



Planning Applications Sub-Committee

ADDENDUM

Date: TUESDAY, 10 SEPTEMBER 2024
Time: 10.30 am
Venue: LIVERY HALL - GUILDHALL

4. 45 BEECH STREET, LONDON, EC2Y 8AD

For Decision
(Pages 3 - 10)

Ian Thomas CBE
Town Clerk and Chief Executive

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Agenda Item 4

CITY OF LONDON PLANNING AND TRANSPORT COMMITTEE

Addendum to 45 Beech Street Committee Report

Application Fact Sheet

The formatting of the application fact sheet has been amended to be more readable, as formatting errors became apparent after publication of the main report.

The Proposed AoD (Maximum height) has been amended to reflect the height of the lift overrun and plant.

The table in row 17 has been changed, as explained in the Sustainability section of this addendum below.

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	42.35m (AoD)		51.3m (AoD)	
2. FLOORSPACE GIA (SQM)	USES	EXISTING sqm	PROPOSED	
	Office	5,284	Office	0 sqm
	Co-Living	0 sqm	Co-Living	6,968.2
	TOTAL	5,284	TOTAL	6,968.2
			TOTAL UPLIFT:	1,684.2 sqm
3. OFFICE PROVISION IN THE CAZ	N/A			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	N/A		Approximately 14 FTE	
5. VEHICLE/CYCLE PARKING	Car parking spaces	<u>7</u>	Car parking spaces	1
	Cycle long stay	25	Cycle long stay	<u>134</u>
	Cycle short stay		Cycle short stay	<u>12</u>
	Lockers	N/A	<u>Lockers</u>	<u>0</u>
	Showers	N/A	<u>Showers</u>	<u>0</u>
	Changing facilities	N/A	<u>Changing facilities</u>	<u>0</u>
6. HIGHWAY LOSS / GAIN	N/A			
7. PUBLIC REALM	No Works to public realm outside of the site boundary are proposed.			
8. STREET TREES	EXISTING		PROPOSED	
	N/A		N/A	

9. Heritage Gardens	N/A													
10. SERVICING VEHICLE TRIPS	EXISTING Estimated 40	PROPOSED Estimated 16												
11. SERVICING HOURS	To be agreed in Delivery and Servicing Plan, details of which are recommended to be secured as a condition of the development.													
12. RETAINED FABRIC	Substructure : 90% retention by mass Superstructure : 66% retention by mass Façade : 0% retention													
13. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: 12% GLA requirement: 35%													
14. OPERATIONAL CARBON EMISSIONS	4,922,059 kgCO ₂ e over 60 years 712 CO ₂ kg CO ₂ e/m ² GIA over 60 years (includes life-cycle modules B6+B7)													
15. EMBODIED CARBON EMISSIONS	<p>Application scheme life-cycle emissions compared to GLA benchmarks</p>  <table border="1" data-bbox="443 1256 1347 1711"> <caption>Embodied Carbon Emissions (KgCO₂/m²)</caption> <thead> <tr> <th>Category</th> <th>A1-A5 (upfront)</th> <th>B-C (in use)</th> </tr> </thead> <tbody> <tr> <td>GLA Benchmark</td> <td>850</td> <td>350</td> </tr> <tr> <td>GLA Aspirational</td> <td>500</td> <td>300</td> </tr> <tr> <td>45 Beech Street</td> <td>690.5</td> <td>359.9</td> </tr> </tbody> </table> <p>A1-A5: upfront embodied carbon emissions per square meter B – C (excluding B6 and B7): in use stage embodied carbon emissions per square meter</p>		Category	A1-A5 (upfront)	B-C (in use)	GLA Benchmark	850	350	GLA Aspirational	500	300	45 Beech Street	690.5	359.9
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16. WHOLE LIFE CYCLE CARBON EMISSIONS	Total whole life-cycle carbon emissions: 11,996,542 kg CO₂e Total whole life-cycle carbon emissions per square meter: 1,736 kg CO₂e/m² GIA													

17. WHOLE LIFE-CYCLE CARBON OPTIONS

Carbon Options

	 Option 2: Major Refurbishment	 Option 2: Major Refurbishment with Extension
Project reference period	60	60
Gross internal area (GIA) m2	4,383	7,175
Net internal area (NIA) m2	2,773	4,103
Change in NIA (compared to existing) m2	0	1,330
Substructure % retained by mass	100	90
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100	66
Superstructure (External walls, Windows and External doors) % retained by area	38	0
Existing Building Demolition & Deconstruction (C1) (kgCO ₂ e/m ² GIA)	0	0.32
Upfront Embodied Carbon (A1-A5) excl. sequestration (kgCO ₂ e/m ² GIA)	370	464
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7(kgCO ₂ e/m ² GIA)	463	420
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO ₂ e/m ² GIA)	833	884
Total WLCA (incl. B6 & pre-demolition) (kgCO₂e/m² GIA) Module B7 is not considered	2,080.5	1,724.2
Total WLCA (incl. B6 and pre-demolition) (kgCO₂) Module B7 is not considered	9,119,000	12,371,000
Total existing building demolition (tCO ₂ e)	0	2
Upfront Embodied carbon (A1-A5) (tCO ₂ e)	1,622	3,329
In-use embodied carbon (B-C) (tCO ₂ e)	2,029	3,014
Operational Carbon for building life time (B6) (tCO ₂ e)	5,468	6,026

18. TARGET BREEM RATING



Policy target: Excellent or Outstanding

19. URBAN GREENING FACTOR



0.22
Policy target: 0.4

20. AIR QUALITY

Construction and operational air quality effects of 45 Beech Street are judged to be ‘not significant’. The proposed development has also been shown to meet the London Plan’s requirement that new developments are at least ‘air quality neutral’.

Sustainability:

- For Paragraph 170: The report states ‘Often a sizable reduction in carbon emissions is seen at the Be Clean stage where the actual efficiency of the proposed energy systems is compared to those used for the notional building. However, since the development will be connected’. This is to be replaced with: **‘The overall emissions will result in 12% savings beyond a Part L 2021 compliant scheme. Since the development will be connected...’**
- For Paragraph 178: The 2 grey rows, and the 4 rows below that have been added. The table is replaced by the following:

	 Option 2: Major Refurbishment	 Option 2: Major Refurbishment with Extension
Project reference period	60	60
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- For Paragraph 179: The report states ‘The results show that, based on new building services installations, both options’ carbon emissions rise at a similar rate throughout a 60-year life cycle, and that the upfront and whole life-cycle carbon impact is higher with more new build quantity (Option 3). This is to be replaced by: **‘The results show that, based on new building services installations, both options’ carbon emissions rise at a similar rate throughout a 60-year life cycle. The higher upfront carbon associated with Option 3 is attributed to the increased floorspace and higher levels of new build quantity, however over 60 years Option 3 would have a lower overall carbon impact due to reduced operational carbon emissions.’**
- For Paragraph 185: The report states ‘7,074,484 tCO₂e’. Replace this with **7,074,484 kg CO₂e**
- For Paragraph 199: The report states ‘although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 2 options, none of the other options would be able to deliver....’. Replace this with: **‘although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 2 options, this option would be able to deliver’**
- For the Sustainability section on page 3 (Report Summary section), the same change is needed in the 2nd paragraph:
The report states ‘...although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 2 options, none of the other options would be able to deliver....’. This is

replaced with: **‘...although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 2 options, this option would be able to deliver’.**

- The wording of condition 12 has been amended as follows:

Detailed Whole Life-Cycle Carbon Assessment:

Prior to the commencement of the development, excluding demolition and below-ground works of the development, after RIBA Stage 4, a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions savings for modules A1 – A5 of the development achieve at least the GLA standard benchmark and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Carbon Assessment Guidance, and that modules B – C of the development aim to achieve at least the GLA standard benchmark. 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: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2040: DE 1.

None of the above changes to the report would alter officer's assessments or conclusions on the proposed development with regard to sustainability.

Design

- Paragraph 209 is replaced with: The proposal would retain a significant proportion of the existing structure, and as such the building's plan form would predominantly follow the existing building lines. The greatest alterations to bulk and massing come from the upward extension at level 06 increasing the height of the building to +50.0m AOD and rising to an overall height of +51.3m AOD including the rooftop plant and maintenance rail which would be set back from the building edge. Where the existing terrace at level 06 on the south would be filled in, and the building shoulder height pulled up by two storeys reaching +44.0m AOD, it would strike a comparative alignment with the two Barbican Blocks which flank the site on both sides. The top of the building is expressed by a series of arched roofs, which on the south are set back from the body of the building creating private terraces.
- The conclusions of the assessment are not altered as a result of this and are discussed in paragraph 222 of the main report.

Representations

One additional representation has been received since the agenda print date, from a member of the public and it is appended in full to this addendum.

Issues raised include delivery and servicing impacts, as well as construction impacts. It also raises issues of noise and disturbance resulting from servicing, in particular waste collection. A suggestion regarding the location of a potential on-street accessible car parking space has also been made. Delivery and servicing impacts are discussed from paragraph 314 of the report, and construction impacts from page 344.

A further issue is raised that documents and revised plans were uploaded to the public access, and that objectors had not been directly notified of this. The documents referred to were uploaded prior to the publication of the committee report and comprised supplementary detail and information which would not necessitate additional consultation of neighbouring residents.

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Gwyn Richards
Director of Planning and Development
Environment Department
City of London Corporation
[REDACTED]

31 August 2024

Dear Mr Richards,

RE: 24/00176/FULL: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: - Addition of an accessible car parking space within the courtyard; and - Addition of a flue to the courtyard elevation, serving an emergency generator (“the Application”)

It was only after receiving an email with the date of the proposed determination meeting and details for applying to address the meeting that I realised there were revised drawings and plans, along with other documents:

Four documents were posted to the planning portal on 05 July, including the third version of the proposed west elevation, a swept path analysis for a large car and a schedule of proposed drawings. The fourth, the first version of PL224 – the proposed courtyard north elevation – doesn't seem to be included in the schedule though; and

Including a belated consultee comment from The Gardens Trust, a Design and Access Statement Addendum No2 – although there doesn't appear to be a No1 – and the TS Addendum, 25 documents in total were posted to the planning portal between 20 and 24 August

but no effort appears to have been made to inform the 57 – to date – objectors.

As a result, residents' interests have been ignored in your failure to notify objectors of the posting of the 29 additional documents. No doubt there is no statutory obligation on your part to do so but there was nothing preventing an opportunity to show residents respect for once through notifying them.

Having already submitted comments on the Application on two occasions, below are my further comments which should be treated as an objection. These deal with the proposals regarding deliveries, waste collection and disabled parking set out in the D&AS Addendum No2 – although there doesn't appear to be a No1 – and the TS Addendum.

My comments of 05 March refer to the potential closure of the Beech Street/Bridgewater Street junction to vehicles but, along with vehicle restrictions at the Beech Street/Golden Lane junction, there is also the possibility that same could be introduced on Beech Street itself. However, neither the D&AS Addendum No2 nor the TS Addendum refer to these possibilities with the proposals for deliveries, waste collection and disabled car parking all reliant on the Beech Street/Bridgewater Street junction remaining open.

Rather than relying on the continued use of the Beech Street/Bridgewater Street junction, the Application should be amended to address the possibility that access to Bridgewater Street may only be possible via Golden Lane, Brackley Street, Viscount Street and Cripplegate Street. Even then, access via Golden Lane may only be available from Old Street and, of course, although temporary, the construction works at 1 Golden Lane are likely to mean the closure of Brackley Street to through traffic.

During the “experimental” Beech Street Zero Emissions Scheme, City Corporation's waste collection operatives collected domestic waste with both Beech Street junctions closed. This, though, didn't extend to 45 Beech Street. Whatever waste there was – vastly reduced because of both lock downs and working from home – wasn't included in City Corporation's domestic collections.

The proposed waste collection arrangement – from the street level bin store to the RCVs via a new dropped kerb – has been accepted by City Corporation as the “trundle” distance would be less than 11 metres. However, I understood the maximum “trundle” distance to be 10 metres. That approval, though, ignores the likelihood that the RCVs will have to either undertake 3-point turns or reverse into/from Bridgewater Square to exit Bridgewater Street via Cripplegate Street if the junction is closed.

You should require the applicant to submit proposals as to how it will respond to the impact of both alternatives for RCVs on pedestrians, cyclists and other road users in Bridgewater Street and Bridgewater Square if the junction is closed. At the same, you should require the applicant to submit a feasibility study for RCVs undertaking 3-point turns in Bridgewater Street.

As far as the proposals for waste bin storage are concerned, there is one obvious issue, in addition to the “trundle” distance. The movement of the bins up and down the ramp will be noisy and produce a negative impact on the residential amenity of residents on all four sides including those living in the proposed development. There is also the problem of available space on the ramp if the disabled vehicle space is occupied as the waste bins appear to be as wide as the available space on the ramp.

In addition to the proposed disabled parking space on the ramp, the TS Addendum refers to the proposed additional space in Bridgewater Square adjoining the existing one. This proposed space seems unsuitable for an occupant of 45 Beech Street as it would be a considerable distance from the building’s entrance and the journey to and from there necessitates crossing Bridgewater Square. A more suitable location, especially if the junction with Beech Street is closed, would be on Bridgewater Street, north of the entrance ramp. Not only would this be notably closer to entrance door but proximity to the entrance ramp would make turning a car around much easier.

According to the D&AS Addendum No2:

The net increase of deliveries in the area will be small as there [sic] deliveries associated with the current office, such as Royal Mail and most delivery vehicles are already part of the network for surrounding buildings.

This may well be correct but the closure of the Beech Street/Bridgewater Street junction will create a cul-de-sac. As proved by the occupants of Clarendon Court, deliveries to and collections from the proposed development, when it’s fully occupied, will be substantially more than is currently the case. Whether or not there will be an increase in the number of delivery vehicles in Bridgewater Street will depend on how deliveries are organised, particularly as several drivers tend to park and trolley parcels etc to the various blocks. Noticeably though, the applicant appears to have completely ignored the likely use of cabs by residents of the proposed development.

Finally, the key to the various elevation drawings indicates that the dark areas are “retained existing structure” and the light areas are “new structure”. However, from looking at the drawings, the opposite appears to be the case.

Best regards,

Fred Rodgers

100 Breton House EC2Y 8PQ