



## Planning and Transportation Committee

**Date:** TUESDAY, 16 FEBRUARY 2021  
**Time:** 10.30 am  
**Venue:** VIRTUAL PUBLIC MEETING – ACCESSIBLE REMOTELY

4. **70 GRACECHURCH STREET, LONDON EC3V 0HR**  
Report of the Interim Chief Planning Officer and Development Director.

**For Decision**  
(Pages 1 - 28)

**Items received too late for circulation in conjunction with the Agenda.**

**John Barradell**  
**Town Clerk and Chief Executive**

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## **Planning & Transportation Committee – 16 February 2021**

### **Addendum for Agenda item 4.**

#### **Planning application 20/00816/FULEIA 70 Gracechurch Street London EC3V 0HR**

##### **1. Letters of representation**

Two letters of no objection have been received from the London Borough of Lambeth and the London Borough of Camden (attached).

GLA Stage 1 Letter has been received, the draft comments were received in time to be addressed within the officer report.

TfL Stage 1 Letter has been received, the draft comments were received in time to be addressed within the officer report.

##### **2. Further representation from Freeholder of 2-4 Bulls Head Passage**

An objection has been received from the Freeholder of 2-4 Bulls Head Passage which they have requested be brought to the attention of Committee. Their request to address the Committee directly was received after the specified deadline and so could not be agreed to.

The objection (attached) is as follows:

- The present building is approx 10 storeys, and to build a 33-storey high building so close to Leadenhall Market (which is immediately adjacent) will have a damaging effect to both the amenity and light of this historical market. I also note that, unlike the Walkie Talkie building, there is no provision for space around the building to ameliorate these effects.
- The boundary of the building is also approx 20 metres from Bulls Head. Unlike the new development on the corner of Leadenhall St and Gracechurch St, this proposal is south of the market and will overshadow the entire area, including our business and the residential leasehold flats for which we are responsible
- The building will also overshadow our satellite dishes preventing us from receiving access to the signals
- I am concerned that I have only learnt of this application from the leaseholders and am unaware of notices to us and am concerned that we have not had a chance to object earlier. I am concerned that the planning officials have marked this application for acceptance and believe that the committee should delay any decision so that further consideration should be made in relation to the impact of the proposals, especially since Covid is interrupting the normal consultation process.

Officer response: The points raised are addressed in full in the officer report. The S106 associated with the application requires a TV interference survey be provided. Full consultation was undertaken on the application: Site notices were displayed on the site on 05.11.2020 and 12.01.2021; Press notices were published on 10.11.2020 and 12.01.2021; and residents of 4 Bulls Head passage were consulted on 09.11.2020 and 13.01.2021.

### 3. Further representation from residents of 2-4 Bulls Head Passage

A letter has been received from Right of Light Consulting on behalf of the residents of flats A, B and C, 4 Bulls Head Passage. In summary, the letter outlines the following concerns:

- The study has been prepared without a site visit to inspect the internal arrangements of the properties;
- The study collectively summarised the residential windows within 2-3 and 4 Bulls Head Passage as a total of 16 windows across 9 rooms;
- The study does not include a window key to indicate which windows the results apply to specific properties;
- The results of the five windows tested in respect of 4 Bulls Head Passage cannot be reconciled with the objectors windows;
- The three rooms considered for NSL are habitable multi-use living rooms and not bedrooms; and
- The objectors consider the loss of daylight and sunlight to their properties will be substantially greater than the GIA results indicate.

The applicant has addressed the points raised and these points of clarity have been sent to the objectors. The applicant's response is attached in full. The objector's response to this letter is also attached in full.

Officer Response: The applicant's response addresses the concerns raised in the letter from Right of Light Consulting. Whilst the flats at 4 Bulls Head Passage were mislabelled (as 2-3 Bulls Head Passage) in the Daylight and Sunlight addendum, there is nothing to suggest that the assessment that was carried out in respect of these properties was inaccurate, and officers are satisfied that they have the necessary information before them to assess the impact of the development on these properties (and advise the committee of this). Objections have been received from the owners of each of these properties (including the freehold owner) objecting to the impact that the development would have on their daylight and sunlight, and these objections are considered as part of the officer report to the committee and in this addendum. Officers accept the points made by applicants in their letter dated 15<sup>th</sup> February 2021. It is normal practice for these reports to be prepared without a site visit to inspect the internal arrangements of each individual dwelling and the reports are often based on planning history searches and the best information available. The officer recommendation and conclusions remain unchanged.

Due to the mislabelling of the properties within the GIA Addendum the committee report contains an error. This does not change the assessment in relation to daylight, sunlight and overall conclusions. The following paragraphs of the committee report should read:

A, B and C, 4 Bulls Head Passage

372. A total of 16 windows serving 9 rooms were assessed for daylight. For VSC, 8 would meet BRE criteria and 8 would see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more.
373. Of the 8 affected windows, 7 would experience alterations between 20-29.9% which is considered Minor Adverse and 1 would experience an alteration of 33.7% which is considered Moderate Adverse. All 8 windows have low baseline values, ranging from approximately 5-10% VSC and therefore the percentage alteration is disproportionate to what the occupant would experience.
374. For NSL, 2 of the 9 rooms would experience alterations between 20-29.9% which is considered Minor Adverse.
375. Overall, owing to the low VSL and NSL baseline values of this property, it is considered that the daylight overall effect is Minor Adverse.

A, B and C, 4 Bulls Head Passage

394. A total of 9 rooms were assessed for sunlight within this building, of which 5 would meet the BRE Criteria for APSH and Winter PSH.
395. 4 rooms would see reductions in APSH from 20-29.9% which is considered Minor Adverse. Each of the rooms would retain between 16-18% APSH, which is considered good within a city centre location.
396. No reductions in Winter PSH would occur. The overall effect to sunlight at this property is considered Negligible.

4. Corrections/Amendments to officer's report

Clarification on the sunlight assessment. 4 Brabant Court was excluded from the sunlight assessment due to the orientation of its relevant windows. This is in accordance with BRE Guidance which states that only windows with an orientation within 90 degrees of south need be assessed.

451. The following, most significant opportunity areas for reducing ~~operational~~ **embodied** energy consumption have been identified going forward into the detailed design phase:

- Use of low carbon steel cement replacements for the concrete (e.g. Ground Granulated Blast-furnace Slag (GGBS) and fly-ash) which would reduce the total embodied carbon emissions for the development
- Re-use of raised access flooring
- Considering alternatives to terracotta façade elements
- Using low carbon refrigerant gas and reduced leakage rate
- Using low carbon materials for the internal elements and fit-out.

#### 5. Correction and amendments to conditions

Various conditions relating to BREEAM, circular Economy and Whole Life Carbon have been amended following a review of the London Plan wording to make sure it is accurately reflected in the conditions. This review crossed over with the report deadline, the amendments are minor and are included in full below. Additionally, officers have sought to tighten up condition 36 relating to a signage strategy. The revised conditions are below.

#### **Condition 3:**

Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: Publication London Plan; D3, SI 7, SI 8 – Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

#### **Condition 4:**

Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA at

[ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk) and the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON : To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: Publication London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

**Condition 35:**

Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the Publication London Plan.

**Condition 36:**

Prior to occupation of the building the following details relating to signage shall be submitted to and approved in writing by the Local Planning Authority and all signage placed on the development site shall be in accordance with the approved details:

- (a) A Signage strategy for the retail units within the development shall be submitted;
- (b) A Signage strategy relating to the public viewing gallery and winter garden shall be submitted and this strategy shall make provision for clear signs to be placed in prominent positions on the development site, including signage indicating the access point for the public viewing gallery and winter garden; and
- (c) The signage relating to the public viewing gallery and winter garden shall also be included within the overall strategy.

All signage relating to the public viewing gallery and winter garden (as approved in the signage strategy) must be erected and in place on the development site prior to occupation of the building.

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, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

**Condition 42:**

Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at:

[ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk). The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the Publication London Plan.



Your Ref:  
Our Ref: 20/03782/OBS



P11956313/003156  
Kurt Gagen  
City Of London  
P O Box 270  
Guildhall  
London  
EC2P 2EJ

14th December 2020

**RE: REQUEST FOR OBSERVATIONS**

Dear Kurt Gagen

**DECISION NOTICE  
TOWN AND COUNTRY PLANNING ACT 1990.**

**REQUEST FOR OBSERVATIONS**

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 20/03782/OBS Date of Application: 02.11.2020 Date of Decision 14.12.2020



P000N

Proposed Development At:  
**Adjoining Borough Observations Within The Corporation Of London**

**For:** Observations on a proposed development within the City of London with respect to demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. (The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,566sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD) at 70 Gracechurch Street London EC3V 0HR.

The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact [hello@triumenv.co.uk](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118.

**Lambeth Planning**  
PO Box 734  
Winchester  
SO23 5DG

Telephone 020 7926 1180  
Facsimile 020 7926 1171  
[www.lambeth.gov.uk](http://www.lambeth.gov.uk)  
[planning@lambeth.gov.uk](mailto:planning@lambeth.gov.uk)

**Approved Plans**

Cover Letter dated 2nd November 2020

**Conditions**

- 1 The London Borough of Lambeth raises no objection.

Notes to Applicant:

Yours sincerely

A black rectangular box redacting the signature of Rob Bristow.

**Rob Bristow**

Assistant Director Planning, Transport & Development  
Growth, Planning and Employment Directorate

Date printed: 14th December 2020

Application ref: 2021/0320/P  
Contact: Kristina Smith  
Tel: 020 7974 4986  
Email: Kristina.Smith@camden.gov.uk  
Date: 1 February 2021

**Development Management**  
Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
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WC1H 9JE

Phone: 020 7974 4444

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[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

City of London  
Department of the Built Environment

Dear Sir/Madam

## **DECISION**

Town and Country Planning Act 1990 (as amended)

### **Request for Observations to Adjoining Borough - No objection**

Address:

**70 Gracechurch Street  
London  
EC3V 0HR**

Proposal: Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, unlight, overshadowing and solar glare effects and wind microclimate effects).

Drawing Nos: Letter dated 13 January 2021 from Department of the Built Environment at the City of London ref 20/00816/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Informatives:

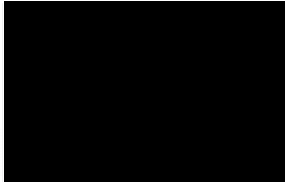
- 1 The application involves the erection of a 33 storey building accommodating 72,992sqm GEA of Class E offices; 1,823sqm GEA flexible retail use and a public viewing gallery.

The Townscape, Visual Impact Assessment (TVIA) submitted with the application assess the visibility of the proposed development in the strategic London views from LB Camden including from Parliament Hill, Kenwood and Primrose Hill. It concludes that the proposal adds a minor element (within an existing cluster of tall buildings) to the wider setting of St Paul's with no effect on its significance.

Due to the distance of the application site from LB Camden's boundary, it is not considered that the proposal would have a harmful impact on Camden as a neighbouring borough.

It is advised that London Borough of Camden raises no objections and the application should be assessed under the City of London's planning policies.

Yours faithfully



Daniel Pope  
Chief Planning Officer

# GREATER **LONDON** AUTHORITY

## Good Growth

Kurt Gagen  
City of London Corporation  
By email

**Our ref:** 2020/6712/S1  
**Your ref:** 20/00816/FULEIA  
**Date:** 1 February 2021

Dear Kurt,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**  
**70 Gracechurch Street**  
**Local Planning Authority reference: 20/00816/FULEIA**

I refer to the copy of the above planning application, which was received from you on 5 November 2020. On 1 February 2021 the Mayor considered a report on this proposal, reference 2020/6869/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan and Publication London Plan for the reasons set out in paragraph 106 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Deorah Ewenla, email [v\\_DeborahEwenla@tfl.gov.uk](mailto:v_DeborahEwenla@tfl.gov.uk).

Yours sincerely



**John Finlayson**

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Lucinda Turner, TfL  
DP9, 100 Pall Mall, London SW1Y 5NQ



**TfL Ref:** CITY/20/43

**Borough Ref:** 20/00816/FULEIA

**GLA Ref:** 6712

Transport for London  
City Planning

5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

## Sent by Email

10<sup>th</sup> February 2021

Dear Kurt Gagen

### **70 Gracechurch Street, London EC3V 0HR - TfL Stage 1 Comments**

Thank you for consulting Transport for London (TfL) on the proposed redevelopment on 70 Gracechurch Street, London EC3V 0HR.

*The following comments are made by Transport for London officers on a 'without prejudice' basis only. You should not interpret them as indicating any subsequent Mayoral decision on any planning application based on the proposed scheme. Furthermore, these comments also do not necessarily represent the views of the Greater London Authority.*

## **Development Proposal**

The application is referable to the Mayor under Category 1Cb of the Mayor of London Order (2008), as the development proposal is more than 150 metres high and is in the City of London

*Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.*

*(The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,566sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD)*



## Principle of development

The proposed development complies broadly in principle with Publication London Plan policies T1 (Strategic approach to transport), T7 (Deliveries, Servicing, construction) and D8 (Public Realm).

Some detailed elements of the proposals nonetheless raise issues of policy compliance with policy T2 (Healthy Streets), T3 (Transport capacity, connectivity and safeguarding), T4 (Assessing and mitigating transport impacts) as explained further below.

## Summary

- S106 through Section 278 for highway works on Borough Highway.
- Section 278 contribution for highway works on the TLRN.
- A full Line Load Impact Assessment for all LU stations within walking distance
- Cycle parking provision and facilities should be secured by condition.
- S106 contribution of £150,000 for Cycle Route Quality Criteria Check and works identified therein
- A Parking Design and Management Plan (PDMP) to be secured by condition.
- A full Deliveries and Servicing Plan (DSP) should be secured by condition with restrictions to night-time out of peak hours for all servicing.
- A full CLP should be secured by condition with RSA for all vehicle construction routes.

## Site Location and Context

The development is located on the Transport for London Road Network (TLRN), Gracechurch Street, along its western frontage, with local highway routes Fenchurch Street to the south, Lime Street to the east and Ship Tavern Passage to the north. As Gracechurch Street A1213 forms part of the TLRN, TfL is the highway authority. The nearest part of the Strategic Road Network (SRN) is Eastcheap, approximately 150m south.

The site has a Public Transport Access Level rating (PTAL) of 6b, which is considered excellent. The closest London Underground (LU) station is located 180m south east at Monument and the site is within walking distance of Liverpool Street, Fenchurch Street, Aldgate, Bank, Monument and Cannon Street, providing access to a wide range of LU, London Overground, National Rail, TfL Rail and Docklands Light Railway (DLR) services. Liverpool Street will also be served by the Elizabeth Line. There are 21 bus services within walking distance of the site.

Cycle Superhighway 3 (CS3) is located 320m south of the site on Lower Thames Street. CS3 provides links from Barking to Tower Gateway. The nearest Cycle Hire docking station is located 225m southeast on Eastcheap.

## Healthy Streets and Vision Zero

The development proposes public realm improvements including a new pedestrian route from Ship Tavern Passage to Fenchurch Street facilitating shorter pedestrian and cycling trips in line London Plan Policy T2. Public realm improvements also extend to the improvement of lighting, footways, new trees on Lime Street and a proposed super crossing across Fenchurch street.





The proposed realignment of the junction between Philpot Lane and Lime Street, Gracechurch Street footway widening from 1.4m-1.9m, widening of the eastern pavement on Lime Street and the western pavement width of Philpot Lane would improve Pedestrian Comfort Levels (PCL) around the site. This will be enabled by the relocation of a taxi bay to the south and a removal of yellow lines along Fenchurch Street. This is strongly supported in line with policies D8 (Public Realm) and should be secured by section 278 and section 106 agreement as appropriate. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The applicant should also consider the recommendations of the stage 1 safety audit for the final design.

The Transport Assessment (TA) has identified two collision clusters where deaths and serious injuries have occurred in the recent highway safety record. These are at the junction of Gracechurch Street, Lombard Street and Fenchurch Street, and the junction of Fenchurch Street and Philpot Lane. The applicant should consider measures to mitigate any safety risk and deliver measures accordingly.

## **Pedestrian Comfort Levels (PCL)**

The proposals are supported by a PCL assessment which is welcome. The growth factor assumed for future baseline pedestrian movement is acceptable in principle, as is the 10% diversion assumption for the new through-route. The Pedestrian Comfort Level (PCL) assessment has been provided with updated base flows along Gracechurch Street, reflecting the current pedestrian distribution model. which is accepted.

Further discussion on junction improvement scheme works along Gracechurch Street is welcome. PCL Base 2027 with development scores have been accepted, this is within TfL's PCL Guidance for office / retail developments and the City of London City Cluster Vision policy document.

Due to the findings at paragraph 5.5.3 of the TA PCL analysis, the development must fund a proportionate and reasonable contribution to Section 106, Section 278 (S278) with TfL as the highway authority, for works proposed on the TLRN adjacent to the site, to widen the footways. This is necessary to ensure expected future PCL scores of C and D do not occur in the future baseline with development with diversion assumed scenario, as currently indicated by the TA.

It should be noted that the footway widening currently implemented at this location as part of the Streetspace for London programme is temporary. The highway works and planning obligations proposed to support this development should therefore be updated prior to determination to ensure that they will be robust and deliverable, with sufficient flexibility for if the Streetspace for London works either become permanent or are removed.

If the widened footways are eventually made permanent, it may be appropriate for this development to fund the physical works and approvals required to deliver that, given that it would directly benefit employees and visitors of the new development, and ensure policy compliance against the strategic transport policy of the Publication London Plan.



## **Trip Generation and public transport impact**

Further improvements are required to the trip generation analysis.

The trip generation data tables should include Trains Per Hour (TPH) at the specific stations assessed rather than using a more generous TPH rate from other points along the London Underground line (LU) they serve. An updated trip generation assessment including Trains Per Hour (TPH) of related stations has been agreed, this should be provided before permission is granted.

The applicant should also assess all LU stations within walking distance of the development, not just Monument. Whilst a Station Capacity Assessment has been provided for Monument, a full Line Load Impact Assessment should be undertaken using TfL Rail Plan data.

The proposed trip rates for new travel expected to be generated by the new development are likely to be acceptable in principle but the TA should be updated prior to determination to specify where the rates in Table 5.3 originate from and why they are being used.

## **Cycle Parking**

1,002 long stay cycle parking spaces are proposed at the lower ground level; this complies with standards in London Plan Policy T5. 85% would be Two-Tier cycle racks, 10% folding bicycle lockers, and 5% Sheffield stands and 3 would be tricycle parking spaces.

All the long-stay cycle parking aisle widths must be at least 2.5m beyond the lowered frame to comply with the London Cycling Design Standards. In addition, access to a number of cycle racks proposed at the lower ground floor should be amended to provide wider access. At least 5% of cycle parking will be suitable for larger and adapted cycles which is also welcome supporting London Plan policy T5.B.

The proposals provide showers and lockers within the Lower Ground Mezzanine and Lower Ground levels, which is welcomed. Two dedicated cycle parking lifts and a gullied cycle stair are proposed, accessible at ground floor level adjacent to a dedicated cycle entrance proposed in Ship Tavern Passage.

In order to reduce potential waiting times and improve the flow of cycle parking users, the applicant has clarified cycle lift capacity will accommodate a minimum of two cyclists per lift. LCDS specifies a maximum of two set of doors between cycle stores and the development surroundings.

TfL welcome the clarification of cycling access/egress routes along Lime Street. The applicant should ensure all routes shared with service vehicles are maintained and in line with Vision Zero objectives in London Plan policy T7.

22 short stay cycle spaces are proposed whereas 102 spaces would be required. The location of short stay cycle spaces is nonetheless supported as it would relate well to expected pedestrian desire lines,

The applicant proposes 20% more long stay cycle parking to maintain pedestrian comfort around the site. Due to space constraints and unique characteristics of this development site, offsetting short stay with long stay cycle parking is considered reasonable in this case.

The detailed design and delivery of all cycle parking should be secured by condition.



## Cycling

The applicant should consider which cycle routes would link with CS3 in accordance with London Plan policy T5.

TfL's Cycle Route Quality Criteria Check tool should therefore be used to assess the route between the site and CS3 prior to determination, to show whether segregation or street changes such as removal of on-street car parking needed to support that route. TfL has agreed a cycle hire contribution of £150,000 to fund a Cycle Route Quality Criteria Check study and works identified therein. This should be secured by S.106 agreement.

## Cycle Hire

The nearest Cycle Hire docking station at Eastcheap, is the 30<sup>th</sup> busiest out of over 800 in London. This development would increase demand for Cycle Hire and increasing Cycle Hire capacity would directly benefit employees and visitors of the new development, supporting compliance with London Plan policy T5. TfL requested a S106 contribution of £220,000 to fund a new Cycle Hire docking station in the vicinity, this has been resolved as cycle route improvements contributions has been agreed.

## Car parking

The proposal is car-free except for one accessible parking space proposed at the ground level, accessed from Lime Street. The disabled car parking space proposed would have an Electric Vehicle Charging Point which is welcome in accordance with Publication London Plan policy T6.3 (Retail parking) part F.

A Parking Design and Management Plan (PDMP) should be secured by condition in accordance with policy T6.2 part G and discharged prior to commencement of construction. This should include details for the design and management of all parking including LCDS-compliant cycle parking.

## Deliveries and Servicing

Deliveries, servicing and refuse collection are proposed within a basement area with four loading bays, storage spaces and a turntable large enough for 10m rigid vehicles, accessed from flatbed vehicle lifts via Lime Street. The design, number of vehicles, access and hours of operation are considered reasonable and should be secured by condition, though the applicant should clarify how access to the disabled parking space would be retained.

A full Deliveries and Servicing Plan (DSP) should be secured by condition and discharged in consultation with TfL due to the close proximity of the TLRN. This multi-use of the basement area loading bay are robust in principle as deliveries and servicing is restricted, the applicant should confirm how the management of the pop-up retail floorspace will be maintained over the timeline of the development.

## Construction

An outline Construction Logistics Plan (CLP) has been submitted. This includes proposals for two loading lanes, one located on Fenchurch Street and the other on Gracechurch Street.

No construction access should take place directly from the TLRN at Gracechurch Street. Any proposals for construction vehicles to use the Gracechurch Street. Lombard Street and Fenchurch Street junction should be supported by a RSA to determine the safety of vehicle movements in line with the Mayor's Vision Zero agenda.



A full CLP should also be secured by condition. All construction proposals in the full CLP should also support the Mayor's Vision Zero Action Plan.

The full CLP should follow TfL guidance, and TfL should be consulted prior to discharge of the CLP condition due to the close proximity of the TLRN. The CLP will need to ensure that all vehicle movements during construction are safe, efficient and legal, minimising the risk of collision with vulnerable road users such as cyclists and pedestrians. All construction vehicles should meet the Direct Vision Standard and have a HGV safety permit if eligible (see TfL Direct Vision Standards here: <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles>). The full CLP should also commit to all construction vehicles serving the site being part TfL's Freight Operator Recognition Scheme (FORS).

Yours sincerely,

**Deborah Ewenla**

v\_deborahewenla@tfl.gov.uk

**Assistant Planner, TfL Spatial Planning**

## Gagen, Kurt

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**From:** Chris B [REDACTED]  
**Sent:** 08 February 2021 16:01  
**To:** Gagen, Kurt  
**Subject:** Fw: Planning Application 20/00816/FULEIA

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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**From:** Chris B [REDACTED]  
**Sent:** 08 February 2021 11:55  
**To:** plans@cityoflondon.gov.uk <plans@cityoflondon.gov.uk>  
**Cc:** [REDACTED]  
**Subject:** Planning Application 20/00816/FULEIA

Dear Sirs

I own the freehold of 2-4 Bulls Head Passage EC3V 1LU

I would like to object to the following planning application for what is now the site occupied by Marks and Spencers

**Planning Application 20/00816/FULEIA**

In summary the present building is approx 10 storeys, and to build a 33 story high building so close to Leadenhall Market (which is immediately adjacent) will have a damaging effect to both the amenity and light of this historical market. I also note that, unlike the Walkie Talkie building, there is no provision for space around the building to ameliorate these effects.

The boundary of the building is also approx 20 metres from Bulls Head. Unlike the new development on the corner of Leadenhall St and Gracechurch St, this proposal is south of the market and will overshadow the entire area, including our business and the residential leasehold flats for which we are responsible

The building will also overshadow our satellite dishes preventing us from receiving access to the signals

I am concerned that I have only learnt of this application from the leaseholders and am unaware of notices to us, and am concerned that we have not had a chance to object earlier. I am concerned that the planning officials have marked this application for acceptance and believe that the committee should delay any decision so that further consideration should be made in relation to the impact of the proposals, especially since Covid is interrupting the normal consultation process.

I would like to appear in person at the planning

Best

Dr Chris Blatchley  
Freeholder 2-4 Bulls Head Passage EC3V 1LU

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By Email:  
plncomments@cityoflondon.gov.uk  
kurt.gagen@cityoflondon.gov.uk

City of London  
Guildhall  
PO Box 270  
London  
EC2P 2EJ

15 February 2021

Dear Kurt Gagan

**Application Reference No. 20/00816/FULEIA  
Proposed Development at 70 Gracechurch Street, London EC3V 0HR  
Impact on Flats A, B and C, 4 Bulls Head Passage, London EC3V 1LU**

We are appointed on behalf of the following clients within 4 Bulls Head Passage:

Mann Vergan, of Flat A  
Emma Baylis, of Flat B  
William Ryan, of Flat C

Our clients are concerned that the proposed 33 storey development at 70 Gracechurch Street will impact upon the daylight and sunlight receivable by their properties.

The Building Research Establishment (BRE) "Site Layout Planning for Daylight and Sunlight: a good practice guide" 2011 by PJ Littlefair provides guidance for the planning department to consider.

The introduction to the BRE guide at 1.1 suggests that "people expect good natural lighting in their homes and in a wide range of non-domestic buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by. Access to skylight or sunlight helps make a building energy efficient; effective daylighting will reduce the need for electric light, while winter solar gain can meet some of the heating requirements."

We understand that the applicant, has instructed GIA surveyors to undertake a daylight and sunlight study. An addendum to this study was produced on the 13th January, following the applicant's consideration of additional properties, including 4 Bulls Head Passage. The results of which indicate a reduction of daylight to two windows and two rooms within the building, although concludes the proposal satisfies the BRE guidelines.

We have the following concerns regarding the daylight and sunlight addendum report:

- The study has been prepared without a site visit to inspect the internal arrangements of our clients' properties.
- Page 3 of the study confusingly collectively summarises the residential windows within 2-3 and 4 Bulls Head Passage as a total of 16 windows across 9 rooms.
- The study does not include a window key to indicate which windows the results apply to specific properties, including those pertaining to our clients.
- The results of the five windows tested in respect of 4 Bulls Head Passage cannot be reconciled with our clients' windows.
- The three rooms considered for NSL are habitable multi-use living rooms and not bedrooms, which are deemed to be less important than living rooms.
- Our clients consider the loss of daylight and sunlight to their properties will be substantially greater than the GIA results indicate.

Given the lack of information available to us, you will appreciate we are unable to confirm to our clients that the GIA results are an accurate interpretation of the anticipated light loss. We would therefore request that no decision in favour of the application is made on Tuesday 16<sup>th</sup> February until the applicant instructs GIA surveyors to:

- Liaise with ourselves to arrange a joint site visit to our clients' properties to obtain the internal layout and measurements.
- Amend their computer model where necessary and re-run the BRE daylight and sunlight tests to include all windows and rooms within the three properties.
- Supply us with a copy of the computer model and analysis so that we can advise our clients accordingly on the accuracy of the results. We will be happy to liaise with our clients so that the matter can be considered promptly.

We also understand that you have yet to visit our clients' properties. We look forward to liaising with you for a convenient time you will be able to visit and evaluate the reduction of light from our clients' perspective.

In addition to planning considerations, it is useful to assess the risk of any potential civil action from the outset. We understand that the properties at 4 Bulls Head Passage enjoy a right of light over the proposed development site. Our clients do not acquiesce to any interference of their right and seek to establish and resolve any such matters during the planning stage - to avoid permission being granted for a proposal which might not be built due to right of light issues.

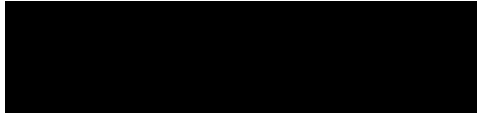
In summary, we request that no decision is made in favour of the application until we are satisfied that the results of GIA's daylight and sunlight study are accurate, and that the proposal complies with both the BRE Guide and the civil legal rights of light criteria.

Please acknowledge receipt of this letter and respond accordingly with your assurance. Should you wish to discuss any aspect please do not hesitate to contact me.

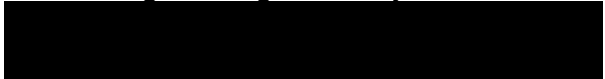
I look forward to hearing from you shortly with your assurance of our request.

Yours sincerely,





Shirley Ellis LLB (Hons)  
Senior Right of Light Surveyor



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## By Email

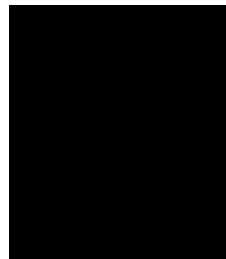
Mr Kurt Gagen  
City of London Corporation  
Guildhall, PO Box 270  
London  
EC2P 2EJ

## DATE / REF

15/02/2021  
JW/13333

## ADDRESS

THE WHITEHOUSE  
BELVEDERE ROAD  
LONDON SE1 8GA



Dear Mr. Gagen,

**Re: Application Reference Number 20/00816/FULEIA Proposed Redevelopment at 70 Gracechurch Street, London, EC3V 0HR – Impact on Flats A, B and C, 4 Bulls Head Passage, London EC3V 1LU**

We are writing to respond to the letter dated 15th February submitted by Rights of Light Consulting on behalf of the owners of Flats A, B & C at 4 Bulls Head Passage.

It is our understanding that these three flats are located directly above the ground floor retail unit known as 2-3 Bulls Head Passage. Number 4 Bulls Head Passage sits directly next door to the west and has its own street entrance from the passage. As such the results summarised in our Addendum report on page 3 and in Tables 1 & 2 split the two properties. The 16 windows listed for 2-3 Bulls Head Passage relate to the windows for Flats A, B & C at 4 Bulls Head Passage.

We obtained plans for these properties from the City of London planning archives and as such we are aware of the room uses, sizes and layouts for each flat and these are taken fully into account in our model and analysis. There are 16 windows assessed and reported upon, as the curved windows in the brow of the building have to be modelled as two windows in order for the analysis to be undertaken as it does not recognise curved glassing. As such there are 6 windows at first and second floor and 4 windows at third floor.

The impacts discussed on page 3 of the Addendum, that Rights of Light Consulting refer, relate to 4 Bulls Head Passage as explained above.

The overall daylight impacts to the windows and rooms in Flats A, B & C at 4 Bulls Head Passage (previously labelled as 2-3 Bulls Head Passage) are considered to be Minor Adverse. The results for each individual window associated with Flats A, B & C at 4 Bulls Head Passage are included within our previously submitted Daylight & Sunlight Addendum on page 9 of the PDF version of the document. The 3 properties are specifically labelled as F01, F02 & F03.

The existing levels of VSC, NSL and APSH in these properties are low, due to the tight urban context that they are situated within. As such, small absolute reductions result in higher percentage changes. This does not correlate to greater noticeability and the focus has therefore to be upon the absolute reduction. As is set out in the Addendum, these are small (3% or less) It is widely held that absolute reductions of this quantum will not be noticeable.

As such I can confirm that each of the rooms in each of these three flats has been modelled according to plans and the impacts arising from the development proposed are minor and would not result in any noticeable harm to the daylight or sunlight amenity currently enjoyed.

Yours sincerely,



Jerome Webb  
**Senior Partner**



## Gagen, Kurt

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**From:** Emma Baylis [REDACTED]  
**Sent:** 15 February 2021 20:41  
**To:** Gagen, Kurt  
**Cc:** [REDACTED]  
**Subject:** RE: Right of Light Consulting. Attention of Mr Kurt Gagen. Application Reference No. 20/00816/FULEIA. Proposed Development at 70 Gracechurch Street, London EC3V 0HR

Dear Kurt

Thank you for this and for providing a copy to our adviser. I am sure you'll appreciate that receiving this outside business hours a matter of hours before the meeting tomorrow is highly unsatisfactory and does not allow us time to consult with our advisers. I'll of course make this point tomorrow.

Having said that it is noted that Mr Webb's letter in effect confirms that the 13 January report was not accurate in relation to which properties it described and could not (without further explanation) be reconciled to the windows by us as owners either individually or collectively. This simply reinforces our concern that the report has been hastily prepared without a site visit and does little to give us confidence in its wider findings.

The letter also acknowledges that the analysis "does not recognise curved glassing" which gives us further cause for concern on which we need to seek advice since these unusual character windows are a feature of our historic properties.

The letter also fails to deal with the matter raised by Ms Ellis about our civil rights of light. Our windows are considerably older than the required 20 years having been unmodified since the building's construction c1830. As Ms Ellis has already advised, we do not acquiesce to any interference with our rights of light and have made a genuine offer to seek to resolve this issue at planning stage.

Finally, the letter from Mr Webb is aggressively drafted with a menacing tone seeking to dismiss the genuine concerns related to our three residential properties which have thus far gone unanswered. One of our contacts at a well-known media channel has had sight of the letter and shares our concern that the application appears to be being hurried through at a time when both we as residential owners and our business neighbours have been seriously hit by the pandemic. We will seek to raise the profile of this case through this channel if due consideration is not given to our reasonable request for a postponement of the decision pending further investigation.

I look forward to speaking with you tomorrow. Please can you also ensure that a copy of this email is also included in the Addendum Report to the Committee.

Kind regards

Emma

[REDACTED]

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**From:** [Gagen, Kurt](#)  
**Sent:** 15 February 2021 18:52  
**Subject:** RE: Right of Light Consulting. Attention of Mr Kurt Gagen. Application Reference No. 20/00816/FULEIA. Proposed Development at 70 Gracechurch Street, London EC3V 0HR

Dear residents of A, B and C at 4 Bulls Head Passage

Please find attached the applicants response to the letter from Rights of Light Consulting dated 15<sup>th</sup> February 2021.

Your representation and this response will be reported in the Addendum Report circulated to Members prior to committee.

Please note I have provided this to Rights of Light Consulting.

Kind regards,  
Kurt

**Kurt Gagen**  
**Senior Planning Officer**  
**Department of the Built Environment**  
**City of London**



[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)



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