the approved development which has not previously been reported in writing to the Local Planning Authority, it must be reported in writing to the Local Planning Authority within five working days and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the local planning authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.
REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the following policy the Core Strategy: DM15.8

- 3 None of the development hereby permitted shall be commenced (except those works expressly agreed by Crossrail in correspondence with GVA dated 4th August 2015*) until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Local Planning Authority which:-
- (i) Accommodate the proposed location of the Crossrail structures including tunnels, shafts and temporary works,
 - (ii) Accommodate ground movement arising from the construction thereof,
 - (iii) Mitigate the effects of noise and vibration arising from the operation of the Crossrail railway within the tunnels and other structures.
 - (iv) Mitigate the effects on Crossrail, of ground movement arising from development.

The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required parts (i), (ii), (iii) and (iv) of this condition shall be completed in their entirety before any part of the buildings hereby permitted are occupied.

*The works agreed by Crossrail are set out in Informative number 21.

REASON: To ensure that the development does not prejudice construction of Crossrail and to protect the amenity of occupiers of the proposed building in accordance with the following policies of the Local Plan: CS5, DM16.1.

- 4 None of the development hereby permitted shall be commenced (except those works expressly agreed by Crossrail in correspondence with GVA dated 4th August 2015*) until a method statement has been submitted to, and approved in writing, by the Local Planning Authority to include arrangements to secure that, during any period when concurrent construction is taking place of both the permitted development and of the Crossrail structures and tunnels in or adjacent to the site of the approved development, the construction of the Crossrail structures and tunnels is not impeded.

* The works agreed by Crossrail are set out in Informative number 21.

REASON: To ensure that the development does not prejudice construction of Crossrail and to protect the amenity of occupiers of the proposed building in accordance with the following policies of the Local Plan: CS5, DM16.1.

- 5 No works below ground level comprised within the permitted development shall be carried out at any time when sprayed concrete lined tunnels or compensation grouting works are being undertaken in close proximity.

REASON: To ensure that the development does not prejudice construction of Crossrail and to protect the amenity of occupiers of the proposed building in accordance with the following policies of the Local Plan: CS5, DM16.1.

- 6 Before any Phase 2 construction works hereby approved are begun details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at ground floor level in relation to the existing highway levels. The development shall be carried out in accordance with the approved site 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.
- 7 Before any Phase 2 construction works hereby permitted are begun the following details and information 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) details of provision within the building facades for the inclusion of street lighting;
 - (b) details of all alterations to the City Walkway bridge over Moor Lane.REASON: In the interests of public safety and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM10.1, DM16.2.
- 8 Provision must be made within the development for City Walkways to be constructed in accordance with specifications to be submitted to and approved in writing by the Local Planning Authority before any works thereby affected are begun, such specifications to include the positions, widths, levels and finishes of the City Walkway.
REASON: To ensure that facilities are provided for the City Walkway in accordance with the following policy of the Local Plan: DM16.2.
- 9 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 and monitoring (including any agreed monitoring contribution) 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 (including payment of any agreed monitoring contribution)

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.

- 10 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 11 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: attenuation systems, flow control including the hydraulic brakes and pumps, rainwater harvesting system, design for system exceedance, water quality, integration with the public realm, construction plan, cost etc. The surface water discharge rates for each storm event should be no greater than agreed and the actual attenuation volume provided within each of the catchments should be no smaller than agreed; changes will need to be justified and agreed by the Lead Local Flood Authority;
 - (b) Full details of measures to be taken to prevent flooding (of the site or by the site) during the course of the construction works.REASON: To improve sustainability, reduce flood risk and reduce water run off rates in accordance with the following policies of the Local Plan: DM15.5 and DM18.1
- 12 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 improve sustainability, reduce flood risk and reduce water run off rates in accordance with the following policies of the Local Plan: DM15.5 and DM18.1

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

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

- 14 No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground water and sewerage utility infrastructure. Piling has the potential to impact on local underground water and sewerage utility infrastructure.

- 15 Before any Phase 1 construction work is begun, impact studies of the existing water supply infrastructure must be submitted to, and approved in writing, by the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new

additional capacity required in the system and a suitable connection point.

REASON: To ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand.

- 16 No piling 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.

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

- 17 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any Phase 2 construction works hereby permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.

- 18 Before any construction works at Phase 2 hereby permitted are begun details of rainwater collection, harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policies of the Local Plan: DM15.5 and DM18.1.

- 19 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 to include the vertical fins, glazing, specialist coating and fritting and details of their contribution to light spillage reduction to the Moor Lane and west facing elevations, external ground and upper level surfaces;
- (b) details of the proposed new facades including typical details of the fenestration and entrances;
- (c) details of typical bays of the development;
- (d) typical details of stonework;
- (e) details of ground floor and podium level (Highwalk) elevations;
- (f) details of junctions with adjoining premises;
- (g) details of soffits, hand rails and balustrades;
- (h) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level

- (i) details of all ground level surfaces including materials to be used;
- (j) details of external surfaces within the site boundary including hard and soft landscaping;
- (h) details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus.

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: DM10.1, DM10.4, DM10.5, DM21.3.

- 20 Before any works thereby affected are begun, details shall be submitted to and approved in writing by the Local Planning Authority of the proposed Highwalk lighting artwork. This shall include details of all light fittings and associated works, and shall be accompanied by an lighting impact assessment.
REASON: to ensure a satisfactory external appearance and protect the amenity of all users of the Highwalk and neighbouring residential and commercial occupiers in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM11.2 and DM21.3.
- 21 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the arrangements for the servicing area accessed from Moor Lane so as to control and minimise noise to neighbouring residential properties. The scheme shall include details of any acoustic absorbent materials as well as details of the operation of the "Blocker" and security gates. The details approved must be implemented prior to occupation.
REASON: To protect the amenities of neighbouring residential and commercial occupiers in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
- 22 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.
- 23 The development shall be designed to connect into the CityGen district heating network.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 24 Before any Phase 2 construction works hereby permitted are begun a detailed assessment of measures to improve carbon dioxide emissions

savings and the BREEAM rating shall be submitted to and approved in writing by the local planning authority.

REASON: To minimise carbon emissions and provide a sustainable development in accordance with the following policy of the Local Plan: DM15.1.

- 25 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 26 A landscaping scheme for the publicly accessible square, Highwalk, street bridges, roof terraces and facades, to include details of all planting and plant species, must be submitted to and approved in writing by the Local Planning Authority before any works affected thereby are begun. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
- 27 The green roof(s) indicated on the drawings hereby approved shall be designed to achieve at least the number of BREEAM credits indicated in the pre-assessment in relation to flood risk/water run-off and enhancing ecological value of the site. Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM15.1, DM18.2, DM19.2.
- 28 (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.

- 29 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A1, A3 or A4 uses. The details approved must be implemented before the individual Class A1, A3 or A4 uses are implemented.
REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7.
- 30 No cooking shall take place within any Class A1, A3 or A4 units hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Any works that would materially affect the external appearance of the building will require a separate planning permission.
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
- 31 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
- 32 Prior to installation and use of the boilers, full details of the systems together with the potential for emissions, including any mitigation measures to be applied, shall be submitted and approved by the Local Planning Authority. The emissions shall be modelled in accordance with a methodology agreed with the City of London.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

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

REASON: To ensure that the generator, which does not meet City of London noise standards, and would have a negative impact on local air quality, is used only in response to a life threatening emergency situation in accordance with the following policies of the Local Plan and the London Plan: DM15.6, DM15.7, DM21.3; 7.14B (a) and (c).

- 38 The party wall elements between the proposed offices and retail premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the office premises due to noise from the neighbouring retail premises and shall be permanently maintained thereafter.
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
- 39 The Class A1 or A3 or Class A4 use hereby permitted shall not be open to customers between the hours of 23:00 on one day and 07:00 on the following day.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 40 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip loading area as shown on the approved drawings.
REASON: To ensure satisfactory servicing facilities in accordance with the following policy of the Local Plan: DM16.5.
- 41 Facilities (other than by street level turntable) must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.
- 42 No goods, including fuel, shall be accepted from or dispatched onto or into any motor vehicle (except a motor cycle) other than one waiting for that purpose wholly within the servicing area within the building, except for between 5.00am and 7.00am and 9pm and 11pm when goods may be accepted from or dispatched onto or into motor vehicles waiting for that purpose on Fore Street Avenue (limited to two such vehicles).
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, DM16.5, DM21.3.

- 43 No servicing of the premises shall be carried out from the Moor Lane servicing area other than between the hours of 7.00am and 9.00pm from Monday to Friday and from 9.00am to 6.00pm on Saturdays and not at all on Sundays and Bank Holidays. Servicing includes the loading and unloading of goods from motor vehicles and putting rubbish outside the building.
REASON: To protect the amenities of neighbouring residential and commercial occupiers in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
- 44 All vehicles entering and exiting the servicing area within the building from or to Moor Lane shall do so in the forward direction and in a forward gear.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety and protect the amenity of neighbouring residents in accordance with the following policy of the Local Plan: DM16.5, DM21.2.
- 45 The loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 46 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway or such alternative as may be approved in writing with the Local Planning Authority.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 47 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.
- 48 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 49 Provision must be made within the development for the lighting and drainage of City Walkways together with a lockable service cupboard and cleansing facilities in accordance with specifications to be

submitted to and approved in writing by the Local Planning Authority prior to any works thereby affected being begun.

REASON: To ensure that City Walkways may be used in safety at all times and in all weathers in accordance with the following policy of the Local Plan: DM16.2.

- 50 All City Walkways within the development shall be constructed in accordance with specifications to be submitted to and approved in writing by the Local Planning Authority prior to any works thereby affected being begun, which shall include details of surface finishes, handrails, balustrades, parapets and signage.
REASON: In the interests of public safety and to ensure uniformity of design treatment of all City Walkways in accordance with the following policy of the Local Plan: DM16.2.
- 51 Provision must be made within the development for continuing structural support for the City Walkway(s) in pursuance of Section 10 of the City of London (Various Powers) Act 1967.
REASON: To ensure the integrity of the City Walkway in accordance with the following policy of the Local Plan: DM16.2.
- 52 After the City Walkway(s) incorporated in the planning permission have been constructed, certified and declared by the City of London Corporation to be City Walkways in pursuance of Sections 5 and 6 of the City of London (Various Powers) Act 1967, any person may have access thereto on foot and may pass and re-pass thereon on foot as of right, but subject nevertheless to any restrictions which may legitimately from time be imposed in relation thereto.
REASON: To ensure the public has access over the City Walkway on this site in accordance with the following policy of the Local Plan: DM16.2.
- 53 There must be no building, roof structures or plant above the top storeys except as may be approved in writing by the Local Planning Authority.
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.
- 54 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 55 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment 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 a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 56 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 830 Long Stay 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.
- 57 Provision shall be made for disabled people to obtain access to the offices and to the retail unit via their respective principal entrances without the need to negotiate steps and shall be maintained for the life of the building.
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.
- 58 No public address system (PA), amplified live or amplified recorded music shall be played within any part of the site so loud that it can be heard outside the site or within any other premises in the buildings on the site.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 59 No public address system (PA), amplified live or amplified recorded music shall be played on the roof terraces at any time.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 60 Unless otherwise agreed in writing, there shall be no private or public events or associated activities within the new publicly accessible square.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 61 No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 62 Other than public street lighting where required, there shall be no external feature lighting on the Moor Lane facade of the building.
REASON: In order to protect residential/commercial amenities in the area and safeguard the settings of designated and non-designated heritage assets in accordance with the following policies of the Local Plan: DM12.1, DM15.6, DM21.3.
- 63 The roof terraces at levels 9, 10 and 12 hereby permitted shall only be used for non-maintenance purposes between the hours of 08:00 and 21:00 Monday to Friday and the roof terraces at levels 11, 13 and 14 and 08:00 to 22:00 Monday to Saturday and not at all on Sundays or Bank Holidays.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 64 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:
Drawings numbered:
00873-WEA-XX-XX-P-0001, 0071, 0072, 0099, 0100, 0100M, 0101, 0102, 0103, 0104, 0105, 0106, 0107, 01080109, 0110, 0111, 0112, 0113, 0114, 0115, 0115M, 0116, 0201, 0202, 0203, 0204, 0205, 0206, 0301, 0302, 0501, 0502, 0503, 0504, 0505, 0801.
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 The Mayoral Community Infrastructure Levy is set at a rate of £50 per sq.m on "chargeable development" and applies to all development over 100sq.m (GIA) or which creates a new dwelling.

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

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

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

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Section 106 Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

- 3 You are advised that the planting and plant species indicated on the approved drawings are NOT approved and details of the final planting scheme will be required by condition of this planning permission.
- 4 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 5 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for

planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

- 6 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.
- 7 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
 - (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
 - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.
 - (c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.
 - (d) Bridges over highways
 - (e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.
 - (f) Declaration, alteration and discontinuance of City and Riverside Walkways.

(g) The provision of City Walkway drainage facilities and maintenance arrangements thereof.

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

(i) Carriageway crossovers.

(j) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".

8 The enabling of archaeological work to meet the requirements of condition 12 is the responsibility of the developer and should be regarded as an integral part of the development programme in accordance with the NPPF and the policies of the Local Plan. This would include on site facilities, funding, fieldwork, post excavation analysis and reporting and publication of the work in accordance with recognised guidelines and codes of practice. This is to ensure adequate "preservation by record" of the archaeological resource affected by the proposed development.

9 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

(a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site and compliance with the Construction (Design and Management) Regulations 2007; the Environmental Health Team should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments (including the Offices, Shops and Railway Premises Act 1963); in particular:

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;
- provision for window cleaning (internal and external) to be carried out safely.

(f) The use of premises for the storage, handling, preparation or sale of food.

(g) Use of the premises for public entertainment.

(h) Limitations which may be imposed on hours of work, noise and other environmental disturbance.

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

(j) Methods of odour control.

10 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, 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.

Terraces and Open Space

(f) The location of outside space is an important consideration with regard to the exposure of air pollutants. The applicant is therefore minded to consider the location of existing and planned combustion plant termination points relative to any terrace, general access areas or openable windows etc. In addition to any building control or planning requirements, the third edition of the Chimney Height Memorandum (1981) requires that that certain types of combustion plant terminate at least 3m above any area to which there is general access.

Boilers and CHP plant

(g) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2011.

(h) All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2011.

(i) 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.

(j) 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

(k) 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.

(l) 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

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

Ventilation of Sewer Gases

(n) 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

(o) 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.

(p) 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.

- 11 The Directorate of the Built Environment should be consulted on:
 - (a) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".
 - (b) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window cill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). You are advised that highway projection licenses do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. In such cases please also contact the Corporate Property Officer, City Surveyor's Department.
 - (c) Bridges over highways.
 - (d) Permanent Highway Stopping-Up Orders, dedication of land for highway purposes, declaration, diversion and stopping up of City and Riverside Walkways.
 - (e) The display of any advertisement material on the premises which may be subject to the City of London Corporation's Byelaws.
- 12 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 13 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which

may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification:

London Fire Brigade, Fire Prevention Branch
5-6 City Forum
City Road
London EC1N 2NY

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

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

(c) Works in proximity to the line of the CrossRail project:

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

(d) Works affecting railway operational land and structures:

Planning Surveyor
Railtrack
355 Euston Road
London NW1 3AG

(e) Works affecting water supplies, land drainage and flood defences:

Environment Agency,
North London Planning Liaison Team
9th floor, Eastbury House
30-34 Albert Embankment
London, SE1 7TL

- 14 Transport for London has indicated its preparedness to provide guidelines in relation to the proposed location of the CrossRail structures and tunnels, ground movement arising from the construction of the running tunnels, and noise and vibration arising from the use of the running tunnels. Applicants are encouraged to discuss the guidelines with the CrossRail Engineer in the course of preparing detailed design and method statements.
- 15 The existing walkway stair on the north west corner of New Union Street will become redundant following removal of the bridge and should be removed and the area made good. This must be agreed with the owners of City Point.

16 Thames Water advises:

(1) The developer is advised to contact Thames Water Development Services (0845 850 2777) to discuss the details of the piling method statement required by a condition of this planning permission.

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

(3) It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or suitable sewer. 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 Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

(4) Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet 'Best Management Practices for Catering Establishments' which can be requested by telephoning 01923 898 188.

(5) The developer should incorporate with their proposals, 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.

(6) 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 Water's pipes. The developer

should take account of this minimum pressure in the design of the proposed development.

(7) A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

(8) Thames Water would recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol/oil interceptors could result in oil-polluted discharges entering local watercourses.

(9) The development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.

(10) There are important water assets adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

- 17 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 18 The Environment Agency advises:
 - (a) Developers should ensure that any proposed piling methods do not pose a pollution risk to controlled waters. Piling to facilitate building foundations or the installation of ground source heat pumps has the potential to create a pathway between contaminated shallow soils and deeper geological formations and aquifers. Deep piling can also result in physical disturbance of aquifers.
 - (b) If piling is proposed, a Piling Risk Assessment will be required to demonstrate that the chosen piling method does not increase the risk of near-surface pollutants migrating into deeper geological formations and aquifers. A Hydrogeological Risk Assessment of physical

disturbance to the aquifer should also be undertaken and if unacceptable risks are identified, appropriate mitigation measures must be provided.

(c) We recommend that developers follow the risk management framework provided in our guidance for 'Piling into Contaminated Sites' and also refer to the document: 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention'

- 19 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 20 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 21 The works agreed by Crossrail in correspondence with GVA dated 4th August 2015 referred to in conditions 3 and 4 are:
Above deck:
Soft strip and asbestos removal to existing 21 MF structures including roof enclosures, City Boot pub and Moorgate Buttery. [completed]
Fit out of City Boot pub for site welfare. [completed]
Erection of perimeter hoardings on New Union Street, Moor Lane, Fore Street Avenue and Moorfields. [completed]
Erection of encapsulation scaffold round existing buildings.
Erection of Tower Crane 1 and Tower Crane 2 on retained deck.
Installation of temporary impact protection and temporary waterproofing.
Drainage surveys and leak testing.
Installation of temporary protection to LUL vents.
Remedial repairs to retained deck expansion joints.
Removal of New Union Street and Fore Street Avenue Link Bridges and temporary propping to Moor Lane Link Bridge.
Site Investigation works to retained deck including coring works.
Installation of accommodation gantry and cabins on Moorfields by Holland and Barrett.
Reduction in size of Fore Street Avenue substation and disconnection/demolition of New Union Street substation.
Structural demolition of existing buildings (including podium slab) down to retained deck level. This includes New Union Street substation and Phases 1 and 2 of demolition.
Formation of penetrations in retained deck in pile locations to allow for the installation of trimming steels and also piles themselves.
Installation of piling grillage on retained deck.

Below Deck

- ' Asbestos removal in LUL demise and developer's area.
- ' Setting out and surveys to LUL demise and developer's area.
- ' Site Investigations including beam and column intrusive works, boreholes and UXO surveys.
- ' Mini piling in developer's area East ' 300mm diameter piles to depth of 30m + installation of pile caps.
- ' Installation of trimming steels.
- ' Installation of pile protection shields in developer's area at pile positions 3, 5, 7 & 9.
- ' Drainage diversions including Crossrail manhole at Pile 003.
- ' Fit out of developer's area for LUL welfare.
- ' MEP diversions.
- ' Installation of platform 6 lighting and ceiling.
- ' Installation of hoardings in LUL demise.
- ' Installation of link bridges across tracks 5 & 6.
- ' Remedial works to columns/beams and concrete planks within station.

- ' Installation of LUL vent infill slabs.
- ' Removal of lifts and lift shafts.
- ' Temporary propping to retained deck.

- 22 The investigation and risk assessment referred to in condition 2 must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:
- (i) a survey of the extent, scale and nature of contamination;
 - (ii) an assessment of the potential risks to:
 - 1. human health,
 - 2. property (existing or proposed) including buildings, open spaces, service lines and pipes,
 - 3. adjoining land,
 - 4. groundwaters and surface waters,
 - 5. ecological systems,
 - 6. archaeological sites and ancient monuments;
 - (iii) an appraisal of remedial options, and proposal of the preferred option(s).
- This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11.