



Planning Applications Sub-Committee

Agenda Item 5

Date: TUESDAY, 29 OCTOBER 2024

Time: 10.30 am

Venue: LIVERY HALL, GUILDHALL

5. **65 FLEET STREET, LONDON, EC4Y 1HT - *AMENDED 25/10***

Report of the Planning & Development Director.

For Decision
(Pages 591 - 932)

This page is intentionally left blank

Agenda Item 5

Committee:	Date:
Planning Applications Sub Committee	29 th October 2024
Subject: 65 Fleet Street, London EC4Y 1HT Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.465m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.	Public
Ward: Castle Baynard	For Decision
Registered No: 24/00648/FULMAJ and 24/00649/LBC	Registered on: 21 st June 2024
Conservation Area: Part within Fleet Street Conservation Area	Listed Building: 2x Grade II

Summary

Planning Permission is sought for:

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.465m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Listed Building Consent is sought for:

External and Internal alterations to The Tipperary Pub including part demolition of the rear of the pub; erection of 1 storey roof extension containing student accommodation with associated expansion into northern block of 65 Fleet Street at fifth floor level. Works to improve access to Whitefriars Crypt with changes to the surrounding structure of the Crypt to allow for presentation and interpretation of the asset.

Overall proposals:

The proposed development would deliver a retrofit and extension development scheme that optimises the potential of the application site through the re-provision and enhancement of the existing pub, enhanced public realm and the provision of much needed learning space in association with the applicant's preferred partner St Brides Foundation. The proposals also enhance access to the existing Whitefriars Crypt all of which is achieved through the provision of student accommodation.

The student accommodation would provide 856 student rooms, 35% of which will be affordable. The rooms represent a range of typologies, including studios and shared accommodation. 5% of the bedrooms are proposed to be wheelchair accessible, with a further 5% designed to be wheelchair adaptable.

In addition to the student accommodation, the proposed development makes provision for 1,503.68 sqm (GIA) cultural and community use to be curated and operated by the St Brides Foundation and set over part of the ground and lower ground floors.

The original submission has been revised with amended plans and supporting documents being received on the 29th August 2024 following initial Officer comments. The amendments proposed a reduction in the bulk and massing of the upper extension of the southern block. The student rooms proposed on the tenth floor have been removed, to deduct a significant amount of bulk and massing of this storey in order to reduce impacts on the setting of surrounding heritage assets - particularly the Temples Conservation Area and the listed buildings along Kings Bench Walk. As a result, Level 10 now only proposes to provide access to an external amenity terrace as well as containing some plant, requiring a smaller scale extension at this level.

The Applicant has provided a viability assessment to justify the loss of office at the site which has been independently reviewed. It is considered that the loss of office floorspace would be acceptable in this instance. The proposed uses of student accommodation and cultural space would not compromise the primary business function of the City.

The development would provide for student well-being and activities, ensuring a range of accessible, internal and external, communal amenity space. The provision of purpose-built student accommodation in this mixed-use development would not prejudice the business function of the City, would not result in an excessive concentration of student housing and is not considered to have an adverse impact on residential amenity of surrounding properties. Whilst there may be a lower levels of light to some of the bedrooms and kitchen areas, there are constraints around the retrofit of the existing building and it is considered that students would have the option of using amenity, breakout and study areas located throughout the building, along with the use of the publicly accessible roof terrace. The proposals also include 35% affordable student bedspaces and provides for 10% accessible rooms. It is therefore considered that the purpose-built student accommodation would accord with London Plan and Local Plan Policies and is considered acceptable.

The proposal would deliver two elements of cultural community use, comprising cultural space with the intended occupier being the St. Bride's Foundation as well as the opening and curation of the Whitefriars Crypt at the south of the site.

The proposed cultural uses are considered to be an enhancement to the City's cultural provision and provide significant public benefit to residents, workers, and visitors. Having an identified operator who have been able to specify requirements at an early stage in the design process and a strong commitment from the developer to provide this space at rent and service charge free for 60 years will ensure that this cultural space is deliverable.

The Local Plan and London Plan supports the delivery of cultural uses. The proposed museum would provide a destination cultural and community space which would contribute towards the Corporation's Destination City initiative of creating fun, inclusive and innovative spaces and places that attract people to the City.

The development makes the optimal use of site capacity relative to constraints and delivers a scheme which supports 'Good Growth' by-design objectives, that is growth, which is socially, economically and environmentally inclusive.

The proposed cultural uses, student accommodation and public realm proposals would enrich the existing learning and educational offer to deliver a vibrant wider neighbourhood, both during the day and at night, in accordance City's broader visions to deliver outstanding places, as part of 'Destination City', 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021).

Fleet Street is a dynamic area, having developed organically and has a 'loose fit' urban structure, eclectic in character and which has continuously evolved over time. The proposals are considered to be appropriately designed to be distinct yet complementary to the characteristic eclecticism and family of high quality buildings along Fleet Street and its surrounds.

In pan-London and strategic views the development would preserve the setting of St Paul's Cathedral as the Strategically Important Landmark which go to the heart of the character and identity of the City and London. The proposal would protect views of relevant City Landmarks and Skyline Features with the exception of some slight diminishment to St Brides Church.

The proposals would preserve the significance and contribution of setting of all the identified heritage assets except that of St Brides Church (Grade I); Nos. 2 – 6 Kings Bench Walk (Grade I) and Nos. 3 North King's bench Walk (Grade II*); Inner Temple Registered Historic Park and Garden (RHPG) (Grade II); and the Temples Conservation Area, which would experience, via setting impacts, low to slight levels of less than substantial harm.

The proposals seek to make the optimal use of land within a sensitive location partially within the Fleet Street Conservation Area and within the setting of the Whitefriars and Temples Conservation Areas alongside numerous listed buildings and the Temple Registered Historic Park and Garden. There would be no harm to the character and appearance of the Fleet Street Conservation Area.

The proposals would result in improvements to The Tipperary public house following its recent reopening. The harm to the significance of The Tipperary (Grade II) is evaluated at less than substantial at the lowest end of the spectrum due to the loss of the rear walls, windows and lightwell at the pub. The extent of the alterations is limited to the rear, an area generally considered to be less sensitive to change, and overall the characteristic 17th century cellular floor plan, fittings and sensitive spaces towards the front of the pub are retained.

The Whitefriars Crypt would be subject to significant improvements, with the asset currently uncelebrated at the rear of the site with no clear public access arrangements nor step free access. A new mezzanine floor would be constructed with a platform lift providing step-free access to the asset, whilst a new structure would be constructed around the lightwell to allow for more internal space around the crypt. This would allow for exhibitions and displays of artefacts to accompany the Crypt to help support it as a new visitor destination.

An appropriate lighting scheme would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City by night.

The proposed development is on track to achieve an "Excellent" BREEAM assessment rating. High quality building fabric, passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond the new Part L 2021. The carbon impact of construction and maintenance has been minimised through high levels of retentions and considerate design which prioritises retrofit, reuses materials and designing out waste. The upfront embodied carbon emissions are calculated to be better than the GLA's Standard Benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible, residential development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity.

A daylight, sunlight and overshadowing assessment and supplementary radiance assessment have been undertaken to assess the impact on the daylight and sunlight received by neighbouring properties and the direct sunlight received by surrounding external amenity areas, and an internal daylight and sunlight assessment has been undertaken to assess the impact on the rooms within the development.

With regards to external daylight and sunlight impacts, the submitted assessments conclude 62 Fleet Street would be most impacted as a result of the proposal, receiving a moderate adverse impact in terms of daylight and a major adverse impact in terms of sunlight to windows, and 148 Fleet Street faces a negligible daylighting impact and a minor adverse impact in terms of sunlight. Considering the existing poor daylighting/sunlighting factors, and the

tight knit urban context, although some minor and major adverse impacts have been identified in this case officers consider this to be acceptable overall.

Turning to internal daylight and sunlight, officers express some concern around the light levels to some of the student rooms and amenity spaces within the proposed development. The majority of the rooms failing to meet the relevant BRE guidance are to rooms on the lower floor levels, those which are north facing, and both the eastern and western elevations are impacted by the tight urban grain of the surrounding streets. Whilst concern remains, Officers consider that the site has been well optimised for its location, has struck the fine balance between daylight distribution and overheating with the variation in window design, and overall consider that the future students would experience good levels of amenity with access to a range of internal and external communal spaces that are well lit in parts. This is particularly given the building is being substantially retained, representing a significant design constraint which is then compounded by the existing tight knit urban grain of the surrounding street scene. It is also recommended that the layout of the rooms be optimised and secured by condition to ensure that desks are located in the brightest part of the rooms.

Overall, the daylight and sunlight impact of the proposed development on neighbouring properties is considered to be acceptable and in accordance with the requirements of the Local Plan, as well as London Plan and Draft City Plan.

The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the site and all of its proposed uses to full fill their goal of being an inclusive and welcoming place to live, visit and enjoy the highest accessibility standards and inclusive environments practices are essential. Great consideration has been given as to how to improve the public realm and the arrival experience to the building in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Access Management Plan, it is considered that the proposal accords with the access related policies outlined above. The proposal has also been reviewed by the City of London Access Group and Accessibility Officers. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies in the report below.

Wind conditions and Thermal Comfort conditions will be maintained at levels suitable for intended uses at street level and at roof terrace levels for both the proposed development.

The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan (i.e., the London Plan and Local Plan) and relevant policies and guidance, SPDs and SPGs, relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

It is almost always the case that where major development proposals come forward there is at least some degree of non-compliance with planning policies, and in arriving at a decision it is necessary to assess all the policies and

proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

In this case, the proposals are considered to be in accordance with the development plan as a whole. In addition, the Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

Recommendation

1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading 'Planning Obligations' the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule; and
2. That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report.

APPLICATION COVER SHEET

65 Fleet Street, London

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	48.44 AOD		55.465 AOD	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Public House (sui generis)	244.99	Public House (sui generis)	670.91
	Student (sui generis)	0	Student (sui generis)	32,078.36
	Learning & non-residential institutions (F1)	0	Learning & non-residential institutions (F1)	1,503.68
	Retail	834.65	Retail	391.85
	Office	29,714.26	Office	0
	TOTAL	30,793.91	TOTAL	34,644.79
			TOTAL UPLIFT:	3,850.88
3. OFFICE PROVISION IN THE CAZ	Not applicable - application proposes the loss of office space.			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	c.20 FTE (building is vacant)		42	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	24	Car parking spaces	1
	Cycle long stay	170	Cycle long stay	659 (meets London Plan Policy Standards)
	Cycle short stay	0	Cycle short stay	74 (meets London Plan Policy Standards)
	Lockers	0	Lockers	0
	Showers	0	Showers	0
	Changing facilities	0	Changing facilities	0
6. HIGHWAY LOSS / GAIN	None			

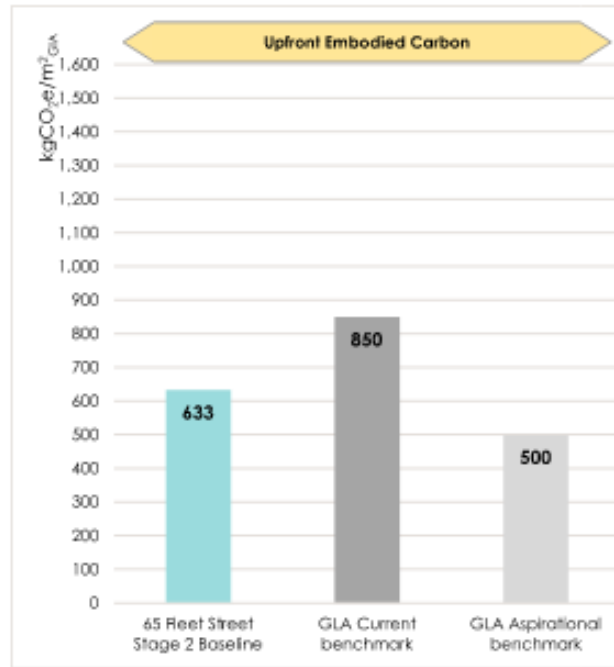
7. PUBLIC REALM	Existing public realm re-landscaped.		
8. STREET TREES	EXISTING		PROPOSED
	There are currently no trees on the site.		None.
9. SERVICING VEHICLE TRIPS	EXISTING		PROPOSED
	44 per day		43 per day
10. SERVICING HOURS	<p>There shall be no trips to the Site by Goods Vehicles or (save in the event of emergency) Facilities Management Vehicles which are servicing the cultural use, retail and student management or maintenance deliveries during the following hours: Between 0700 hours and 1000 hours: Between 1200 hours and 1400 hours Between 1600 hours and 1900 hours and for the avoidance of doubt these restrictions shall not apply to cargo cycle deliveries.</p> <p>There shall be no trips to the Site by Goods Vehicles or (save in the event of emergency) servicing the student accommodation which have been arranged by students themselves other than during the following hours: Between 0700 hours and 2300 hours Tuesdays to Saturdays inclusive: Between 0700 hours and 2100 hours on Sundays and Mondays</p>		
11. VOLUME OF RETAINED FABRIC		North block	South block
	substructure	100%	100%
	superstructure	80%	70%
	Façade*	0%	0%
*463m ² of stone cladding panel is proposed for deconstruction and reuse in new facade			
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvement against Part L 2021: 32% GLA requirement: 35%		
13. OPERATIONAL CARBON EMISSIONS	B6: 8,024 tCO ₂ e or 229 kgCO ₂ e/m ² GIA		
	B7: 239 tCO ₂ e or 7kgCO ₂ e/m ² GIA		
See paragraph 685.			

Also refer to page 8 of WLC report at Section 3.1
(based on June submission)

**14. EMBODIED
CARBON
EMISSIONS**

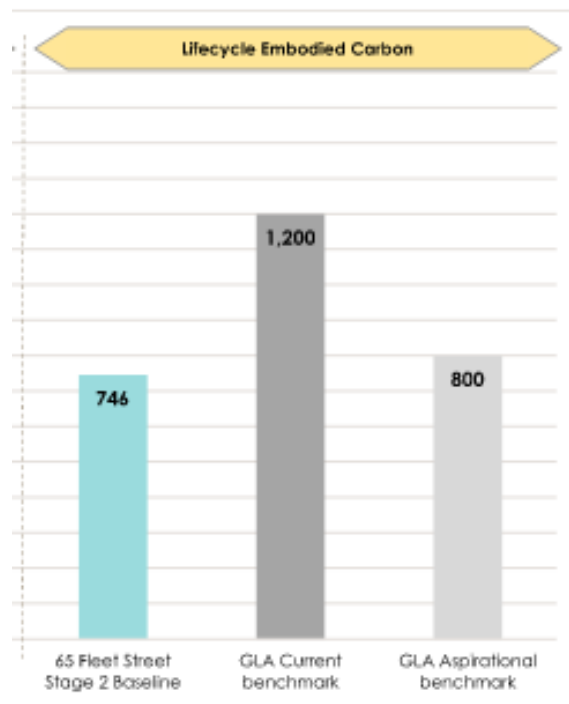
PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS

See paragraphs 666-669.
Also refer to page 11 of WLC report at Section 3.4



**15. WHOLE LIFE
CYCLE
CARBON
EMISSIONS
(kgCo2e/m2
GIA)**

See paragraph 685.
Also refer to page 11 of WLC report at Section 3.4



**16. CARBON
OPTIONS
ASSESSMENT
-
LIFE-CYCLE
CARBON
EMISSIONS**

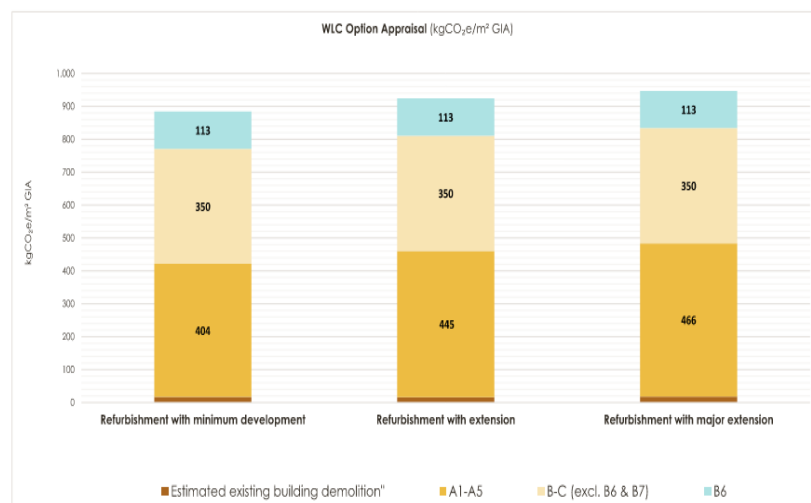
CARBON OPTIONS ASSESSMENT

Figures are separate to planning stage WLCA

See paragraphs 666-669.

Also refer to page 19 of Carbon Optioneering report at Section 4.4.5

	Option 1 Refurbishment with min development	Option 2 Refurbishment with extension	Option 3 Major refurbishment
Upfront Embodied Carbon (A1-A5) (kgCO ₂ e/m ² GIA) <i>exc. sequestration</i>	404	445	466
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO ₂ e/m ² GIA)	704	795	816
Operational Carbon for building lifetime (B6) (kgCO ₂ e/m ² GIA)	113	113	113
Total WLC Intensity (incl. B6 & pre-demolition) (kgCO ₂ e/m ² GIA)	867	908	929
Upfront Embodied carbon (A1-A5) (tCO ₂ e)	12,243	14,684	16,378
Operational Carbon for building lifetime (B6) (tCO ₂ e)	3,437	3,743	3,986
Total WLC (incl. B6 and pre-demolition) (tCO ₂ e)	26,287	29,976	32,665



17. TARGET BREEAM RATING	Target (minimum) Excellent, with the potential to achieve Outstanding
18. URBAN GREENING FACTOR	0.305
19. AIR QUALITY	Air Quality Neutral


Site Location Plan



© Crown copyright and database rights 2024 OS 100023243

ADDRESS:
65 Fleet Street

CASE No.
24/00648/FULMAJ

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



ENVIRONMENT DEPARTMENT

Site Photographs

Image



1:

Northern elevation of the northern block, containing The Tipperary (Grade II)



Image 2: The eastern elevation of the site, beyond the ongoing Salisbury Square development, from Fleet Street

Image 3: Birds down into the and southern northern block



eye shot looking central courtyard, elevation of the



Image 4: The Remains of the Whitefriars Convent (Grade II) visible within the lightwell on Ashentree Court / Magpie Alley

Image 5: The northern elevation of the southern block, showing the existing



main entrance and the central courtyard with lightwell



Image 6: The southern elevation of the southern block within Ashentree Court.



Image 7: The base of the existing lightwell in the centre of the courtyard

Main Report

Site and Surroundings

The Site:

1. The site occupies an area of 1.2 acres and is located on the southern side of Fleet Street, between Bouverie Street and Whitefriars Street. The site is bounded by Fleet Street to the north; Whitefriars Street to the east; Ashentree Court and Magpie Alley to the south; and Bouverie Street to the west.
2. The existing building was originally completed in 1989, and was previously occupied by law firm Freshfields Bruckhaus Deringer, before the company vacated the premises in 2019.
3. The site currently is made up of a part 5/ 7 storey building (Use Class E (g) (ii)) with a lower ground and a basement. The northern part of the building fronts Fleet Street, and includes the Tipperary pub, retail uses and office floorspace, comprising of 5 storeys. The Tipperary Pub, which claims to be London's first Irish Pub, dates to c.1667 and is Grade II listed. The southern part of the building is in office use, comprising of 7 storeys. The building also includes the Grade II listed Whitefriars Crypt at basement level of the southern building.
4. While the application site comprises one building, it is linked at lower ground level, a semi-enclosed courtyard at ground floor provides separation between the north and south parts of the building.
5. To the east side of the Site, there is a recently consented scheme (20/00997/FULEIA) for the redevelopment of 69-71 Fleet Street, 72-78 Fleet Street, 80-81 Fleet Street, 8 Salisbury Square, 1 Salisbury Square, 35 Whitefriars Street (Hack and Hop public house), 36-38 Whitefriars Street, 2-6 Salisbury Square (Fleetbank House), and 2-7 Salisbury Court which includes the demolition of the above buildings as well as the provision of three new buildings which are a new police headquarters, a new Class E building, and a combined court building (Class F1).
6. The northern section of the site is located within the Fleet Street Conservation Area. The site is adjacent to the Whitefriars Conservation Area which is located to the south.
7. There are two listed structures within the site; the Grade II The Tipperary Public House (No.66 Fleet Street) and the Grade II Remains of the Former Whitefriars Convent.
8. The Whitefriars Crypt is a 14th Century remnant of the Carmelite Monastery, possibly the Prior's mansion, that was located on the South part of the site.

The crypt was extensively excavated and restored in 1927. In 1989 when the surrounding buildings were demolished to construct 65 Fleet Street the crypt was moved to its present location, under the South Building off Magpie Alley and is accessed via appointment with the building management.

9. There are a number of heritage assets in the immediate vicinity of the site. These include Northcliffe House (Grade II), the Harrow Public House (Grade II), 24 Tudor Street (Grade II), 143 – 144 Fleet Street (Grade II), 146 Fleet Street (Grade II) and Ye Olde Cheshire Cheese Public House (Grade II).
10. Other designated heritage assets in the wider setting include, and not limited to: St Paul's Cathedral (Grade I), St Bride's Church (Grade I), Nos.1-7 King's Bench Walk (all Grade I), Nos.3 North & 8 King's Bench Walk (both Grade II*), Nos.9-13 King's Bench Walk (all Grade II), Daily Express Building (Grade II*), Nos.1-4 & 5 Paper Buildings (both Grade II), Inner Temple Garden (RHPG Grade II), Hamilton House (Grade II), Telephone House (Grade II), 9 Carmelite Street (Grade II), Sion College (Grade II), Former City of London School (Grade II), Unilever House (Grade II) and the Temples Conservation Area.
11. The closest neighbours are properties in the immediate vicinity are located at 61A Fleet Street, 62A Fleet Street, 3 Pleydell Street, 53A Fleet Street, 54A Fleet Street, 4-7 Lombard Lane, King's Bench Walk and Mitre Court Buildings to the west, Victoria House 25 Tudor Street and Temple House 6 Temple Avenue to the south, 24 Tudor Street to the east and 142 Fleet Street, 145 Fleet Street, 148 Fleet Street, 7 Hind Court and 2 Wine Court to the north of the application site.

Planning History

12. Planning permission was granted in 2020 under planning permission ref. 19/00058/FULMAJ for alterations and extensions to the existing building. Following this, in 2022, a Section 73 application was approved under reference 21/00709/FULMAJ for alterations to the building (also for the variation of condition 20 of the original application (19/00058/FULMAJ).

Proposals

13. Planning permission under LPA Ref 24/00648/FULMAJ is sought for:

For the partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.465m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses

including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

14. Listed Building Consent under LPA Ref 24/00649/LBC is sought for:

External and Internal alterations to The Tipperary Pub including part demolition of the rear of the pub; erection of 1 storey roof extension containing student accommodation with associated expansion into northern block of 65 Fleet Street at fifth floor level. Works to improve access to Whitefriars Crypt with changes to the surrounding structure of the Crypt to allow for presentation and interpretation of the asset.

15. The proposed scheme would provide a total of 34,644.79sqm (GIA) floorspace comprising:
- Public House (670.91sqm)
 - Learning and Non-residential institutions – Use Class F1 (including Crypt) (1,503.68sqm)
 - Retail (391.85sqm)
 - Student accommodation (Sui Generis) (32,078.36sqm)

Public House

16. The proposed scheme would include the refurbishment and enhancement of the Tipperary Pub, which has recently been brought back into use by the applicant following its closure in 2022.
17. The proposals as part of this scheme will look to enhance the provision of the pub through carefully thought-out refurbishment, increasing the floorspace from 244.99 sqm to 670.91 sqm (GIA) through extension to the building to the east at the lower ground floor, ground floor and first floor. The new ground floor area will allow for a larger area for drinking and eating. It is also intended that this space can be utilised for live music and events. New drinking areas will also be provided adjacent to the original bar area upstairs. The upper floors (second to fourth) will remain as they currently are, but with an addition of a lift to make the pub more accessible.
18. The proposed scheme would ensure important original pub features remain and the proposed extension is sensitively integrated. Works that effect the fabric of the listed pub are considered under the listed building application.

Learning and Non-residential institutions – Use Class F1 (including Crypt)

19. The proposed development makes provision for 1,503.68 sqm (GIA) of cultural use. The proposed scheme would provide cultural uses at ground floor and lower ground floor level with active frontages to principal elevation and internal courtyard elevations.
20. The Grade II Listed Crypt located in the southern portion of the building is proposed to be retained in its current location and raised in profile by creating a visitor interpretation space as well as providing improved wayfinding signage and an interpretation panel within the entrance colonnade off Fleet Street.
21. The Crypt also will be enhanced the lighting and interpretation panels within the space, providing a broader history of the Crypt and Friary.

Retail

22. The proposed scheme will provide 391.8 sqm (GIA) of retail space (Use Class E) focusing on the north-western corner unit. The two front units will be combined into one space and the connected to the first floor. The current ambition for the retail space is for a print and bookshop located on Fleet Street, which highlights the rich history of the print industry on Fleet Street.

Student Accommodation

23. The proposed scheme seeks to deliver 856 student rooms of which 35.02% will be affordable. The student rooms comprise of cluster and studio accommodation, as set out as follows:
 - Cluster Rooms (192 rooms)
 - Studios (593 rooms)
 - Wheelchair Accessible (86 rooms)
24. Student bedrooms are proposed to be provided on the lower ground floor to the ninth floor. These bedrooms would be located in both the southern and northern parts of the building. The entrance for the southern block is on Bouverie Street (featuring the reception lobby), while the northern portion is accessed via the passageway from Fleet Street.
25. The studio accommodation range from 15.2 sqm to 45.7 sqm. Each studio is designed to accommodate a 1950mm x 1250mm bed and contains an en-suite and kitchenette. The cluster rooms make up for 22% of the total accommodation which have en-suites and communal kitchens, living and dining space to encourage social interaction and inclusion.

26. 10% of the rooms are wheelchair accessible studio rooms to meet the London Plan requirements. Moreover, wheelchair accessible rooms will have a wheelchair accessible kitchen.
27. As well as the provision of student bedrooms, the proposed development will also provide 1792.2 sqm of student amenity space. The amenity space will be both internal and external to the building, including a roof terrace located on the southern portion of the building. Internally, the amenity space will also be provided at the basement and lower ground floor level, providing spaces for students to meet and interact. The glazed dome at the top of the southern building will provide a centre piece of natural light to users of the student accommodation amenity space on the lower ground floor. Internal space has been tailored to meet different students' needs, and the design allows open space to flourish and natural light to brighten the building internally, while the outdoor space provides nooks for users to either interact with other users of the space or to provide a quiet oasis to undertake study work. The spaces allow harmony for both study spaces but also places for interactions to ensure that social inclusion is fostered between students.

Amended Plans

28. Amended plans and supporting documents were received on the 29th August 2024. The amendments relate to alterations to massing, articulation, and materials of the building design following on from the detailed discussions post-submission stage, surrounding the Temple View. The key design amendments include the reduction of the 10th floor level and continuation of setbacks up to floors 8 and 9 in order to improve the setting of neighbouring heritage assets and wider. The amendments also proposed changes to the materiality of the new upper floors and refinement of the façade treatment more generally.

Consultations

Statement of Community Involvement

29. The Applicants have submitted a Statement of Community Involvement dated June 2024 outlining their engagement with stakeholders which commenced in February 2024. Their community engagement programme included a dedicated project website, engagement with locally elected representatives, engagement with local stakeholders and direct liaison with residents and employees.
30. The applicant has engaged with key stakeholders and has conducted briefings with local stakeholders. Meetings with St Bride's Church and the Worshipful Company of Carmen, in addition to ongoing meetings and liaison with St Bride's Foundation and Fleet Street BID. Lady Lucy French, the CEO

of Fleet Street BID, also attended the public exhibition on the proposals, alongside Castle Baynard ward member John Griffiths.

31. A digital website was created and has been live since 19th February 2024. The website has remained live since its launch. During the consultation period (19th February - 4th March 2023) 108 users engaged with the website.
32. Engagement also included targeted delivery of a flyer to 1,168 residential and business addresses surrounding the application site. The flyer contained details of the proposals and consultation website, and invited residents to leave their feedback via completing the online survey. The flyer also contained details of the in-person drop in event, and invited residents to attend to offer their questions and comments.
33. The consultation was complemented by two interactive in-person street stalls, which sought to engage directly with those living, visiting and working in the vicinity of the site by inviting them to leave their feedback via the online survey. These were held on Thursday 22nd February and Monday 26th February. The Applicant also conducted an in-person drop-in exhibition to provide an opportunity for the local community to find out more about the plans and put any questions to members of the project team. This was held on Tuesday 27th February between 11:30am and 3:30pm at St Mary at Hill. Overall, there were seven attendees at the in-person exhibition and 22 survey responses were received throughout the consultation period.
34. The Applicant has also conducted extensive community consultation to shape the cultural strategy and Tipperary offer.
35. The applicant has also engaged with the City of London Corporation officers through formal pre-application process.
36. The Statement of Community Involvement concludes that the feedback received throughout the consultation period has been positive towards the introduction of student accommodation and other cultural uses at this location on Fleet Street.

Statutory Consultation

37. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon in accordance with article 15 of the Development Management Procedure Order (as amended). Copies of all received letters and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.

38. The views of other City of London departments have been taken into account in the preparation of this report.
39. Following consultation feedback, as set out above, the applicant made design amendments, and these were received on the 29th August 2024. Accordingly, a 30-day re-consultation has been undertaken. Comments from the second consultation are also set out below.

Date	Consultee	Summary of comments
17 th July 2024 16 th September 2024	NATS Safeguarding	No objections.
30 th July 2024	Health and Safety Executive	<p>The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.</p> <p>HSE acknowledges the applicant's commitment that CFD will demonstrate (section 7 of the fire statement), that 'the smoke extract system will be effective in preventing the flow of smoke into the escape stair...'. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>HSE welcomes the commitment to review and potentially add further safety measures.</p> <p>Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide</p>

		<p>guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at E-bikes and e-scooters fire safety guidance – NFCC</p> <p>Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.</p> <p>Officer Response: These matters are addressed in paragraphs 713 to 717 below, and those matters raised by the HSE which are to be dealt with at a later regulatory stage would be the subject of informatives attached to any decision.</p>
1 st August 2024	Environmental Resilience Officer	<p>The proposed development is partially compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.</p> <p>Requests a certain condition to be included.</p> <p>Officer Response: Conditions appended.</p>
5 th August 2024 (FULL) 6 th August (LBC)	Historic England	<p>(FULL) In our view, the proposals are unlikely to harm the character and appearance of the Fleet Street conservation area and have the potential to enhance the significance of the listed remains of the Whitefriars Convent. The proposals also have the potential to impact on</p>

		<p>the significance of heritage assets outside of the site through development within their setting. We recommend that further clarity is provided on those impacts and that any harm to heritage assets is adequately justified or mitigated, in accordance with policy.</p> <p>(LBC) We have drafted the necessary letter of authorisation (attached) for your authority to determine the application as you see fit and referred the case to the National Planning Casework Unit (NPCU). You will be able to issue a formal decision once NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.</p> <p>Officer Response: Addressed in paragraph 378 of this report.</p>
<p>8th August 2024 20th September 2024</p>	<p>Thames Water</p>	<p>Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>Agent Response: We are not proposing any excavation outside of the existing basement and we will ensure any necessary permits</p>

		<p>associated with cavity drainage are sought.</p> <p>Officer Response: Recommended informatives appended.</p>
13 th August 2024	Air Quality Officer	<p>Requests certain conditions to be included.</p> <p>Officer Response: Conditions appended.</p>
22 nd August 2024 2 nd October 2024	Lead Local Flood Authority	<p>Requests certain conditions to be included.</p> <p>Officer Response: Conditions appended.</p>
28 th August 2024	Transport For London	<p>Further clarity is required on the status of access to the courtyard within the site connecting Bouverie Street and Whitefriars Street</p> <p>Further information on the design of the cycle parking, including lift dimensions.</p> <p>A nighttime / dark hours ATZ using the same routes as the daytime completed ATZ.</p> <p>Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers for all proposed highway works prior to determination.</p> <p>Further clarity is needed on the relationship between public and private space within the site.</p> <p>We would be supportive of implementing a new wayfinding strategy featuring Legible London signage.</p> <p>TfL must be consulted on discharge of the Student Move In Move Out Strategy.</p> <p>The routes from the site to Cycleway 6 should be assessed against the Cycle Route Quality Criteria.</p> <p>We request a PCL assessment of crossings at the junction of Whitefriars</p>

		<p>Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, Bouverie Street, Tudor Street.</p> <p>We request a contribution of £100,000 to increasing capacity of the existing docking station on Bouverie Street. Further consultation with TfL is required regarding construction plans, pitlanes and impact on Fleet Street.</p> <p>The final DSP, CLP and Travel Plan should be secured by condition. The Travel Plan requires more ambitious targets and funding for measures including free Cycle Hire memberships for future residents.</p> <p>Officers Response: Addressed at the Highways and Transportation section of this report, starting at paragraph 521.</p>
<p>10th September 2024</p>	<p>City of London Police</p>	<p>The current proposals whilst generally acceptable, we have raised a number of concerns within the development, which will directly impact on the safety and security of the build and have a likelihood of affecting the community.</p> <p>Due to the high number of student domiciles that have been proposed to be included into the development, City of London Police feel that it would be appropriate and proportionate to apply a condition of build to the project, that they secure a minimum of Silver Award certificate of secured by design for homes. This will help to ensure that the residents and common users will have an enhanced feeling of safety and security inside of their abodes.</p>

		<p>Similar student accommodation sites within the City of London area have already decided to include SBD as a standard within their build environments. It has been noted that new Student accommodation that has achieved Secured By Design have seen a dramatically lower crime output that comparable sites without accreditation. Older adjacent sites within the local area of Fleet Street have seen the introduction of retrofitted additional security measures.</p> <p>The security measures that have been introduced would draw an inference that they were necessary to safeguard residents and commercial buildings due to reported crime and antisocial behaviour within the area. Within the plans are proposals for further retail and commercial office spaces, again we would recommend that the developers be conditioned to build these integrated units to achieve a minimum Silver Award of Secured by Design Commercial.</p> <p>Officer Response: Relevant condition appended, addressed in paragraph 129 of this report.</p>
<p>11th September 2024</p>	<p>Health and Safety Executive</p>	<p>The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.</p> <p>HSE acknowledges the applicant's commitment that CFD will demonstrate (section 7 of the fire</p>

		<p>statement), that ‘the smoke extract system will be effective in preventing the flow of smoke into the escape stair...’.</p> <p>However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>HSE welcomes the commitment to review and potentially add further safety measures.</p> <p>Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at E-bikes and e-scooters fire safety guidance – NFCC</p> <p>Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.</p> <p>Officers response: Addressed in paragraphs 713 to 717 of this report, and informatives appended concerning CFD modelling and identifying operational hydrant.</p>
12 th September 2024	Environmental Health Officer	Requests certain conditions to be included.

26 th September 2024		Officer Response: Conditions appended.
2 nd October 2024	Historic England (GLAAS) (FULL and LBC)	Recommends no Archaeological Requirement.
9 th October 2024	District Surveyors	We will not comment on gateway 1 applications as this is HSEs role as statutory consultee.
10 th October 2024	The Gardens Trust	Proposed development will cause detrimental effects. Officer Response: addressed in paragraph 407 and 408.
14 th October 2024	Conservation Area Advisory Committee	No objections to the proposed uses. There were no objections to the proposals as far as they affected the detailed treatment of the buildings in the Fleet Street Conservation Area, including the added storeys and the new entrance. As far as the longer views were concerned the Committee expressed reservations about the raised height of the south block in the proposals. Members were concerned about the apparent bulk and horizontal character of the proposal shown in the views from sites on the South Bank, though accepting that the zoom images may have accentuated the harmful effects of the proposals, but were especially concerned by the effects of the proposals in the view from the Temple – View 12 in the applicant’s HTVI – which the applicants Heritage, Townscape and Visual Assessment accepts might do some harm. The Committee considered this to have an adverse effect on the Temple Conservation Area.

		<p>The Committee also wondered whether the proposed recladding of the existing building in GRC would introduce an unwelcome new material into the City's townscape.</p> <p>Officer Response: addressed in paragraphs 178, 451 and 452.</p>
14 th October 2024	NHS North East ICB	<p>Request for a contribution of £45,000 towards the mitigation of the adverse impacts of the development on local health infrastructure. This sum will enable the reconfiguration and upgrading of non-clinical space to clinical space and is considered to meet the tests set out in the CIL Regulations for contributions. Given the scale of the proposed development the impact across all types of health infrastructure will be significant and will require mitigation.</p> <p>Daylight - It is important to ensure that communal spaces or those where students may study or spend daytime has maximum daylight.</p> <p>Lifts - Should be large enough for a trolley bed and two paramedics with their equipment.</p> <p>Pedestrians and Cyclists – It is important that pedestrians are considered separately as there can be conflict between cyclists and pedestrians, and cycle parking/storage should be safe and accessible. There should be adequate parking for emergency vehicles and for service vehicles to ensure pedestrian routes are not impeded.</p> <p>Noise - It is important that there is adequate insulation between units to ensure privacy, and noise can be a contributor to stress and poor health.</p> <p>Public Realm - An ongoing management plan is important, and</p>

		<p>should be secured via condition or the S106 agreement.</p> <p>We consider a modest contribution of £45,000 for enabling the conversion of non-clinical space (administrative or storage for example) to increase clinical capacity alongside the arrival of the new student population is important in the short term. This is a modest, but important contribution. The calculations from the HUDU Planning Contributions Model indicates the capital cost to the NHS of creating additional capacity could be in the region of £1.7m. While this assumes new buildings/extensions it does not include outpatients, accident and emergency and ambulance infrastructure.</p> <p>Agent Response: While the submitted HIA clarifies that there is there is sufficient GP capacity locally, the requested contribution is agreed.</p> <p>Officer Response: This is addressed further in paragraphs 653 to 659 of this report, with the applicant agreeing to the requested contribution.</p>
--	--	---

Letters of Representation

40. In accordance with the SCI, notification letters were sent to residential properties in the vicinity in addition to the site and press notices as set out above. A total of 19 responses have been received in support of the application and 4 neutral comments. Comments in support were supportive of the retrofit strategy, improvements to Fleet Street and local area, sustainable design approach, refurbishment of the Tipperary public house, provision of high quality purpose built student accommodation and the delivery of new public/cultural spaces with the aim to deliver a print related visitor experience and learning centre. Other comments were supportive of the social and economic benefits the scheme would generate. Letters of support were received from the Guildhall School of Music and Drama, Fleet

Street Quarter, Dr Johnson's House and The Inns of Court College of Advocacy.

41. It is noted that all material planning consideration raised in the representations above are addressed within this report.

Policy Context

42. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The 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.
42. The City of London (CoL) has prepared a new Local Plan, the City Plan 2040, which was published for Regulation 19 consultation in the Spring of 2024 and submitted to the Secretary of State in late Summer 2024. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
43. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
44. The National Planning Policy Framework (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".

The NPPF

45. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
46. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11.
47. For decision-taking this means:
 - a) approving development proposals that accord with an up-to-date development plan without delay; or

- b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
48. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
 49. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
 50. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
 51. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
 52. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
 53. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 states that “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health*”.
 54. Paragraph 116 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to

high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.

55. Paragraph 117 states that *“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”*.
56. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
57. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
58. Paragraph 136 of the NPPF states that *“Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...”*.
59. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability

or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

60. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
61. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
62. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 180 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, *inter alia*, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.
63. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
64. Paragraph 203 of the NPPF advises, "*In determining applications, local planning authorities should take account of:*
 - a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - c) *the desirability of new development making a positive contribution to local character and distinctiveness.*"

65. Paragraph 205 of the NPPF advises *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
66. Paragraph 206 states that *“any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*
67. Paragraph 208 of the NPPF states *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.*
68. Paragraph 209 of the NPPF states *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.*

Statutory Duties

69. 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).
70. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

71. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).

Main Considerations

72. In determining the planning application, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
73. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.
74. The principal issues in considering this application are:
- a) The principle of development, including the proposed student accommodation use and associated retail uses.
 - b) The economic impact of the proposal.
 - c) The impact of the development on the character and appearance of the area and the design of the building itself.
 - d) The impact of the development on designated and non-designated heritage assets.
 - e) The impact on strategic views in the London Views Management Framework and on other strategic local views.
 - f) The impact of the development on public realm.
 - g) The impact of the development on ecology.
 - h) The accessibility and inclusivity of the development
 - i) The impact of the development on any potential archaeological assets beneath the site.
 - j) The impact on the development in highway and transportation terms.
 - k) The impact of the development in terms of energy, sustainability and climate change.
 - l) The acceptability of the scheme in terms of its environmental impacts, including solar glare, daylight and sunlight, thermal comfort, noise and vibration, air quality and contamination
 - m) The impact of the proposed development on the amenity of nearby residential and other occupiers.
 - n) The impact of the development on health and wellbeing.
 - o) The impact of the development on fire safety.
 - p) The acceptability of the proposed security, suicide prevention and fire safety arrangements
 - q) The requirement for the development to secure financial contributions and planning obligations.

- r) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and The Human Rights Act 1998

Principle of Development

Loss of Office Floor space

75. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
76. London Plan Policy E1 supports increases in the current office stock. Likewise, Core Strategic Policy CS1 of the Local Plan and Strategic Policy S4 of the Draft City Plan 2040 seek to ensure that the City provides additional office accommodation to meet demand from long term economic and employment growth.
77. The existing lawful use of the site is employment (office) (Use Class E (g) (i)). Having being previously occupied by law firm Freshfields Bruckhaus Deringer as their global headquarters, until they vacated in 2019. A Small portion of the offices are currently in use as a construction site office. However, the building is currently stripped to shell and core out as part of the previous planning consent (21/00709/FULMAJ).
78. This application would result in the loss of 29,714sqm (GIA) of existing Class E(g) office floorspace.
79. London Plan Policy E1 supports increase in current office stocks, especially within the central London office market. The City of London Local Plan 2015 and the proposed Submission Draft City Plan 2040 promote the delivery of a world class business city and the protection and provision of office floorspace. Local Plan policies CS1 and DM1.1 and proposed Submission Draft City Plan 2040 policies S4 and OF2 seek to protect existing office accommodation.
80. Local Plan Policy DM1.1 and draft City Plan Policy OF2 seek to protect office accommodation. Policy DM1.1 seeks to prevent the loss of existing office accommodation where the building is considered suitable for long term viable office use and there are strong economic reasons why the loss would be inappropriate. *“Losses would be inappropriate for any of the following reasons:*
- *prejudicing the primary business function of the City;*
 - *jeopardising the future assembly and delivery of large office development sites;*
 - *removing existing stock for which there is demand in the office market or long term viable need;*

- *introducing uses that adversely affect the existing beneficial mix of commercial uses.”*
81. To meet the requirements of Core Strategic Policy CS1 and Policy DM 1.1, applicants proposing the loss of office accommodation will need to provide robust evidence relating to the current and long-term unsuitability of the site for office use and that the proposed change would not adversely affect the existing beneficial mix of commercial uses in the area or prejudice the primary business function of the City. Applicants will need to provide robust evidence to demonstrate that the building has depreciated such that office use is not viable or suitable in the long-term. Evidence will need to address the physical state of the building and its functional and locational obsolescence. Marketing evidence will be required to show that there is no recent or likely future demand for continued office use on a site.
 82. Emerging Policies S4 and OF2 of the draft City Plan require the protection of existing office stock from being lost to other uses where the existing floor space would be viable in the longer term or where the loss would cause harm to the primary business function of the City.
 83. Evidence provided in support of planning applications should take into account the potential for the building to meet a variety of office needs including, where appropriate, the potential for sub-division to provide smaller office suites, the potential to provide accommodation suitable for start-ups or ‘move-on’ accommodation and the potential for comprehensive redevelopment to re-provide office floorspace.
 84. The Office Use Supplementary Planning Document sets out detailed criteria for evaluating the long-term viability of office accommodation and requires the submission of a viability appraisal and evidence of marketing in support of an application for change of use.
 85. The applicant has submitted an economic viability assessment. The City Corporation appointed independent consultants to review the Assessment and provide advice to the City Corporation on whether the assessment meets the terms of Policies CS1 and DM1.1 and emerging policies S4 and OF2.
 86. The applicant’s viability assessment and the City Corporation’s consultant review consider the viability of development at current day costs and values.
 87. The applicant’s viability assessment has looked at 2 scenarios as follows:
 - The consented office remodel/extension scheme (Scenario 1);
 - A larger office remodel/extension scheme within the envelope of the proposed student-led mixed-use scheme (Scenario 2).

88. Overall, the City Corporation's consultant concludes that the none of the scenarios of building out the now implemented scheme or a larger scheme which fills the envelope of the proposed development subject of this application are financially viable and therefore that this site would not be viable in the longer term for future office use. The viability information submitted in support of the application has been subject to third party review, with the reviewer concluding that they agree with the applicant's advisors assessment that both scenarios tested would be unviable.
89. Turning to the marketing evidence recommended by the Office Use Supplementary Planning Document. The applicant has submitted a Commercial Office Market Report authored by CBRE and appended to the Financial Viability Appraisal. The report concludes that over 150 parties contacted during the marketing period for the site, 11 parties progressed to the bidding stage, and notes that a number of interested investors/developers expressed concerns over whether targeted sustainability credentials such as an EPC B rating and a BREEAM 'Excellent' could be met within the constraints of the existing permission. Supplementary to this, it concludes that the property was marketed on a pre-let basis with approximately 20 target tenants, with no tenants prepared to commit to the site.
90. In conclusion, the principle of a change of use from office to an alternative use is satisfied in accordance with Local Plan policies CS1 and DM1.1, proposed Submission Draft City Plan 2040 policies S4 and OF2, and the Office Use SPD.
91. The loss of office floorspace on this site is not considered to be significant when considered against the existing and pipeline floorspace in the City of London, including those schemes which this Committee has resolved to permit but which have not progressed yet to full permission. Whilst the Local Plan resists the loss of office floorspace, the scale of the loss on this site would not prejudice the overall supply of office space in the City, nor prejudice the potential for future site amalgamation or result in the loss of existing stock for which there is demand or longer-term viable need.
92. To conclude, the viability assessment demonstrates that continued office use of the site is unlikely to be a viable proposition and that alternative uses should be considered. It has also been demonstrated that both the implemented scheme and an alternative scheme are not viable options. It is therefore considered that the loss of existing office floorspace would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. It is considered that the proposed high quality student accommodation will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for seven days per week and

contribute to the achievement of the City Corporation's Destination City ambitions and align with the City Corporation's wider ambitions for a post-Covid City.

93. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2040.

Public House

94. London Plan policy HC6 'Supporting the nighttime economy sets out planning decisions should protect and support the evening (and night-time) venues such a public houses. London Plan Policy HC7 (Protecting Public Houses) states that boroughs should protect public houses where they have a heritage, economic, social or cultural value to communities and applications for the loss of public houses should be refused. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character.
95. The Tipperary Pub is a Grade II Listed Building. Accordingly Local Plan policy DM12.3 'Listed buildings' also applies. The policy sets out that the City will resist the demolition of listed buildings and will grant consent for the alterations to a listed building only where this would not detract from its special architectural or historical interest character, or significance of its setting.
96. The proposed works include the extension into the neighbouring eastern portion of the building, increasing the floorspace from 243.5 sqm to 648.4 sqm (GIA) at lower ground floor, ground and first floors. With the upper floors (second to fourth) remaining the same with the addition of a lift to make the pub more accessible. The proposals also include a larger area for eating and drinking at ground floor level, with the space also being able to be utilised for live music or events.
97. Detailed analysis of the proposed works to restore the pub are addressed below. The proposals are in conformity with both emerging and adopted Local Plan policies. It is considered that the re-imagining of the public house accords with London Plan Policy HC6.

Learning and Non-residential institutions – Use Class F1 (including Crypt)

98. The Site falls within the CAZ and London Plan Policy SD4 outlines that within this area the unique concentration and diversity of cultural, arts and tourism functions should be promoted and enhanced.

99. The London Plan Good Growth objectives GG1 and GG5 are considered applicable to the provision of community and cultural use within development proposals. Policy S1 of the London Plan seeks to ensure that the social infrastructure needs of London's diverse communities are met. London Plan Policy HC5 supports London's culture and creative industries.
100. The Local Plan sets out in Policy CS11 that the City will seek to maintain and enhance the City's contribution to London's world class cultural status and to enable the City's communities to access a range of arts and cultural experiences, in accordance with the City's Corporation's Destination City Strategy.
101. Policy CS22 of the Local Plan seeks to maximise opportunities for the City's residential and working communities to access suitable, health, social and educational facilities and opportunities, whilst fostering cohesive communities and healthy lifestyles.
102. Emerging Policy S5 looks to encourage the vitality and vibrancy of the streets of the City of London. Whilst draft policy S6 'Culture and Visitors' looks to set out the City's vision of maintaining and enhancing the City's cultural offering. The policy draws out the importance of heritage in the City and seeks opportunities to create opportunities to celebrate the rich history in the city. Emerging Policy CV2 (Provision of Visitor Facilities) of the Draft City Plan 2040 encourages the provision of facilities that meet the need of visitors in new cultural developments.
103. The application site is also in the area which is designated as a key area of change (Fleet Street and Ludgate Key Area of Change) which is part of the Draft Submission of the City Plan. Fleet Street is identified in this document as one of the City's four Principal Shopping Centres and has a strong cultural offering.
104. The application proposes 1,503.68 sqm (GIA) of cultural floorspace, providing interactive learning spaces with the applicant's preferred partnership with the St Brides Foundation and an enhanced viewing area for the existing Whitefriars Crypt (Use Class F1). The scheme would also seek to provide creative wayfinding between all amenities within the application site. This would prominently indicate entrances to cultural spaces and integrate Lettering Art commissions that bring the cultural experience into the public realm.
105. The proposals in partnership with the St Brides Foundation seek to educate and engage in the story of print, derived from the meaning and value of Fleet Street and its location. At ground and lower ground floor levels, the proposals seek to create an interactive and engaging experience, telling the story of print through multisensory stimulation. The entrance will be via

Whitefriars Street, creating a vibrant and active frontage where activities can be seen through the windows.

106. The proposals also seek to enhance the accessibility and visitor experience of the Crypt. This will be achieved through the creation of a double height viewing gallery around the Crypt. A dedicated entrance will be provided via Ashentree Court, with enhanced visibility of the Crypt from both Ashentree Court and Magpie Alley. Disability access will also be provided by a new platform lift.
107. The proposals are considered to deliver a scheme that would respond to the above policies, delivering new cultural uses and visitor attractions to the City which contribute to the local vibrancy and appeal. Moreover, it will celebrate Fleet Street's nationally important achievements in print and media.
108. A section 106 obligation would be required to secure the provision of a proposed uses, including a management plan, opening hours and the securing of a cultural partner, officers consider these obligations to be necessary to the delivery of the proposed Learning and Non-residential institutions – Use Class F1.
109. The proposed Learning and Non-residential institutions – Use Class F1 spaces would contribute to the cultural and community offer in this part of the City. It is therefore complimentary with Policy HC5 of the London Plan and emerging Policies S6 and CV2 of the draft City Plan.

Retail

110. The site is within a designated Principal Shopping Centre (PSC) on Fleet Street.
111. London Plan policy E9 'Retail, markets and hot food takeaways' is supportive of the provision of retail which promotes a sector which is successful, competitive and diverse which provides a sustainable access to goods to Londoners.
112. Local Plan paragraph 3.20 'Retailing' highlights that retail contributes to the City's vitality and provides important services to the City's communities. The Plan identifies that Fleet Street is one of the City's Principal Shopping Centres with new retail development not compromise the City's primary business function.
113. Policy CS20 'Retailing' is supportive of new retail where it is provided within Principal Shopping Centres, in the way of achieving the target of the gross increase in relation floorspace by at least 136,000m² by 2026.

114. Within the Emerging City Plan Strategic Policy S22 'Fleet Street and Ludgate' outlines that the City are supportive of complementary retail units in the predominantly office location which enhance the areas rich heritage and culture. Moreover, the policy sites that the retention of retail within Fleet Street is supported where it encourages a greater diversity of retail.
115. The proposal seeks to create active frontages through the re-provision of retail, specifically located in the north western area of the Site. The proposal seeks to create 391.85 sqm of retail space which will reinvigorate the ground floor. The primary retail unit which this application proposes is the new print/bookshop on Fleet Street giving nod to Fleet Street historic link to the print industry.
116. The proposed retail provision as part of this application is supported by both the adopted and emerging policy at both the London and local level. The provision of retail which is proposed compliments the mix of uses on the Site, giving nod to Fleet Street's rich heritage and connections to the print industry.

Student Accommodation Use

117. In considering the student housing element, regard must be had to the need for student housing, the suitability of the site for delivering student housing and the quality of accommodation that would be delivered.
118. London Plan policy H15 encourages the development of purpose-built student accommodation to meet demand in London.
119. Local Plan Policy DM21.7 and draft City Plan Policy H6 states that student accommodation would be acceptable where it would not prejudice the primary business function of the City, result in the loss of office (contrary to Local Plan Policy DM1.1), result in an excessive concentration of student accommodation, or have an adverse impact on the residential amenity of the area. Policy DM21.7 also states that proposals for purpose-built student accommodation should be supported by identified further or higher educational institutions operating in the City of London or CAZ.
120. London Plan Policy SD5 and Local Plan Policy DM21.1 states that residential development is not appropriate in defined parts of the City of London. The Local Plan identifies clustered locations for the delivery of future housing developments. The Local Plan recognises that a thriving residential community contributes to the City of London's vitality and makes it livelier and safer outside working hours.
121. The proposal would deliver 856 rooms of Purpose-Built Student Accommodation with ancillary communal spaces and external roof terraces.

The accommodation and ancillary spaces would be provided over 9 floors above ground floor level. The 856 rooms would provide a mix of bedroom types including studios and cluster apartments, with 10% proposed to be wheelchair accessible. 35% of the units will be affordable, provided at a rent level capped by the Mayor of London, in line with London Plan policy H15.

122. It is considered that the proposal would not result in a development which would prejudice the primary business function of the City and consider the proposal acceptable in this regard.
123. The proposed development would not result in a loss of viable office accommodation and would not be contrary to Policy DM1.1 for the reasons set out in the above section of this report.
124. Student accommodation contributes towards the City's housing target at a ratio of 2.5 student flats to 1 permanent residential dwelling. Therefore, the provision of 856 student flats would count as 342 residential units towards the City's housing land supply and delivery target.
125. The City's annual housing target is 146 dwellings per annum, therefore, 342 dwellings from this development proposals would equate to just over 2 year's housing supply.
126. The applicant has submitted an Economic Benefits Statement which as well as the wider benefits of the scheme also includes the added value generated by student accommodation. It states that students spend off campus on a variety of goods and services including food, clothing, bars and cafes and that the presence of students in any particular area often coincides with the presence of retail and retail services which can add to the vibrancy and vitality of high streets and increase weekend and evening activity in an area making a valuable contribution to the wider economy as well as helping to support a safer and more welcoming area at night. The statement advises that the development could generate up to £10.2m in student spending every year thus supporting a total of 43 FTE (28 direct jobs and 14 indirect) jobs.
127. A draft Student Management Plan has been submitted which addresses traffic management, out of hours emergency management, security, working with neighbours to minimise disturbance, code of behaviour and conduct for students and refuse/waste management. The student housing will be managed 24/7 by a dedicated operator, by 9 full-time staff and contracted cleaning and security services.
128. Environmental Health have reviewed this application and have not raised any objection on the grounds of noise or disturbance to nearby occupants.

129. The City Police have reviewed the application and consider the scheme to be acceptable in general but have raised a number of issues regarding the development, which could directly impact on the safety and security of the build and have a likelihood of affecting the community. With the inclusion of the proposed development, there may be an increase in the opportunity for crime in this area based on current crime statistics in the local area. Given the extent of development in close proximity to the application site, City Police have commented that it is essential that this site is held in keeping with the high standards of security and maintenance of neighbouring buildings, one of note will be the Salisbury Square development, housing the new Police Headquarters and Courts within the City of London. Internally within the site, City Police have recommended further compartmentation to ensure that penetration into the site would be limited.
130. Due to the high number of student domiciles that have been proposed to be included into the development, City of London Police commented that it would be appropriate and proportionate to apply a condition of build to the project, that they secure a minimum of Silver Award certificate of secured by design for homes. This will help to ensure that the residents and common users will have an enhanced feeling of safety and security inside of their abodes. City Police note that that new student accommodation that has achieved Secured By Design have seen a dramatically lower crime output that comparable sites without accreditation. Older adjacent sites within the local area of Fleet Street have seen the introduction of retrofitted additional security measures. The security measures that have been introduced would draw an inference that they were necessary to safeguard residents and commercial buildings due to reported crime and antisocial behaviour within the area.
131. As such, it is considered that a condition to require the submission of details regarding the opportunities to design out crime are to be submitted for consideration by the City of London Police. The proposed conditions are in keeping with the City of London Local Plan 2015 and proposed Plan for 2040.
132. Officers consider that there would not be an unacceptable impact on the amenity of nearby residential properties and that there would unlikely be a significant rise in anti-social behaviour as a result of the student accommodation if the accommodation were to be run in accordance with a Student Accommodation Management Plan. Officers consider that as part of the final Student Accommodation Management Plan a strategy to ensure litter in and around the student accommodation is managed adequately.
133. If permission were to be granted a detailed Student Accommodation Management Plan would be required as part of the Section 106 Agreement

to ensure a detailed and ongoing management of the student accommodation is provided.

134. Officers consider that there would not be an unacceptable concentration of student accommodation in this area.
135. Proposals for student housing must be supported by identified further or higher educational institutions operating in the Central Activities Zone and provide accommodation for their own students.
136. The applicants have commissioned a Student Housing Supply and Demand Study which concludes that London's supply of Purpose Built Student Housing (PBSH) does not meet the accommodation needs to house London's students, with approximately 131,000 students having to find accommodation outside of the PBSH sector.
137. The applicant is currently engaging with local Higher Educational Institutions with an interest in securing at least a majority of the rooms at the proposed development. These discussions draw from the applicants' recent experience engaging with institutions to deliver other schemes in London.
138. The applicants will need to ensure an arrangement for nomination rights with an appropriate higher education provider is secured for all of the proposed housing units prior to occupation through a S106 agreement in line with Policy DM21.7.
139. Policy H15(A)(5) of the London Plan requires that student accommodation provides adequate functional living space and layout. Local Plan Policies DM21.1(Location of New Housing) states new housing (including student accommodation) will only be permitted where development would not result in poor residential amenity within existing and proposed development.
140. The student accommodation element will be accessed via the ground floor for both the northern and southern element of the building. As well as the student rooms there will also be communal amenity space for students. The spaces which are for communal use have been designed to provide a series of thought through and consciousness spaces fitted to meet the needs of the students and equate to 2.05sqm per student, which is above the national average (premium) of 1.89sqm.
141. The internal daylight and sunlight conditions of student spaces and rooms contributes to the amenity of these space. The applicants have submitted an internal daylight/sunlight assessment of the building, including student bedrooms and communal spaces. It is expected that not all rooms would meet the criteria set out by the BRE guidelines. Officers are concerned about the results achieved by a number of rooms, particularly those on the

lower ground floor levels and overlooking the internal atrium, but it is reasonable to expect the rooms to fall below guidance in the dense city centre location.

142. Officers consider that the building design has been optimised, particularly with regards the fenestration, to allow for the most reasonable light levels to the rooms whilst also successfully overcoming concerns around overheating in the building. The compromise between daylight levels and overheating is finely balanced and Officers consider that the applicant has successfully achieved the right balance in this difficult context. Further, it is considered that the access to well-lit communal spaces including indoor amenity and outdoor terrace spaces would satisfactorily offset the lower-than-expected levels of daylight and sunlight in some rooms, with the prospective students receiving an acceptable level of amenity from these spaces and their rooms combined. It should also be considered that the room layouts are recommended to be optimised with desks in front of the windows to enhance the light levels available for study (secured by condition), and that the students would spend a good portion of their time away at their university campus.
143. As such, officers are satisfied that the internal daylight and sunlight achieved into student bedrooms would be acceptable in this instance as student rooms can be optimised through layout and students will have access to a diverse range of amenity spaces within the building.
144. The development would provide one main external communal amenity space on Level 10 as part of the proposed terrace offering. Other amenity space is proposed on lower ground floor level. The internal student amenities have been designed to promote neurodiversity through the provision of a variety of uses and space ranging from intimate to open plan areas to suit a wide range of student needs. The detailed design for student accommodation terraces, public realm and lower ground amenity associated with the cultural space should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users.
145. Provision is made for a range of amenities in the generous internal amenity space including lounges, study rooms, private dining spaces, cinema, gym, gaming room, karaoke room and music room.
146. Whilst there are no space standards for student accommodation, the development is considered to be fit for purpose and provide for student well-being and activities, ensuring a range of high-quality and accessible, internal and external, communal amenity space. The provision of purpose built student accommodation in this mixed-use development would not prejudice the business function of the City, would not result in an excessive concentration of student housing and is not considered to have an adverse

impact on residential amenity of surrounding properties. Whilst the level of light to some of the rooms and kitchen areas would fall below BRE guidance, officers are of the view that students would have the option of using amenity, breakout and study areas located throughout the building, along with the use of accessible roof terraces. The proposals also include 35% affordable student bedspaces and provides for 10% accessible rooms. On balance, the purpose-built student accommodation would accord with London Plan Policy H15, Local Plan Policy, CS5 and DM21.7 and Draft City Plan Policy HS6 and S23.

Architecture, Urban Design and Public Realm

Policy Context

147. The relevant Adopted Local Plan (2015) policies for consideration are CS10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.5, DM10.6, DM10.8, CS16, DM16.2, CS19, DM19.1 and DM19.2; emerging Local Plan policies HL1, S5, RE1, RE2, S8, DE2, DE3, DE5, DE8, S10 and AT1; and London Plan (2021) policies D3, D4, D5 and D8. This is in addition to the relevant sections of the National Planning Policy Framework as well as the National Design Guide.

Existing Site and the Surrounding Townscape Context

148. The subject site at 65 Fleet Street comprises two blocks of commercial buildings on the southern side of Fleet Street. The site is bounded by Fleet Street to the north; Whitefriars Street to the east; Magpie Alley and Ashentree Court to the south; and Bouverie Street to the west. The two blocks are dissected by an east-west pedestrian route and courtyard between Whitefriars Street and Bouverie Street, which is also linked to Fleet Street via an archway. This route has been closed since the building was vacated following the Covid Pandemic and is in a state of disrepair.
149. The subject site comprises one larger commercial building which forms the southern block of the site, and a smaller commercial building with retail at base forming the northern block. The two blocks resulted from an extensive comprehensive redevelopment of the site in 1989/90 by YRM Architects as part of the then known "Whitefriars Scheme". The building replaced the former News of the World Headquarters following their relocation to Wapping.
150. The northern block of the site is located within the Fleet Street Conservation Area, whilst the southern block is not located within a conservation area. The southern boundary of the site abuts the Whitefriars Conservation Area, whilst the Temples Conservation Area is located to the west. The

development site is visible in views into and out of these surrounding conservation areas.

151. The site itself contains two Grade II listed buildings. The Tipperary Public House (No.66 Fleet Street) sits within the northern block of the site as a standalone building. The Remains of the Former Whitefriars Convent are located within the basement of the southern block – on the south eastern corner, alongside Magpie Alley / Ashentree Court. In addition, the site is located within the context of numerous other listed buildings assessed within the Heritage section of this report.
152. The smaller northern block faces directly onto Fleet Street and comprises a G+4 Storey (and basement) building with a height of 33.8m AOD. The northern block is integrated into the retained facades of Nos.63 and 67 Fleet Street which predate the YRM scheme, whilst No.66 (The Grade II Listed Tipperary) remains as a standalone element separate to the rest of the commercial building. Nos.64 and 65 are the only elements with a later façade associated with the YRM scheme, with an archway located at ground floor level of No.65 providing access to the southern block. Both Nos.63 and 67 provide robust, stone bookends to the stylistically varied group of buildings that form the façade of the northern block and are considered to be Non-Designated Heritage Assets.
153. The Grade II listed Tipperary Pub was recently reopened after a prolonged period of closure following the Covid 19 pandemic. Light touch works have been made to the pub already associated with its re-opening, including like-for-like cosmetic changes such as new paint on the ground floor frontage. The upper floors of the pub (Level 2 and above) are currently in a state of disrepair, with no step free access to the upper floors nor is there public access beyond the first floor bar and second floor toilets.
154. The larger southern block comprises a large G+7 Storey (and 2 lower levels) building, with a height of 48.49m AOD, situated on the site of a former printing works. The building is of a postmodern style, with a steel frame composite structure clad in light and dark grey granite and metal. The building presently has extensive facades which feel monotonous given the lack of depth to the building and the use of the same granite materiality across the building.
155. The Grade II Whitefriars Crypt is located within the basement level of the southern building, in the south eastern corner accessed from Ashentree Court. The crypt dates to the 13th or 14th centuries and this is from where Whitefriars derives its name. As part of the YRM scheme the crypt was relocated and moved to its present location where it could be viewed by the public. However, the asset is currently uncelebrated at the rear of the site with no clear public access arrangements nor step free access. The public

can view the crypt through windows via a staircase down to the lightwell from Magpie Alley. This is considered to be a dark and uninviting space at present.

156. The subject site sits on the edge of a cluster of larger commercial buildings which sit to the east and south of the site. The subject site is located to the west of the Salisbury Square Development including Court, Police Headquarters and a Commercial Building development, which is currently under construction. To the south of the site is Northcliffe House, (Grade II) recently subject to a refurbishment providing best in class office accommodation. To the west and north, the townscape is modest and more traditional in character, with buildings of a variety of architectural styles varying in height up to eight storeys.
157. The later YRM buildings of the northern block (Nos. 64 and 65) alongside with the Southern Block are considered to be unremarkable, with no apparent potential for inherent architectural, historic or archaeological interest and is not identified as a non-designated heritage asset. Nos 63 and Nos 67 Fleet also within the development site are identified as non-designated heritage assets.
158. The YRM buildings are not identified as a non-designated heritage asset nor does the development contribute positively to the settings of nearby designated heritage assets. Their refurbishment is supported in principle from a design and heritage perspective.

Design Proposals

159. The proposals would comprise the retention of the two existing blocks on the site, with rooftop extensions and a new façade associated with its change of use from office to student accommodation with cultural floorspace at the lower ground floor.
160. Fleet Street is a dynamic area, having developed organically over time and has a 'loose fit' urban structure, eclectic in character and which has continuously evolved over time. The proposals are considered to be appropriately designed to be distinct yet complementary to the distinctive eclecticism and family of high quality buildings along Fleet Street and its surrounds. Whilst the proposals would not result in any change to the existing urban grain and building lines, new facades would bring design benefits to the Fleet Street Key Area of Change. The improved public realm provided within the plaza which sits between the northern and southern blocks would benefit from improvements, including new areas of soft landscaping and seating to create an intimate and tranquil space for the public to enjoy.

161. The proposals would result in improvements to The Tipperary pub following its recent reopening, however, external works would be limited to repair works to the façades and windows. Internally, more extensive works are proposed including a new connection to the neighbouring unit at No.67 to create a new dining area. In addition, a new kitchen and dining rooms at the upper floors with a new lift located at the rear are proposed to provide inclusive access for all. The full details and assessment of the internal works are set out within the Built Heritage section of this report.
162. The Whitefriars Crypt would be subject to significant improvements, with the asset currently uncelebrated at the rear of the site with no clear public access arrangements nor step free access. The public can view the crypt through windows via a staircase down to the lightwell from Magpie Alley.
163. The Crypt would be retained in its current position, following its relocation as part of 1988 YRM scheme, with a new prominent entrance to be provided on the southern elevation of the southern block facing onto Ashentree Court. A new mezzanine floor would be constructed with a platform lift providing step-free access to the asset, whilst a new structure would be constructed around the lightwell to allow for more internal space around the crypt. This would allow for exhibitions and displays of artefacts to accompany the Crypt to help support it as a new visitor destination. At ground level, a new glazed active frontage would be provided allowing the public to view the crypt at ground level from Magpie Alley and Ashentree Court, providing new animation to this presently inactive space. New signage and wayfinding would be provided, alongside historical interpretation with details to be secured via way of condition. Further details of the proposals impacting this asset are discussed within the Built Heritage section of this report.
164. The proposals seek to make the optimal use of land within a sensitive location partially within the Fleet Street Conservation Area and within the setting of the Whitefriars and Temples Conservation Areas alongside numerous listed buildings and the Temple Registered Historic Park and Garden. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate growth and would assist in the provision of providing additional student accommodation in an appropriate location in proximity to several Educational Institutions whilst retaining much of the host buildings. In this, the proposals would accord with Emerging City Plan Policy S22: Fleet Street and Ludgate; and London Plan Policies SD4 and SD6. It is also considered that the scheme would represent 'Good Growth' by design, in accordance with the Local Plan Good Growth Objectives GG1 – 6: growth which is socially, economically and environmentally inclusive.

Architecture

Northern Block:

Bulk, Height and Massing

165. The disposition of the final massing, bulk and overall expression of the northern block has been carefully considered in relation to key townscape views, with particular attention to views experienced from along Fleet Street and within the Fleet Street Conservation Area. These are discussed in further detail within the Heritage and Views section of this report.
166. The proposal would retain a significant proportion of the existing structure and as such the plan form of the northern block would follow the existing building lines. The greatest alterations to the bulk and massing come from the upward 2 storey extension increasing the height of the building from 33.8m AOD to 36.7m AOD. The existing fifth floor would be demolished, and three new upper floors would be constructed. The central lightwell of the building would remain, however, the lightwell to the rear of the Tipperary pub would be partially infilled.
167. The roof top extension would take the form of a double height mansard roof uniting the different facades of the building, whilst the uppermost part of the roof would be set back to reduce visual impacts and ensure subservience. The roof form would be slightly set forward or back with parapet walls included to accentuate the individuality of the plots and facades below. The roof extension would be recessed to retain the historic roof form of the frontage of the Grade II listed pub, to allow for this asset to be appreciated in its current standalone form.
168. The total increase in bulk and height of the northern building is considered to be moderate and maintain a commensurate scale with the surrounding townscape found along Fleet Street. It would have a recessive character in oblique views along Fleet Street and the roof extensions would appear proportionate to the levels below when viewed directly from closer viewpoints. The retention of the narrow widths of the facades reflects the wider historic character of plots along Fleet Street, which have developed over time in an organic, piecemeal manner.

Expression and Materiality

169. There has been a considered approach to the detailed design of the northern block, owing to its sensitive location on the southern side of Fleet Street. The character and expression of the block has been designed to respond to the variety of narrow fronted facades traditionally found along Fleet Street, with the facades of the Grade II Listed The Tipperary pub retained as existing with minor alterations associated with repairs.

170. The retained façade of No.63 Fleet Street, located on the junction with Bouverie Street, would largely be retained as existing with no changes proposed on the northern elevation. On the western elevation a secondary door would be replaced with a window to match the design of other elements of this facade's fenestration. The roof to this façade, which is non-original and associated with the 1988 redevelopment, would be demolished and replaced with a double height mansard roof extension. Dormer windows would be set within the roof, providing visual interest with the fenestration language referencing the crissall windows found on the façade below, and are considered to provide an appropriate termination to this façade that has a good traditional hierarchy.
171. The proposals involve the complete façade replacement of Nos.64 and 65 Fleet Street which sit at the centre of the northern elevation of the northern block. The existing post-modern design of the façade and granite materiality is somewhat at odds with the predominant traditional, classical style found elsewhere on Fleet Street. The new Portland stone façade would retain a shopfront window at the ground floor of No.64 providing activation and animation to the street, whilst the upper floors would include a regular rhythm of windows that run up to the double height mansard roof of the building. The materiality is considered to be more appropriate and complementary to its context within the Fleet Street Conservation Area.
172. The existing archway under No.65 which provides access to the southern block is presently a dark, uninviting space as a result of its lighting and materiality. As part of the proposals, the generous double height size of the opening would be retained but with a simplified geometry to provide an elevated experience and lighter / clearer route into the courtyard beyond. A new muted green faience would delineate the passageway in an expressive but simplified manner, providing a nod to the adjoining Tipperary and a subtle contrast to the natural stone elevation it would sit within. This would be accompanied by subtle lighting and signage. The materiality is considered to be high quality and durable, pertinent given its presence at ground floor level where the building is most closely interacted with.
173. Within the archway itself, new areas of glazing and entrances are included which will create a more outward facing and visually permeable space thus increasing activation and animation. On the eastern elevation of the passageway, new public art with references to the Whitefriars Crypt will provide further additional visual interest with details of this to be secured by condition. The main entrance to the student accommodation element on the upper floors of the northern block would be provided on the western side of the passageway alongside new windows into the ground floor retail unit on the north western corner. The cycle parking entrance would also be provided in this space. The area would also be available for patrons of The Tipperary pub to use as a covered external space. Overall, Officers consider

the changes that inject moments of playful vibrancy and animation into the passageway of the building which is currently hostile, dark and unwelcoming to be beneficial and are welcomed. Final details of these works, including materials and shopfront designs, would be secured via way of condition.

174. On the upper floors above the archway, new slimer windows and a vertical focus of the architectural articulation help demarcate the archway located below and give a sense of elegance to the robust materiality of the building. A Portland stone coping would be located above the third floor of No.64 / 65 which will link onto the datum of the existing retained façade of No.63. At fourth floor level, the fenestration language of this element of the building would change to give a more recessive and subordinate appearance to the top of the building.
175. As with No.63, the existing roofs of No.64 / 65 would be demolished and replaced with a new double height mansard with slimline dormers to reflect the fenestration pattern below. There would be variation in the roofline to reflect the variation between the two façades below, with a change in the roof line resulting in the roof of No.64 sitting slightly below that of No.65 to reflect its more subordinate nature. Furthermore, a darker green slate tile would be used on No.65 with a paler green slate tile on No.64 alongside a raised stone parapet delineating the two elements. Full details of the dormers and roof materiality would be secured via way of condition.
176. With regard to the Grade II Listed Tipperary pub at No.66 Fleet Street, the façade will be retained as existing with no significant changes proposed. The upper floor windows would be refurbished on a like-for-like basis with the original roof retained in situ. A single storey mansard roof extension would be setback from the building line and the original pitched roof at the front of the pub, clad in traditional clay heritage roof tiles with two smaller dormers to match the modest nature of this façade. The internal works are detailed within the Built Heritage section of this report.
177. The final element forming the northern elevation of the northern block comprises the retained façade of No.67 Fleet Street. The roof including the existing dormers to this elevation would be demolished, and an additional storey clad in Portland stone to match the existing would be added above the existing datum. At roof level, this element would also benefit from a part single storey, part double storey mansard roof extension – with the double storey mansard located on the eastern elevation. The single storey element would adjoin the Tipperary pub, thus the single element reduces visual discordance. The ground floor would retain its active frontage, providing animation on this busy street corner on Fleet Street and down along Whitefriars Street. The lower dormers would take reference from the existing dormers of the building, whilst the upper windows would be flush with the roof plane to ensure subservience.

178. The southern elevation of the northern block facing onto the courtyard would be subject to an entire façade replacement, with the existing postmodern design associated with the 1980s YRM scheme reimagined with the same design principles as those found on the northern elevation of Nos.64/65, continuing the same architectural language through the archway and into the public space and providing a cohesive connection to the architectural language of the southern block it sits opposite too.
179. Granite reclaimed from the existing façade system of the building would be used to delineate the base of the building, providing a high quality and sustainable materiality to the element of the building that is experienced at ground level. The archway would be finished in a muted green faience to match the appearance found on the northern elevation, with a simplified geometry. The active frontage on the southern eastern corner would be retained, providing animation. However, the active frontage on the south western corner would be removed in order to accommodate a new blue badge parking bay. Whilst the loss of this activation is suboptimal, given the animation provided by the active frontage opposite on the southern block and the provision of infrastructure to support inclusive access at the site this is considered to be acceptable.
180. At middle, the fenestration pattern of the building would be retained, with new clear glazing replacing the postmodern pastiche crittall windows. The façade would be replaced, with a new GRC finish in a Portland stone style which provide a lighter materiality to the courtyard which is a shaded space and the existing dark granite materiality presently accentuates this darkness. The use of GRC in a Portland stone is considered to be acceptable owing to its locations at the upper floors, whilst its finish would reflect the predominant Portland stone materiality of the Fleet Street Conservation Area.
181. Metal railings would be installed onto the structure to provide visual interest and depth to the building above the archway, to further delineate this feature below improving legibility and acting as a focal point to this elevation. The roof form would take a double mansard roof to match that found on the northern elevation, punched with dormers to provide further visual interest and provide hierarchy. The additional storey set back at the top of the building would ensure a recessive and subordinate appearance, and ensures no further enclosure of the courtyard which is already an enclosed, shaded space.
182. In terms of the ground floor units, 3 smaller retail units on the western side of the northern block facing onto Fleet Street and Bouverie Street would be amalgamated into one larger unit. This is proposed to make the unit more viable, whilst part of the retail unit facing onto Bouverie Street would be lost

to the inclusion of the blue badge bay for the student accommodation. Nonetheless, the merging of the units would allow for the retention of the rest of the active frontage on Bouverie Street and Fleet Street whilst introducing new areas of active frontage within the covered passageway which is presently inactive.

183. Furthermore, a new connection would be made between the Tipperary and the adjoining ground floor unit of No.67 facing onto Whitefriars Street. This would enable a new dining area to help sustain the operation of the listed pub, which would retain its historic bar and whiskey bar in the existing footprint.
184. The roof of the building has been designed to integrate a bisolar and brown roof, with a green roof on the lift core. There would be no additional accretions on the roof form of this block, ensuring there would be no additional visual impacts from views along Fleet Street. As the roofscape would be visible from surrounding taller buildings, further details will be conditioned to ensure that the roofscape is of a high quality.

Southern Block:

Bulk, Height and Massing

185. The height, massing and overall expression of the development has been carefully considered in relation to key townscape views, with particular attention to views experience from within the Temples Conservation Area and from the River Thames. These are discussed in the following section of the report.
186. The proposal would retain a significant proportion of the existing structure of the southern block, and as such as 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, which will see an additional 4 storeys plus plant taking the height of the building to 55.465m AOD, following the demolition of the top storey and plant of the existing building.
187. The appropriateness of extending the existing southern building at the site with additional bulk, height and massing was analysed under planning permissions 19/00058/FULMAJ (subject to amendments via Section 73 application 21/00709/FULMAJ) based on a rigorous assessment of views and impacts on surrounding heritage assets. The principle of additional height on the southern block was considered to be acceptable. However, the proposals subject to this application present a slight level of additional height and this is assessed below. Whilst the subject proposals contain a number of extra floors than the previously consented office accommodation

scheme, this has been accommodated in a broadly similar height envelope as a result of the lower floor to ceiling heights required by student accommodation.

188. At a macro level, the City steps down in building scale from Holborn towards the river and the proposed extensions to the existing southern building would integrate into this traditional historic urban layering as experienced from the South Bank and river bridges. At a local level, the proposals would have limited visibility owing to the narrow nature of the streets. This would mitigate the impacts of the proposal, however, the stepping back at each level of the roof extension would further reduce the impact in glimpsed views from the immediate surrounds.
189. To help reduce the visual impact of the proposals, a number of design interventions have been made. The roof extension would be set back progressively at each floor as you move up the building at levels 08 – 10, ensuring it appears recessive. Furthermore, a gradation of green tones to the PPC cladding would lighten towards the top of the building further ensuring subservience. This green metallic finish would provide a crown to the building, particularly in longer views from the Temples, South Bank and bridges across the Thames.
190. In addition, the proposals incorporate features to further articulate and break down the bulk and massing of the extension. The existing setbacks which break down the existing façade would be carried up to the top of the building, breaking down the massing and reducing the horizontality of the proposals. In addition, the fluted nature of the façade system with its expressed coping would provide visual interest and would extenuate shadows providing depth. The corners of the roof extension would be softened to reduce its impacts. Planting would be incorporated onto the roof terrace to provide a softer termination to the building, whilst there would be a glazed balustrade over 2m high to ensure student safety in line with the aspirations of the City of London Suicide Prevention Planning Guidance.
191. Amendments were secured following the planning submission which have seen a reduction in the bulk and massing of the upper extension of the southern block. The student rooms proposed on the tenth floor have been removed, to deduct a significant amount of bulk and massing of this storey in order to reduce impacts on surrounding heritage assets - particularly the Temples Conservation Area and the listed buildings along Kings Bench Walk. As a result, Level 10 now only proposes to provide access to an external amenity terrace as well as containing some plant, requiring a smaller scale extension at this level.
192. As a result of the retention of the main body of the building, limited interventions have been proposed for the bulk and massing of the base and

middle of the building. The most substantial intervention at base incorporates the extension of the building over the rear lightwell on Ashentree Court to provide more circulation space for the Whitefriars Crypt.

193. The extension around the Whitefriars Crypt would take a single storey form, with reclaimed granite from the existing building facing the walls including articulation from reclaimed textured granite. The extension would feel lightweight with large amounts of glazing to allow passersby to look into the crypt, with CLT flitch piers. This modest extension is considered to be of an appropriate scale to the intimate alley it would sit within, sitting comfortably within its context.
194. Visual impacts are further mitigated by the facade detailing and the introduction of different colour tones through the façade – discussed in detail in the following section.

Expression and Materiality

195. Whilst as a result of the retention of the main body of the building meaning that limited articulation interventions could be achieved to help break down its bulk and massing, there has been a considered approach to the design detail of the proposals.
196. Owing to the buildings location in the context of several designated heritage assets, including three Conservation Areas, the character and expression of the building has been designed to help mitigate its visual impacts whilst having a good level of articulation and visual interest through its fenestration and materiality. The building has been given a clear base, middle and top as set out below.

Base:

197. The base of the building would be clearly defined with the use of reclaimed dark grey granite which would be re-used from the existing façade ensuring a sense of robustness to the structure. This would cover the ground floor and lower ground floor, covering two storeys at the south of the building owing to the level change across the site. The existing lightwells would be retained, with the metal railings with an anodic finish to match the fenestration of the building. This would provide depth to the base and visual interest along Whitefriars Street and Bouverie Street. Visual interest would be provided with the set back breaks in the façade retained, and reclad in textured PPC metal cladding in a dark green finish which would rise up the building to the crown. This would break down the façade into three bays along Bouverie Street and Whitefriars Street, and two bays on the northern elevation.

198. The main entrance to the cultural element of the development would be centered on the northern elevation, in the place of the existing entrance, facing onto the central courtyard. This would provide level access to the cultural space, ensuring inclusivity to all, whilst the northern eastern section of the building would accommodate a reception space for the cultural occupier and an exhibition space. A secondary entrance to the student accommodation element of the scheme would also be located on this elevation, providing further activation.
199. The main entrance to the student accommodation would be located on the western elevation of the building, facing onto Bouverie Street and accessed via a small bridge link across the existing lightwell. This would provide new activation and animation to this frontage which presently does not benefit from much activity.
200. To the south of the building, a new entrance for the Whitefriars Crypt would provide new active frontage on this presently underutilised and uncelebrated space. The simple design of the new single storey extension around the Crypt with timber piers would enliven the base of the building in this location, whilst respecting the sensitive heritage asset it would surround. Full details of the final design, materiality, signage and lighting would be secured via condition.
201. The existing service bay would be retained in its current position in the south east of the site, facing onto Whitefriars Street. No significant design changes are proposed for this element.
202. The proposed ground floor elevations would see an increase in the amount of outward facing and visually permeable frontage around the site, allowing passers-by to look into the new cultural spaces and reception areas. Overall, officers consider that the proposals adaptations to the ground floors would provide greater animation and enhance the quality of the central courtyard, surrounding streets and alleyways and significantly improve the design quality of the base of the building. A condition would be applied to the application to ensure glazing remains clear and transparent to enable views into the public elements of the base of the building.

Middle:

203. Each elevation of the building would follow the same design principles as each other and are broken down into bays, with the existing setback breaks retained. The bays would be finished in a GRC with a Portland stone style textured finish which lighten the building, and appear more complementary to the architecture of the surrounding conservation areas. The setback breaks would be finished in a dark green metallic finish, which would provide a striking contrast to the light GRC thus breaking down the monotony of the existing building extensive elevations further. These setbacks would rise up

to the crown of the building. New horizontal bands would run around the building with a ribbed textured finish providing additional articulation and depth to the façade which is presently very flat. The datums would be thicker at each shoulder height datum where the building sets back slightly at Levels 03, 04 and 07.

204. A new fenestration pattern would be added to the façade with a regular rhythm of new larger openings, with integrated ventilation side panels providing natural ventilation without endangering student safety. The window has been designed to maximise natural light, yet prevent overheating. The windows would be within a metal frame, with darker finish to the lower floors and a lighter finish to the main body to fit more comfortably within the wider materiality. The upper three storeys of the middle of the building would see a variation in the fenestration with an increase in slimmer windows giving a more recessive and subordinate appearance to the top of the building.
205. The existing metal framed balcony structures which are unusable and cover most of the building would be removed, leaving a simpler façade without overly fussy detailing allowing the new façade to speak more strongly. Decorative metal railings would be retained on levels 2 – 4 on the western and eastern elevations to provide some depth, articulation and finish to these elevations. These would be finished in an anodised finish to match the fenestration language. Final details would be secured via way of condition.

Top:

206. The crown of the building would differentiate from the main body of the building through the use of a lightweight materiality to provide a more recessive appearance that contrasts with the robust main body below. The proposed use of metal cladding with a dark green colouration would link in with the setback breaks in the façade below providing a visual link between the main body and the crown. The colouration of the metal cladding would lighten from a dark green to a paler green gradually from Level 08 to 10, to further enhance the sense of subordination.
207. The cladding would be fluted to provide texture and depth that creates playful shadows, with coping at each parapet to ensure strong datums to terminate the building. The fluting includes a bird mouth at each junction to soften the corners of the building, whilst the PPC finished would be textured to provide further depth. The use of the green colour would be reflected with green frames to the fenestration to match the gradation of colours as you move up the building. This will particularly help crown the building in long views from The Temples and the South Bank, where it would integrate more comfortably in the wider roofscape which includes numerous copper crowned buildings.

208. The fenestration of the crown would further differentiate to the main body to give this element of the building a more subordinate, attics treatment. The crown of the building incorporates the plant with metal louvers screening equipment, ensuring a well-integrated and seamless finish in long views of the development.
209. Finally, the top of the building has been designed to incorporate a landscaped amenity terrace for the use of the students with glazed balustrading integrated into the design to ensure their safety. These balustrades would be set within from the buildings edge to ensure visual impacts are reduced. The balustrades would be 2.1m in height to ensure it accords with the City of London Suicide Prevention Guidance. On top of the lift and service, a biodiverse green roof would be incorporated into the design alongside the brown roofs located on the setback levels below as well as around the Level 10 amenity terrace. Further details of this element of the proposal are to be secured by way of condition.

Other Matters:

210. Irrespective of the submitted drawings, full details of the ground floor frontages, design and materiality of the public realm improvements, and way finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayors Public London Charter promoting a safe, inclusive and welcoming environment.
211. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the context, responding to public safety and enhancing the unique character of the City by night. A detailed Lighting Strategy would be subject to condition to ensure final detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The proposed public realm lighting strategy would provide low level illumination to architectural and landscape features, to enhance the pedestrian experience and improve safety.
212. A high-quality signage and wayfinding strategy for the proposal would be required and would be secured via condition.
213. Officers acknowledge the concerns raised by the City of London Conservation Area Advisory Committee in relation to the use of GRC as one of the materials on the southern block. The material is already found throughout the City, and the elements of the scheme which contain this material are not within an Conservation Area. Furthermore, GRC would be limited to parts of the façade that are not experienced or interacted with at

street level – all located at first floor level and above – with reused marble from the existing building at ground floor level. Conditions have been attached requiring details and samples of all external materials to be used on the scheme to ensure they are robust and high quality, including sample panels at a scale of 1:1.

Urban Design and Public Realm

214. The layout of the ground floor of the Northern block of the site would largely retain the existing active frontage and different uses contributing to the variety of activity found along Fleet Street and contributing to its role as a Principal Shopping Centre as designated within the emerging Local Plan Policy RE1. The retention of these existing active frontages, alongside the addition of new further areas of animation to both the northern and southern blocks would help generate additional activity at ground floor level, positively stitching the site into the wider urban grain. The improvements to the public space would contribute to an urban structure characteristic of the city, with streets, courts and public spaces which are welcoming, convenient to use and attractive. The proposals present compliance with London Plan Policy D3 and Local Plan Policies CS10, DM10.1 and DM10.4, by offering spaces that positively respond to the character, distinctiveness, scale and appearance of the City's Public Realm.
215. The existing courtyard which dissects the two blocks is of a poor quality, with no soft landscaping and is not presently open to public use with limited step free access. The space does not afford itself to encourage activity and vibrancy, with a sparse, harsh and dark environment. The proposals are considered to improve these conditions insofar as possible.
216. Within the proposals the public space would be refreshed with new areas of seating and soft landscaping provided with new York stone surfaces to provide a consistent language that aligns with the rest of the City's public spaces. The re-invigorated courtyard has been designed to become a new dwell space, providing a quieter and intimate space away from the hustle and bustle of Fleet Street. The space will form part of a new network of spaces and passageways which will run between the site and the St Brides institute through the new court development with enhanced wayfinding and greening. In addition, the changes to the public courtyard will see the inclusion of new step free access between the space and Whitefriars Street to the north via the inclusion of a new platform lift. The existing gates would be removed to allow for clear public access at all times, increasing the sense of publicness and openness of the space for all to use. Overall, the proposals are considered to be compliant with London Plan Policy D3 and D8 and Local Plan Policies CS10, DM10.1 and DM10.4, by creating public spaces that have a positive relationship with their context and the proposed building.

217. In addition to the retained active frontages on the northern elevation, the secondary frontages of the northern block facing onto Bouverie Street and Whitefriars Street would be retained as existing. Within the archway between Fleet Street and the courtyard, new areas of glazing and entrances would be provided resulting in furthering activation and animation.
218. The existing main entrance of the southern block, facing onto the courtyard, would be reused as a new entrance to the cultural spaces found at Lower Ground Floor level. An additional secondary entrance would be provided for the student accommodation on the northern elevation, whilst the main entrance to the student accommodation reception would be provided via a new entrance on Bouverie Street providing new activation on this elevation. In addition, new activation would be provided on the southern elevation within Ashentree Court to provide new public access to the Whitefriars Crypt. This would result in a significant betterment to the existing situation, where this alleyway has no animation at present.
219. The mixed use nature of the proposals would result in a positive contribution to the vibrancy and activity of the area, offering social and economic benefits that align with the nature of Fleet Street as an important thoroughfare and place of commerce within the City. The provision of retail units on the Fleet Street elevation of the northern block alongside a two new entrances for the cultural uses in addition to the student accommodation reception on the southern block would promote activity at different times of the day and on different days of the week, appealing to a range of audiences and attracting a diverse range of users to the site. Altogether, the proposals would provide high quality public realm, alongside more pedestrian-focused streets which promote active travel and are comfortable, convenient and attractive, in accordance with London Plan Policy D3 and City Plan Policy S8 and Local Plan Policies CS10, DM10.1 and DM10.4.
220. An appropriate management of the public realm would be ensured via a Public Realm Management Plan. This will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8 and guidance in the Public London Charter.
221. The proposal would deliver green infrastructure, optimising the quantum and planting palette in a manner which is human-centred, seeking to improve health and wellbeing, landscaping in the public space would transform what is currently a hardscaped environment. Final details, including planting palettes, specifications and fit out, are reserved by condition with the intent to optimise the inherent biodiversity and wellbeing benefits, in accordance

with London Plan Policy D3 and D8 and Local Plan Policies CS10, DM10.1 and DM10.4.

222. The proposed materials would be robust and high quality, with the final details of surface materials and specification of street furniture to be reserved for condition. The use of Yorkstone paving in the public realm would read as a continuation of the surface treatment on adjacent streets and spaces, helping to suggest to pedestrians that the space is publicly accessible. This would be a betterment to the existing poor quality confusing mix of paving found in the existing space. The new public realm would be a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Technical Guide, with final detail reserved for condition. The overall materiality of the public realm would have a coordinated design aesthetic and overall the proposals are considered to be acceptable.
223. An appropriate management, curation and programming of the public realm, both internal and external, would be ensured via section 106. A Public Realm Management Plan and Cultural Implementation Strategy will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8(H) and guidance in the Public London Charter.

Outdoor Amenity Space and Landscaping Design

224. Two different outdoor amenity spaces are proposed at 65 Fleet Street, with the primary communal amenity space for students located at Roof Level 10, with an additional secondary amenity space located within the Lower Ground lightwell of the public courtyard for the use of the cultural tenant.
225. The Level 10 Roof Terrace would be accessed from the central stair and lift core and would provide an elevated terrace with views over Central London for the use of students. The space would incorporate planters, pergolas, fixed and unfixed furniture to provide a range of flexible spaces while ensuring inclusivity and safety. Both a mix of sociable spaces with raised seating for group gatherings as well as quieter, intimate spaces for activities such as studying would be provided. The glazed balustrade of the terrace would be 2.1 metres in height and set back from the building line in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. Further detail regarding suicide prevention, inclusivity and landscaping would be secured via condition.
226. The Lower Ground amenity space would provide a breakout space for the use of the Lower Ground tenants with a central specimen tree to provide

amenity and a mix of fixed and unfixed furniture. The soft landscaping for this element would be of a shade tolerant mix better suited to this shaded location. Further detail of landscape design including inclusive design would be secured via condition.

227. In addition to the accessible amenity spaces, the proposals also incorporate brown roofs seeded with a wildflower mix at Levels 00 within the central lightwell and at Roof Levels 07 of the northern block and Roof Levels 08, 10 and 11 of the southern block. A green roof would be provided atop of the lift overruns. Climbers have not been incorporated on to any of the structure in line with fire regulation requirements for residential accommodation. The inclusion of these additional planted areas are considered to be significant betterment to the existing situation at the site.
228. Notwithstanding the approved drawings, the final details of the landscaping including full planting specifications, hard and soft materials, furniture, maintenance regime and irrigation, in accordance with the City of London Technical Toolkit, will be conditioned to ensure that the design and materials are of a high quality, so the landscape thrives and is of acceptable design quality and is full inclusive.
229. Appropriate lighting, in accordance with Local Plan Policy DM10.1, would deliver a sensitive and coordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City at night. Irrespective of the approved drawings, a detailed lighting strategy would be subject to condition to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with the guidance set out within the City of London Lighting Strategy.

Conclusion on Architecture and Urban Design

230. Officers consider that the architectural design of the proposals would be compatible with the existing context in terms of scale, architectural articulation and massing. The proposals are considered to result in a well layered piece of design that would improve the buildings contribution to the local townscape. The ground floors of the building would become more outward facing with new areas of active frontage, particularly on the southern elevation and within the arched passageway under the northern block. Similarly, the proposals would unlock for the Whitefriars Crypt for better public viewing as well as enhancing the landscaping within the site, providing richer planting and new opportunities for siting within the courtyard which would be reopened for public access. The proposals optimise the use of land, whilst improve the buildings interface with their surroundings.

231. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises site capacity to accommodate a student accommodation development alongside ground floor retail, food & beverage and cultural uses which would contribute to the Destination City objectives and support the regeneration of Fleet Street. The proposals are considered to be in accordance with Emerging City Plan Policy S22; and London Plan Policies SD4 and SD6.
232. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, emerging City Plan Policy S8, S22 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6. The proposals would also align with the objectives of Destination City by improving the public realm and creating a new sense of place in this part of the City of London.
233. Irrespective of the approved drawings, full details of the frontages, design and materiality of the public realm improvements, and way-finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayor's Public London Charter promoting a safe, inclusive and welcoming environment.
234. A high-quality signage strategy for the proposal would be required and would be secured via condition.

Heritage & Strategic Views

Policy Context

235. The relevant Adopted Local Plan (2015) policies for consideration are CS12, DM12.1, DM12.2, DM12.3, DM12.5 and CS13; emerging City Plan 2040 policies S11, HE1 and S13; and London Plan (2021) policies HC1, HC2, HC3, HC4 and HC5. This is in addition to the relevant sections of the National Planning Policy Framework as well as the London View Management Framework and other relevant supplementary planning guidance including the City's Protected Views SPD.

Strategic Views

236. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG (the SPG), protect and

enhance views of historic City Landmarks and Skyline Features and secure an appropriate setting and backdrop to the Tower of London.

237. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. This has been supplemented by additional imagery during the planning application's assessment.
238. For clarity, the application site is located in the west of the City, at considerable distance from the World Heritage Site. Intervisibility between the two has been tested in the TVIA, confirming that the proposal would have no visual relationship with and would therefore have no impact upon the World Heritage Site.

Tower of London World Heritage Site

239. The site is not located within the Local Setting of the Tower of London and the proposal would share no intervisibility with the World Heritage Site in any of the Representative Views identified in the LVMF or the Local Setting Study.

London View Management Framework (LVMF) Impacts

240. The LVMF designates pan-London strategic views deemed to contribute to the Capital's character and identity at a strategic level. Those relevant strategic views where there would be a material impact are addressed here against London Plan Policy HC4 and associated guidance in the SPG.
241. The site falls outside of Protected Vistas in the LVMF and due to the relative low height would only appear in a few of the River Prospects, assessed below

LVMF 12A.1: Southwark Bridge: The Upstream Pavement

242. St Paul's Cathedral is the sole SIL, whilst other landmarks include Millennium Bridge and St Bride's Church in a broad riparian composition.
243. This view is located at the centre of Southwark Bridge and upstream and is dominated by St Paul's Cathedral. The visual management guidance paragraph 209 describes the broad expanse of the River dominated by the Cathedral. St Bride's Church is identified in the view and is referred to in paragraph 210 of the LVMF SPG as part of the layering of history in the view. Referring to HTVIA View 11, the proposed development would be positioned well to the right of Unilever House and, in the baseline scenario, would largely be occluded by 8 Salisbury Square and the emerging Police Headquarters at Salisbury Square any visibility would be limited to the

uppermost southern corner. As such, the proposal would be embedded with the established and recessive midrise buildings stepping down to the river.

244. In cumulative scenarios there would be no change to the impact of the proposed development on the composition of this view.
245. In accordance with the guidance, the limited visual presence of the proposal in baseline and cumulative scenarios would not harm the viewer's ability to recognise and appreciate the Cathedral or dominate it. The proposal would not obscure or detract from a contributing landmark or features and the distinctive vertical presence of St Bride's steeple would be unchallenged. The proposals would accord with the SPG paras 211-213.
246. LVMF view 12A.2 is orientated southwest, and the proposal would have no additional impact.
247. Overall, the proposal would not harm the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

LVMF 15 B.1 - 15B.2: Waterloo Bridge: The Downstream Pavement

248. LVMF 15B comprises two Assessment Points, 15B.1 and 15B.2 and the kinetic experience between them. It is an iconic London view with important views east towards St Paul's Cathedral and the City of London. St Paul's Cathedral is identified as the Strategically Important Landmark in this kinetic and iconic view in daytime and night-time. The visual management guidance paragraph 259 describes the broad expanse of the River how the eye is drawn towards Temple Gardens, St Paul's Cathedral and the City cluster. St Bride's Church (grade I), Old Bailey (grade II*) and the Barbican Towers (grade II) and Temple Gardens are identified in the view as recognisable buildings and elements on the skyline in the LVMF SPG.
249. There would be no impact on the ability to appreciate St Paul's Cathedral due to the distance from the site and overall the development would comply with the Visual Management Guidance set out in paragraphs 262-265 of the LVMF SPG.
250. In assessing the baseline impacts of the development to 15B.1 and 15B.2 (HTVIA Views 16 and 17) these are a kinetic viewing experience from this River Prospect, the development would be visible to the near left hand side and as part of the urban layering set back from the river frontage. In the baseline scenario, the proposals would be backdropped by the emerging Salisbury Square Development including the Police Building and Commercial Building.

251. From 15B.1 the development is largely occluded by intervening development and the verdant linear Temple Gardens and Victoria Embankment. The faceted metallic gradations of green to the crown of the southern elevation would be visible and part of the pale masonry body of the building below. The development where seen would blend with the layering, scale, colour and materiality of existing midrise developments which characterise development along this river fringe. St Bride's Church spire is prominent at this assessment point as an historic and recognisable although, in the baseline scenario, the lowest storey is concealed by the emerging Police Headquarters at Salisbury Square and backdropped by City Point, making the experience of the spire in this view not pristine and the spire is enclosed by urban layers. Under the baseline scenario, the south eastern upper two storeys of the proposed development would entirely conceal the arcaded arches of the lowest tier and there would be an additional densification of development around the spire. From this static assessment point there would be an erosion of the ability to appreciate this Wren spire within the view.
252. Moving from 15B.1 to 15 B.2, the development would move away from the spire and reveal the lowest tier. This is a dynamic skyline and in the baseline the aforementioned emerging Salisbury Square Development backdrops the proposal site and at 15B.2 partially obscures the Dome of Old Bailey, slightly erodes St Bride Church and occludes parts of the Barbican Towers (Cromwell and Shakespeare Tower). From 15B.2 the proposal would result in no further impacts on St Bride Church or Dome of Old Bailey; the clear sky silhouette of St Bride would be preserved and the gilded Lady Justice and stone lantern would remain visible. The relatively low scale, linear articulated roof form and colouration of the development would complement and preserve the Temple Gardens and its verdant softness rippling along the Embankment would continue to dominate the foreground. Equally whilst the development would encroach on the lower storeys of the Barbican Towers (Lauderdale Tower) at 15B.2 the striking silhouette on the skyline and ability to appreciate the landmark status as a cluster of tall buildings would be preserved.
253. In cumulative scenarios the approved developments of 120 Fleet Street and Hill House would step up in the background and the former would more significantly occlude the Barbican Towers at 15B.2. There would be no change to the impacts on St Bride's Church, Dome of Old Bailey or Temple Gardens.
254. The proposed development in baseline and cumulative scenarios would preserve the existing setting of St Paul's Cathedral as the Strategically Important Landmark.

255. In baseline and cumulative scenarios, the proposal's impacts on St Bride Church spire would result in some limited conflict with Policy HC4 (A), and SPD para 72 harming the contribution of this landmark element of the view in the baseline scenario. Otherwise, the proposal would preserve the setting of the Cathedral as the Strategically Important Landmark and other identified landmark elements and the juxtaposition between them, and there would be no harm to the characteristics or composition of the view in accordance with LVMF SPG guidance paras 73, 305. Historic England identifies harm to St Bride Church in this view and discussed, further in the indirect impacts to listed buildings section.
256. Further consideration of the impact of the proposal on Temple Gardens, Old Bailey and Barbican Towers is given in the Heritage section of the report below.

View 16 (16B.1- 16B.2), River Prospect, The South Bank: Gabriel's Wharf Viewing Platform (HTVIA View 14)

257. These two assessment points are located together on the viewing platform and St Paul's Cathedral is identified as the sole SIL, whilst other relevant elements are St Bride's Church and Temple Gardens.
258. The visual management guidance describes the dominance of the River in the foreground, with those buildings on the north side providing a rich and intricate skyline. Reference is made to the subtle transition of scale between the Temples and the more recent commercial development on Fleet Street/Ludgate. Sited at some distance from the Cathedral in this view, and clearly belonging to the established midrise Fleet Street skyline including the Salisbury Square development. The uppermost storeys of the fluted soft green metallic roof would rise unobtrusively above the tree lined river frontage preserving the townscape setting of the Cathedral in accordance with paragraph 280. At some distance from the Cathedral the development would preserve the ability to recognise and appreciate the SIL, which would remain the pre-eminent focus. Nestling into the middle ground skyline other historic buildings and landmarks within the composition would also be preserved, all in accordance with paragraph 282 of the SPG.
259. In cumulative scenarios the expanded New Street Square including Hill House and 120 Fleet Street would back drop the development and 65 Fleet Street would be pivotal in gently transitioning the scale from these taller buildings to Temple Gardens and the River.
260. It is considered in baseline and cumulative scenarios that the proposal would preserve the pre-eminence of the open prospect over the river and skyline presence of the Temples and other Victorian/Edwardian buildings defining the Victoria Embankment. The proposal would preserve the ability

to recognise and appreciate St Paul's as the SIL, which would remain the pre-eminent focus, its townscape presence preserved in accordance with paragraphs 280-283 of the LVMF SPG.

261. Overall, the proposal would not harm the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL and Temples in accordance with paras 68-70 of the SPG.

LVMF 17B.2 and 17B.1: Golden Jubilee/Hungerford Bridge – crossing the Westminster Bank (HTVIA View 18)

262. The footbridge provides a kinetic enhanced viewing experience from and between two assessment points 17B.1 and 17 B.2 eastwards towards the City of London. St Paul's Cathedral is the Strategically Important Landmark, St Bride's Church (I) is also highlighted as a landmark with the Dome of Old Bailey (II*) and the Barbican Towers (II) amongst others are also identified within the view.
263. The SPG describes the River as defining the foreground and middle ground, enlivened by Waterloo Bridge and the Embankment trees creating a significant sense of horizontality. It identifies St Paul's as rising above the general townscape, including the City Cluster off to the right, while the spire of St Bride's and the dome of Old Bailey are identified as distinctive vertical elements seen against sky as are the Barbican's trio of towers. On the urban skyline St Brides currently has a clear sky backdrop in these views; the Barbican Towers and Old Bailey are experienced within urban layers of foreground and background development.
264. In baselines scenarios from 17B.1 and 17B.2 (HTVIA 18 and 19) and between these assessment points the development would appear to the left, projecting slightly above the dominant horizontality of the verdant trees along the Embankment but would be some distance from St Paul's Cathedral nestling unobtrusively within the characteristic Fleet Street midrise skyline. The fluted soft green linear roof form and upper storeys of the pale masonry southern and western facades would rise above tree-lined river frontage stepping down in scale from the under-construction Salisbury Square Development.
265. From 17B.1 close to the Victoria Embankment, the Salisbury Square Development will conceal the lower half of Cromwell Tower, one of the Barbican Towers, part of the Dome of Old Bailey and the lowest tier of St Bride's spire. The proposed development would be in the foreground shadow of this taller development and there would be no worsening of the impacts to St Bride Church or the stone lantern and gilded statue of Old

Bailey although there would be an almost indiscernible encroachment on the base of Shakespeare Tower (the central Barbican Tower).

266. Moving towards 17B.2, the midpoint of the Bridge, the development would further conceal the bases of the Barbican Towers including Shakespeare and Lauderdale Tower. However, the robust silhouette of these landmarks would overall remain largely revealed and overall preserved thus retaining the ability to readily appreciate and recognise these distinct skyline features. There would be no further impacts on other landmarks from this assessment point.
267. If cumulative impacts are considered including the approved development of 120 Fleet Street and Hill House these would be visually prominent additions to the skyline. Through the kinetic sequence these would backdrop the development site and densify development around St Brides spire, Dome of Old Bailey and further conceal the Barbican Towers in a more impactful manner than the proposed development.
268. In baseline and cumulative scenarios, the proposals would comply with Policy HC4 (A), and the guidance in the SPG and would preserve the setting of the Cathedral as the Strategically Important Landmark and other identified landmark elements and the juxtaposition between them, and there be would no harm the characteristics or composition of the view in accordance with LVMF SPG guidance paras 73 and 305.
269. Further consideration of the impact on the heritage assets of St Bride Church, Temple Gardens, Old Bailey and Barbican Towers is given in the Heritage section of the report below.
270. The development would preserve the setting of St Paul's as the Strategically Important Landmark. In baseline line scenarios in relation to LVMF 15 B.1 there would be some concealment of the lowest tier of St Bride Church spire and to a lesser extent there
271. In all other scenarios the proposal would preserve the characteristics and composition of relevant strategic views and their landmark elements. It would preserve the viewer's ability to recognise and appreciate St Paul's Cathedral as the relevant Strategically Important Landmark.

Summary of impacts on LVMF Strategic Views

272. On balance due to the identified impacts the baseline and cumulative proposals would conflict to a small degree with Local Plan Policy CS 13(1), draft City Plan 2040 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LMVF SPG.

City of London Strategic Views

273. The City of London Protected Views SPD provides guidance on the St Pauls Heights code, relevant (LVMF) Strategic Views, views from and to the Monument, views to and from the Tower of London World Heritage Site and views of historic City landmarks and skyline features. The site is not located within St Pauls Heights Policy Area, the Monument Views Policy area or the Local Setting of the Tower of London. The SPD identifies Historic City Landmarks and Skyline Features which includes St Brides Church as a “City Church with a Skyline Presence” and Old Bailey and Barbican Towers are recognisable landmarks. The SPD is supported by Local Plan Policy CS 13(1), draft City Plan 2040 Policy S13 and London Plan 2021 policy HC3 and guidance contained in the LVMF SPG. St Paul’s Cathedral and the Processional Route.
274. The impact on St Pauls Cathedral and its setting is identified in the SPD Protected Views are assessed in detail in the LVMF and also under Indirect Impacts to Listed Buildings.

The Monument

275. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposal is not in the defined Immediate Setting of the Monument and would have no impact on those identified views of/approaches to the Monument as identified in the Protected Views SPD.

Views from the Monument:

273. The proposal would be outside the field of view scope of all the Monument Views except for View 5.

View 5: North West to St Paul’s Cathedral

274. From here St Paul’s and St Bride’s Church are identified as the key features. The uppermost part of the southern block of the development would be partially glimpsed in these views and would be visually unobtrusive neither concealing or detracting from existing skyline features. As a composition, it is considered that the proposals would accord with paragraphs 4.3 of the Protected Views SPD, in that the proposal would not obstruct it, nor would it detract from the general open prospect and those landmark elements as a result of appropriate bulk and massing.
275. Overall, officers consider the proposed development would protect this significant local view from the Monument, in accordance with Local Plan

Policy CS 13 and emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.

St Paul's Heights & Viewing Points

276. The site is situated some distance west of St. Paul's Cathedral, and there would be no direct intervisibility between the development site other than along Fleet Street. The proposal would not be visible and would be out of scope of most of the identified Viewing Points of St Paul's identified in the Protected Views SPD (Figure 3) other than those identified below.
277. The northern block of the development would positively frame this part of the processional route preserving the pre-eminence of the Cathedral within the kinetic experience. The retention of Nos 63, 67, The Tipperary and the infill building all extended in a traditional manner including mansard roof forms and application of contextual materiality of masonry and slate would blend the remodelled block seamlessly into the characteristic southern townscape of Fleet Street.
278. The upper storeys of the southern block would be glimpsed in the kinetic riparian sequences along the south bank in those orientated towards the Cathedral between Hungerford Bridge and Blackfriars Bridge most noticeably from outside the National Theatre but with no intervisibility with the Cathedral. In these experiences the linear development would nestle within the mid-rise developments south of Fleet Street rising unobtrusively above the Embankment and Temple Gardens and historic buildings fronting the river. The materiality of the pale masonry and tonal green articulated roof would complement the context of both buildings and established greenery (see HTVIA Views 13, 14 and 15).
279. Exceptional public views of London are afforded from the Golden Gallery and Stone Gallery of St. Paul's. Looking westwards from the viewing platform the development would largely be screened by the Salisbury Square development. Where part of the uppermost storeys of the southern block would be revealed projecting above the Commercial Building the articulated green roof would be an unobtrusive addition on the skyline. There would be no harm to the appearance and design of rooves as experienced from the Golden Gallery and Stone Gallery.
280. The development would not be visible from Watling Street, St Johns Street, Amwell Street, Farringdon Road, Cheapside and Cannon Street/ New Change junction.
281. The development would comply with Local Plan Policy CS 13(1), draft City Plan 2040 Policy S13 and the Protected Views SPD.

Views from other publicly accessible elevated viewing areas

282. With regard to 120 Fleet Street (LPA Refs: 21/00538/FULEIA and 23/01371/NMA), the approved public roof terraces on the roof of the Daily Express Building will provide mid-range 180 degree with visibility towards the south, west and east including of the Cathedral, St Brides Church and the New Court Building and the taller distant buildings in Southwark including the Shard. The location of the development site towards the west and set back height would be glimpsed on the skyline but would largely be screened by The Court Building and the Police Headquarters. The proposal would not interrupt obscure key landmarks nor the quality of the visual experience.

Other Borough Strategic Views:

283. Relevant views from the London Borough of Lambeth and the City of Westminster, have been considered.

London Borough of Lambeth Local Views

284. Lambeth's adopted Local Plan Policy Q25 (Views) designates a series of Panoramas, Landmark Silhouettes and Roofscape Views which are of local interest. It seeks to protect their general composition and character from harm. Further visual management guidance is contained in a draft Local Views SPD. The Local Views of relevance here are: Panorama View viii) National Theatre terrace where the proposal would be visible low on the skyline but peripheral to the visual experience and from low on the horizon sitting between the Barbican Towers and City Point.
285. Overall, it is considered the proposal would protect the general composition and character of these Local Views.

Westminster City Council

286. Westminster's Draft Metropolitan Views SPD identifies and describes the significance of views of metropolitan importance including views that are enjoyed from well-known public spaces and those featuring an exceptional townscape or landscape, including visually prominent landmarks. Views 42 A and B (Waterloo Bridge), View 43 Golden Jubilee Bridge (A and B) and these have been reviewed within the LVMF section of the report and the proposals preserve the key elements of the composition identified within the guidance other than the identified impacts to St Bride Church to View 42A close to the northern Embankment of Waterloo Bridge.

287. Overall, it is considered the proposal would protect the general composition and character of these Local Views other than the above identified impact to View 42A.

City Landmarks and Skyline Features, Views of:

288. The proposal would affect views of historic City Landmarks and skyline Features which, in accordance with CS 13, should be protected and enhanced for their contribution to protecting the overall heritage of the City's landmarks in accordance with Local Plan Policy CS13(2). These are addressed individually below:

St Pauls' Cathedral:

289. The impact on skyline panoramic and river prospect views is assessed in the LVMF and Heritage sections of the report. These conclude that in the baseline and cumulative scenarios, the proposals would preserve views of and the ability to appreciate the Cathedral as a Skyline Feature.

Barbican Towers:

290. The impact on the skyline is considered and assessed in the LVMF section and Heritage sections. These are a prominent ensemble on the City skyline as experienced from riparian locations where their distinct vertical geometry and serrated balconies can be appreciated and are easily recognisable from riparian bridges and along the South Bank. From Hungerford Bridge and Waterloo Bridge there would be intervisibilities between the linear green roof of the development and the Barbican Towers partially concealing the lower parts of the Towers but overall this would not diminish their robust landmark status or expressive silhouettes on the skyline which would be preserved. In the cumulative scenarios from these river bridges, the implemented development at 120 Fleet Street would backdrop the proposed development and would significantly increase the occlusion of these towers diluting any impacts from the proposed development.
291. Overall, in baseline and cumulative experiences, the proposal is considered to preserve views of and the ability to appreciate the Barbican Towers as City Landmarks.

Old Bailey:

292. The impact on the skyline is considered and assessed in the LVMF and Heritage sections of the report. In baseline and cumulative scenarios there would be no further diminishment in the clarity of the Old Bailey beyond the impacts of the emerging Salisbury Square Development to the dome on the skyline at the midpoint Hungerford Bridge at Westminster Embankment

(LVMF 17B.1). The stone lantern and the gilded Lady Justice would remain appreciable. Overall, the proposal would not reduce the visual clarity of the Old Bailey as a City Landmark when taking into consideration the baseline scenario.

St Bride's Church:

293. The impact on the skyline is considered and assessed in the LVMF and Heritage section. In baseline and cumulative scenarios there would be an increased diminishment in the clarity of the Portland stone tiered spire of St Bride's Church on the skyline from Waterloo Bridge close to the northern embankment (LVMF 15B.1). The southern aspect of the green roof would momentarily conceal the lowest arched tier of this characterful Wren skyline feature. Officers note that the previous consented scheme at the site (LPA Ref: 19/00058/FULMAJ) had a broadly similar impact on this asset. Overall the proposal would momentarily and partially slightly erode the clarity of St Bride's Church spire as a Skyline Feature.
294. Historic England's consultation response to the proposals, dated 5th August 2024, noted the potential impact on St Bride's Church in views from the Thames and recommended that the proposals ensure there is no blocking or obscuring of the church spire in these views beyond the extent of any existing buildings or permitted schemes. Taking into account the previous consented scheme at the site, the impacts are broadly similar. Officers are aligned with the concerns of Historic England and the impact of the proposals on the skyline as well as the steps to mitigate this are considered and set out within the Heritage and LVMF sections of this report.

Conclusion on City Landmarks and Skyline Features

295. The proposal would protect views of relevant City Landmarks and Skyline Features with the exception of some slight diminishment to St Brides Church. This would result in a degree of conflict with City Plan policy CS 13(2), draft City Plan Policy S13 and CoL Protected Views SPD.

Overall Conclusion on Strategic Views

296. The development in pan-London and strategic views would preserve the setting of St Paul's Cathedral as the Strategically Important Landmark which go to the heart of the character and identity of the City and London.
297. In the baseline and cumulative scenarios the proposal would slightly erode the clarity of St Bride's Church (LVMF 15B.1). As such, the development conflicts to a small degree with Local Plan Policy CS13 (1 and 2), Emerging City Plan Policy S13, London Plan Policy HC4 , GLA LVMF SPG and City

of London Protected Views SPD and Westminster's Draft Metropolitan Views SPD View 42A.

Other Views

298. As a midrise building, the proposals would not be visible in other strategic views. Rather, it would be glimpsed along streets in the locality. The proposed building has been appropriately designed in relation to its surroundings and its quality design and appropriate massing would not detract from the visual amenity of other townscape views. The proposed building would have an appropriate presence in significant views of important buildings, townscape and skylines and would not result in harm to the views identified in the Built Heritage and Townscape Visual Impact Assessment and the settings and significance of the heritage assets and landmark buildings featured within these views would not be harmed by the proposals.

Built Heritage

Direct Impacts:

Tipperary Public House, 65 Fleet Street (Grade II)

Significance:

299. In January 1987, The Tipperary Public House was listed as Grade II with the public house dating back to 1667, but with a much-altered frontage dating from 1895. The mid-terrace building is hemmed in with the other facades that form the northern block of the Whitefriars development, with the pub remaining a standalone independent element detached from the rest of the scheme. The significance of the building is derived from its historic, architectural and evidential values.

Historic Value:

300. The pub was constructed in 1667 as part of an extensive reconstruction of the area following the Great Fire of London. Originally known as "The Boar's Head" until 1936, where it was renamed as "The Irish House" before becoming "The Tipperary" later on. Initially the pub occupied a single plot with a yard at the rear and a passage on its western side. After the Great Fire, much of Fleet Street was rebuilt initially on slim building plots that related to the pre-fire widths of buildings. The pub forms one of these plots, part of a collection of historic pubs along Fleet Street that provides a good example of the dense mix of development found along Fleet Street which has evolved over time.
301. The pub saw substantial alterations in 1895 and again in 1936 which saw a new frontage and insertion of two staircases to the north and south of the

ground floor following the removal of the original central staircase at ground and first floor levels. The roof was also likely replaced in this period.

302. The pub is noted for having strong connections to the Irish community, with contested claims that it was London's first Irish pub and the first pub to sell Guinness in the capital. This is reflected within its architecture with imagery such as clovers in the mosaic flooring, and elements of Irish language displayed within the décor.

Architectural / Artistic Value:

303. The building provides a good example of a narrow width traditional pub typical of the 17th century, despite the later alterations to the façade, with a cellular historic pub floor plan which has largely remained.
304. The ground floor is noted for its heavily ornate appearance, with intricate wood carvings on panelling and joinery that surrounds the bar area. The dark varnished wood demonstrates a good level of craftsmanship, with detailed and unique designs alongside the textured panel roof. A mosaic lines the floor of the bar with decorative clovers. The level of detail to the interior decoration is considered to be of particular high quality. On the upper floors, the original double range layout has been retained with an early turned baluster staircase – considered to be of particular sensitivity owing to its contribution to the significance of the building. The fifth floor and roof are later additions, of reduced interest.
305. Overall, the significance of building is considered to be high and retains a moderate sensitivity to change.

Setting:

306. Setting makes a moderate positive contribution to an appreciation of the building's significance, although this contribution is layered. The length and breadth of Fleet Street is appreciated as an historic route and this amplifies an understanding of the pub's longevity on the site. Equally the narrow plot width of the site also creates the sense of piecemeal development of the street over time, again creating the sense of an organic historic urban environment. The surroundings include a number of other historic pubs, and this creates a degree of group value where the site is appreciated as part of an established typology found along Fleet Street associated with serving changing custom.

Detailed Proposals and Justification:

307. Paragraph 206 of the NPPF requires clear and convincing justification to support listed building consent where there is harm or loss to the significance of an asset. Following the closure of The Tipperary pub during

the Covid pandemic, it is clear that the pub must adapt to meet demands of the present market to ensure its long term viability and operation. As such, several interventions are proposed to the pub. These follow on from a light touch refurbishment that took place earlier in the year to reopen the pub.

308. Demolition works are proposed for the rear wall of the pub, which will also see the removal of an early 20th century staircase between the basement, ground and first floor within the rear landing area. The rear wall has been subject to heavy alterations overtime, particularly following on from the YRM development scheme in the early 1990s, whilst the rear landing area does not contain any elements of heritage significance. Following the demolition of this area, an infill extension would be constructed in the place of the existing rear lightwell removing this feature. This would facilitate the installation of a new lift which would provide inclusive access to each floor of the building. In addition, a new stairwell would be provided as well as a link to the adjoining building at No.67 Fleet Street which would become part of the pub's demise as a restaurant area.
309. As part of these changes at ground floor level, there would be a need to remove elements of the existing wooden panelling on the rear wall of the pub. A methodology statement would be required for dismantling, storage and repairs for all components as well as reinstatement as part of these works. The methodology and work for all stages would be conditioned to be undertaken by an appropriate expert. Other changes at ground floor level, include the re-hanging of the internal entrance doors to swing inwards to improve accessibility and circulation into the pub.
310. At the upper floor, changes in addition to the loss of the rear wall / windows at each level include the removal of the dumb waiter at first floor level, the removal of later 20th century fittings and stud walls such as the toilets on the second floor, non-original kitchen equipment and other storage areas which are not considered to be of heritage value.
311. At roof level, the existing mono pitched roof which slopes down towards the front elevation would be retained. However, the rear existing walls would be demolished to below the Level 05 slab to allow for a new floor slab to project over the rear roof element of The Tipperary behind the parapet line to enable the upward extension above it associated with the student accommodation works.
312. Other internal works include the addition of new partition walls to accommodate new private dining areas at second and third floor level, new WC facilities and staff space. There would also be repairs to the existing windows, making good of any damaged elements. No changes are proposed to the bars at ground and first floor level. Back of house areas including the kitchen and toilets would be provided in the adjacent building

at No. 67 following the new connection between the two buildings. Details of this would be secured via way of condition.

313. No external changes are proposed to the front elevation of the asset.

Impact:

314. The demolition of the rear wall and windows as well as the infilling of the lightwell to the rear of the pub would result in a low level of less than substantial harm through the erosion of the historic floor plan. However as outlined above, due to the extent of alterations limited to the rear, this area is generally considered less sensitive to change, and this aspect of the works will preserve those more sensitive spaces to the front of the pub.
315. There would still be a sense of the 17th century cellular floor plan, which would remain largely legible and would see improvements through the removal of unsympathetic partitions and other additions which have been added over time – particularly to the second floor, where elements such as the bathrooms have disrupted the legibility of the original floor plan. The proposed works would largely reinstate this double range, cellular floor plan.
316. In addition, a number of benefits would arise from the interventions including improved circulation and enhanced accessibility with step-free access provided to each floor for the first time. The new connection to No.67 Fleet Street would enable the pub to diversify its offering with new restaurant space, yet not causing any change to the ground floor and first floor bars which would remain primarily for drinking. Furthermore, the turned baluster staircase at the upper levels would be preserved with the double range layout repurposed with new private dining areas and back of house uses.
317. The works to the roof would not result in any loss of original fabric to the pub, with the existing roof being an extension on the original. The front element of the roof form sitting beyond the parapet line would remain unchanged giving the pub a standalone appearance externally which preserves its narrow width frontage along Fleet Street.
318. As such, Officers conclude that as a result of the loss of the historic rear walls, windows and lightwell, which would to an extent dilute the historic floor plan, that the proposals would result in a low level of less than substantial harm to this asset.

Change within the setting of the Listed Building:

319. It is proposed to provide a link between The Tipperary and the adjacent unit at ground and first floor level of No.67 Fleet Street. Although interlinked, the Tipperary would remain independent in terms of plan form with the

connections provided within the infill extension of the lightwell therefore limiting interventions within the original cellular floor plan.

320. The proposed changes to both the wider northern and southern blocks would result in a clear change to the setting of the asset, however, it is not considered to dominate or harm the setting of the designated heritage asset. The altered façade and archway element on the northern block with a Portland stone finish would be more complementary and not compete with the asset with a more muted and contemporary finish. The roof extension element would be set back beyond the pub to ensure that it retains its standalone profile as a distinct building part of the organic development of Fleet Street over time.
321. Owing to the narrow nature of Fleet Street, there would be no intervisibility between the asset and the proposals on the southern block other than small glimpses as you move along the street.
322. Officers consider that the proposals amount simply further change in the surroundings of the asset, as part of the ongoing, organic evolution of urban development on Fleet Street. As such, officers consider that the scheme would preserve the contribution made by setting to the significance of the listed building although the proposals would not preserve the significance of the listed building overall through the harm caused by the direct impacts set out above.

Remains of Former Whitefriars Convent (Grade II)

Significance:

323. The remains of the Former Whitefriars Convent were designated as Grade II in January 1950, and comprise a single ragstone vaulted chamber which dates from the 14th century. The remains were relocated to its current position following late 20th century archaeological excavations, where it sits below ground level within the southern boundary of the site. The significance of the building is derived from its historic, architectural and archaeological values.

Historic Value:

324. The historic interest of the crypt relates to it being a rare surviving element of an urban Carmelite Friary, demonstrating the Carmelite migration to Europe during the 13th century following religious conflict in the middle east and illustrates how they established themselves in London. The Carmelites, also known as Whitefriars from the white cloaks they wore, originated as hermits on Mount Carmel during the late 12th or early 13th century. Following the Arab reconquest of the Holy Land, they migrated to Europe, establishing provinces in Cyprus, Sicily, and eventually England by 1242.

325. The crypt, which is the vaulted basement of the Prior's house, is a rare example of a late medieval ancillary building associated with the convent. Whilst the crypt has been relocated from its original location, it still remains in proximity to the original location of the Friary which was dissolved in November 1538.

Architectural Interest:

326. The main architectural interest of the crypt is attributed to its plan form and the craftsmanship employed in its construction in addition to the typology. The plan form of the Crypt depicts how the vaulted undercroft of the Prior's house would have been laid out, with the entry points indicating how the crypt was entered via a turret staircase on its western face and the doorway to the south showing that the crypt would have had a double range layout.
327. The crypt displays a high level of craftsmanship, illustrating medieval ecclesiastical masonry work and the at the centre of the curved stone vaulted roof is a corbel form from which eight stone ribs project. This supports the roof and provides decorative elements. The arched doorway to the south survives well, with the original stone voussoirs that surmount the door still well discernible. The interior of the crypt is ashlar stone. Detracting elements include 20th century brick infill on the south face of the crypt.

Archaeological Interest:

328. The crypt provides archaeological interest as it is evidential in the sense it holds evidence of human activity. The crypt was the undercroft to the Prior's house, and therefore depicts how circulation routes would have been present within the building as well as the ways the house would have been used. The undercroft would have been used for storage, and originally formed part of a double range basement as demonstrated by the doorways and plan form.

Setting:

329. The setting of the Crypt does not make a contribution to the significance of the asset, as a result of the relocation of the asset as part of the YRM development of the site in the late 1980s / early 1990s. The crypt is an entirely self-contained element and a surviving fragment of a once substantial convent and wider late medieval London. The asset has been decontextualised, with its setting now defined by modern commercial development from the 19th, 20th and 21st centuries.

Impact:

330. The proposals for the crypt would not result in any changes to the structure itself, and instead involve alterations around the remains. The single storey extension around the lightwell at ground level, would enable the creation of

a double height space giving visitors a better ability to appreciate the remains, which are presently constrained by their suboptimal location and surrounds.

331. The new enlarged space would showcase historical interpretation about the Crypt and the Whitefriars, as well as allowing for exhibitions and displays to complement the remains. The inclusion of step free access would enable the asset to be enjoyed by all. The proposals would not change the significance of the asset, but the investment made would allow for its long term preservation which would sustain its value longer term. Therefore, the proposals are considered to result in a moderate enhancement to the ability to appreciate the significance of this asset.
332. Historic England's consultation response to the proposals, dated 5th August 2024, stated that subject to detailed design considerations the "proposals have the potential to enhance the significance of the remains" as a result of the greater public access and understanding. The package of enhancements including repair, future maintenance, public access, interpretation including cross referencing to other publicly accessible activities will be secured through conditions and S106.

Fleet Street Conservation Area

333. The impact here would be direct, as a result of the works to the northern block, which sits within the Fleet Street Conservation Area, and in-direct, as a result of change in the wider setting of the Conservation Area.

Significance:

334. The character and appearance and heritage significance of the Fleet Street Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summarises that core significance and character stem from:
- The ceremonial grandeur and commercial bustle of Fleet Street, the broad, main route running east to west through the City;
 - The evocative historic network of streets, lanes and alleys either side of Fleet Street, particularly to the north, which are contrastingly intimate;
 - A variable urban grain with contrasts between broad main street, subsidiary alleys and formally planned Circus;
 - An exceptional richness and variety in architectural styles and building ages, including 17th century timbering, narrow Victorian eclecticism, understated Georgian domestic frontages, dignified commercial architecture, and monumental 20th century newspaper buildings;
 - The highly significant grade I listed churches of St Dunstan-in-the-West and St Bride's, which has perhaps the most recognisable of the City Churches' spires;

- The views of St Paul's Cathedral from Fleet Street and of St Dunstan-in-the-West backed by the Royal Courts of Justice from Ludgate Circus, both of which create a strong sense of ceremony;
- A long-lived association with the newspaper industry that unusually persists despite their recent departure from the area (for example, St Bride's church continues to be known as the Journalists' church);
- Associations with nationally significant literary figures such as Dr Johnson and Oliver Goldsmith;
- Associations with medieval institutions such as the Knights Templar, Whitefriars, the Inns of Court and the clergy, as well as current associations with the legal quarter;
- An area originally outside the City wall, developed since the Great Fire of London (1666) on what was formerly a low-density suburb on a key route between the City and Westminster.

335. The Conservation Area is of outstanding local and national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric, and to a lesser but significant degree via setting.

Contribution of Setting:

336. Elements of setting make a significant contribution to significance, and views and vistas deemed integral to that significance are identified in the SPD. The main contribution comes via the below:
- Those approaches and views along the Processional Route, both east and west, towards the Strand and the Royal Courts of Justice to the west and St Paul's to the East (Note Views 1 and 2 in the SPD, for example). This makes a significant contribution to significance and an appreciation of it.
 - Those sensitive strategic riparian broad prospects from the South Bank Queen's Walk which allow an appreciation of the wider skyline of the Conservation Area in a wider London context, in particular as a picturesque ensemble of national monuments and landmarks lining the Processional Route with a skyline presence to London's River. This makes a significant contribution to significance and an appreciation of it.

Impact:

337. The proposals for the northern block would retain and enhance the active frontage along Fleet Street, including the retention of The Tipperary Public House as well as retail units at ground floor, which contribute to the commercial bustle of Fleet Street as the broad main route running east to west through the City. The proposals would introduce a new land use, in the form of student accommodation, on the upper floors of the northern block which further contribute to the vibrancy of the street by diversifying the mix

of uses resulting in a greater mix of users, visitors and residents helping ensure its long term vitality.

338. The retention of the historical facades of Nos.63, 66 and 67 alongside the appropriate disposition and hierarchy of the new facades to Nos.64 and 65 ensures that the buildings fit comfortably into the historic townscape of Fleet Street which is predominantly defined by narrow plot widths with a diverse and varied mix of architectural styles and differing heights. The stepping of the double height mansard roof with accentuated parapets alongside different dormer styles would reinforce the distinctive facades below of the northern block in line with the sense of the piecemeal and organic development of the Conservation Area overtime.
339. The development would retain the existing building lines within the Conservation Area ensuring that the urban grain and structure is consistent with the finer grain historic structure of the Conservation Area. The proposals would retain the courtyard and arched passageway, in keeping with the wider informal network of passageways, courtyards and alleyways beyond Fleet Street. As such, the proposals would result a compatible urban grain and structure which would embrace that distinctive pattern of informal and formal townscape, of grandeur and intimacy and of high quality and distinctive spatial contrast.
340. On the whole, the architectural dressing of the northern block would contribute to the exceptional richness in a variety of styles and ages as identified within the SPD. The new façade elements of the proposals would be finished in high quality materials including Portland stone would further ensure that the proposals fit comfortably within the prestige and gravitas of the Processional Route.
341. The southern block is fully outside of the Fleet Street Conservation Area and its impacts are confined to the setting of the designated asset. There would be no adverse visual impacts from the proposals to the southern block on Fleet Street, with visibility limited to short glimpses when passing Whitefriars Street or Bouverie Street. The changes to the block with a lighter materiality and a new crown are well considered and would be compatible with the setting of the Fleet Street Conservation Area.
342. Overall, the scheme in its entirety would be of a scale, structure, urban grain, disposition, form and appearance consistent with the wider character and appear and setting of the Fleet Street Conservation Area, and would deal sensitively with the Grade II Tipperary Public House and the non-designated historic assets of Nos.63 and 67 Fleet Street.
343. Fleet Street has continuously evolved over time with a rich diversity of architecture tracing the centuries, and the new element would build upon

this organic development retaining the finer urban gran and narrow width frontages whilst introducing new high quality materials and a good level of architectural articulation in the new facades and roof extension. As such it is considered that the proposals would have a neutral direct impact on the Conservation Area and a neutral indirect impact on the setting of the Conservation Area.

344. Historic England's response to the proposals, dated 5th August 2024, stated that subject to detailed design and execution that the proposals are "unlikely to have a harmful impact on the character and appearance of the Fleet Street Conservation Area." The final detailed designs including samples of materials will be secured through conditions.
345. The City of London Conservation Area Advisory Committee response to the proposals, considering the direct impacts on the Fleet Street Conservation Area, confirmed that they had "*no objection to the proposed uses. Members acknowledged that the greater part of the site lay outside the Fleet Street Conservation Area and that there was already a large building south of the Fleet Street frontage. There were no objections to the proposals as far as they affected the detailed treatment of the buildings in the Fleet Street Conservation Area, including the added storeys and the new entrance.*"

Non-Designated Heritage Assets

63 Fleet Street

Significance:

346. This corner building bookends the western end of the wedge-shaped development block with a narrow two bay frontage to Fleet Street and a five bay plus later infill extension to Bouverie Street. Significance is derived from historic associations, architectural and artistic quality as well as group value.

Historic Value:

347. Designed by Frank Matcham and Co, a practice associated with the grand late nineteenth century west end theatres, the building dates from 1922 and is synonymous with the heyday of the printing industry which has defined Fleet Street and was formerly headquarters for the Scotsman.

Architectural and Artistic Interest:

348. Externally the five storey principal Portland stone elevations are well preserved with Italian classical detailing and traditional proportions utilising high-quality materials characteristic of the prevailing area. The elevations above ground floor are expressed with triple height flat pilasters, stone cills, corner medallion and brackets with a defined cornice with scrolls and dentil course. Windows are subdivided and metal framed with attractive balconies accentuating the penultimate storey. The chamfered corner is expressive

and the entrance is well defined with a raised architrave central dropped scroll and stone panels. The Bouverie Street elevation is part Portland stone and masonry with simplified embellishment and the later extension is of limited interest and overall internally the building was rebuilt following bomb damage. The stone attic storey terminates the building with a later inconspicuous simple slate pitched roof. Overall this a handsome corner building with well-preserved rich embellishment executed to a high standard.

Group Value:

349. The former associations with journalism, the press, classical appearance and materiality embed the building in the rich history of Fleet Street and provide linkages with similar buildings from this period including in the immediate context Reuters, Daily Express Building and the Telegraph Building. The building successfully bookends this block with No 67 as a complementary pair of early twentieth century Portland stone buildings.

Impacts:

350. The proposal, as described previously would result in the loss of some historic and modern fabric including the pitched roof and later infill to Bouverie Street.
351. The façade of No.63 Fleet Street would be retained and cleaned with no changes proposed on the northern elevation. On the western elevation a secondary door would be replaced with a window to match the design of other elements of this facade's fenestration. The roof to this façade, which is non-original and associated with the 1988 redevelopment, would be demolished and replaced with a two storey double pitch mansard roof extension. Dormer windows would be set within the roof, providing visual interest with the fenestration language referencing the crissall windows found on the façade below, and are considered to provide an appropriate termination to this façade. The retail uses at ground floor would utilise the shopfront elevations and the student accommodation would be located in the rooms above. Overall these physical changes employ a restrained traditional approach compatible with local character and materiality and whilst the roof would be more prominent in views these would be limited due to the orientation of the block and narrow frontage. The addition would be modest and so preserve the significance of the non designated heritage asset.
352. Elsewhere the wider alterations in relation to this northern block including to the Tipperary and to the rebuilt Nos 65 Fleet Street have been designed coherently as a distinct group fronting Fleet Street and not detract from the identified elements of significance. The southern block to site has a distinct but complementary presence which would successfully integrate with this corner building. Direct and indirect impacts to the non-designated heritage

asset would be neutral. Conditions will be attached to ensure retention of features and to manage the facade cleaning.

67 Fleet Street

Significance:

353. This curved corner building bookends the western end of the wedge shaped development block with a narrow two bay frontage to Fleet Street and a five bay plus later infill extension to Bouverie Street. Significance is derived from historic associations, architectural and artistic quality as well as group value.

Historic Value:

354. Designed by AAH Scott, dates from 1930-2 part of the interwar commercial building along Fleet Street and was the headquarters for the Nottingham Guardian and Nottingham Evening Post. Former associations of the site with Clockmakers are marked by a plaque.

Architectural and Artistic Interest:

355. Externally the four storey elevations are well preserved employing traditional proportions and utilising high-quality materials characteristic of the prevailing area. The elevations are restrained comprising a rusticated ground floor with arch headed windows to Whitefriars Street including secondary entrance. Above rises a hierarchy of metal sash windows with stone framing and key stones to the first and second floor with a smaller attic storey above. The curved corner is accentuated with a series of stone framed venetian style windows through the facade and recessed arched entrance. Above the deep cornice is a pitched slate roof with a series of relatively heavy dormers. Overall this a classically detailed high quality period building which responds successfully to the corner townscape location. Internally the building has been heavily rebuilt following bomb damage.

Group Value:

356. The building evokes the classical appearance and materiality embedded along Fleet Street, the most prolific is Portland stone including in the immediate context Reuters Building and Telegraph Building. The building also successfully bookends this block with No 63 as a complementary pair of early twentieth century Portland stone buildings.

Impacts:

357. The roof including the existing dormers to this elevation would be demolished, and an additional storey clad in Portland stone to match the existing attic level would be added above the existing datum effectively stretching the façade. At roof level, this element would also benefit from a part single storey, part double storey mansard roof extension – with the double storey mansard located on the eastern elevation. The single storey

element would adjoin the Tipperary pub, thus the single element reduces visual discordance. In long views west along Fleet Street the upper storeys to Bouverie would have limited visual impact due to the screening provided by the emerging Court Building. The lower dormers would take reference from the existing dormers of the building, whilst the upper windows would be velux windows to ensure subservience. The ground floor would retain its rusticated facade hosting an active restaurant uses complementing its higher status and student accommodation is located above.

358. Overall these changes employ a restrained traditional approach compatible with local character and materiality and whilst the roof would be more prominent and the stretched façade results in a changed proportion to the façade these are seamless and modest interventions which would preserve the elements of significance of this non designated heritage asset. Elsewhere the wider alterations in relation to this northern block including to the Tipperary and to the rebuilt Nos 65 Fleet Street have been designed coherently as a distinct group fronting Fleet Street and not detract from the identified elements of significance. The southern block has a distinct but complementary presence which would integrate with this corner building. Direct and indirect impacts to the non-designated heritage asset would be neutral. Conditions will be attached to ensure retention of the features in addition to managing the facade cleaning.

Indirect Impacts:

Listed Buildings

St. Paul's Cathedral (Grade I)

Significance:

359. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration.
360. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital.

361. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

Setting:

362. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance.

- i) those wider strategic plan-London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
- ii) The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
- iii) Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.
- iv) Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some

active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact:

363. In terms of the impact on the Processional Route, the architecture lining the Fleet Street section of the route is eclectic and diverse with varied floor plates, sizes and architectural styles and includes landmark buildings such as the churches of St Dunstan, St Brides and St Martin Ludgate, banks such as Hoare's and offices such as the Daily Telegraph and Daily Express.
364. The views of St Paul's change along the length Fleet Street depending on the topography and alignment of buildings. Views unfold as the observer walks eastwards along the northern side of Fleet Street. The experience is dynamic, rather than static and the buildings on the southern side unfurl to gradually reveal St Paul's Cathedral. The viewing experience has been subject to long-term curation as a kinetic townscape sequence and experience.
365. The views begin on the north side of Fleet Street at the junction with Fetter Lane in a series of visual sequences. From Fetter Lane the south side of the street, larger historic buildings frame the view including the Reuters Building (grade II), behind which the spire of St Brides can just be glimpsed. The existing buildings on the site have a relatively consistent building scale and relate well to the overall scale of Fleet Street and these lead the eye to the Cathedral. Opposite, on the north side, are the prominent former offices of the Daily Telegraph and Daily Express. The Cathedral appears in the view: the lantern, a sliver of dome, peristyle and the north-west tower are all visible. There is a pleasing juxtaposition of the spire of St Martin Ludgate, the north-west tower and the dome, arranged in a rising progression.
366. The proposed height and massing of the northern block would be visible to the right of St. Paul's, however, the experience would be fleeting as you travel eastward along Fleet Street from the junction of Fetter Lane towards the site. Furthermore, from these vantage points, cumulatively, developments including the Salisbury Square Courts would sit in the background of the development site and the proposal would add a further layering in the foreground of this neighbouring development forming part of the wider townscape. Moving further eastward along the Processional Route, there would be no impact on the cathedral.
367. The massing of the roof extension, with its double height mansard with the upper most storey set back would ensure the proposals would fit

comfortably within the wider townscape composition along the Processional Route as not to be distracting. The new façade elements of the proposals would be finished in high quality materials including Portland stone would further ensure that the proposals fit comfortably within the prestige and gravitas of the Processional Route.

368. Overall, St Paul's would remain in focus as the pre-eminent landmark and the contribution that the Processional Route makes to the significance of St. Paul's would be unharmed, with the proposal having a neutral impact. The other setting impact is on those strategic City-wide riparian views from the banks of the Thames and its bridges. At no point would the pristine, sky-etched silhouette of the Cathedral be obscured or shadowed by the proposal, which would be sited some distance from it in these broad panoramas, and where it would accord with the prevailing heights and datums so as to not dilute the varying pre-eminence of the Cathedral's skyline presence. Thus, this significant contribution of setting to significance would be preserved.

St. Bride's Church (Grade I)

Significance:

369. Portland stone Church of 1671-8 by Sir Christopher Wren with spire of 1701-3, one of Wren's tallest and comprising five octagonal stages of diminishing height. The spire is one of the most distinctive and memorable on the city's skyline, appreciated from within and outside of Fleet Street Conservation Area. The skyline presence when viewed from the bridges and banks of the Thames makes a significant contribution to significance, especially where the spire can be seen as part of the romantic historic skyline around the Temples to Blackfriars and in association with St Paul's. Those varied and more incidental local views from Fleet Street and Ludgate Hill are also significant, albeit less so. Those further afield riparian views of the spire from the east are also significant, albeit less so again. The church was gutted in the Blitz and restored by Godfrey Allen in 1957. The associated excavations by Professor Grimes in 1952-3 comprised the first complete archaeological investigation in England of a parish church. They revealed that the site of the church had been in use since the Roman period.
370. It is of outstanding national architectural / aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

Setting:

371. Elements of setting make a significant contribution to architectural and historic significance, in particular an appreciation of it. In relative order of contribution, it is considered that this derives from:

- Pan-London broad riparian views from the River Thames, its embankments and bridges, including strategic LVMF River Prospect views from Waterloo Bridge, Gabriel's Wharf, Hungerford Bridge, Southwark Bridge and London Bridge, where it can be appreciated as a landmark steeple atop the rising banks of the Thames, denoting the processional route and seen in complementary juxtaposition with Wren's masterpiece, St Paul's. These make a significant contribution to architectural/aesthetic and historical significance.
- Local, often glimpsed, sudden and fleeting local views from Fleet Street, St Bride's Avenue, Bride's Passage and Bride Lane allow for the full force of Wren tower and steeple to be appreciated in an intimate townscape context conjuring the sublime. This makes a moderate contribution to architectural and historic significance, especially an appreciation of it.
- The local topography and change in levels which allow for an appreciation of the burial site and it marking a climb from the riverside making a modest contribution to architectural/aesthetic, historical and archaeological significance.

Impact:

372. There would be a change to the setting of St Bride's Church in the baseline kinetic viewing experiences from Waterloo Bridge, Hungerford Bridge, the Southbank and Southwark Bridge. From these locations, St Bride's spire is a legible landmark within a complex urban layering with taller background buildings and lower foreground buildings. The proposed development would form a further urban layer and in some kinetic views from Waterloo Bridge, the lowest tier of St Bride's Church spire would be partially concealed and the setting around the spire further built up and the ability to appreciate the spire in its totality would be diminished.
373. The immediate setting of St. Bride's would remain unchanged and the development on the site which is its wider context setting would not impact on localised views of the spire.
374. Whilst there is presently intervisibility between the site and St Brides from views along Fleet Street, such as adjacent to St Dunstan's Court, this is only temporary associated with the redevelopment of the Salisbury Square site which has now been implemented and the court buildings under construction form part of the baseline assessment. As such, there is no impacts on local views from the development on St Brides.
375. Overall, the development would result in a changed setting of St Bride's Church with a slight diminishment of its landmark present in views identified with the baseline views, namely Waterloo Bridge. The development would partially conceal the bottom tier of the spire, however, this experience would be fleeting as you move along the bridges, where the proposal would remain

as a pre-eminent monument in other locations. Furthermore, owing to the presence of development in the backdrop of St Brides within this view, it is not pristine at present.

376. Officers also note that the previously consented scheme at the site (LPA Ref: 19/00058/FULMAJ) had broadly similar impacts to the Church as the proposal subject to this application, albeit the subject proposals having slight further erosion to the Church albeit in a more streamlined manner
377. This would be a slight diminishment in its landmark presence in views from those identified Thames Bridges in baseline views (see HTVIA View 17). There would be a degree of harm to setting and significance and this is evaluated at less than substantial, at the lower end of the spectrum which would be mitigated as a result of the transient nature of this impact.
378. Historic England in their response to the proposals dated 5th August 2024, confirmed that where any part of the spire of St Bride's Church is proposed to be partially blocked from views, the proposals have the potential to cause harm to the significance of the church through development within its setting. Officers concur with this view, as set out in the assessment above.

King's Bench Walk (Northern) Group – Nos. 1, 2, 3, 4, 5, 6 and 7 King's Bench Walk (Grade I); and Nos.3 North and 8 King's Bench Walk (Grade II*)

Significance:

379. These are a highly significant terrace of buildings within Temples Conservation Area. They are part of a terrace which defines the east side of Kings Bench Walk, and were built as chambers in the late 17th century. They are one of the most complete groups of buildings of that date in London and have high aesthetic, architectural and historic significance. Although there is a variety in the width, height and roofs, they have a strong visual unity and uniformity of appearance with a raised ground floor, central and prominent doorcase, strong cornice line and brick parapet, hipped mansard roofs and a lower ground floor, constructed of dark red and brown bricks with red dressings.
380. Officers consider that because of this strong degree of commonality between them it is appropriate and proportionate to consider them as a group in relation to the proposals, though they are individually listed.
381. Their significance is derived from their special historic and architectural interest, and evidential values due to their date, design and building, as they were constructed for, and still in use as legal chambers. There is a distinctive wide York stone pavement to the front of the terrace with a border of Purbeck setts and mature Plane trees. Kings Bench Walk is an irregular

oblong shape, now used for car parking, which has a gentle slope down to the River Thames. It is bordered on the west side by 1-5 Paper Buildings, Inner Temple Library and on the south side by Inner Temple Garden.

Setting:

382. The principal elements of setting contributing to the significance of these listed buildings are as follows:
- Each of these individually listed building forms a complementary element of setting with the other, making a significant contribution to significance.
 - The neighbouring buildings and spaces within the Temples immediately to the west, including Nos. 1 & 2 Mitre Court Buildings, Paper Buildings, the Francis Taylor Building, and the Inner Library which complement them in aesthetic, style and scale, illustrate the development of the group and help to define the sense of intimacy and enclosure prevailing across the Temple. This makes a significant contribution to significance.
 - The open, verdant setting of Inner Temple Garden and the open, riparian setting to the south, which contrast pleasingly with the framing buildings and which with them generate that singular sense of place which prevails across the Temple. This makes a significant contribution to significance.
 - The open sky setting framing the group in closer views, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the ensemble. This makes a moderate contribution to significance.
383. The wider setting of the group consist of the environs of Fleet Street beyond, which are generally of a consistent historic scale but with variations in height and instances of a greater scale of development than in the Temples. When viewing the group from the west, a backdrop of modern development, including the existing southern block of 65 Fleet Street and Harmsworth House, appears behind the roofline of the group. The implemented Salisbury Square scheme will also appear in this view when consented. These modern buildings outside the Temples are clearly detached from the intimate setting and make a neutral contribution to the significance of this group of buildings.

Impact

384. While this section considers the impact upon the group as a whole, it is considered that the proposals would most specifically affect Nos. 2-6 King's Bench Walk, to which the proposal site would be closest.
385. As mentioned above, in views of the group from the west along Crown Office Row/King's Bench Walk, there are modern buildings already visible behind them, but appearing as clearly disassociated, recessive modern development beyond; officers consider that the visibility of development behind this group is not necessarily harmful in principle; it is proximity and

scale of development, in this largely low-rise area, which could result in harm.

386. In mid-range views around the Temples, including within its gardens, the proposal would be visible, to varying degrees, as a prominent new form behind this group and would be most acutely visible behind Nos. 2-6 King's Bench Walk (see HTVIA View 12). Whilst outside of and peripheral to their collegiate arrangement, the proposal would result in a sharp increase in background urbanisation and, through its closeness and height, would be visually intrusive in views of this group, and Nos. 2-6 in particular. Whilst obviously modern, the proposal would not be far enough away to read as recessive and completely disassociated from the group in a way that other modern buildings can be; it would be not a modern backdrop form, but a modern visual intrusion.
387. As such, the proposed roof top extension would result in increased visual distraction in the background to this sensitive arrangement of buildings, with an abrupt and sharp change in scale with a further erosion of open sky beyond the roofline through the additional densification and height of development in the background – as demonstrated in HTVIA View 12. This open sky presently helps enforce the self-contained distinct integrity of the ensemble of listed buildings in this group.
388. Whilst the proposal would result in visually intrusive new development within the background to these assets, the views would only be evident in isolated views from western areas of the Inner Temple Garden, Crown Office Row and Kings Bench Walk. Furthermore, the presence of mature trees in the foreground would further soften the visual impacts whilst the roofscape is not full pristine with other development present beyond.
389. As well as this, it is considered that the impact of the proposal would be most acute and pertinent to Nos. 2-6 King's Bench Walk, with the other buildings of the group more visually disassociated from the proposals in the views. As such it is considered that the proposal would result in a low level of less than substantial harm on the significance and setting of Nos. 2-6 King's Bench Walk as individual assets and as a group.
390. Historic England have also identified a low degree of harm to the significance of these assets. The consultation response sets out that the proposals "*would appear on the skyline behind buildings on the east side of King's Bench Walk. We note that existing developments are visible in the backdrop setting of these buildings in longer views from the west and the previous planning permission did introduce development into this area of sky space. As such, the proposed roof extension will appear on the skyline and will distract from the architectural composition of the buildings in King's Bench Walk. As such, the proposals are considered to cause a low degree*

of harm to the significance of the affected heritage assets through development within their setting.” The consultation response goes on to request that the harm is justified and reduced or minimised as far as possible.

391. Officers are aligned with the views of Historic England in this regard and in response, Officers at the City have requested amendments to the scheme. This has seen the removal of habitable accommodation at the 10th floor and changes to the articulation, colouration and materiality of the roof extension. This is considered to have reduced the impact of the proposals on these assets, with a more subordinate, reduced and subdued appearance achieved via these amendments.

Daily Express Building, 120 – 129 Fleet Street (Grade II*)

Significance:

392. This 1932 iconic art deco building with expressive black Vitrolite glass and rounded corners is a bold architectural statement on the northern side of Fleet Street albeit located further to the east of the subject development site. Significance is derived from its architectural, artistic, historical and evidential values.

Setting:

393. The setting of the designated heritage asset is defined by larger former newspaper single block buildings set between historic alleys and comprises a rich variety of styles and materials. In the immediate setting is Reuters building to the south, and Ludgate House, Mersey House and the Telegraph Building to the west which all enhance the setting of the Daily Express Offices. The northern block of 65 Fleet Street are part of this wider setting. This diverse context of larger commercial historic buildings on Fleet Street positively contribute to significance.

Impact:

394. The designated heritage asset is sufficiently robust with a striking standalone architectural identity which is reinforced by the other unique and diverse range of designated assets on the northern side of Fleet Street. The proposed development would complement the existing diverse range of historic buildings with an enhanced materiality more appropriate to Fleet Street on its northern elevation and careful architectural detailing. Overall, the proposal is considered to preserve the special architectural and historic interest and heritage significance of the Daily Express Building, including the contribution made by setting.

Paper Buildings Group: Nos. 1 – 4 and 5 Paper Buildings (Grade II)

Significance:

395. Chambers of 1848. Nos. 1-4 are in a plain, classical design while No. 5, terminating the row to the south, is of a more striking Tudor style. The group embody the rich, dignified mix of styles and materials of the Temples, tied together by a consistent scale and dignified aesthetic. Accordingly, the buildings have high architectural and historic interest.

Setting:

396. The principal elements of setting contributing to the significance of these listed buildings are as follows:
- The neighbouring buildings and spaces within the Temples immediately to the west, north and east, including Nos. 1 & 2 Mitre Court Buildings, Paper Buildings, the Francis Taylor Building, the Inner Library, Harecourt Buildings and Temple Gardens which complement them in aesthetic, style and scale, illustrate the development of the group and help to define the sense of intimacy and enclosure prevailing across the Temple. This makes a significant contribution to significance.
 - The open, verdant setting of Inner Temple Garden and the open, riparian setting to the south, which contrast pleasingly with the framing buildings and which with them generate that singular sense of place which prevails across the Temple. This makes a significant contribution to significance.
 - The open sky setting framing the group, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the ensemble. This makes a moderate contribution to significance.

Impact:

397. There would be background distant views of the development beyond these assets, but the distances involved would mean it would read as a disassociated part of the modern City and not overly intrusive. The impact to the wider setting of these assets would be similar to existing distant townscape in both baseline and cumulative scenarios which include the Salisbury Square development. The proposals would not worsen the situation or detract from the enclosed setting and its contribution to significance. There would be no harm to the wider setting or significance of these listed buildings.

King's Bench Walk (Southern) Group: 9 – 11 and 12 – 13 King's Bench Walk (Grade II)

Significance:

398. The eastern side of Inner Temple Garden is formed by Sydney Smirke's 9-11 King's Bench Walk a four storey yellow brick terrace dating from 1814 which form continuous terrace. Adjacent to the South, No. 12 – 13 King's

Bench Walk is a later terrace dating from the early 19th century comprising four storeys in a plain, classical design in Bath stone. The significance of these assets is derived from their evidential, architectural and historic values as part of the wider Temples complex.

Setting:

399. The setting of all these assets is defined by Victoria Embankment, the wider landscaped settings and the complex of high value historic buildings which form the Inner Temples. The setting contributes to the unique intimate enclosed collegiate like character of this special area distant from the busy City Streets.

Impact:

400. The potential impact from the development on these assets has been assessed from footpaths and the sweeping lawn which is scattered with trees. There would be glimpsed moments of the proposal rising above these foreground buildings but this would be discreet and largely experienced between trees from incidental locations and the impact would not be adverse. Existing taller buildings already rise slightly including the implemented Salisbury Square development and 120 Fleet Street. The proposals would not worsen the situation for detract from the existing quiet enclosed setting and its contribution to significance. As such, there would be no harm to the wider setting or significance of these listed buildings.
401. The consultation response from Historic England advised harm to the listed buildings on Kings Bench Walk, as discussed above with respect to the northern group. Officers consider that the harm would most specifically affect Nos.2 – 6 Kings Bench Walk and would not arise from the proposals in respect of the listed buildings within the southern group as a result of the siting of the proposals having a lesser impact on these listed buildings with intervisibility limited here.

Inner Temple Registered Historic Park and Garden (RHPG) (Grade II)

Significance:

402. Inner Temple Garden and Middle Temple Garden have a medieval origin and evolved from the 16th to 20th centuries, initially associated with the Knights Templar. Today, the area is defined by its legal professions which have evolved over the centuries and continue to exist here. The gardens are the largest private green space in the City of London and include mature trees, shrubs and considered planting that illustrates a layout developed within the 19th and 20th centuries. The gardens retain a quiet domestic character and are important for the setting of the listed buildings that surround the space where together they have a group value with the garden playing a significant role in the important collection of medieval and later

buildings. The buildings and spaces, including the garden, is set in a distinctive collegiate-style arrangement.

403. In brief, the significance of this Registered Historic Park and Garden is derived from its successive landscape layouts, varied planting and lawned areas, and its domestic gated quiet character representing historic and architectural values.

Setting:

404. The principal elements of setting contributing to the significance of this RHPG are the arcadian but planned character of the registered landscape, in addition to its connection to the open setting of the River. Of equal contribution, by virtue of its juxtaposition, is the sense of enclosure derived from the cloister of buildings in a collegiate arrangement which consistently define its edges. The tranquillity afforded by this landscape also contributes to its experiential quality as rare sanctuary within inner London, which also contributes to its significance.

Impact:

405. The proposed development would be visible from vantage points in the north western section of the gardens, where it would rise above King's Bench Walk – particularly in views along the footpath on the western side of the gardens. As such the proposal would bring in additional visually intrusive development that would lead a further erosion of the sky from these vantage points.
406. This impact would be isolated and contained to the north western section of the garden and the existing townscape beyond the collegiate arrangement around the gardens is not pristine with other developments present. The formal relationship between the surrounding buildings and the gardens would be retained, as would the sense of completeness and quietness in the series of formal spaces that make up the garden. Giving consideration to the above, Officers consider that the proposed development would result in a slight degree of less than substantial harm on the setting of this asset.
407. The Gardens Trust have also identified less than substantial harm to the RPG, and raised objections to the roof extension of the south block. They requested that *“consideration is given to reducing the height of the roof extension by at least two storeys, so that the new development, when viewed from the RPG, appears to rise no higher than the existing buildings (Harmsworth House and 10 Bouverie Street) and the visual intrusion of this modern building into the historic RPG is lessened.”*
408. Officers are aligned with the views of The Gardens Trust in relation to the low level of less than substantial harm on the Inner Temple Garden. Officers at the City have requested amendments to the scheme. This has seen the

removal of habitable accommodation at the 10th floor and changes to the articulation, colouration and materiality of the roof extension. Whilst this has not seen a reduction of two storeys, this is considered to have reduced the impact of the proposals on the asset, with a more subordinate, reduced and subdued appearance achieved via these amendments.

Northcliffe House, 26 Tudor Street (Grade II)

Significance:

409. Northcliffe House is a substantial and striking former printing office dated 1925 – 1926, comprising four storeys plus attic, clad in stone on a steel frame. The deco Neo-Egyptian style of the façade, popular at the time following the discovery of Tutankhamun's tomb in 1922, includes lion heads and Neo-Egyptian fluted curved cornice and pilasters, found elsewhere at the former Daily Telegraph building on Fleet Street. The elevations to Tudor Street and Whitefriars Street are finely detailed and modelled. The octagonal tower emboldens the prominence of the corner entrance and adds interest to the roofline.

Setting:

410. It is prominently located on the western corner of Whitefriars Street and Tudor Street. The gridded street arrangements and diverse architectural styles and materiality of largely commercial buildings of the 20th century make a positive contribution to significance.

Impact:

411. The proposed development to the southern block would rise above this listed building, exacerbated by the rising topography on Whitefriars Street / Bouverie Street and as such the proposal would form part of the wider setting of this building – particularly in views from the south. The proposed architectural articulation would contribute to a new layering and depth to this setting in oblique views northwards. The proposed scale of the development and materiality would be compatible with the wider setting.
412. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of Northcliffe House including the contribution made by its setting.

The Harrow Public House, 22 Whitefriars Street (Grade II)

Significance:

413. The Harrow is a modest 18th century building comprising 3 storeys plus mansard reflecting the historic character of the area. The building's significance is derived from its architectural and historic values.

Setting:

414. The historic setting of the Harrow Pub is presently fragmented due to redevelopment of Salsbury Square to the north which previously hosted Fleetbank House which detracted from the setting of this asset. No element of setting makes a contribution to the significance of the pub.

Impact:

415. The proposed development would not result in any change to the existing eastern building line of the southern block of 65 Fleet Street, retaining the historic street pattern. In addition, further activation would be provided on the southern elevation onto Ashentree Court which meets Whitefriars Street diagonally opposite of this asset. The more active uses of development at ground floor would animate the streetscape and complement the Harrow Public House increasing footfall which would support the continued success as an establishment.
416. As such, the special architectural and heritage significance of the Harrow Pub, and the contribution made by its setting, would be preserved.

Victoria Embankment Group – Hamilton House, Telephone House, No.9 Carmelite Street, Sion College, Former City of London School and Unilever House (Grade II)

Significance:

417. This dignified group of 19th Century buildings have strong architectural interest as a well-detailed and executed series of elevations in a variety of styles and employing a variety of materials to delightful effect; they have historic interest for their associations with their original occupants (a mix ranging from insurance firms to an ecclesiastical college to a school).

Setting:

418. They have strong group value (with the exception of Carmelite House) and together (also with the Temples and Blackfriars Bridge) form a picturesque composition with the river. These two elements of setting make a substantial contribution to significance. Other elements make a neutral contribution.

Impact:

419. In views of the listed buildings from the South Bank, opposite, the tiered massing of the southern elevation and the colouration of the metallic crown would form part of an unobtrusive presence, read as part of a layer of the townscape beyond these buildings. The pre-eminence of the listed buildings within this setting would be unchallenged. Accordingly, the proposal would preserve these listed buildings and the ability to appreciate them.

146 Fleet Street (Grade II)

Significance:

420. No 146 dating from late 17th century has a painted brick elevation to Fleet Street. The rear elevation is simple brick elevation with sash windows and segmental arches of the late 17th century rear elevation and includes a passageway at ground leading from Fleet Street to Wine Office Court. The significance of this building is derived from its historic, architectural and evidential values.

Setting:

421. The setting of the designated heritage asset is defined by larger former newspaper single block buildings set between historic alleys and comprises a rich variety of styles and materials. The northern block of 65 Fleet Street are part of this wider setting. This diverse context of a mix of smaller and larger commercial historic buildings on Fleet Street positively contribute to significance.

Impact:

422. The proposed development would complement the existing diverse range of historic buildings with an enhanced materiality more appropriate to Fleet Street on its northern elevation and careful architectural detailing. Overall, the proposal is considered to preserve the special architectural and historic interest and heritage significance of 146 Fleet Street, including the contribution made by setting.

Ye Olde Cheshire Cheese Public House, 145 Fleet Street (Grade II)

Significance:

423. A late 17th century, heavily altered modest terraced building intrinsic to the historic core of Fleet Street located on the north side of Fleet Street. The significance of the building is derived from historic, architectural and evidential values.

Setting:

424. The existing setting is defined by an eclectic mix of building types both the monumental scale of former newspaper buildings including Daily Express office, Mersey House and The Telegraph Building as well as the finer urban grain of 143-144 and 146 Fleet Street which are now retail and commercial buildings and more modern infills. This setting positively contributes to the historic values of the listed building.

Impact:

425. The proposed development is located diagonally opposite this asset, however, would not substantially alter its setting. The proposal is well

designed and detailed on the northern block with appropriate materials that are of a high quality and durable that are better aligned with the wider character and appearance of Fleet Street. This would complement the diverse setting of this asset, whilst its height, bulk and massing would not detract from the values of this asset. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of 145 Fleet Street including the contribution made by setting.

143 and 144 Fleet Street (Grade II)

Significance:

426. The building dates from 1905 and is steel frame with vigorous almost ecclesiastical Gothic, with a lone central statue of Mary Queen of Scots. The significance of the building is derived from the artistic historic, architectural and evidential values.

Setting:

427. The setting of the listed building is architecturally diverse and representative of Fleet Street's rich history including the more historic narrow finer grain buildings to the west and the larger commercial floor plates of the 20th century. This diverse context and richness of building types contributes to the significance of the listed building.

Impact:

428. The designated heritage asset has a robust five storey scale, decorative architecture and is set within a cluster of other historic designated assets on the northern side of Fleet Street which provide a defined local setting which enhances significance. The detailed design of the northern block would complement this diverse setting and its massing would not detract from the listed building's significance. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of 143 and 144 Fleet Street including the contribution made by setting.

Daily Telegraph Building, 135 – 141 Fleet Street (Grade II)

Significance:

429. The Daily Telegraph Building dates from 1928-31 and is a monumental former newspaper headquarters in Portland stone comprising 6 storeys and a recessed additional storey and includes giant columns and showcases Egyptian ornamentation. The significance of the building is derived from the former artistic historic, architectural and evidential values. This is a robust building with a strong architectural identity.

Setting:

430. The Daily Telegraph Building dates from 1928-31 and is a monumental former newspaper headquarters in Portland stone comprising 6 storeys and a recessed additional storey and includes giant columns and showcases Egyptian ornamentation. The significance of the building is derived from the former artistic historic, architectural and evidential values. This is a robust building with a strong architectural identity and would be a similar height and materiality to the Court Buildings which would be directly opposite.

Impact:

431. The designated heritage asset has a robust scale, decorative architecture and is set within a cluster of other historic designated assets on the northern side of Fleet Street which provide a defined local setting which enhances significance. The detailed design of the northern block would complement this diverse setting and its massing would not detract from the listed building's significance. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of the Daily Telegraph Building including the contribution made by setting.

Mersey House, 132 – 134 Fleet Street (Grade II)

Significance:

432. Dating from 1904-6 this successful Portland stone narrow 5 storey building has a big arched ground floor and is nestled amidst other larger commercial buildings. The significance of the building is derived from their former, historic, architectural and evidential values.

Setting:

433. The building has a similar setting to the Daily Express offices and is defined by the larger commercial buildings on the north and south sides of Fleet Street. In the immediate setting is Reuters building (grade II) to the south, Daily Express office (grade II*) and the Telegraph Building (grade II*) to the west which all enhance the historic and architectural significance of Mersey House reflecting the rich commercial and newspaper history of Fleet Street and forms a unique hub of eclectic architecture.

Impact:

434. The designated heritage asset has a robust scale and identity set within a cluster of other historic designated assets on the northern side of Fleet Street which provide a defined local setting which enhances significance. The detailed design of the northern block would complement this diverse setting and its massing would not detract from the listed building's significance. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of Mersey House including the contribution made by setting.

Listed Buildings Further from Development Site

Central Criminal Court, Old Bailey (Grade II*)

435. Designed by EW Mountford between 1900 and 1907 with a distinctive copper domed roofed dome on a Portland stone base with stone lantern bearing a gilt and bronze statue of Lady Justice. The significance of this asset is derived from historic, architectural and evidential values. The existing dome, lantern and Lady Justice is a recognizable silhouette on the London skyline and these significant features contribute to views from the river setting. The existing setting of the listed building is urban layering with taller buildings (Barbican Towers and 200 Aldersgate Street) background buildings and lower foreground buildings which truncate the listed building.
436. The proposed development would form a further layer and in the kinetic experience from Hungerford Bridge. In baseline views the dome will be largely concealed by the Salisbury Square Development from the northern embankment of Hungerford Bridge (LVMF 17B.1). The proposed development would not increase this concealment. The ability to appreciate and recognise the distinctive landmark from this view point would not be diminished and the top of the stone lantern and statue of gilded Lady Justice would remain visible.
437. Officers also note that the previously consented scheme at the site (LPA Ref: 19/00058/FULMAJ) had broadly similar impacts to Old Bailey as the proposal subject to this application, albeit the subject proposals having slight further erosion to the asset.
438. Overall, the development would result in changed setting of The Central Criminal Court, however, when taking into account the baseline scenario of the implemented Salisbury Square development there would be no further diminishment of its landmark presence. As such, Officers conclude no harm to the setting or significance of this asset.

Barbican Towers (Grade II)

439. These 20th century modernist towers have a distinctive and recognizable presence and silhouette on the skyline in city wide views. These landmark buildings have architectural and historical values. The setting of the Lauderdale House, Shakespeare House and Cromwell House as part of the Barbican and experienced in views from Waterloo and Hungerford Bridge is urban layering with a diminishment in scale towards the river. The Barbican Towers are striking vertical landmarks on the skyline as a grouping and their distinctive form is central to their significance.

440. The development would add to the existing urban layering which positively defines their metropolitan setting. There would be intervisibility between the green roof of the proposed development, and the Barbican Towers, with the proposal resulting in some concealment of the lower elements of this designated asset. Nonetheless, in cumulative baseline scenarios from these river bridges 120 Fleet Street would backdrop the proposed development and would significantly increase the occlusion of these towers diluting any impacts from the proposed development.
441. As such, the development would not diminish the group value due to the already complex setting and kinetic nature of the views from the river bridges. There would be no harm to the setting or significance of these listed buildings, particularly given the cumulative scenario, and the proposal would not diminish their robust or expressive silhouettes on the skyline which would be preserved.

Conservation Areas

Temples Conservation Area

Significance:

442. Of ancient origin, the Temples is perhaps the most distinctive City conservation area and has a character that is not only unique to the City, but rarely found elsewhere. It has a restrained, dignified, private and often tranquil character, in pleasant contrast to the hustle and bustle of Fleet Street and the Embankment. It comprises an exceptional collection of outstanding buildings as part of a lush open landscape setting comprising the Inner and Middle Temples and the Temple Church. To summarise the outstanding significance of the Temples derives from:
- It has a distinct and venerable legal quarter of ancient origin resulting in a collection of outstanding authentic survivals from the 17th, 18th and 19th Centuries comprising rare legal chambers, domestic quarters and buildings associated with the Inns of Court.
 - An outstanding townscape of collegiate character comprising courts, squares and streets, and strong sense of domestic human scale, of complementary architectural styles and materials, all set in the verdant setting provided by the Inner and Middle Temple Gardens.
 - Its connections with the Knights Templars and the focus on the Temple Church, based on one of the holiest places in the Crusader world, the Church of the Holy Sepulchre in Jerusalem, it is one of the oldest and most significant ancient churches in the City
443. The Conservation Area has a high concentration of designated heritage assets including Grade I, Grade II* and Grade II buildings alongside the Inner Temple Garden which is a Grade II Registered Historic Park and Garden. The earliest buildings in Kings Bench Walk date from the 17th

century and are one of the most complete groups of buildings of that date in London and have high aesthetic, architectural and historic significance. There are a number of mature trees including a distinctive avenue of trees on the southern boundary with Victoria Embankment. The buildings all share a uniformity of design and materials amongst the generous landscaped setting.

Setting:

444. The setting has a clear sense of separation between the inward and enclosed quite collegiate character of Temples which turns its back on the bustle and noise of surrounding streets which define its wider setting. There are glimpses of this wider setting above rooflines and between buildings but the encroachments are modest and where buildings are visible they do not detract or dominate from the overall character, appearance or significance.
445. Elements of setting make a significant contribution to significance and an appreciation of it, in the form of environmental qualities, in particular views of and through it, but also of wider intangible qualities. In relative order of contribution, those elements comprise:
- Strategic pan-London kinetic views from Hungerford and Waterloo Bridges and the South Bank Queen's Walk looking north and east, where it is seen as part of the Victoria Embankment and as part of the wider skyline. These make a significant contribution to significance and an appreciation of it.
 - Those views out of and through the Conservation Area of the sky, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the Conservation Area ensemble. These make a significant contribution to significance.
 - Views into the Temples which act as 'portals' which transition between the bustle of Fleet Street / the Embankment, accentuating the sharp contrasts in character and appearance. The peaceful, restrained and often tranquil intangible qualities of the public realm, and their contrast with the bustle of the City around it, make a significant contribution to significance and an appreciation of it.

Impact:

446. The Conservation Area lies within the west of the City, where the hustle and bustle of the City and larger commercial buildings reduce in size and scale as you move southwards towards the Embankment from Holborn. As a result there are glimpses of surrounding development beyond the Temples which contrasts with the peaceful, restrained and often tranquil qualities of the Conservation Area thus enhancing the significance and the appreciation of it.

447. The proposed development would see the extension of an existing building that is presently visible from vantage points within the Conservation Area – namely from Kings Bench Walk, Crown Office Row and north western areas of Inner Temple Garden. This would introduce additional height and massing above the roofscape of Kings Bench Walk. Whilst there are existing glimpses of development beyond The Temples from these vantage points, these are presently modest in scale and do not detract or distract from the distinctive enclosed collegiate arrangement.
448. The proposal would result in an additional degree of visual intrusion beyond the roofline of Kings Bench Walk, with a new contemporary materiality that would reduce the amount of open sky and the sense of openness this brings which accentuates the self-contained and distinct integrity and authenticity of the Conservation Area ensemble. However, these impacts would be limited to locations within the east of the Conservation Area which presently do not benefit from a pristine townscape beyond the Temples. The distinct integrity and ensemble of the collegiate arrangement would remain and still clearly be appreciated.
449. Giving consideration to the above, Officers consider that the proposed development would result in a slight degree of less than substantial harm to the setting of the Conservation Area.
450. Historic England have also identified a low degree of harm to the significance of this assets. The consultation response sets out that the proposals *“likely to be visible in views from the neighbouring Temples Conservation Area and would appear on the skyline behind buildings on the east side of King’s Bench Walk. We note that existing developments are visible in the backdrop setting of these buildings in longer views from the west and the previous planning permission did introduce development into this area of sky space. As such, the proposed roof extension will appear on the skyline and will distract from the architectural composition of the buildings in King’s Bench Walk. As such, the proposals are considered to cause a low degree of harm to the significance of the affected heritage assets through development within their setting.”* The consultation response goes on to request that the harm is justified and reduced or minimised as far as possible.
451. The City of London Conservation Area Advisory Committee also raised concerns in relation to the impacts of the proposals on the Temples Conservation Area, stating that *“the Committee expressed reservations about the raised height of the south block in the proposals. Members were concerned about the apparent bulk and horizontal character of the proposal shown in the views from sites on the South Bank, though accepting that the zoom images may have accentuated the harmful effects of the proposals, but were especially concerned by the effects of the proposals in the view*

from the Temple – View 12 in the applicant’s HTVIA – which the applicants Heritage, Townscape and Visual Assessment accepts might do some harm. The Committee considered this to have an adverse effect on the Temple Conservation Area.”

452. Officers are aligned with the views of Historic England and the City of London Conservation Area Advisory Committee in this regard and in response, Officers at the City have requested amendments to the scheme. This has seen the removal of habitable accommodation at the 10th floor and changes to the articulation, colouration and materiality of the roof extension. This is considered to have reduced the impact of the proposals on the Conservation Area with a more subordinate, reduced and subdued appearance achieved via these amendments.

Whitefriars Conservation Area

Significance:

453. The heritage significance of the Whitefriars Conservation Area is covered in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summarises its significance as stemming from:
- An impressive collection of consistently high quality late Victorian / Edwardian commercial and institutional buildings on land reclaimed and comprehensively planned by the Corporation resulting in a more regular grid plan, a rare more formal townscape in a City context, in contrast to the more organic, evolutionary Fleet Street environs which it abuts.
 - The setting of grand Victorian urban infrastructural, engineering and urban planning interventions, namely Blackfriars Bridge, Victoria Embankment and New Bridge Street.
 - An important wider context to the Temples and as foreground to St. Paul’s Cathedral from sensitive riparian views.
 - A varied assortment of land uses including the former Whitefriars friary precincts, domestic tenements, industrial works and commercial HQs in addition to a historical association with the press and newspaper production.
454. The Conservation Area is of a high level of local and even national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric of the Conservation Area and its archaeology, and to a lesser but significant degree via setting.

Setting:

455. The setting of Whitefriars Area integrates into the urban grain to the North and the Fleet Street Conservation Area with building heights generally

increasing northwards uphill towards Fleet Street creating a layering of modern development in the wider setting.

456. Elements of setting make a substantial contribution to significance, manifesting principally in views across and through the Conservation Area from the River, its embankments and bridges. The main contribution derives from the following in descending order of contribution:
- Strategic pan-London riparian views from Hungerford and Waterloo Bridges and from the South Bank Queen's Walk comprising open river prospects across the City skyline. These make a significant contribution to architectural and historic significance, in particular and an appreciation of it.
 - Views from the immediate environs of the Temples and Fleet Street Conservation Areas, in particular from the Victorian Embankment and south from Fleet Street towards the River which allow for a more enriched appreciation of a wider historic setting. These make a moderate contribution to significance and an appreciation of it.

Impact:

457. The proposed development site is located immediately to the north of the Whitefriars Conservation Area. As such, the proposal would be visible in views within the Conservation Area looking northward along Temple Avenue and Carmelite Street. The proposal would be visible within identified view No.7 (View north up Temple Avenue from the Embankment) as designated within the Whitefriars Conservation Area Character Summary and Management Strategy SPD.
458. There would be no adverse visual impacts arising from the proposals with the existing building lines remaining as existing along the historic street pattern as you look north beyond the Conservation Area retaining the high level of visually permeability achieved through the grid street layout. The additional height would be visible in longer views from the south, but would form part of a further layering of the townscape which reflects the rising topography as one moves northward from the River towards the more commercial areas of the City around Holborn. The proposal therefore is considered to have a neutral impact and therefore would preserve the setting, significance, character and appearance of the conservation area.

Other Designated Heritage Assets

459. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is potentially within the setting of an enormous amount of heritage assets, and it would be disproportionate to assess them all. As part of a

scoping exercise, this assessment is in accordance with paragraph 200 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact of the proposal on its significance. In accordance with paragraph 201 a number of potentially affected assets were scoped, accounting for their significance and contribution of setting to that significance. These include:

- 24 Tudor Street (Grade II)
- Former Argus Printing Company, 8 – 10 Temple Avenue (Grade II)
- Former Guildhall School of Music, John Carpenter Street (Grade II)
- Carmelite House, 8 Carmelite Street (Grade II)
- Salisbury Square Obelisk (Grade II)
- 2 – 7 Salisbury Court (Grade II)
- 82 – 85 Fleet Street (Grade II)
- 9 – 11 Kings Bench Walk (Grade II)
- 12 – 13 Kings Bench Walk (Grade II)
- Kings Bench Walk Gateway (Grade II)
- Lamp Standards, King's Bench Walk (Grade II)
- Gates, Piers and Steps, Inner Temple Crown Office Row (Grade II)
- Gateway to Tudor Street, King's Bench Walk (Grade II)
- Inner Temple Church (Grade I)
- Buttery at Inner Temple Hall (Grade II*)
- 1 & 2 Mitre Court Buildings (Grade II)
- Mitre Court Chambers (Grade II)
- The Masters House, Church Court (Grade II)
- 37 Fleet Street (Grade II*)
- 49 – 50 Fleet Street (Grade II)
- 56 – 57 Fleet Street (Grade II)
- 1 – 3 Wine Office Court (Grade II)
- Church of St Dunstan's in the West (Grade I)
- Victoria Embankment Wall and Lamp Standards (Grade II)

460. The settings and the contribution they make to the significance of these designated assets, would not be adversely affected and/or any impact would not be over and above those impacts already identified. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these designated heritage assets.

461. The assets assessed in detail here are considered sufficient to understanding the impact on significance overall.

Heritage Conclusion

462. The proposals have been assessed against Local Plan Policies CS12, DM12.1, DM12.2, DM12.3 and DM12.5, draft City Plan 2040 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs.

There has been special regard given to the desirability of preserving The Tipperary Pub, The Remains of the Whitefriars Convent and surrounding listed buildings including their setting and any features of special architectural or historic interest which they possess, under s.16 and s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended. Considerable importance and weight has been attached to and special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Fleet Street Conservation Area under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.

463. In terms of direct Impacts, the harm to the significance of The Tipperary Pub (Grade II) is evaluated at less than substantial at the lowest end of the spectrum due to the erosion of the original floor plan at the rear of the pub. The extent of the alterations is limited to the rear, an area generally considered to be less sensitive change, and would retain the 17th century cellular floor plan and sensitive spaces towards the front of the pub.
464. The proposed development would result in a moderate enhancement to the ability to appreciate the significance of the Remains of the Whitefriars Convent (Grade II) through the works opening up its surrounds to allow for an improved ability to appreciate the asset and facilitate new heritage interpretation and step-free public access to the asset.
465. There would be no harm to the character and appearance of the Fleet Street Conservation Area.
466. Indirectly, the proposals would preserve the significance and contribution of setting of all the aforementioned heritage assets except that of St Brides Church (Grade I); Nos. 2 – 6 Kings Bench Walk (Grade I) and Nos. 3 North King's bench Walk (Grade II*); Inner Temple RHPG (Grade II); and the Temples Conservation Area, which would experience, via setting impacts, low to slight levels of less than substantial harm.
467. Although these harms have been clearly and convincingly justified, and mitigated through good design, the proposal would result in some conflict with Local Plan Policies CS12 (1, 2 and 4), DM12.1 (1 and 4), DM12.3 (2), DM12.5 (1) and CS13 (1 and 2); Emerging City Plan 2040 policies S11 (1 and 2), HE1 (1) and S13 (1 and 2); London Plan Policy HC1 (C) and with the objective set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
468. The proposals comply with policies CS12 (3 and 5), DM12.1 (2, 3 and 5) DM12.2, DM12.3 (1), DM12.4 and CS13 (3); Emerging City Plan 2040 S11 (3-5), S 13 (3), HE1 (2-9) and HE2 and with the objectives set out in Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

469. The benefits and harms are considered as part of the paragraph 208 NPPF balancing exercise, and in the final planning balance at the end of this report.
470. Objections on heritage impacts have been received from Historic England and the Gardens Trust. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Archaeology

471. The City of London is considered an archaeologically sensitive area in its entirety. In accordance with the City of London Local Plan 2015, all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.
472. The site is located in an area of known archaeology, and previous investigations on the site in the 1920s and 1980s revealed the remains of the medieval Whitefriars priory, as well as Roman and post-medieval remains. The medieval undercroft of the priory, now a listed building, has been preserved within the current development, albeit in a different location to where it was found.
473. An Archaeological Desk Based Assessment accompanied the planning application (MOLA 2024). The Assessment sets out that any potential impacts on any archaeological remains would arise from the excavation of new lift pits and pump pits. These works would not affect the archaeological interest of the preserved crypt. Accessibility and visibility of the preserved crypt at the rear of the site would also be enhanced via the proposals.
474. Although some below ground excavations such as lift pits and pump pits are proposed, these will be located within the current basement footprint where archaeological remains have already been removed and are therefore unlikely to have an impact on archaeological remains of significance. The Whitefriars undercroft is to become part of a visitor centre within the site and will therefore be much more accessible to the public. This public benefit is very much welcomed.
475. The Greater London Archaeological Advisory Service (GLAAS) have advised that no below ground excavations are proposed outside the footprint of the current basements, no archaeological mitigation will be necessary.

476. NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. Paragraph 200 requires that applicants provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. It is also stated that “*Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.*”
477. Core policy CS12 of the Local Plan requires the protection and promotion of the evaluations and assessment of the City’s archaeological remains and their setting, including interpretation and publication of results of archaeological investigations. The preservation, protection and safeguarding of the archaeological remains and their setting and their public display and interpretation is a requirement of policy DM 12.4 of the Local Plan.

Public Access and Inclusivity

478. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2040 and Policy D5 of the London Plan. In addition, the Local Plan Policy DM11.3, draft City Plan and Policy CV3 require high accessibility standards.
479. Local Plan policy DM 10.8 requires “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.
480. The City’s Access Officer has reviewed this application and identified a number of areas which require further consideration at a detailed design stage.
481. It is also noted that the proposed development has been reviewed by City of London Access Group (CoLAG) on the 21st of June during pre-application stage.

Arrival at the Site

482. The site is well-served by public transport and including buses from Fleet Street and Farringdon Street, national rail from City Thameslink and

Blackfriars and London underground from Blackfriars. The walking distances from key public transport nodes has not been provided however it is judged to exceed the recommended 50m without a rest. It is therefore recommended that resting points with accessible seating are proposed wherever possible at maximum intervals of 50m along the approaches to the building from key points of arrivals. A travel plan would be secured via a Section 106 agreement to detail how disabled visitors could request support to get to/from this site if required. Further details of the travel plan are set in the Transport and Highways section of this report.

483. Noting that public transport is not accessible to some users, suitable drop-off points are recommended in best practice guidance BS 8300. No specific drop-off points are identified with informal drop-off anticipated along Bouverie Street. The matter will be dealt with through S278 and by condition through the AMP.
484. The existing route between the northern and southern block currently comprises a significant level change between the internal courtyard and Whitefriars Street navigated by a number of steps and is a significant barrier to access for people who require step-free routes. The proposals will provide a lift, which is accessed from Whitefriars Street to create an intuitive step-free route between Whitefriars and Bouverie Street. Further information regarding the lift specification and maintenance will be secured via condition and AMP.
485. It is also welcome that an accessible parking space is proposed on site located at street level directly off Bouverie Street. Further details of management and design of this entry point and Electric Vehicle Charging (EVCP) would be included within an AMP and secured via condition.
486. Continuing provision of the existing on-street Blue Badge spaces in the area during construction is important provided it is safe for use and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

Entrances

487. London Plan D5 requires entrances to be easily identifiable and to allow independent use without separation. All primary entrances to the development would be step free, automated and with a minimum clear opening width of at least 1000mm, further detail is required regarding how this will be achieved within the existing retail unit and will be secured via condition. Further detail will be secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door

furniture are designed to in line with inclusive-design best practice guidance.

488. Double leaf swing doors are proposed to both the primary student accommodation entrance from Bouverie Street and the cultural space accessed from the central courtyard. Providing primary entrances into the building which are easily identifiable and allow everyone to use the entrances independently without additional effort, separation or special treatment.
489. Reception facilities associated with student accommodation and cultural facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2. Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details would be provided through condition.
490. An Access Management Plan (AMP) for visitors and building users on points of arrival and entrances would be required and would be secured by condition.

Cycle and End of Trip Facilities

491. The long stay cycle parking would be accommodated within the basement and would access via Whitefriars Street through the existing servicing bay. The internal access to the cycle store would be via the servicing ramp or the cycle lift. The internal route from the cycle lift to the cycle store would need to navigate existing columns and concrete wall creating a convoluted route and number of pinch points. Further detail regarding the access route to the cycle store would be secured via condition to ensure that disabling barriers are removed. All gates and doors along the route would be automated sized in accordance with Approved Document M. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users.
492. It is noted that 5% of long stay cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. Irrespective of the approved drawings, full details of the cycle stand types and the setting out of the cycle store, including swept paths, and end of trip facilities are reserved for condition to ensure these are well-designed and are useable promoting a safe, inclusive and welcoming environment.

Vertical Movement

493. London Plan D5, (B)5 states 'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure.
494. All lifts associated with the student accommodation, culture space, crypt, pub and retail will be designed to allow for use in the event of fire to provide a dignified means of escape. Further detail will be secured via condition.
495. The cycle lift would be sized appropriately to provide access to the cycle store in the basement. The detail design would be secured via condition to ensure the lift is designed to accommodate all cycle types, in line with London Cycle Design Standards, including larger recumbent cycles as well as being welcoming and inclusive.
496. Details of the management protocol for people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition.

Horizontal Movement

497. Corridor widths and door openings are confirmed as consistent with AD M(2), including sufficient door widths and passing places for wheelchairs and will be subject to detailed design development.

Public Realm and Amenity Terraces

498. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.
499. The detailed design for student accommodation terraces, public realm and lower ground amenity associated with the cultural space should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

500. The landscape layout will be conditioned to ensure that it is welcoming and inclusive for a wide range of users and provides a variety of seating options for a range of people including recesses for wheelchair users to site alongside other people and a range of seating heights, handrails and backrests.

Student Rooms

501. All rooms would be accessible via step-free routes and 10% of all rooms would be accessible consistent with London Plan Policy H15H.
502. The variety of accessible room types are currently limited to studio rooms only, further detail should be provided regarding how a wider range of accessible room types are provided. To ensure that students have the same level of choice regarding type and quality of room.
503. All accessible rooms would be designed in line with AD M4(3) and would have an entrance door with a minimum clear opening of 850mm with minimum of a 300mm leading edge to the door, a 1100x1700mm wheelchair storage and transfer zone, a 750mm movement route from the point of entry to the openable window, a minimum of 1500mm in front of the kitchenette and ensuite sanitary facilities in line with AD M4(3). Further detail of the room layouts will be secured via condition.
504. The accessible rooms would be prioritised for disabled residents, and there will not be a premium rental cost for these units to disabled residents. Allocation and management of the accessible units is to be secured in the Operational Management Plan as part of the Section 106 agreement.

Student Accommodation Amenity

505. The proposal includes a number of internal amenity spaces all of which should be designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9. Further detail will be secured via condition.

Cultural Spaces

506. The proposal includes cultural space fronting the internal courtyard creating a direct visual link to the public realm. The internal arrangement of the cultural space should be designed to meet the highest standards of access

and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9. Further detail will be secured via a AMP.

507. An end-user has not been secured for the culture use and conditions are recommended to ensure that the cultural offer is inclusive of the greatest range of people at all levels of operation.

Sanitary Facilities

508. Building regulations say that wheelchair users should not have to travel more than 40m to reach sanitary facilities, including any transfer between floors (AD M 2 5.10) and there should be sanitary facilities at the point of entry. This has not currently been demonstrated and further detail is reserved by condition.
509. A mixture of left- and right-hand transfer options should be provided throughout the building to accommodate a wider range of users. Further detail will be secured via condition.

Signage and Wayfinding

510. Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of 'two senses'. Details of signage and wayfinding will be secured by condition.

Inclusive Procurement and Co-curation

511. An obligation for Inclusive Procurement has been made under the Section 106 including but not limited to opportunities of co-creation / co-curation, partnerships with artists from underrepresented groups, as well as opportunities for volunteering, training and mentoring for underrepresented groups of people.

Access and Inclusivity Conclusion

512. The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the site and all of its proposed uses to full fill their goal of being an inclusive and welcoming place to live, visit and enjoy the highest accessibility standards and inclusive environments practices are essential. Great consideration has been given as to how to improve the public realm and the arrival experience to the building in order to secure the optimal solution for the greatest range of

building users. Subject to further design details and an Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.

513. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above. Therefore, subject to the inclusion of conditions, the development complies with policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2040 and Policy D5 of the London Plan. In addition, the proposals comply with the relevant parts (accessibility) of Local Plan Policy DM11.3, draft City Plan Policy CV3 and Policy H15 of the London Plan.

Cultural and Community Use

514. Local Plan policies CS11 and DM11.2 and draft City Plan 2040 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Plan has been submitted in accordance with draft City Plan 2040 Strategic Policy S6.
515. The proposal would deliver two elements of cultural community use, comprising cultural space with the intended occupier being the St. Bride's Foundation as well as the opening and curation of the Whitefriar's Crypt at the south of the site.
516. The St. Bride's Foundation space would total c. 1,240m² of floor space across ground floor and lower ground floor levels, with its ground floor entrance on Whitefriars Street. This space will be used to expand their existing activities in the Fleet Street area, with the charity having its sole existing premises at St Bride's Passage to the east of the subject site. The space would have a clear identity, featuring its own dedicated entrance, and would function separately from the student accommodation.
517. The charity itself was established in 1891 and is dedicated to the printworking, typography, design and publishing crafts. The charity currently runs a programme of workshops and design events dedicated to these fields as well hosting a significant archive of books and print-related periodicals as well as a collection of related objects which includes type specimens. The existing premises also houses Bridewell Theatre.
518. This space would be subject to a cultural space implementation plan and management plan which would be secured via s106 alongside its lease at peppercorn rent for a period of 60 years.
519. The Whitefriars Crypt at the south of the site also forms a part of the cultural offer of the proposal. The Crypt would be staffed by security and open to the

public for free, with a visitor's experience available inside including curated displays. This space would be subject to an implementation strategy secured via s106, and concerning matters including planned events and activities, visitor numbers and marketing efforts (including school trips), and opportunities for collaborations and joint-initiatives. The proposed works would also include improvements to the accessibility for the space by all users, including the installation of a platform lift.

520. As such, officers consider that the proposal would be in accordance with Policy CS11 To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy, Policy DM 11.2 Public Art to enhance the City's public realm and distinctive identity.

Highways and Transportation

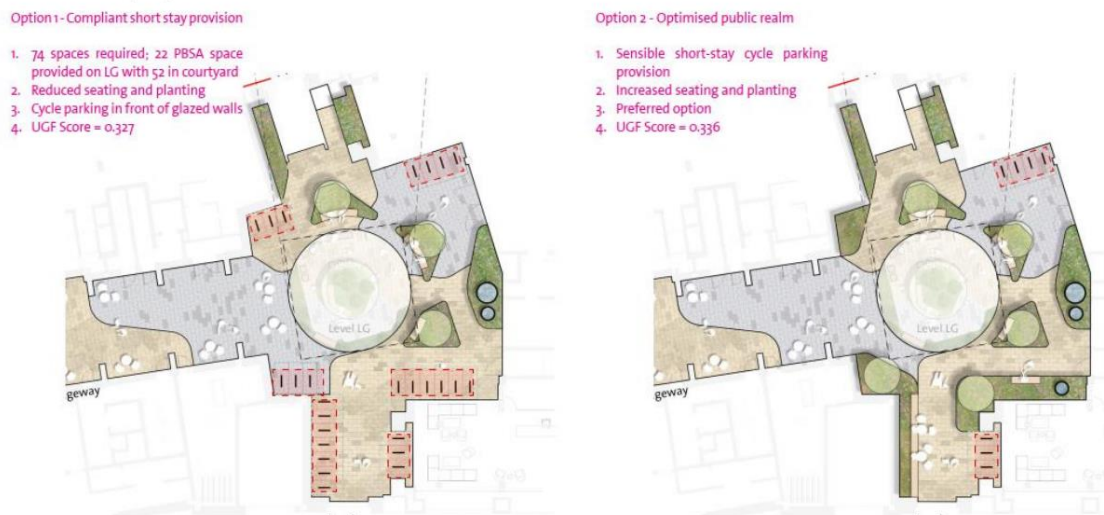
521. A previously consented planning application (Planning ref. 19/00058/FULMAJ) at the Site was to re-provide an office-led scheme with some retail floorspace for the ground and first floors to the north of the building and flexible retail/gym/office uses to the lower ground floor level to both the north and south of the building. The consented scheme was to provide a total of 32,144sqm GIA, an uplift of 1,350 sqm GIA from the existing floor area. The consented scheme has agreement for servicing within the existing service yard and cycle parking within the basement. No car parking spaces were proposed as part of the consented scheme.
522. The application site benefits from being highly accessible by non-car modes, including excellent levels of access to public transport (PTAL rating of 6b) as well as walking and cycling links in the vicinity of the Site. There are well maintained footways connecting the application site and these offer convenient access to the local area, local amenities as well as public transport opportunities such as the bus and rail services.

Cycle Parking

523. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

524. Regarding existing conditions, a total of 170 cycle spaces are located in the basement of the current proposal site. There are 33 Santander Bike spaces provided on Bouverie Street.
525. In terms of proposed development, long-stay student cycle parking will be provided in the basement. The cycle parking store can be accessed via Whitefriars Street existing ramp via the service yard or via the cycle lift.
526. The proposal includes a total 653 long stay spaces, 14 of which are enlarged cycle bays also located within the basement.
527. 22 Short stay visitor guest space for students are also available in the basement. There are options for the provision of short stay spaces within the courtyard – Option 1 which includes 52 spaces complying with policy and Option 2 – providing 14 of the 52 spaces required for policy compliance. The shortfall should be provided nearby within the public realm, subject to S278 agreement and sign off from CoL officers.
528. These options are illustrated in Figure 4.5 below, from the TA. Option 2 offers more opportunities for seating and planting, yet does not comply with policy standards

Figure 4.5: Courtyard Cycle Parking Options



529. A summary table of the cycle parking provision is shown below.

<u>Use Class</u>	<u>Description</u>	<u>Policy requirement</u>	<u>Long stay</u>	<u>Policy requirement</u>	<u>Short stay</u>
------------------	--------------------	---------------------------	------------------	---------------------------	-------------------

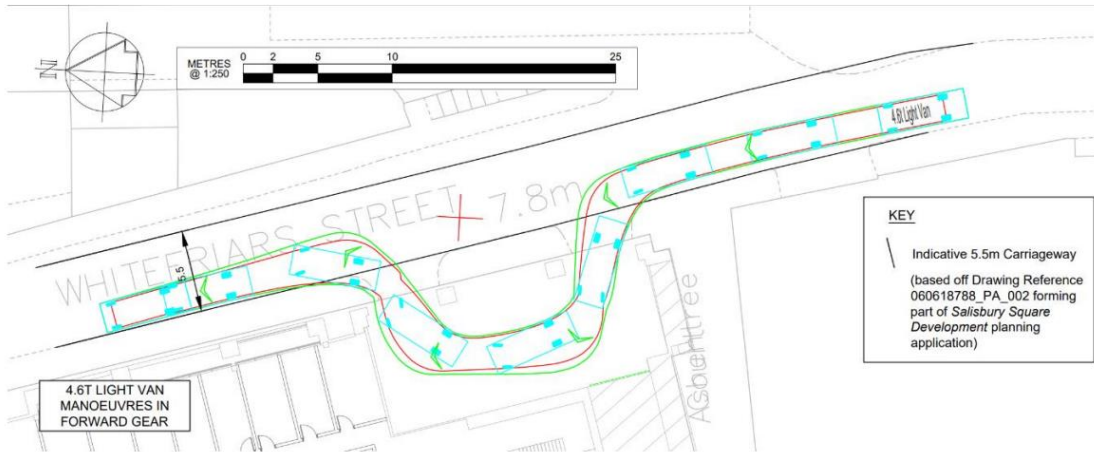
Class C2	Student Accommodation (856 rooms)	0.75 spaces per bedroom	653	1 space per 40 bedrooms	22
Class D1	Other, Gallery (1,797sqm GIA)	1 space per 8 FTE staff	1	1 space per 100 sqm (GEA)	18
Class A1	Non-food retail – Café / Bookshop (444sqm GIA)	first 1000 sqm: 1 space per 250 sqm thereafter: 1 space per 1000 sqm (GEA)	2	first 1000 sqm: 1 space per 125 sqm; • thereafter: 1 space per 1000 sqm (GEA)	8
A2-A5	Drinking Establishment, Pub (517sqm GIA)	1 space per 175 sqm (GEA)	3	1 space per 20 sqm (GEA)	26
Total	-		659		74

530. Should planning permission be granted, the development is required to provide as an obligation, 659 long stay cycle parking spaces and 74 short stay cycle parking spaces for the development.
531. The applicant will be responsible for promoting the use of the cycle parking spaces and as such will be required by Section 106 obligation to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It will be submitted to the City for approval in line with the London Plan Policy T4.
532. In conclusion, the proposed provision is compliant with London Plan cycle parking standards, as the development should look to support users of the site who wish to cycle.

Servicing and Deliveries

533. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2040 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.
534. The service yard has one loading bay accessible via Whitefriars Street. A swept path analysis included in the Transport Assessment (TA), was conducted for vehicles up to 4.6T, which were successfully able to access and egress in forward gear (Figure 3.14).

Figure 3.14: Swept Path Analysis – 4.6t van enters and exits loading bay in forward gear



535. A servicing option within the TA proposed vehicles sized around 7.5T would reverse into the delivery bay, hanging over the public footway. This was demonstrated in the TA (Figure 3.15 below). The City does not support vehicles reversing into the service yard at this location, due to road safety issues and site constraints.

Figure 3.15: Swept Path Analysis – 7.5t box van reverses into loading bay



Source: Pell Frischmann.

536. Servicing within the service yard itself is limited to vehicles no larger than a 7.5T box van and therefore, servicing utilising larger vehicles was initially proposed to be carried out on-street.
537. Further to a wider stakeholder’s consultation it has been established that on-street servicing cannot be considered due to site constraints and security matters to accommodate the upcoming Police base rapid response. The existing parking arrangements and restrictions are being reviewed to cater for such requirements.
538. TfL have also commented on the matter – “*highlighting that London Plan Policy T7 identifies that on street provision is only accepted when off street is not possible and understand that work has been done to prove larger vehicles cannot be accommodated for in the service yard. The TA details*

four options to mitigate on street servicing, including reversing into the servicing yard, weight limits, lengthening and increasing the depth of the servicing yard. All options were discounted.”

539. Therefore, taking the above into consideration, a restriction on the size of vehicles that will carry out servicing and deliveries for the proposed development to ensure they must enter and exit the delivery bay in forward gear will be secured via obligation. The details of the servicing and delivery operations are to be secured by condition.
540. The draft City Plan 2040 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, for all pre-booked deliveries in line with the City of London Transport Strategy. Cargo bikes would be permitted to access the proposed internal off-street servicing area during these times.
541. The development will be required to produce a delivery and servicing plan (DSP), and this would be secured by Section 106 obligation.
542. The development will also be required to produce a Student Welcome Pack, as part of a wider Student Management Plan, both documents secured by Section 106 obligation.
543. These documents will provide further detail must be provided on how the development will manage receiving ad-hoc deliveries such as Amazon and Deliveroo. These deliveries are likely frequently but during off-peak hours, ensuring that these deliveries should be managed and monitored by on-site Facilities Management.
544. Overall, it is not considered that the proposed servicing arrangement would result in any undue implication on the public highway, nor highway safety in general.

Car Parking

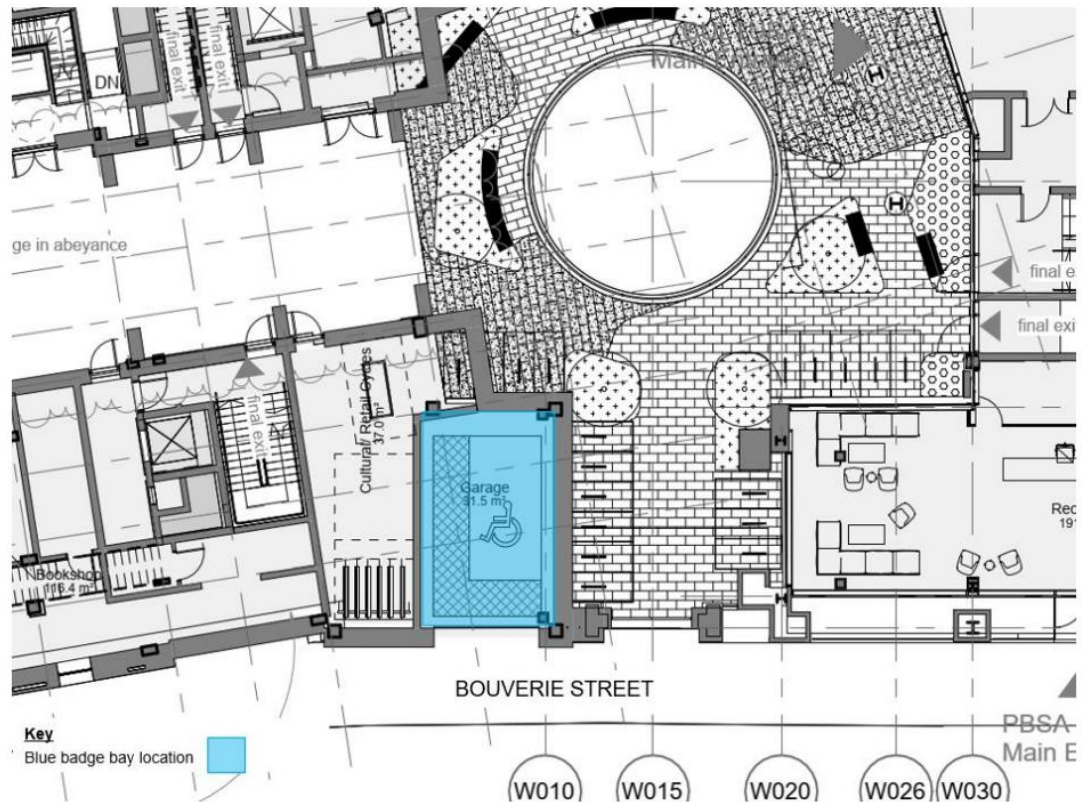
545. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2040 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.
546. London wide policy T6 (Car Parking) requires appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking. Section G of this policy outlines the following:

“Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:

- 1. ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset*
- 2. demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.”*

547. If policy is applied to the quantum’s submitted in the transport scoping report for the provision of 856 bedroom student accommodation, this would mean that the disabled parking requirement for this site would be 26 Disabled Parking bays, to meet London Plan Policy T6 for the student accommodation.
548. The current proposals do not meet the policy requirements for one disabled car parking bay per land use or to accommodate the level of parking required for the student accommodation.
549. Historically, the proposed development site featured 24 car parking spaces within the basement. On the public highway, there are currently two on-street disabled bays on Whitefriars Street. These bays however, are to be relocated as part of the Salisbury Square development to accommodate the needs of the police’s rapid response operations.
550. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. Appropriate disabled persons parking for Blue Badge holders are to be provided in accordance with Policy T6.5 for Non-residential elements of the development.
551. The policy indicates the levels of provisions, to ensure that all non-residential parts of a development provide access to at least one, on or off-street, disabled parking bay.
552. A car-free development has no general parking but still has to provide disabled persons parking, in line with the aforementioned policy. For this development, an on-site designated disabled bay located within Bouverie Street has been proposed. The bay is adjacent to the existing courtyard entrance.
553. The proposed layout (Figure 3.13 from the TA and shown below) has been modified to accommodate an enlarged space; a dropped kerb subject to an agreed vehicle crossover license is required.

Figure 3.13: Blue Badge Bay - Bouverie Street



554. The disabled parking space will be fully managed by facilities management who will provide the necessary support to any future users. Internal discussion amongst CoL officers showed that the disabled parking bay does not fully meet guidance requirements. Compliant on-site disabled parking provision should be secured via planning condition, in order to ensure this disabled parking space can meet the required guidance standards.

Trip Generation

555. A trip generation assessment was undertaken to determine peak hour and daily trips generated by the scheme, comparing forecast trips associated with the proposed development to the existing land uses.

556. The average hourly trip rates used were from 08:00 to 09:00 for the AM peak and 17:00 for the PM peak.

557. The projected future the trip generation and the impact of the new development on the transport network is summarised in the table below below:

Time	Arrivals	Departures	Total (two-way)
08:00 – 09:00	9	91	99

17:00 – 18:00	234	124	358
Daily	1570	1605	3176

558. Regarding mode share, the total proposed development is expected to generate 1,808 trips on foot, 1,053 trips by underground/train, 144 by bus, 122 by bicycle and 49 by taxi.

559. Net Trip Generation (Total Proposed trip minus Total Existing Land uses) demonstrates that the proposal will achieve a AM peak net reduction of 507 trips, a PM peak reduction of 411 trips and daily total net trip reduction of 3,412.

Time	Arrivals	Departures	Total (two-way)
08:00 – 09:00	-560	53	-507
17:00 – 18:00	133	-545	-411
Daily	-1794	-1618	-3412

560. Net mode share can also be found in table 6-20 from the TA below, which describes the net trip reduction by mode. It demonstrates a higher proportion of walking journeys, compared to the trip generation of the previous use - the City supports development which demonstrates higher walking and active mode share.

Table 6-20: Net Mode Share

Method of Travel	AM Peak (08:00 - 09:00)		PM Peak (17:00 - 18:00)			Daily			
	In	Out	In	Out	In	Out	In	Out	Total
Underground / Train	-444	-6	-450	17	-473	-455	-1982	-1866	-3847
Bus	-49	3	-45	3	-51	-48	-200	-185	-385
Taxi	-4	1	-3	3	-3	0	-4	-3	-7
Bicycle	-31	4	-28	5	-32	-28	-119	-109	-228
On foot	-32	51	19	125	14	120	511	544	1055
Total	-560	53	-507	181	-545	-411	-1794	-1618	-3412

*Any discrepancies (+/-1) are due to rounding.

561. It should be noted that despite the net reduction in trips in the AM & PM peak, as well as the total daily drips, the net trip generation does indicate a net addition of trips between the hours of 19:00 and 24:00. This is due to the assumption that students will be returning to the development later in the evening, a difference between traditional PM peak activity when users return home from work between 17:00 and 19:00.

562. Given the accessibility of the site in relation to local public transport services and when considering the projected mode share of trips (subject to appropriate mitigation and improvements to the transport network), it is

considered that this additional level of activity can be accommodated within the highway network.

563. The Applicant has submitted an outline Moving in/out strategy within the Transport Assessment which includes a number of measures to manage and mitigate the impacts on the highway network, including staggering move in and out times. A robust and comprehensive Moving in/out strategy must be secured by 106 through the student management plan with details to be discharged prior to occupation.

564. Trip Generation – delivery and servicing

565. The servicing area for the proposed development will be located off-street via Whitefriars Street. This will be the same arrangement as the current development, with one proposed loading bay to accommodate demand.

566. The proposed servicing trip generation analysis anticipates a total of 86 vehicle trips serving the site per day, including refuse vehicles and facilities management.

567. For clarity, a trip is defined as one movement to or from the proposed site. For example, a parcel delivery by van will count as two trips (arriving and departing).

568. According to a TRICS assessment in the Delivery and Servicing Management Plan (DSP, p17), the total daily trip generation is projected to be 86 trips daily.

569. These trips according to the TA and DSP are unconsolidated therefore, there is potential for these trips to be reduced once consolidation comes into effect.

Public Relam and S278 Agreement

570. The extent of the areas for the highway improvement works (under a Section 278 Agreement) was presented to the applicant. The scope of the works (but not limited to) is set out below and would be secured within the S106 agreement:

Fleet Street

- Resurfacing of the carriageway within the frontage of the site
- Reconstruction of footways as per the City of London's standard materials and City's Healthy Streets proposals
- Reinstatement of street furniture if applicable
- Road Markings and associated traffic orders

- Reinstatement of controlled crossing, associated road markings and infrastructure

Bouverie Street

- Resurfacing of the carriageway within the frontage of the site
- Reconstruction of footways as per the City of London's standard materials.
- Removal of redundant street furniture if applicable (removal and reinstatement) legible London
- Road Markings and associated traffic orders (if applicable)
- Provision of crossover for the provision of disabled bay and accommodation works
- Reinstatement of Santander cycle hire

Whitefriars Street

- Reconstruction of footways as per the City of London's standard materials.

Construction Logistics Plan

571. The submission of a deconstruction logistics plan and construction logistics plan will be secured by condition. The logistics arrangements will be developed in consultation with the City's Highways Licensing and Traffic Management teams to minimise the disruption to neighbouring occupiers and other highway users.

572. Travel Plan

573. In order bring this proposal in line with the policy and address potential requirements for disabled people, a Travel Plan (TP) has been recommended and is to be secured via the Section 106 Agreement.

574. The foundation of the TP is supporting disabled people occupying this development through different measures. Each disabled staff/resident to have a tailored travel plan, on how to get to/from this site, and supported through different initiatives. The foundation of the TP is to support the inclusion of disabled people.

575. Similarly, disabled visitors of this development, could request support to get to/from the site, if the public transport is lacking to meet their needs.

576. Not all London Underground (LU), nearby stations are step-free access, thus some users of this development may require additional support, such

as: arranging a pick up from a nearby LU station which has step-free access or at a pre-arranged location.

577. The TP must also monitor the demand for on-street car parking spaces coming from this development. If records show that demand is higher than the available spaces nearby, the developer will be required to provide additional travel plan measures to support the needs of the disabled users of this development.

Transportation Conclusion

578. Subject to conditions and planning obligations, the proposal would accord with transportation policies including London Plan policies T5 cycle parking, T6 car parking. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2040 Policies AT1, AT2, AT3, and VT3. The proposals do not accord with DM 16.5 however on balance the proposals are considered acceptable in transport terms.

Waste Collection Arrangements

579. Local Plan policies CS17 and DM17.1 require sustainable choices for waste and for facilities to be integrated into building design. Draft City Plan policies S16 and CE1 requires developments to consider circular economy principles.
580. The Cleansing Team have reviewed the waste collection arrangements and confirmed the proposed waste storage and collection facilities comply with the City's requirements.
581. The waste storage is considered to comply with Local Plan policies CS17 and DM17.1 and draft City Plan policies S16 and CE1.

Environmental Impact of Proposals on Surrounding Area

582. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Emerging City Plan 2040 Strategic Policy S8 and Policy DE7 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivers improvements in air quality, open space and views.

-

Wind Microclimate

583. Policies DM10.1 of the Local Plan 2015, Policy S8 of the draft City Plan 2040 and Policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of development should avoid unacceptable wind conditions.
584. Computational Fluid testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site.
585. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways, bus stops and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, consisting of five Comfort Categories defining conditions suitable for: frequent sitting /occasional sitting /standing /walking /uncomfortable.
586. Table 4 outlines the various criteria for wind microclimate assessment. Assessments have been carried out for both the Windiest Season and the Summer Season and with surrounding buildings within a 400m radius of the site.

Key	Comfort Category	Threshold	Description
●	Frequent Sitting	<2.5 m/s	Acceptable for frequent outdoor sitting use, e.g. restaurant, café.
●	Occasional Sitting	2.5-4 m/s	Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies and terraces intended for occasional use, etc.
●	Standing	4-6 m/s	Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
●	Walking	6-8 m/s	Acceptable for external pavements, walkways.
●	Uncomfortable/unsafe	>8 m/s	Not comfortable for regular pedestrian access.

Table 4: City of London criteria included in assessment (and taken from the City's Microclimate Guidelines, 2019).

587. The proposed development is a total of 55.465AOD and therefore, the recommended approach in accordance with the Wind Microclimate Guidelines is to carry out one type of testing. For the purposes of this scheme Computational Fluid Dynamics (CFD) simulations or wind tunnel testing should be submitted. Wind microclimate conditions were assessed using high resolution CFD undertaken by GIA. The report is considered to follow an appropriate methodology and are in line with the City of London's Microclimate Guidelines.
588. The following scenarios have been tested:
- Configuration 1: The existing Site with existing surrounding buildings (The Baseline);

- Configuration 2: The Proposed Development with existing surrounding buildings;
 - Configuration 3: The Proposed Development with cumulative schemes (schemes for which planning permission has been granted).
589. The following consented schemes are considered sufficiently advanced to be treated as baseline, and are included in all configurations tested:
- 100 New Bridge Street (22/00748/FULMAJ)
 - Thavies Inn House (21/00885/FULMAJ)
 - 2 - 7 Salisbury Court (20/00998/LBC)
 - 120 Fleet Street (21/00524/LBC & 21/00538/FULEIA)
 - 120 Fleet Street London (21/00538/FULEIA)
 - Peterborough Court (21/00730/FULL)
 - Northcliffe House (20/00581/FULMAJ)
 - Stonecutter Court 1 (18/00878/FULMAJ)
 - 100 And 108 Fetter Lane (21/00534/ FULMAJ)
 - 11 Pilgrim Street (20/00870/FULL)
 - 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street (21/00755/FULMAJ)
590. The following schemes have also been included as cumulative schemes in Configuration 3.
- 5 Chancery Lane (20/00546/FULMAJ)
 - Hill House (23/01102/FULMAJ).
591. Trees and soft landscaping have not been included in the model, to ensure that conditions represent a reasonable worst-case scenario.
592. The baseline results show that there are no safety or distress exceedances anywhere within the site or surrounding area, with winter conditions ranging between frequent sitting, occasional sitting, standing and walking and summer conditions ranging between frequent sitting, occasional sitting and standing. There are no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling. All off-site entrances within the study area will be suitable for either sitting or standing in all seasons, which will be suitable for the intended use and all sensitive receptors are suitable for intended uses.
593. The proposed development with the existing developments demonstrates comfort levels generally the same as the baseline scenario. The results show that with the proposed scheme, there would a slight reduction in windiness to the east of the site on Whitefriars Street and a slight increase in the windiness around the north-west corner of the site on Bouverie Street and Fleet Street. The occasional seating area in the courtyard by the cultural entrance is suitable for a mix of frequent sitting and occasional sitting in summer. The occasional seating areas in the St Bride's churchyard is

suitable for frequent sitting in summer. The occasional seating area to the east of the Salisbury Square Police building suitable for a mix of frequent sitting and occasional sitting in summer. The proposed level 10 amenity terrace is suitable for a mix of occasional sitting and standing in summer, with the majority of the terrace suitable for occasional sitting. There are no instances of strong winds around the Proposed Development and nearby surrounding area.

594. The proposed development with the cumulative schemes results show that the inclusion of the Cumulative Schemes would result in conditions of a consistent level with those seen in Configuration 2. As such, no wind safety risks were identified associated with the proposed development. On-site conditions are suitable for the intended uses without landscaping or mitigation measures for all proposed entrances, ground level amenity and the roof terrace. Off-site conditions were suitable for the intended use (or consistent with the baseline) for all entrances, bus stops, thoroughfares, crossings, ground level amenity and roof terraces. The inclusion of cumulative schemes did not have a material impact on wind conditions.
595. It is considered that the proposed development in all scenarios tested would not result in any wind safety exceedances either at street level or on any amenity terraces within the surveyed radius. All spaces and identified sensitive receptors would remain suitable for their intended uses. There are no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling. All offsite entrances within the study area will be suitable for either sitting or standing in all seasons.
596. Therefore, no mitigation measures are required and the development is considered to comply with London Plan Policy D8, Local Plan Policy DM10.1, and Draft City Plan 2040 Policy S8.

Daylight, Sunlight, Overshadowing

597. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.
598. Local Plan Policy DM10.7 'Daylight and Sunlight' seeks 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 (BRE) guidelines.
599. Draft City Plan Policy DE8 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby

dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.

600. 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. Policy HS3 of the Draft City Plan 2040 states when considering on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
601. The BRE guidelines "Site layout planning for daylight and sunlight - A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:
- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. 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. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
 - **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

Interpreting results

602. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is *proportionately* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

603. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

Assessment

604. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan. The impact of the development on the nearby residential properties has been assessed. It is noted that all other non-residential properties in the vicinity of the site are of commercial use, apart from a school to the northwest of the site, that they do not have the same expectation for daylight and sunlight as the domestic properties.
605. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City, is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight.

Daylight and Sunlight

606. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from a working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.
607. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
608. Both the London Plan 2021 and the draft City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.
609. The applicant has submitted a Daylight, Sunlight and Overshadowing report and a Daylight and Sunlight Radiance Addendum. A third party review was then commissioned by the Local Planning Authority to review the findings of the reports. The advisor agrees with the scope of assessment in terms of the properties selected to be reviewed, as well as the methodology used in the submitted assessments.
610. With regards neighbouring properties and open spaces the submitted assessment has been undertaken using the recommended BRE daylight (VSC, NSL), sunlight (APSH) and overshadowing (SHOG) assessment methodologies. An 'internal' daylight and sunlight report with regards to the proposed student accommodation has also been submitted.
611. The following properties are identified as sensitive receptors within the surrounding area:
- 148 Fleet Street
 - 147 Fleet Street & 7 Hind Court
 - 145 Fleet Street
 - 143-44 Fleet Street
 - 22 Whitefriars Street
 - 24 Tudor Street
 - 62 Fleet Street
 - 61 Fleet Street
 - 59 Fleet Street
612. Since submission, the proposal has been amended so that it has diminished in bulk at the higher levels, described elsewhere in this report, while the daylight and sunlight and overshadowing assessments have not been subsequently updated. Officers consider an update to each of these

technical reports unnecessary as any impacts would be commensurately diminished as a result of the scheme reducing in size. It was agreed with the applicant that the change in room layout also subject to amendments during the application would impact internal daylight and sunlight levels such that a new report would be necessary, and as such an amended assessment was undertaken and submitted. The results have been set out in this report in the following sections.

Daylight and Sunlight - Neighbouring Impacts

613. Concerning commercial properties, the dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. It is not considered that the proposed development would have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.
614. With regards to overshadowing, while the proposed amenity areas have been tested as described elsewhere in this report, no sensitive receptors were identified in the surrounding area which would necessitate an overshadowing assessment.
615. Properties identified as sensitive receptors in the surrounding area were subject to a two stage assessment, the first stage (Stage 1) identifying where receptors would continue to strictly comply with the BRE Guidelines when considering the impacts of the proposal and the second stage (Stage 2) assessing whether the remaining receptors would face acceptable levels of daylight and sunlight appropriate to their context. Where passing into the second stage of assessment, the report also compares and contrasts the impacts of the proposed against the impacts of the consented scheme at the site (as referred to in the site history section above).
616. Sensitive receptors passing Stage 1 of this assessment are as follows:
- 145 Fleet Street
 - 143-44 Fleet Street
 - 22 Whitefriars Street
 - 24 Tudor Street
 - 59 Fleet Street

617. As the assessment shows that these properties would strictly comply with the BRE Guidelines, they were not subject to further assessment. Receptors then being assessed as Stage 2 are then as follows:
- 148 Fleet Street
 - 147 Fleet Street & 7 Hind Court
 - 61 Fleet Street
 - 62 Fleet Street
618. The assessment of these properties is summarised in the following subsequent paragraphs below.
619. 148 Fleet Street: This property is mixed-use and lies to the north of the site. Residential uses are found on 1st to 4th floors. With regards to strict compliance with the BRE criteria for VSC for daylighting, 12 of 12 windows meet this criteria. When considering the NSL daylight methodology, four of five rooms assessed (80%). The room which does not comply experiences a reduction of 20.9% against a BRE target of 20%. In relation to sunlight, 9 of 12 windows (75%) meet the relevant BRE criteria. During the summer months, these three windows would continue to achieve annual probable sunlight levels above 42% in line with the BRE criteria, while they would experience a 2-5% loss in the winter months against a BRE target value of 5%. When compared to the consented scheme at the site, this is a 3% reduction in winter sunlight hours against the BRE target value of 5%.
620. 147 Fleet Street & 7 Hind Court: This property is mixed-use and lies to the north of the site, with residential uses located across 1st to 4th floors. All four windows tests against the VSC methodology comply with the BRE criteria. NSL assessment has been carried out where floor plans were available, on the 3rd and 4th floors, with one room assessed meeting the BRE Criteria. Of the room which did not meet the BRE criteria with regards to NSL testing, the impact would see an NSL of 20.2% against the BRE target value of 20%, with a high value of NSL retained (78.8%). In relation to sunlight, all four windows considered demonstrate BRE compliance.
621. 61 Fleet Street: This property lies to the west of the subject site, and is a mixed use building including residential uses. Those windows facing the site have been tested, with all meeting the BRE criteria for VSC and APSH. Of the two rooms tested for NSL, one would meet the BRE criteria. The room which would not meet the BRE criteria would experience a change of 21% against the BRE target value of 20%. The applicant's assessment adds that this impact is in line with those resulting from the consented development at the site.
622. 62 Fleet Street: This property lies to the west of the subject site, and is in a mixed-use with residential uses across 1st to 5th floors. 5 of 9 windows meet

the BRE criteria in relation to VSC. Of the remaining four windows, the alterations would be between 20.9% and 22.2% against a BRE target value of 20%. Studio apartments on the 1st and 2nd floors also experience low levels of existing VSC (8.6% and 11.4%) which are reduced to 6.8% and 9%. At 3rd floor level, the tested window would be reduced to 12.6% VSC and the window at 3rd floor level reduced to 17.2% VSC. 1 of 5 windows meet the NSL criteria. Three rooms see alterations between 21% and 29.8% against a BRE target value of 20%, and the remaining studio apartment would experience an NSL alteration of 33.7% with a retained value of 43.8%. 1 of 4 windows meet the BRE criteria for APSH. Two of these windows, at 1st and 2nd floor level, will see annual sunlight levels reduced to from an existing 20% and 27% to 13% and 18% respectively (against a BRE target value of 25%). Turning to winter sunlight, two windows at 2nd and 3rd floor level would see their existing winter sunlight levels reduced from 1% to 0%.

Daylight and Sunlight – Conclusions

623. The scope of the submitted assessment is appropriate, and all nearby relevant buildings have been included in the analysis. Cumulative impacts have not been considered, which is considered appropriate since no other planning applications could be identified in the vicinity of the proposal site. This has been confirmed following third party review. The results of the daylight and sunlight impact assessments are summarised as below:
- 148 Fleet Street – Negligible impact on daylight. Minor adverse impact on sunlight to windows.
 - 147 Fleet Street & 7 Hind Court - Negligible impact on daylight.
 - 61 Fleet Street - Negligible impact on sunlight to windows.
 - 62 Fleet Street - Moderate adverse impacts on daylight. Major adverse impacts on sunlight to windows.
 - 145 Fleet Street - Compliant with BRE targets/guidelines
 - 143-44 Fleet Street - Compliant with BRE targets/guidelines
 - 22 Whitefriars Street - Compliant with BRE targets/guidelines
 - 24 Tudor Street - Compliant with BRE targets/guidelines
 - 59 Fleet Street - Compliant with BRE targets/guidelines
624. The assessment confirms that properties within 62 Fleet Street would be most impacted as a result of the proposal, receiving a moderate adverse impact in terms of daylight and a major adverse impact in terms of sunlight to windows. Considering the existing poor daylighting/sunlighting factors, and the tight knit urban context, although some minor and major adverse impacts have been identified in this case officers consider this to be acceptable overall. Of those minor impacts to 148 Fleet Street, there would be a negligible impact on daylighting while only winter sunlight would be impacted beyond BRE Guideline targets. Concerning the major impacts to 62 Fleet Street, this is described in detail above, while the site would also inherently be impacted more acutely given its close proximity to the subject site. This is also in the context of the other merits of the application, including

the retention of the existing building alongside its optimisation comprising its conversion to student accommodation which would then also provide affordable student housing.

625. Overall, the daylight and sunlight impact of the proposed development on neighbouring properties is considered to be acceptable and in accordance with the requirements of Local Plan Policy DM10.7 and DM21.3

Sunlight to Amenity Spaces

626. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed. A third-party review on the findings of the daylight, sunlight and overshadowing report has also been carried out by an independent reviewer instructed by the Corporation of the City of London.
627. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least half of the area should receive at least two hours of sunlight on 21 March (Spring Equinox). In terms of the overshadowing impact to the proposed communal student amenity spaces, including both external terraces and internal amenity spaces, this is the subject of assessments carried out by GIA and a third party independent review has been undertaken.
628. The external terraces at roof level experience good levels of sunlight, over six hours per day across their entirety, with the BRE Guidelines recommending that a space which receives at least two hours of sunlight per day across half of its areas be considered well-lit.
629. Turning to the internal communal areas, an assessment has not been undertaken concerning those communal spaces at basement level given they have no windows to provide light. These would be expected to be taken up by uses which typically do not require light, including viewing rooms or gym space. A communal amenity space would also be provided at ground floor level which does not meet the BRE Guidelines recommended target.

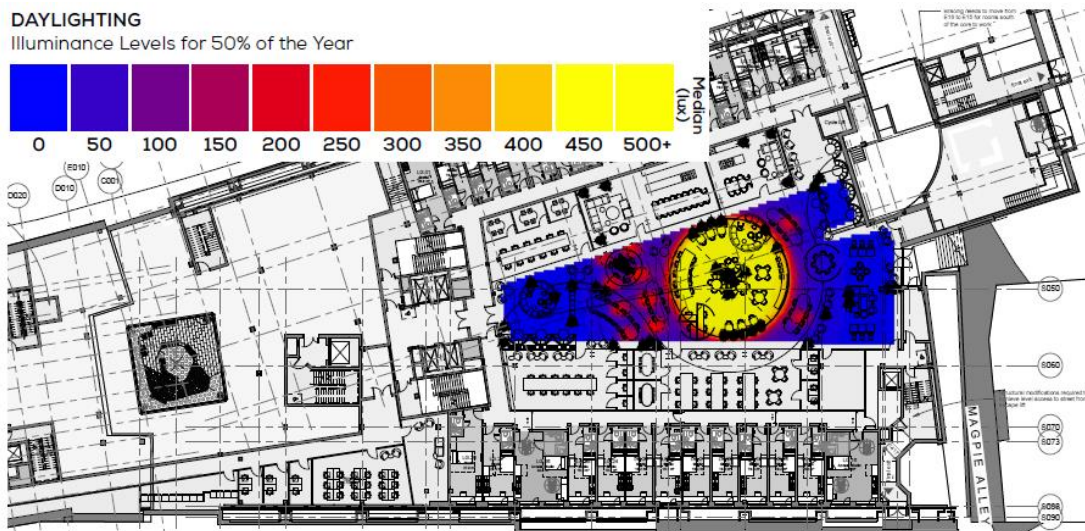


Fig. 03: Median Point Illuminance level within the main Shared Amenity Area at Lower Ground

630. The above figure, taken from the submitted GIA Daylight and Sunlight report, indicates the illuminance levels across half of the year and showing that this space achieves the recommended lux level across 31% of the room. This is below the 50% BRE Guideline target for such a space. The space performs well under the skylight, as would be expected, while the remainder of the space would be reliant on artificial lighting.

Daylight and Sunlight – Internal

631. In terms of amenity for future occupiers, the design of the scheme has sought to optimise the availability of daylight and sunlight while also accommodating the substantial retention of the existing building. The constraints in retaining the existing building include making best use of the existing form of the building, including the central lightwell, while also taking into account the existing envelope and façade structure of the building. The paragraphs below set out the assessment undertaken within the development separated into those rooms within the North Block and those within the South Block.

South Block

632. Concerning daylight, against the BRE Guidance living room target of 150 lux, 40% of the student rooms (317 of 784) achieve said target. When applying the 100 lux bedroom target of 10 lux this increases to 50% compliance (401 of 784). With regards to sunlight, 35% of student rooms (270 of 784) achieve the target of 1.5 hours or more of direct sunlight to a window on 21st March. When considering those rooms only in the new build extension element of the proposal, this compliance rate increases to 81% meeting the 150 lux target and 92 % meeting the 100 lux target, and with 65% of student rooms achieving the target level of exposure to sunlight.

North Block

633. The submitted daylight assessment sets out that the 11% of the student rooms in this block (8 of 72) achieve the 150 lux target, and 32% (23 of 72) meet the 100 lux target. 17% of these 72 student rooms then meet the target of 1.5 hours of direct sunlight exposure to windowpane.

Assessment

634. The compliance of the proposal is broadly similar to, albeit slightly worse than, other proposed purpose-built student accommodation schemes which have come forward in similar urban locations, albeit they have been redevelopment schemes rather than retrofit. The ability of the scheme to provide daylight and sunlight is constrained by the tight knit urban location, restricting its eastern, western and southern elevations, and while the widest streetscape falls to the north this elevation naturally suffers from diminished light. Further to this is the retention of the building which represents a significant design constraint, with daylight and sunlight levels improving in the extended new-build section of the building. When considering these constraints, the design that is proposed has been optimised – making use of internal layout design and the existing lightwell to provide light where possible. In addition, the layout of each room will be secured via condition so those areas of each student room which enjoy the most light will be those areas dedicated to study and recreation.
635. Officers express some concern around the light levels to some of the student rooms and amenity spaces within the proposed development. The majority of the rooms failing to meet the relevant BRE guidance are to rooms on the lower floor levels in particular, those which are north facing, and both the eastern and western elevations are impacted by the tight urban grain of the surrounding streets.
636. Whilst concern remains, Officers consider that the site has been well optimised for its location, has struck the fine balance between daylight distribution and overheating with the variation in window design, and overall consider that the students would experience good levels of amenity with access to a range of internal and external communal spaces that are well lit in parts. This is particularly given the building is being substantially retained, representing a significant design constraint which is then compounded by the existing tight knit urban grain of the surrounding street scene. It is also recommended that the layout of the rooms be optimised and secured by condition to ensure that desks are located in the brightest part of the rooms.
637. Overall, the internal daylight and sunlight of the proposed development considered to be acceptable and in accordance with the requirements of Local Plan Policies DM10.7, DM21.3 and DM21.5, London Plan Policies D3, D6 and H15(A)(5) and Draft City Plan Policy DE7.

Solar Glare

638. Policy D8 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE8 require development to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.
639. The applicant has provided a solar glare assessment within the submission, produced by GIA Surveyors. The report concludes that the design of the facades is unlikely to give rise to a significant solar glare effect to surrounding road users (with viewpoints tested at nearby roads comprising Fleet Street both eastbound and westbound, Pleydell Street approaching Bouverie Street, Eastbound traffic on Temple Lane approaching Bouverie Street, Northbound on Temple Avenue and westbound on Ludgate Hill). Officers agree with this statement. The design of the building incorporates solid façade elements that break up the intensity of the glazing, and the materiality for the solid elements would have relatively low reflectivity. Officers consider that there would not be a high potential for solar glare as a result of the development.
640. For the aforementioned reasons., it is considered that the no further assessment of the solar glare impacts of the development is required, as these are expected to be minimal.

Light Pollution

641. Local Plan Policy DM15.7 and draft City Plan 2040 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
642. To ensure that appropriate lighting levels are achieved externally and internally and to mitigate impacts of public realm and nearby residential properties, it is considered pertinent that a condition for the submission of relevant details of a Lighting Strategy and Lighting Concept are submitted for approval. This will have to be submitted prior to the occupation of the building and the details shall accord with the requirements as set out in the Lighting SPD, including but not limiting to details of all external lighting (street, amenity lighting illuminated advertisement etc) and internal lighting visible from the public realm or which could impact to residential amenity and the environment.

Air Quality

643. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction and transport of construction materials and waste must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.
644. The City's Air Quality Officer has raised no objection subject to conditions in respect of generators, combustion flues, and Non-Road Mobile Machinery Register. However, it has been raised that the submitted assessment states that no generator is required. As such, the Air Quality Neutral Assessment condition is appended so this can be confirmed in writing.
645. In light of the above and subject to conditions, the proposed development would accord with Local plan policy CS15, policies HL2 and DE1 of the draft City Plan 2040 and SI 1 of the London Plan which all seek to improve air quality.

Noise and Vibration

646. London Plan Policy D13 requires the proposed development to mitigate noise-generating uses and Policy D14 aims to avoid significant adverse noise impacts on health and quality of life, and Local Plan Policies DM3.5 and DM15.7, seek to ensure that operational noise does not adversely affect neighbours. Policies S1 and HL3 of the Draft City Plan requires that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.
647. The impact of the proposed development in terms of noise associated with the operational stage of both the museum and student accommodation would be negligible. A deconstruction and construction management plan will be required by condition to ensure that noise and disturbance is controlled during the deconstruction and demolition phases and ensure nearby sensitive receptors amenity is not detrimentally impacted.
648. In regard to noise from plant, an acoustic report has been submitted with the application. This indicates that plant could be operated without detrimentally impacting on neighbouring properties in respect of noise and disturbance.

649. The Environmental Health team have been consulted and conditions have been included with the recommendation. This includes a condition to restrict the hours of use for the terrace on level 10 between 22:00 and 07:00.
650. Due to there being nearby sensitive receptors it is considered necessary to restrict overnight servicing, therefore a condition will be included to ensure no servicing of the development shall take place between 23:00 and 07:00 Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays.
651. The proposed student accommodation has the potential to increase pedestrian movements around the site at a range of times and therefore potential for noise and disturbance to neighbouring properties. The applicant has submitted an outline Student Management Plan with the application, the details of which would be secured by the condition. The site would benefit from a comprehensive 24/7 management team, including on-site staff such as an accommodation manager, receptionist, cleaning staff and security staff who would be present throughout the day and night. The building would also be served by a comprehensive CCTV system to aid in the management of the building and surrounding spaces. As such, officers consider that adequate management of the development would likely ensure no adverse impacts are caused due to increased pedestrian movements around the site or increased number of users of the building.
652. Overall, subject to conditions, the development should not detrimentally impact on amenity of surrounding properties in respect of noise and disturbance. Therefore, the Proposed Development complies London Plan Policy D13 and D14, Local Plan Policies DM3.5 and DM15.7, and Policies S1 and HL3 of the Draft City Plan.

Health Impact Assessment

653. Policy HL9 of the draft City Plan 2040 requires major developments to submit a rapid Health Impact Assessment to assess potential health impacts resulting from proposed developments.
654. Policy GG3 of the London Plan states that *“To improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments”*.
655. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The

HUDU checklist has been satisfactorily completed and this document sets out that no adverse health impacts are expected to result from the proposed development.

656. An appendix to the HIA has been provided which contains a Primary Health Care Assessment. As the development is targeted at students, it is assumed any impact on local healthcare services would be minimal. The majority of students are expected to register with university affiliated GP's which they are directed to via the university websites. Further to this, a review of GP capacity in the surrounding area is included, with capacity identified at a number of GP surgeries. The HIA states that this identified capacity exceeds the expected impact generated by the proposed development, calculated at 0.5 FTE GP's - a figure not accommodating the percentage of students who would access university-affiliated GP surgeries and health care services, or those who would choose to remain registered with their existing GP.
657. Comments were received from NHS North East ICB stating that the scale of this application means that it will have a significant impact on local health infrastructure. NHS North East ICB expressed that they would request a contribution from the developer to mitigate the impact of the development on health. The applicant has agreed to the one-off contribution, in line with the ICB request.
658. The ICB also raise issues in their response which are addressed elsewhere in this report or via details to be secured by condition. With regards to daylight, this is addressed in paragraphs 597 to 640 of this report, and the performance of the proposal in terms of acoustic insulation would be secured via condition. Turning to emergency vehicle access, the site includes a servicing area which would minimise any conflict between such vehicles and pedestrian movements, in addition to all proposed controls as to parking and servicing then excluding emergency vehicles from such restrictions.
659. In conclusion, potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations, and provides sufficient context which includes identified GP capacity in the surrounding area.

Sustainability

Circular Economy

660. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies

CS15 and DM 17.2 and the emerging City Plan 2024 policy DE1 set out the City's support for circular economy principles.

661. The Site is comprised of two blocks, 'North' and 'South', originally completed in 1989. The two blocks have independent superstructures but are connected at ground and lower ground floor levels. Both blocks are supported on a reinforced concrete (RC) raft foundation.
662. The North block has a RC frame. This building is 5-storey tall and has one level of basement. The roof comprises a steel plant enclosure.
663. The South block is steel framed with concrete rib deck superstructure slabs and a RC basement. The building is 7-storey tall and has two storeys of basement. Where the façade steps in at L04 and L05, steel transfer beams are used to support the columns stepping in.
664. According to the applicant team, the intention for the development has always been to retain as much as possible whilst making the development economically feasible. The proposed structural design approach for both blocks was to avoid foundation enhancement or new foundations, whilst still achieving the required massing and number of floors for densification. Due to the location and limited site space, the financial feasibility of the project also relies on avoiding major substructure works. To achieve these criteria, partial demolition of the top floors and replacing with lightweight structure would be required for load balancing.
665. The design team considered two main approaches for the façade, (1) retain and upgrade to meet current energy efficiency standards or (2) replace the existing façade with a new one. Opportunities and constraints were explored for both approaches.
666. When considering façade retention, key design criteria were flagged such as the need to install cavity barriers (fire protection), requiring significant removal of the existing façade, and the need for internal wall lining to upgrade the thermal performance. Intrusive surveys undertaken at an early stage revealed corrosion to the steel subframe, water ingress and damage to cladding, confirming that significant works would be required to make the façade compliant with current standards.
667. The existing windows require significant maintenance work and are reaching the end of their life so need full replacement in due course. Replacement now, rather than in the future, allows greater flexibility in the ventilation strategy and immediate improvement in acoustic and thermal performance.

Carbon options:

668. A redevelopment options assessment was undertaken following the City's Carbon Options Guidance.

669. Three redevelopment options were investigated:

Option 1 - Refurbishment with minimum development

(baseline scenario)

No structural intervention and assessing the reuse of the existing façade's granite in the proposed façade.

Option 2 - Refurbishment with extension

(maximum achievable extension without demolition of any existing floors)

South block 2 new floors, North block 1 new floor.

Complete replacement of facades without any granite reuse.

Option 3 - Refurbishment with major extension

(maximise new floor area with minimal strengthening of existing structure)

Demolition of upper slabs and new additional storeys

- South block - 2 top slabs demolished, 6 new floors
- North block - 1 slab demolished, 3 new floors

Complete replacement of facades without any granite reuse.

Retention rates	Option 1	Option 2	Option 3
Substructure retained by mass	100%	100%	100%
Superstructure retained by mass <i>(frame, upper floors, roof, stairs, ramps)</i>	North block 100% South block 100%	North block 93% South block 87%	North block 80% South block 70%
Superstructure retained by area <i>(external walls, windows, ext. doors)</i>	0%	0%	0%

670. Total upfront embodied carbon for Option 3 is 34% higher than Option 1 and 12% higher than Option 2. Total WLC for Option 3 is 24% higher than Option 1 and 9% higher than Option 2. A significant factor in the increase of carbon is attributable to the increase in floor area. Option 3 provides 19% increase in NIA over Option 1 and 9% over Option 2.

671. All options include a high level of retention of sub and superstructure. Retention of the existing south block facade is not possible for any of the options due to its poor condition (corrosion to steel subframe, damage to cladding, failed double glazing units, no cavity barriers, areas of missing insulation) but areas of stone tiles are planned for reuse. The amount of extension has been designed to work with the loading capacity of the

existing sub/superstructure thereby minimising any strengthening works and the associated carbon. Due to changes at roof level Options 2 and 3 are able to offer a significant increase in greening and outdoor amenity space delivered in the proposed scheme. However, only Option 3 was deemed economically viable by the applicant due to the increase in floor area / no. of bedrooms achievable. It is Option 3 which forms the basis for the proposed development. Acknowledging the level of retention and efforts to minimise structural intervention along with the improved amenity and increased site density Options 2 and 3 can be recommended.

Development proposal

672. As outlined above, the development proposal would see the demolition of upper slabs to allow for a lighter weight vertical extension;

South block - 2 top slabs demolished, addition of 6 new floors
North block - 1 slab demolished and the addition of 3 new floors

673. At least 80% of the superstructure of the North Building and 70% of the superstructure of the South Building would be reused including complete reuse of the substructure for both buildings.
674. The design team assessed the feasibility of different structural floor options for the (lightweight) extension areas. A lightweight steel frame joisted slab with timber deck was chosen. This option was the second lowest in terms of embodied carbon; a solid CLT slab would have been lower, but this option was ruled out due to fire safety and cost challenges.
675. In April 2020, planning permission was granted for extension and façade changes to deliver an office use under a different applicant. That scheme was abandoned in 2023. Strip out works were undertaken as part of enabling works of the extant scheme prior to the current applicant's ownership of the building. This means there was no significant opportunity to review reuse of building interior items, such as services, raised access floors, finishes and ceilings etc.
676. A Circular Economy Statement was submitted as part of the planning application and includes a detailed pre-demolition audit, conducted by a specialist waste contractor. The pre-demolition audit assessed the materials predicted to arise from demolition/deconstruction works, identified the key demolition products (KDPs) and outlines a range of suitable strategies and specialist contractors for reuse/recycling. The audit recommends a target of 12% (by weight) of materials should be reused.
677. Deconstruction will be prioritised over demolition for elements with the highest reuse feasibility/value including granite cladding and steel sections

from areas of the building being removed/reconfigured (upper floors, plant area). The granite cladding tiles are generally in good condition and should hold aesthetic and financial value if removed intact. They could also be used for terrazzo tiling if unable to be removed intact. Currently an allowance of approx. 436m² is allocated for ground floor façade with repurposed granite.

678. Additional opportunities with the highest potential carbon impact as set out in the Circular Economy Tracker include:
- Procurement of steel (rebar/sections) including higher recycled/reused content
 - Reuse of steel beams and columns from demolition on existing site
 - Use of aluminium windows including post-consumer recycled content
 - Stuff layer
 - Prioritise manufacturers that can provide products with higher recycled content
 - Prioritise furniture from second-hand market
679. The pre-demolition audit also provides recommendations on how to maximise reuse of salvaged materials including:
- As long a lead-in time as possible and maximum exposure are required
 - Assess potentially for reuse by the same client locally
 - Sell or give away locally
 - Consider setting aside storage on site for segregation of salvaged items.
 - Working with the design team for the new development, consider any options for direct onsite reuse
 - Consider options for reuse of items in any other nearby planned projects.
 - Advertise as available to local organisations
 - Advertise more widely via virtual exchange platforms
680. Exploration of these opportunities is secured via condition, addressing a further pre-demolition audit submission and the submission of a detailed Circular Economy Statement.
681. The project targets for excavation, demolition, construction and operational waste all match, as a minimum, those set out in Policy SI 7 of the London Plan.
682. The Circular Economy Statement outlines the key targets and commitments of implementing circular economy principles in the proposed development. Some of the key measures proposed to address circular economy principles are:

Designing out Waste

- High level of retention of the existing sub-structure and super structure
- Reuse of existing granite

- Potential reuse of existing steel
- Prioritising suppliers with takeback schemes

Adaptability

- The proposed structural strategy for the new floors promotes adaptability if the development is to be retained and refurbished in the future. However, there are limitations of withstanding heavy loads
- The façade design will suit future change of use. The enhanced design performance of the façade allows for future change of use.

Flexibility

- The plant currently located on the roof of the South Building will be relocated to the basement allowing for greater flexibility in the design of the roof.
- The existing floors are being reused and are flexible to the needs of the building.

Replaceability / Disassembly

- The design of the new floors will aim to implement the ‘building in layers’ approach, to allow different elements to be replaced whilst maintenance and will use mechanical fixings for the main structure.
- Decentralised HVAC systems to include localised MVHR systems and smaller HVRF Systems which allows for ease in future replacement.

683. **Operational energy:**

- London Plan Policy SI 2 requires major development to be net zero-carbon, with a minimum reduction in regulated emissions (i.e. those associated with heating, cooling, ventilation, hot-water and lighting) of 35 per cent beyond Part L of the Building Regulations. Non-residential developments should target a 15% reduction in CO₂ emissions, through energy efficiency measures (Be lean stage) alone. Following all stages, the combined measures are expected to reduce the regulated operational carbon emissions by 32% compared to a Part L 2021 compliant building.

Operational energy reduction for the proposed development

Modelled floor area (m ²)	31,495		
	Tonnes CO ₂ per annum	Stage reduction	Stage percentage reduction
Baseline (Part L 2021)	117.5	N/A	N/A
Be Lean: Demand reduction	113.1	4.4	4%
Be Clean: Decentralised energy	113.1	0.0	0%

Be Green: Low/zero carbon technologies	79.4	33.7	29%
Total reduction	-	38.1	32%

684. The design includes several measures to reduce the energy demand and operational carbon emissions, in line with the Energy hierarchy set out in the GLA Energy Assessment Guidance 2022 which are set out below.

Be Lean

The key 'Be Lean' strategies include:

- a high-performance façade design that optimises glazing ratios (façade is 22% glazing) and performance based on orientation to maximise solar gain, natural daylight, and external views. All glazing will be specified with an improved SHGC (solar heat gain coefficient) to minimise heat gain and risk of overheating.
- Building services optimised for efficiency, focusing on lighting, hot water systems, and fan energy.
- All services pipework, valves, fittings and ductwork will be insulated and distribution routes designed (particularly avoiding lateral pipe runs in living areas) to minimise unwanted heat loss or heat gain.
- Passive/mixed mode ventilation is incorporated for storeys level 5 and upwards (where external noise levels are considered suitable). Ventilation systems will incorporate heat recovery.
- It is proposed that a Building Energy Management System (BEMS) is installed to monitor, control and sequence key mechanical and electrical plant.
- An energy saving key card switch will be installed within each guestroom to control the lighting circuit and ensure that energy is not being wasted when rooms are unoccupied.

Waste Water Heat Recovery was considered but ruled out following assessment of another scheme installed by the energy consultant where results demonstrated that the energy, carbon and cost savings did not provide any substantial benefit, when compared against the increased installation and maintenance costs.

A 4% reduction is achieved compared to Part L at be lean stage, which fails to meet the GLA's recommended target of 15% (non-residential development).

Be Clean

According to the London Heat Map Tool, there is no existing or proposed communal or district heating scheme in close proximity to the site at this time. This was confirmed through correspondence with Eon.

Space and pipework allowance has been allocated within the basement, should a district heat network be available in the future. A full connection strategy will be developed post concept design.

Be Green

The key 'Be Green' measures proposed include the use of highly efficient air source heat pumps for heating, cooling and hot water and a 679m² array of roof level photovoltaic panels predicted to generate 92,422 kWh/year.

The proposed development will be fully electric in operation with the exception of the emergency generators.

EUI

Energy Use Intensity (EUI) is a measure of the total energy consumed in a building annually. It includes both regulated (fixed systems for lighting, heating, hot water, air conditioning and mechanical ventilation) and unregulated (cooking and all electrical appliances, and other small power) energy.

The estimated whole building EUI for the proposed development is 65.9 kWh/m²/year (GIA), which indicates a very high level of energy efficiency, although it is above the GLA target of 55 kWh/m²/year.

The estimated space heating demand is 9 kWh/m²/year (GIA), which is below the GLA target of 15 kWh/m²/year.

Whole Lifecycle carbon:

685. The following carbon reduction measures have been incorporated into the proposed design:
- Retention of the existing structures of both the North and South Blocks
 - Vertical extension (removal and new structure) optimised to keep strengthening of existing sub/superstructure to the minimum possible.
 - Optimisation of duct and pipe runs
 - Change of cladding at upper levels from zinc to PPC aluminium
 - Offsite manufacturing of shower room pods (which minimises material use/waste)
686. The carbon reduction opportunities identified in the applicant team's reduction strategy which will be explored in the further design phases include:
- Optimise design and specification of materials (steel, concrete, internal partitions)
 - Investigate suitability/availability of reclaimed steel sections. Reuse of existing steel sections to be demolished. Investigations into the availability of off-site reclaimed steel to be conducted at time of procurement.
 - Commit to higher proportions of steel produced using electric furnaces rather than fossil fuel furnaces (linked to availability and subject to cost approval)
 - Procure materials locally (concrete, reinforcing steel etc)

- Procure materials covered by EPD certification
- Concrete specifications and optimisation of cement content / use of cement replacement
- Specification of low-carbon aluminium façade elements
- Optimisation of supply chain for prefabricated precast concrete façade bays
- Optimise design and specification of MEP systems including refrigerant
- Explore reusability of existing lift cars
- Efficient design/reduction in quantity of fitted furniture in bedrooms

687. The following table shows the whole life-cycle carbon emissions of the proposed scheme compared to the GLA benchmarks (residential benchmarks, as no student accommodation benchmarks are available):

Whole life-cycle carbon emissions by stage and compared to GLA benchmarks

Stages	Lifecycle Carbon Emissions (tCO ₂ e)	Carbon Intensity (kgCO ₂ e/m ² GIA)		
		Development proposal carbon intensity	GLA standard benchmark*	GLA aspirational benchmark *
Upfront Embodied carbon (A1-A5)	22,217	633	850	500
In-use & End-of-Life Embodied carbon (B-C, exc. B6-B7)	23,324	655	350	300
In-use Operational carbon	8,263	236	n/a	n/a
Lifecycle Embodied Carbon (A-C, excl. B6-B7, incl. sequestration)	43,026	1,226	1200	800
Whole lifecycle carbon (A-C, incl. B6-B7 inc. sequestration)	51,289	1,462	n/a	n/a

**GLA Residential benchmarks*

688. Total WLC emissions of the proposed development over a 60-year period are estimated to be 51,289 tCO₂e (1,462 kgCO₂e/m²GIA). The Upfront Embodied Carbon (A1-A5) accounts for 43% total whole life carbon

emissions. Operational emissions are calculated at 8,263 tCO₂e (236 kgCO₂e/m²_{GIA}), equating to 16% of whole life carbon emissions.

689. After the submission of the application, limited changes to the form and massing have been made following negotiations with Planning Officers. The primary changes are the loss of all 15 bedrooms from the 10th floor (plant and circulation spaces remain at 10th floor) and a 2m step back on the 9th floor of the south block's south façade. The total floor area has been reduced by 355m², just 1% of the total area. These changes will be reflected in a WLCA which will be conducted during Stage 4 technical design phase. As the floor area / massing has decreased, a positive effect on carbon emissions would be expected resulting from this change in massing. Stage 4 and post-completion WLCAs will be secured by condition.
690. The upfront embodied carbon (A1-A5) estimated at planning stage (Stage 2) is approx. 633 kgCO₂e/m²_{GIA}, well below the GLA standard benchmark but exceeding (+23%) the GLA aspirational benchmark (500 kgCO₂e/m²_{GIA}).
691. The life-cycle embodied carbon (A-C, excluding B6-B7) is estimated at 1,226 kgCO₂e/m²_{GIA}, only exceeding the GLA standard benchmark (1200 kgCO₂e/m²_{GIA}) by 2.1%.

BREEAM

692. Emerging City Plan Policy DE1 requires major developments to achieve a minimum BREEAM rating of 'Excellent' and to aim for 'Outstanding'. A BREEAM pre-assessment has been carried out (under the BREEAM NC v6.1 New Construction scheme for a fully fitted development.) which indicates a target score of 79.32%, exceeding the threshold for 'Excellent' (70%) and falling just below the threshold for 'Outstanding' (80%). The potential score given at pre-assessment stage is 91.9%. The development achieves a moderate to high number of credits in the City's priority areas of Water, Waste, Pollution and Materials. The development falls slightly short in the Energy category. This is in part due to credits for free cooling not being achieved as areas of the building are not suitable for natural cooling due to noise limitations. The Wst 05 credit – Adaptation to Climate Change is targeted as required by the Local Plan.
693. The target rating meets the existing Local Plan Policy CS15 and the emerging City Plan 2040 policy requirement. The applicant should explore options to achieve 'Outstanding' based on the pre-assessment. A post completion assessment is secured by condition.

Urban Greening and Biodiversity

694. Local Plan Policies DM10.2 (Design of green roofs and walls) and DM19.2 (Biodiversity and Urban Greening) as well as the emerging City Plan 2040 policies OS2 (Urban Greening) and OS3 (Biodiversity) encourage the inclusion urban greening such as green roofs and walls. Planting would provide a green and attractive setting and roof terraces offers important amenity spaces for occupiers of the building. The proposed greening accords with the local plan policies.
695. The development proposal includes the following greening and biodiversity measures:
- Extensive green and intensive brown roofs namely at ground floor and levels 7-11
 - Level 10 has a terrace that incorporates seating areas and planting, including raised planters and specimen trees, climbing plants on pergolas
 - The public realm incorporates intensive raised planters and standard specimen trees. The raised planters will be seeded with shade tolerant planting owing to their location. Seating will be incorporated into the raised planters
 - Shade and climate resilient planting,
696. The site currently features minimal vegetation and a biodiversity unit score of 0. As such, the proposal will offer a significant increase in the site's offering. With the site designated as primarily residential the GLA's recommended target UGF score is 0.4. Whilst the target of 0.4 is not possible due to the retention of the existing building and balancing the proposed works in a sustainable manner, all opportunities for greening have been explored. The design offers tree, shrub and herbaceous planting, as well as a biodiverse roof alongside the mechanical & plant requirements. The design has sought to maximise planting and biodiversity by providing an intensive brown roof at Ground Floor level (in the south block internal atrium) and Levels 08-11. Green roofs are proposed on the lift over runs. Biodiverse shade and drought planting has been proposed in raised planters to the Ground, Lower Ground Floors and PBSA Terraces. Trellis climbers have been omitted to facades because of potential combustible materials located on the facade. Climbers have been introduced to pergolas away from facades on the L10 PBSA terrace in lieu. Overall the proposal achieves a score of 0.305. Plans have been submitted, indicating the location and size of proposed greening in additional amended received plans on the 8th October 2024
697. Details of the quality, species, irrigation and maintenance of the proposed urban greening are required by condition.

698. As such, officers are satisfied that urban greening has been maximised on site and that due to offsite contributions and 278 works, in this instance, a deficiency under the minimum target is acceptable.
699. An Ecological Appraisal was undertaken by the sustainability consultant following Statutory assessment requirements. With the proposed greening, the development achieves a Biodiversity Habitat Units score of 0.47. This equates to 3.13 biodiversity units per hectare meeting the emerging City Plan target of 3 BU/ha. (Policy OS4: Biodiversity Net Gain). As the existing biodiversity score is 0 it is not possible to report a percentage improvement.
700. The Ecology Appraisal includes a section on Management Recommendations which the consultant advises, "should be adopted as part of a Landscape and Ecology Management Plan (LEMP)". Details and drawings of the final landscaping design and a LEMP will be secured by conditions.

Climate Resilience

Overheating

701. Overheating in mixed use developments can be a problem if it is not dealt with at design stage. The PBSA and commercial areas (retail and coworking) have been assessed in accordance with the appropriate technical guidance (CIBSE TM52) with consideration for current, and future weather files. The detailed overheating assessment demonstrates that the design is compliant for current weather conditions but shows some areas as non-compliant against future weather files. A mitigation strategy to enable compliance and adaptability to future climates will be addressed during detailed design phase. The mitigation strategy will be secured by condition.
702. Due to the enhanced performance of the building fabric, external heat gains are reduced, however having less 'leaky' buildings, means that removal of internal heat gains becomes more difficult. Cooling demand will be minimised through passive measures. Active cooling would be provided by high efficiency ASHPs when required.
703. Solutions already incorporated to minimise internal heat gains include use of LED lighting, and vertical distribution of hot water services to mitigate heat gains into internal circulation spaces.
704. The solar shading, and passive design measures will be considered in more detail at the next stage of the design. Additional passive measures, such as external blinds, internal fans, additional shading will be provided as required to ensure spaces remain comfortable in the future. The submission of

detailed information on the solar shading, and passive design measures proposed will be required by pre-commencement condition.

705. Water resources

706. Water efficient/low flow fixtures and appliances will be specified to minimise water use. 8 out of 10 BREEAM water credits are targeted demonstrating commitment to efficient water use.

707. Rainwater harvesting is proposed in the form of a combined rainwater recycling and surface water attenuation tank.

Flooding and Sustainable Drainage

708. A flood risk assessment has been conducted by a specialist contractor. The site is considered to have a very low probability of flooding from all sources. The surface water drainage strategy considers surface water runoff management, and the solution proposed ensures flood prevention against a 1–100-year rainfall event plus 40% climate change allowance event. Sustainable drainage systems include green roofs, rainwater recycling and attenuation tank. Green roofs and planters will reduce run off rate and improve water quality whilst flow control measures from the attenuation tank to the combined sewer will reduce runoff rates to greenfield runoff rates. Thames Water are satisfied with the waste water discharge strategy.

Sustainability Conclusion

709. The development proposal makes highly effective use of a currently unoccupied building, increasing density whilst avoiding extensive demolition and minimising carbon emissions, very nearly achieving the GLA standard target for whole life carbon (exceeding by 2%). The development proposal retains 100% of the substructure for both buildings, 80% of the superstructure of the North Building and 70% of the superstructure of the South Building. The lightweight floors of the vertical extension have been designed to work with the loading capacity of the existing sub/superstructures thereby minimising any strengthening works and the associated carbon. 436m² of granite cladding is also proposed for deconstruction and reuse in the new façade.

710. The development proposal will be fully electric, making use of highly efficient air source heat pumps for heating, cooling and hot water demand. Mixed mode ventilation (passive and active) has been incorporated, to all areas where possible, to reduce emissions associated with cooling. Occupants have control over openable louvred panels or windows to influence the amount of natural air flow. The development achieves a 32% improvement over Part L 2021 which currently constitutes above average carbon

emission savings for major development in the City. The energy use intensity (EUI) of 65kWh/m²/yr is lower than average for major development in the City.

711. Urban greening of varied aesthetic and biodiversity is provided at ground level including the public courtyard and covering a large area of the roof top terrace. The development achieves the emerging City Plan Policy target of 3 biodiversity units per hectare.
712. The development offers increased resistance to climate risks through the management and attenuation of water, with rainwater recycled for greywater uses and through the significantly increased greening which helps to reduce the urban heat island effects.
713. Overall the proposal offers high-quality efficient student accommodation and amenities with significant new greening and biodiversity. The environmental impact of construction and maintenance has been minimised through high levels of retentions and considerate design which prioritises retrofit, reuses materials and designing out waste. The replacement of the dilapidated façade and MEP equipment with highly efficient new systems as proposed would achieve excellent operational performance. The proposal demonstrates concerted efforts to address the key issues of prioritising retrofit over demolition, minimising embodied and operational carbon emissions and improving greening and biodiversity with further design improvements proposed for investigation at detailed design stage. Evidence of design improvements achieved will be secured through conditions.

Fire Safety

714. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage. Policy D5 requires development to incorporate safe and dignified emergency evacuation for all building users with a minimum of one lift per core to be a suitably sized fire evacuation lift.
715. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
716. The Health and Safety Executive (HSE), who are the statutory respondent in relation to fire safety on development of this nature, have been consulted on this application and are satisfied with the information provided within the application, including the submitted Fire Statement. This would be subject

to carrying out and verification of CFD modelling and either the confirmation that an existing hydrant is operational or that an application is made for an operational hydrant to be installed. Both of these matters are raised in the submitted Fire Statement, and would be subject to review by the HSE and a future regulatory stage. Informatives would be attached to the permission highlighting these matters.

- 717. The District Surveyors have reviewed this application and raise no objection on the ground that the HSE have reviewed and are satisfied with the proposal.
- 718. The proposed development would therefore meet the requirements of Policy D5 and D12 of the London Plan.

Suicide Prevention Measures

- 719. Local Plan policy CS3 requires that security and safety measures are of an appropriate high-quality design. Draft City Plan Policy DE5 requires security and safety to be considered. The City recently adopted the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) which requires suicide prevention and safety measures to be considered and incorporated where necessary.
- 720. The proposed roof terrace and external amenity space at roof top level would have general characteristics which passively improve the safety and suicide prevention credentials of these areas – including centralising the spaces so that there are buffers before each edge, and the tiered design of the crown of the building which precludes a sheer drop. Further detailed design of the roof terrace space would be secured via condition, specific to suicide prevention and safety. The condition would require the submission of further details prior to occupation addressed safety and suicide prevention as it relates to balustrading, barrier treatment of each edge, treatment of the lightwell, lighting strategy as it relates to night time use of the terrace, the affixation of furniture, CCTV and surveillance strategy, and staff training.
- 721. The proposal is considered to comply with Local Plan Policy CS3 and draft City Plan Policy DE5 and the recommendations of the Planning Advice Note.

Flood Risk and Sustainable Urban Drainage

- 722. Local Plan 2015 policy CS18 seeks to “reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer

and sewerage network". The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2040.

- 723. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk) as such it is at a low risk of fluvial and tidal flooding.
- 724. The proposed drainage strategy includes capturing some runoff from the proposed building using a green roof and brown roof on the north and south blocks to limit the overall volume of water run-off that needs to be discharged and an attenuation tank below ground level.
- 725. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, S15, CR2 and CR3 of the draft City Plan 2040 and policies S112 of the London Plan.

Assessment of Public Benefits and the NPPF Paragraph 208 Balancing Exercise

- 726. When addressing the balancing exercise, the heritage harm as outlined is afforded considerable importance and great weight in line with the NPPF. The more important the asset, the greater the weight should be given to the asset's conservation and in this case there are multiple designations, The Tipperary Pub and the Remains of Former Whitefriars Convent are Grade II Listed Buildings whilst the northern block of the site is located within the Fleet Street Conservation Area.
- 727. Paragraph 208 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF. The Planning Practice Guidance provides that public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit.
- 728. When carrying out the NPPF Paragraph 208 balancing exercise in relation to the less than substantial harm to The Tipperary Pub, consideration importance and weight must be given to the desirability of preserving the building and its setting. This is also the case to the moderate enhancement to the Remains of the Former Whitefriars Convent.

729. When considering the listed building consent application, the duty imposed by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies and in considering whether to grant listed building consent special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
730. Under Section 16 and Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard must be had to the desirability of preserving the settings of the aforementioned listed buildings, and under Section 72 of the same Act, special attention paid to the desirability of preserving or enhancing the character or appearance of the Fleet Street Conservation Area.
731. The proposal would result in less than substantial harm via indirect setting impacts to the significance of the below listed buildings, a Registered Historic Park and Garden and a Conservation Area, as follows:
- St Bride's Church (Grade I) – low level of less than substantial harm through the proposal's slight erosion of its sky silhouette in the view from Waterloo Bridge.
 - Nos. 2-6 Kings Bench Walk (all Grade I) – low level of less than substantial harm through the proposals background presence in views of the sensitive group arrangement of these buildings.
 - No. 3 North Kings Bench Walk (Grade II*) - low level of less than substantial harm through the proposals background presence in views of the sensitive group arrangement of these buildings.
 - Inner Temple Registered Historic Park and Garden (Grade II) – slight level of less than substantial harm through the proposals background presence in views from the garden.
 - Temples Conservation Area - slight level of less than substantial harm through the proposals background presence in views from the Conservation Area.
- And via direct impact to:
- The Tipperary Pub (II) – low level of less than substantial harm due to loss floor plan and the rear wall and lightwell.
732. Given the proposal would result in harm to the significance of a Conservation Area, a Registered Historic Park and Garden and of listed buildings, including Grade I listed buildings, there is a strong presumption against the grant of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits.
733. The key benefits that are considered to flow from the proposal are set out below:
734. The following **Economic** benefits that are considered to arise:

- The provision of 856 student accommodation rooms, will introduce a new student audience and increase visitors into the area, supporting the growth of the higher education sector in the Square Mile as well as drive expenditure within this part of the City supporting local businesses and services.
- The provision of 1503 sqm of cultural / educational uses across multiple levels of the site including enhanced step-free public access to archaeological remains would drive footfall and further increase spend in the City as well as provide leisure and educational opportunities for the wellbeing of workers, residents and visitors.
- The enhanced public realm and wayfinding combined with the cultural offer would drive footfall through the site during the day, evenings and weekends. It would contribute to the emerging 21st century Fleet Street further enriching its distinct character with fresh attractions. Occupiers on site and in the locale would benefit from the increase in footfall and the high-quality amenities provided by the proposed development.
- The restoration of the unique Tipperary Pub and reuse of the rooms above for private dining/exhibition/additional bars as well as an expanded food and beverage offer at ground level would encourage a daytime and evening economy and sustain the ongoing success of this much loved tavern.
- The proposal would transform and regenerate this site along Fleet Street making it an attractive environment for wider investment.

735. Collectively these benefits are attributed **Low** weight.

736. The following **Environmental** benefits that are considered to arise:

- It would deliver student accommodation in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- An enhanced setting of the Whitefriars Crypt will revitalise Ashentree Court and Magpie Alley delivering accessible for all, attractive and pedestrian friendly routes. The new Crypt setting would have an external presence and increased visibility including historical interpretation of the remains as well as exhibits showcasing the rich history of the Whitefriars and surrounding area, aligning with Destination City objectives
- At a local level the proposal would result in significant enhancement of the public realm at ground level, delivering enhanced permeable public space including the existing gated entrances as well as active and cultural uses which will enhance the vitality, character and distinctiveness of the site and Fleet Street, all which align with Destination City aspirations.
- The significant increase and extent of urban greening on the buildings and in the public spaces would provide a healthy, sustainable and biodiverse environment for all to access. The urban greening would

achieve a UGF score of 0.305 in line with the emerging City Plan Policy targets.

- A Wayfinding Strategy will incorporate art and creative design to make the experience of moving to and around the site and the different uses both stimulating and pleasurable for all as well as providing opportunities to connect to other cultural organisations and features based in the lanes and courtyards of Fleet Street.

737. Collectively these benefits are attributable to **Low to Moderate** weight.

738. The following **Social** benefits that are considered to arise:

- The proposals will improve this part of the city by delivering a more inviting, pleasant and easily accessible, inclusive and well-connected place for all through the improvement of several pedestrian routes and high quality public spaces.
- A range of flexible accessible cultural spaces prominently positioned at ground and lower ground floor levels, providing opportunities for a new visitor experience and learning with a focus on the story of print forming a cultural hub for schools, workers, visitors and residents which would be operated by multiple operators.
- Whitefriars Crypt will be reimagined with an expanded setting transforming the artefacts into an accessible and inclusive attraction for the first time and to include immersive and free exhibitions using modern technology to increase understanding and appeal to a broad range of visitors of all ages and levels of interest.
- The cultural proposals would attract new audiences, alongside the enhanced public realm, contributing to the transformation of Fleet Street as a distinctive and contemporary place with multiple offers for all sitting alongside the emerging Salisbury Square Development and 120 Fleet Street. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place.
- The fit for purpose cultural spaces would provide multiple educational opportunities with creative learning programmes potentially working with existing institutions and aimed at early years, families and schools with a focus on the story of print which would be designed to align with relevant school curriculum. Sitting alongside the daytime programmes will be evening events for adults.

739. Collectively these benefits are attributable to **Low to Moderate** weight.

740. In relation to the indirect impacts on the Grade I and II* buildings, these are designated heritage assets of the highest order. When carrying out the balancing exercise, considerable importance and weight has been given to the desirability of preserving their settings and great weight given to their conservation. When considering the balancing exercise relating to the less

than substantial harm caused directly to the Grade II The Tipperary and indirectly to the Temples Conservation Area and Inner Temples Registered Historic Park and Garden great weight has been given to their conservation.

741. When carrying out the Para 208 balancing exercise in a case where there is harm to the significance of designated heritage assets, considerable importance and weight should be given to the desirability of preserving the building or its setting. In this case it is the view of officers that the collective package of the public benefits secured, and which flow from the development proposals, would outweigh the heritage harms identified to the designated heritage assets some of which are of the highest calibre, thus complying with Para 208 of the NPPF.

CIL and Planning Obligations

742. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
743. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
744. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
745. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£311,700.70	£299,232.68	£12,468.03

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£288,756.75	£274,318.91	£14,437.84
City Planning Obligations			
Local, Training, Skills and Job Brokerage	£115,502.70	£114,347.67	£1,155.03
Carbon Reduction Shortfall (<i>as designed</i>) <i>Not indexed</i>	£226,290.00	£226,290.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£50,000	£50,000	£0
S106 Monitoring Charge	£5,250.00	£0	£5,250.00
Total liability in accordance with the City of London's policies	£685,799.45	£664,956.59	£20,842.86

746. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. 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.

- *Local Procurement Strategy*
- *Local Training, Skills and Job Brokerage Strategy (Demolition and Construction)*
- *Affordable Student Accommodation*
- *Student Management Plan*
- *Student Accommodation Nomination Agreement*
- *Remedial Highway Works*
- *Travel Plan*
- *Delivery and Servicing Management Plan*
- *Carbon Off-Setting Submissions*
- *Public Realm Management Plan*
- *'Be Seen' Energy Performance Monitoring*
- *Medieval Crypt, Archaeology and Heritage Implementation Strategy*
- *Cultural Space Implementation Strategy*
- *Cultural Space Management Plan*
- *Cultural Space Specification*
- *Medieval Crypt Management Plan*

- *Construction Monitoring Contribution (£30,935 for First Year and £25,760 for Subsequent Years)*
- *Highways Works and Section 278 Agreement*
- *NHS ICB Requested Contribution*

747. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

748. The scope of the s278 agreement may include, but is not limited to

Fleet Street

- Resurfacing of the carriageway fronting the planning application site
- Reinstatement of footways as per the City of London's standard materials fronting the planning application site
- Removal and reinstatement of street furniture (if applicable)
- Reinstatement of road markings and associated traffic orders
- Reinstatement of controlled crossing and associated road markings and infrastructure

Bouverie Street

- Resurfacing of the carriageway within the frontage of the site
- Reconstruction of the footways as per the City of London's standard materials
- Removal of redundant street furniture (if applicable)
- Reinstatement of road markings and associated traffic orders
- Provision of crossover for disabled access and accommodation works
- Reinstatement of TfL cycle hire

Whitefriars Street

- Reinstatement of the footway as per City of London's standard materials
- Reconstruction of existing vehicular access to suit the new site layout

749. 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.

750. 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.

The Public Sector Equality Duty (section 149 of the Equality Act 2010)

751. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
752. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.
753. As discussed above, in the relevant section of the report, the applicant has submitted a Statement of Community Involvement (SCI) including a targeted programme of consultation, which sought to understand the needs of the local community. The applicant has also engaged with key stakeholders and has conducted briefings with local stakeholders. It is considered that the public consultation carried out by the applicant was inclusive and relevant in the context of the Equalities Act. The applicant has also submitted an Equalities Impact Assessment, assessing the possible effects facing the affected population and concluding as to whether these would be positive, neutral or negative.
754. Potential impacts of the proposed development on the nearby occupiers identified above have been assessed including the impacts on the uses. Officers do not consider that they would be detrimentally impacted in so far as any space becoming unusable nor would it be considered that there would be disadvantages or material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010
755. It is the view of officers that a decision to grant permission would remove or minimise disadvantages suffered by persons who suffer from a disability and in particular mobility impairment by providing enhanced and accessible public realm, and through the provision of an accessible parking bay within the development for future occupiers.

Human Rights Act 1998

756. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).
757. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the residential amenity of those living in nearby residential

properties, it is the view of officers that such interference is proportionate, in the public interest and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole. Although it is recognised that the development would have some impact on the amenities of the nearby residents, by way of loss of light and noise and disturbance during constructions, it is not considered that the proposal would result in unacceptable impact on the existing use of nearby residential properties to an extent that would warrant refusal of the application on those grounds. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2040.

758. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference, in these circumstances, is proportionate and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole.

Conclusions and Overall Planning Balance

Conclusion 24/00648/FULMAJ

759. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan (comprising the City of London Local Plan 2016 and the London Plan 2021) and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan 2040 and considering all other material considerations.
760. The scheme delivers a high-quality development for student accommodation with a new cultural space created. Whilst there would be a loss of office floorspace on the site, the City Corporation's consultant concludes that the none of the scenarios of retention of 65 Fleet Street in its existing office use, comprehensive refurbishment of this office use or redevelopment to provide new office space, are financially viable and therefore it would not be viable in the longer term for future office use. Officers consider that the proposal would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The student accommodation and cultural spaces will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for 7 days per week, and contribute towards meeting Local Plan housing targets. This wider range of activity would contribute towards the City Corporation's ambitions for a City of Culture and Commerce and align with the City Corporation's Destination City agenda. The loss of office accommodation is therefore considered to

be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2040.

761. The provision of student accommodation in a highly accessible location is supported in strategic and local planning terms. The provision of purpose-built student accommodation in this mixed-use development will not prejudice the business function of the City, will not result in an excessive concentration of student housing, is not considered to have an adverse impact on residential amenity.
762. Whilst the level of light to some of the student bedrooms falls below BRE guidance, in reviewing the amenity and breakout spaces and study areas would also have the option of various types of amenity, break out and study areas ranging from smaller quieter spaces to larger social spaces set over different levels, along with the use of the accessible roof terrace, on balance it is considered that the overall quality of the student accommodation is considered to be acceptable.
763. The purpose-built student accommodation would be considered and acceptable and would accord with London Plan Policy H15, Local Plan Policy DM21.7 and Draft City Plan Policy HS6.
764. The scheme would deliver significant cultural space in the form of a museum at ground, first and second floor comprising 1,503.65m² and provide a new home for the St Brides Foundation.
765. The architectural design of the proposals would be compatible with the existing context in terms of scale, architectural articulation and massing. The proposals are considered to result in a well layered piece of design that would improve the buildings contribution to the local townscape. The ground floors of the building would become more outward facing with new areas of active frontage, particularly on the southern elevation and within the arched passageway under the northern block. Similarly, the proposals would unlock the Whitefriars Crypt for better public viewing as well as enhancing the landscaping within the site, providing richer planting and new opportunities for siting within the courtyard which would be reopened for public access. The proposals optimise the use of land, whilst improve the buildings interface with their surroundings.
766. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises site capacity to accommodate a student accommodation development alongside ground floor retail, food & beverage and cultural uses which would contribute to the Destination City objectives and support the regeneration of Fleet Street. The proposals are considered to comply with CS10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.5, DM10.6, DM10.8, CS16, DM16.2, CS19,

DM19.1 and DM19.2; emerging Local Plan policies S22, HL1, S5, RE1, RE2, S8, DE2, DE3, DE5, DE6, DE8, S10 and AT1; and London Plan (2021) policies D3, D4, D5, D8, SD4 and SD6. This is in addition to the relevant sections of the National Planning Policy Framework as well as the National Design Guide.

767. The development in pan-London and strategic views would preserve the setting of St Paul's Cathedral as the Strategically Important Landmark which go to the heart of the character and identity of the City and London. In the baseline and cumulative scenarios the proposal would slightly erode the clarity of St Bride's Church (LVMF 15B.1). As such, the development conflicts to a small degree with Local Plan Policy CS13 (1 and 2), Emerging City Plan Policy S13, London Plan Policy HC4 , GLA LVMF SPG and City of London Protected Views SPD and Westminster's Draft Metropolitan Views SPD View 42A.
768. The proposal would protect views of relevant City Landmarks and Skyline Features with the exception of some slight diminishment to St Brides Church. This would result in a degree of conflict with City Plan policy CS 13(2), draft City Plan Policy S13 and CoL Protected Views SPD
769. The direct impact of the proposals would transform the Whitefriars Crypt (II) through repair, representation. increasing opportunities for public viewing with an enhanced experience and improving access for all.
770. The direct impact of the proposals would preserve the significance of the non designated heritage assets 63 and 67 Fleet Street.
771. The direct impacts of the proposals would preserve the character and appearance of Fleet Street Conservation Area.
772. Whilst the setting and significance of identified local and more distant designated heritage assets would overwhelmingly be preserved the proposals would fail to preserve the significance/special interest or setting of the following designated heritage assets and would result in low to slight levels of less than substantial harm to: St Brides Church (I), Nos 2-6 Kings Bench Walk (I) and Nos. 3 North King's Bench Walk (II*); Inner Temple RHPG (Grade II); Temples Conservation Area, and The Tipperary (II) There would also be some conflict with Local Plan policies CS12 (1,2 and 4), DM12.1 (1), DM12.3 (2) DM12.5 (1); Emerging City Plan 2040 policies S11 (1 and 2), HE1 (1) ; London Plan Policy HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies.

773. Where the proposals have resulted in minor levels of harm to the significance of heritage assets, either directly or indirectly via setting, officers consider that this harm has been minimised and mitigated through good design, is clearly and convincingly justified, and is outweighed by the public benefits which arise from the proposal.
774. The proposals comply with policies CS12 (3 and 5), DM12.1 (2, 3 and 5) DM12.2, DM12.3 (1), DM12.4 and CS13 (3); Emerging City Plan 2040 S11 (3-5), S 13 (3), HE1 (2-9) and HE2 and with the objectives set out in Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990.
775. The proposed development is on track to achieve an “outstanding” BREEAM assessment rating. The upfront embodied carbon emissions can be reduced beyond the GLA’s Standard Benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible, residential development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity, while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond the new Part L 2021 and London Plan requirements.
776. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel. The provision of both long stay and short stay cycle spaces would meet the requirements of the London Plan.
777. With regards Daylight, Sunlight and Overshadowing, taking into account the BRE Guidance, it is considered that the impact of the proposed development is considered to be acceptable with regards nearby dwellings, in accordance with the requirements of Local Plan policies DM10.7, DM21.3, London Plan policy D6 and Draft City Plan Policy DE8. It is also considered that the proposed development is acceptable with regards the internal daylight and sunlight levels and would provide adequate amenity to prospective students, according with London Plan policies D3, D6 and H15(A)(5), Local Plan policies DM10.7, DM15.7, DM21.3, DM21.5, and DM21.7, and draft City Plan polices DE8, DE9, and HS6.
778. There are no unacceptable adverse built development, construction or operational impacts anticipated for the proposed development and use, including cumulative impacts, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, including the requirement to provide deconstruction and construction logistics plans, a scheme of protective works, a student accommodation management plan, a rooftop terrace management plan and relevant environmental health

conditions including relating to noise. Therefore, it is considered the proposed development complies with Local Plan Policies CS1, DM1.1, DM1.5, DM15.7, DM21.1, DM 21.7, and draft City Plan Policies HL3, S24, and SB1 regarding impact on amenity.

779. Therefore overall, it is considered that the proposed student accommodation use would not prejudice the primary business function of the City; would contribute to the balance and mix of uses in the immediate locality; and would not result in unacceptable adverse impacts on the amenity of neighbouring properties.
780. As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be).
781. In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 208 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth, also indicate that planning permission should be granted.
782. The proposals are considered to be in accordance with the development plan when taken as whole.
783. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
784. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

Conclusion on 24/00649/LBC

785. The proposals for Whitefriars crypt would not result in any changes to the structure itself, other than some minor repairs and instead involve alterations around the remains. The new enlarged space would showcase historical interpretation about the Crypt and the Whitefriars, as well as allowing for exhibitions and displays to complement the remains. The inclusion of step free access would enable the asset to be enjoyed by all. This investment made would allow for its preservation which would sustain its value longer term. Overall the proposals preserve the setting and significance of the listed building and enhance the ability to appreciate that significance; the proposals would moderately enhance the heritage experience through improved access and setting..

786. The proposals result in less than substantial harm to the Tipperary Public House (II) at the lower end of the spectrum failing to preserve the special architectural and historic interest. This harm would result from the demolition of the rear wall and windows as well as the infilling of the lightwell to the rear of the pub slightly eroding part of the historic floor plan. Otherwise the proposals would see improvements through restoration, the removal of unsympathetic partitions and other additions which have been added over time and the upper floors repurposed. Additional benefits would arise from improved circulation and enhanced accessibility with step-free access provided to each floor for the first time.
787. Overall as the proposals would fail to preserve the significance/special interest of The Tipperary (II) there would be some slight conflict with Local Plan policies CS12 (1), DM12.1 (1), DM12.3 (2); Emerging City Plan 2040 policies S11 (2), HE1 (1)); London Plan Policy HC1 (C) and the objective set out in Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies.
788. Officers consider that this minor level of harm arising to the Tipperary has been minimised and mitigated through good design, is clearly and convincingly justified, and is outweighed by the public benefits which arise from the proposal.
789. As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be).
790. In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 208 NPPF balancing exercise set out above in the report, and the significant weight to be placed on the need to support economic growth and social and environmental benefits indicate that listed building consent should be granted.
791. The proposals are considered to be in accordance with the development plan when taken as whole.
792. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
793. When taking all matters into consideration, subject to the recommendations of this report it is recommended that listed building consent is granted.

APPENDIX A

Background Papers

Application Documents

Design and Access Statement, prepared by BGY

Landscaping and UGF Report, prepared by BD Landscape Architects

Inclusive Access Report, prepared by David Bonnett Associates

Security Report, prepared by QCIC

Lighting Strategy, prepared by MBLD

The Tipperary Pub Management Plan, prepared by City Halo

Acoustic / Noise Report, prepared by Hilson Moran

Air Quality Assessment (including Air Quality Neutral Assessment), prepared by Hilson Moran

Preliminary Ecology Appraisal, prepared by Hilson Moran

Biodiversity Net Gain Assessment, prepared by Hilson Moran;

Overshadowing Report, prepared by GIA

Internal Daylight / Sunlight report, prepared by GIA

Solar Glare, prepared by GIA

Flood Risk Assessment, Drainage and SuDS Report, prepared by Meinhardt;
Heritage and Townscape and Visual Impact Assessment (HTVIA), prepared by The Townscape Consultancy

Office Financial Viability Assessment, prepared by Montagu Evans

Statement of Community Involvement, prepared by Concilio

Energy Assessment, prepared by Applied Energy

Ventilation/ Extraction Statement, prepared by Applied Energy

Sustainability Report, prepared by Hilson Moran

Whole Life Carbon Assessment, prepared by Hilson Moran

Circular Economy Statement, prepared by Hilson Moran

Transport Assessment, prepared by Pell Frischmann

Travel Plan, prepared by Pell Frischmann

Servicing and Delivery Plan, prepared by Pell Frischmann

Waste, Storage and Recycling Plan, prepared by Pell Frischmann

Draft Construction Logistics Plan (CLP), prepared by McAleer and Rush

Draft Construction Management Plan (CMP), prepared by McAleer and Rush
Student Needs Assessment, prepared by Cushman and Wakefield
Student Management Plan, prepared by Dominus Group
Socio-Economic Statement, prepared by Ekosogen
Health Impact Assessment, prepared by Ekosogen
Equalities Statement, prepared by Ekosoge
Fire Statement and Gateway 1 Report, prepared by Jensen Hughes
Microclimate (CFD Analysis), prepared by GIA
Cultural Placemaking Report, prepared by Alex Homfray Cultural Dimensions
VuCity Compatible Model, prepared by BGY
Archaeology Report, prepared by MOLA
Utilities Report, prepared by M&R/ Caldwell
Access Statement, prepared by David Bonnett Associates
Design Access Statement Addendum, prepared by BGY (August 2024)
Updated HTVIA, prepared by The Townscape Consultancy;
Updated Daylight and Sunlight Report, prepared by GIA dated 23.08.2024;
Planning Fire Statement Form by Jensen Hughes dated 28.08.2024;
Gateway 1 Fire Safety Form by Jensen Hughes dated 28.08.2024;
Updated Landscaping planning statement (August 2024) by BD

Consultees Responses

NATS Safeguarding - 17/07/2024
Health and Safety Executive - 30/07/2024
Environmental Resilience Officer - 01/08/2024
Historic England - 05/08/2024
Thames Water - 08/08/2024
Transport Officer - 12/08/2024
Air Quality Officer - 13/08/2024
Lead Local Flood Authority - 22/08/2024
Transport For London - 28/08/2024
City of London Police - 10/09/2024
Health and Safety Executive - 11/09/2024
Environmental Health Officer - 12/09/2024
NATS Safeguarding - 16/09/2024
Thames Water - 20/09/2024
Environmental Health Officer - 26/09/2024
Historic England - 02/10/2024
Lead Local Flood Authority - 02/10/2024

District Surveyor – 09/10/2024
The Gardens Trust – 10/10/2024
Conservation Area Advisory Committee – 14/10/2024

Appendix B

London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy H15 Purpose-Built Student Accommodation
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction

Relevant GLA Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

Local Plan Supplementary Planning Guidance

- Air Quality SPD (CoL, July 2017);
- Archaeology and Development Guidance SPD (CoL, July 2017);
- City of London Lighting SPD (CoL, October 2023);
- City Public Realm SPD (CoL, July 2016);
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014);
- Open Space Strategy SPD (CoL, January 2015);
- Protected Views SPD (CoL, January 2012);
- Planning Advice Notes on Sunlight City of London Wind Guidelines (2019);
- City of London Thermal Comfort Guidelines (2020)
- Planning Obligations SPD (CoL, May 2021)
- Office Use SPD (CoL, January 2015)

Relevant Draft City Plan 2040 Policies

- Policy S1 Healthy and inclusive city
- Policy HL1 Inclusive buildings and spaces
- Policy HL2 Air quality
- Policy HL3 Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5 Location and protection of social and community facilities
- Policy HL9 Health Impact Assessments
- Policy S2 Safe and Secure City
- Policy SA1 Publicly Accessible Places
- Policy SA3 Designing in security
- Policy HS3 Residential environment
- Policy S4 Offices
- Policy OF1 Office development
- Policy OF2 Protection of Existing Office Floorspace
- Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy S6 Culture and Visitors
- Policy CV2 Provision of Arts, Culture and Leisure Facilities

- Policy CV3 Provision of Visitor Facilities
- CV5 Evening and Night-time Economy
- Policy CV6 Public Art
- Policy S7 Infrastructure and Utilities
- Policy S8 Design
- Policy DE1 Sustainability Design
- Policy DE2 Design Quality
- Policy DE3 Public realm
- Policy DE5 Shopfronts
- Policy DE7 Daylight and sunlight
- Policy DE8 Lighting
- Policy S9 Transport and Servicing
- Policy VT1 The impacts of development on transport
- Policy VT2 Freight and servicing
- Policy VT3 Vehicle Parking
- Policy S10 Active travel and healthy streets
- Policy AT1 Pedestrian movement
- Policy AT2 Active travel including cycling
- Policy AT3 Cycle parking
- Policy S11 Historic environment
- Policy HE1 Managing change to Historic Environment
- Policy HE2 Ancient monuments and archaeology
- Policy S13 Protected Views
- Policy S14 Open spaces and green infrastructure
- Policy OS1 Protection and Provision of Open Spaces
- Policy OS2 City Urban greening
- Policy OS3 Biodiversity
- Policy OS4 Biodiversity Net Gain
- Policy OS5 Trees
- Policy S15 Climate resilience and flood risk
- Policy CR1 Overheating and Urban Heat Island effect
- Policy CR3 Sustainable drainage systems (SuDS)
- Policy S16 Circular economy and waste
- Policy CE1 Zero Waste City
- Policy S23 Smithfield and Barbican Key Area of Change
- Policy S26 Planning contributions

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

CS4 Planning contributions

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

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.

CS10 Design

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS11 Visitor, arts and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

CS12 Historic environment

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

CS13 Protected views

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

CS15 Sustainable development and climate change

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

CS16 Public transport, streets and walkways

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

CS17 Waste

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

CS18 Flood risk

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

CS19 Open spaces and recreation

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

CS20 Retailing

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS21 Housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Social infrastructure and opportunity

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

Policy DM 1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

- a) prejudicing the primary business function of the City;
- b) jeopardising the future assembly and delivery of large office development sites;
- c) removing existing stock for which there is demand in the office market or long term viable need;
- d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.5 Mixed uses in commercial areas

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

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.

DM3.2 Security measures

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;

- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

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.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
- b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

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.

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials; to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

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.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

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.

DM12.3 Listed buildings

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

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an

archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

- a) BREEAM or Code for Sustainable Homes pre-assessment;
- b) an energy statement in line with London Plan requirements;
- c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

- a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

- b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
- c) where on-site carbon emission reduction is unviable, offsetting of residual CO₂ emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

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

DM15.4 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.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise

conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

- a) road dangers;
- b) pedestrian environment and movement;
- c) cycling infrastructure provision;
- d) public transport;
- e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

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

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

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

- a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
- b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

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

DM17.1 Provision for waste

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

DM17.2 Designing out construction waste

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

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

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

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.

DM20.4 Retail unit sizes

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

DM21.3 Residential environment

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

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 24/00648/FULMAJ

65 Fleet Street, London, EC4Y 8BQ

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.465m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

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. There shall be no demolition on the site 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 demolition 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 demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

3. Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the

Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

4. (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement 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.
- (b) Prior to commencement of the development, excluding demolition: 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 reuse and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2040; 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.

5. There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction 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 construction 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 ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and in the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

6. Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an updated detailed Circular Economy Statement, to include a site waste management plan, 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 end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements. 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 Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2040; S16, CEW 1. These details are required prior to construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

7. Prior to the commencement of the development (excluding demolition), details of the mitigation strategy for overheating which demonstrates compliance with future weather files and adaptability for future climates. This should include detailed information on the solar shading, and other passive design measures proposed and their impact on reducing energy use and overheating prevention.

Reason: To demonstrate that the design of the development minimises energy use associated with cooling and that the building is resilient to overheating now and into the future based on predicted changes to the climate, in accordance with the following policies of the London Plan; Policy SI 4, Policy GG6,

8. Prior to the commencement of the development, excluding demolition of the development 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 of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's Aspirational Benchmark 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 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 Page 146 Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2040: 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.

9. Prior to the commencement of development (excluding demolition) details of the utility connection requirements of the development (or relevant part thereof) including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the development and a programme for the ordering and completion of service connections from the utility providers have been submitted to the local planning authority for approval in writing. No service connections shall be ordered in connection with the development unless in accordance with the final programme approved pursuant to this condition. REASON: To ensure that the utilities infrastructure arising from the development are met in accordance with policy CS2 of the Local Plan.

10. Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

11. 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 E use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place. REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
12. 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.
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 be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. 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 work except demolition shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution 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 Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

15. Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority 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 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 Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

16. No development other than demolition shall begin until details of such measures as are necessary within the site to resist structural damage and to protect the approved building and the new public realm within the site, from an attack with a road vehicle or road vehicle borne explosive device, have been submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. The development shall be carried out in accordance with the approved details. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

17. Prior to the commencement of the development (excluding demolition), a Fire Statement, in the form of an independent fire strategy produced by a third party suitably qualified assessor shall be submitted to and approved in writing by the Local Planning Authority. The statement should detail how the development proposal will function in terms of: 1. The building's construction: methods, products and materials used, including manufacturers' details; 2. The means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated evacuation strategy approach; 3. Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans; 4. Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these; 5. How provision will be made within the site to enable fire appliances to gain access to buildings; and 6. Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures. The development shall be implemented in accordance with the approved Fire Statement and retained as such for the lifetime of the development. REASON: In order to achieve the highest standards of fire safety and ensure the safety of all building users.

18. Prior to the commencement of development (excluding demolition), a disabled access and management plan shall be submitted to the Local Planning Authority which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for the publicly accessible spaces. The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development. REASON: To ensure the hotel provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

19. Before any construction work hereby permitted are begun, details of all proposed internal lifts shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

20. 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. Details of all external lifts including controls, maintenance strategy and signage;
- b. Details of entrance to accessible parking including siting of controlled entry system at a scale of no less than 1:20
- c. Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate;
- d. Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;
- e. Detail of level access into the retail unit from Fleet Street;
- f. Details of student accommodation reception including details of sanitary facilities, seating and post facilities;
- g. Irrespective of the approved drawings details of step free access to the cycle stores including swept paths, end of trip facilities, cycle stand types and setting out of all accessible cycle spaces;
- h. Details of all accessible room types and locations demonstrating that the mix and quality of room types are equivalent to found elsewhere on the scheme;
- i. Details of all accessible rooms including furniture layouts at a scale no less than 1:20;
- j. Details of landscaping to all public spaces, the lower courtyard and terraces including path widths and seating and demonstrating how unwelcome touch and scent can be avoided;
- k. Details of the location of all accessible WC, ambulant WC, baby changing facilities;
- l. Details of left and right hand transfer wheelchair accessible WC and ambulant WC facilities;
- m. Details of internal amenity spaces;

REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

21. Prior to the occupation of the development, an Access Management Plan 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 which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:

1. Website information including photos and an easy read version with information on:

- a. Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m
- b. Location of dropped kerbs
- c. Sanitary facilities
- d. Facilities available on-site including dimensions and photos for (as appropriate):
 - i. accessible parking facilities
 - ii. entrances and lift access
 - iii. controlled entry points
 - iv. accessible toilets including protocol for access to Radar key if applicable
 - v. baby changing facilities
 - vi. equipment loan
 - vii. facilities for assistance animals
 - viii. assistive listening system and other assistive technology
 - ix. rest and recovery facilities/quiet room
 - x. room for reflection/prayer room
 - xi. culture space
 - xii. plant species
- 2. Inclusive Entrances Strategy
- 3. Management plan for Personal Emergency Escape Plans for building users including staff training and guidance
- 4. Booking information for visiting the crypt including arrangements for:
 - a. Alternatives to online booking
 - b. queuing eg for people who are not able to stand for periods
 - c. security
 - d. essential companions
 - e. assistance animals
 - f. places for rest and recovery
- 5. Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering.

The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.

REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

- 22. The threshold of the private public realm and public route entrances shall be at the same level as the rear of the adjoining footway.

REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

23. Prior to the commencement of the development, excluding demolition of the development a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

24. 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 including blue roofs, rainwater pipework, rainwater harvesting systems, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 115m³ ; (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include: - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; Page 2 of 2 - 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 runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

25. No development shall be occupied until confirmation has been provided that either all water network upgrades required to accommodate the additional demand to serve the development have been completed or a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason: Thames Water have stated that the development may lead to no or low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.
26. Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 attributable to the Class F1 use of the ground floor and/or basement levels. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter. REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
27. Details of the position and size of the green and brown roof(s), the type of planting and the contribution of the green and brown 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: DM18.2, DM19.2.
28. Prior to the commencement of development (excluding demolition) details of the rainwater harvesting, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the Local Planning Authority. REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.5.
29. Prior to implementation, details shall be submitted to and approved in writing by the local planning authority to demonstrate that opportunities have been explored to achieve a target of 0.4 urban greening factor and if not achievable provide a justification as to why a higher UGF could not be

achieved. The development shall be carried out in accordance with those approved details and a minimum urban greening factor target of 0.31 shall be maintained for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

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

- a. Particulars and samples of the materials to be used on all external faces of the building, including soffits and sample panels which demonstrate the appearance and relationship of the materials with each other;
- b. Construction of a 1:1 sample material and façade panels of agreed sections of the façade;
- c. Details of the proposed new façade including typical details and samples of the fenestration, entrances, balustrading and decorative elements at a scale of no less than 1:20;
- d. Detailed drawings of a scale no less than 1:20 in plan, section and elevation of agreed typical bays;
- e. Details of the proposed roof materials, dormers and parapet walls including samples of materials and details of junctions;
- f. Details of ground floor elevations including entrances, shopfronts, artwork and historical interpretation;
- g. Full details of terraces, including all elevations, entrances, fenestration, planters, seating, lighting, soffits, drainage, and any infrastructure required;
- h. Full details of the integration of building cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- i. Full details of access to the roof for cleaning and maintenance, including details of mansafe equipment;
- j. Details of cleaning of retained historic facades, including methodology for the protection of decorative elements;
- k. Details of all external artwork and heritage interpretation; and
- l. Details of all external materials, including samples, within the archway including flooring, windows, shopfronts, soffits, doors and lighting.

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

31. Prior to the occupation of any part of the building all exposed flank or party walls must be faced or treated in accordance with details to be approved by the local planning authority in writing before any such works are commenced and all development pursuant to this permission shall be carried out in accordance with the approved details. 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, DM2.1.
32. Before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site 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. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
33. Before any works thereby affected are begun, details of all balustrades to external terrace areas and associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life 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: DM3.2, DM10.1, DM10.5, DM12.2.
34. Before any works thereby affected are begun, a scheme shall be submitted to an approved in writing by the Local Planning Authority which specifies the design of the roof terrace external amenity spaces and any related strategy concerning its ability to be used safely and to mitigate the risk of suicide. Such design details and strategy shall include:
- Balustrade design at all edges;
 - Affixation of furniture;
 - Treatment of the lightwell;
 - Lighting strategy;
 - Surveillance strategy and potential for CCTV; and
 - Staff training and other management procedures.
- The details approved must then be implemented and completed prior to occupation and then maintained for the lifetime of the development. Reason: In order to ensure that the external amenity spaces are appropriately designed to mitigate the risk of suicide so far as possible, in line with Local Plan Policy CS3, draft City Plan Policy DE5 and the recommendations of the Planning Advice Note.
35. Prior to the commencement of the relevant works, a detailed room layout shall be provided to the Local Planning Authority to demonstrate that student bedrooms have been laid out and designed to maximise daylight to desks/study areas and position these within the brightest parts of each room. Reason: To maximise daylight and sunlight to areas used for more

light sensitive activities in accordance with the requirements of Local Plan Policies DM10.7, DM21.3 and DM21.5, London Plan Policies D3, D6 and H15(A)(5) and Draft City Plan Policy DE8.

36. Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, 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 all soft landscaping, including the position, size and types of all planting and details of their respective planting beds;
 - b) Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights; and details of tree pits/trenches and growing medium;
 - c) Details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation;
 - d) Details of the method of irrigation and nutrient delivery systems;
 - e) Details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat structures;
 - f) Details of all hard landscaping materials, including paving and tactile paving details (including contrast where appropriate) and samples, in accordance with the City Public Realm Technical Manual;
 - g) Details of landscape lighting;
 - h) A management and maintenance Plan (including ecological management) for all proposed landscaping; and
 - i) Details of permanent wayfinding features and other installations.
 - k) Details of external terraces to show inclusive access routes, planters, planting and furniture.

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 and prior to occupation. 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 the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

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 and emerging policies DE2, DE6 and HE1 of the Draft City Plan 2040.

37. Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: -

lighting layout/s; - details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure); - a lighting control methodology; - proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; - all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; - details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 , CS15 and emerging policies DE1, DE2 and HL3 of the Draft City Plan 2040.

38. Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, 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, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
39. Prior to the installation of any generator a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator 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. Reason 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 2019 and the London Plan Policies SI1 and SD4 D.
40. 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 'Outstanding' 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.

41. No later than 3 months after completion of the building and prior to the development being occupied, a post-completion Circular Economy Statement 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 London Plan.
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 . 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 emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
43. Within 6 months of completion of the development details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

44. No servicing of the approved development by motorised vehicles shall occur during the hours of 0700 - 1000, 1200 - 1400 and 1600 - 1900 on any day
REASON: To ensure that the development does not have an adverse impact on the free flow of traffic or highway safety in the surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

45. No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and to comply with section 153 of the Highways Act 1980.
46. 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 659 no. long stay pedal cycles and 74 no. short 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. A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people. 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.
47. If within a period of five years from the date of the planting of any tree, that tree or any tree planted in replacement for it, is removed, uprooted, destroyed, dies or becomes, in the opinion of the Local Planning Authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation. REASON: In order to ensure the continued presence of trees on the site in the interest of visual amenity in accordance with the following policies of the Local Plan: DM10.4, DM19.2.
48. No flues, ductwork, soil stacks, soil vent pipes or any other pipe-work other than rainwater pipes shall be fixed to the elevations of the building unless shown on the drawings hereby approved. REASON: To ensure that the external appearance of the building is satisfactory in accordance with the following policy of the Local Plan: DM10.1.
49. No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.
50. A minimum of 10% of the student accommodation rooms within the development shall be wheelchair accessible as set out in the approved details and retain thereafter for the lifetime of the development. REASON: To ensure the development provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and London Plan Policy D5.
51. The car parking space suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall

be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors. REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, draft Local Plan 2040: 6.13D and 6A.2 and London Plan: T6.5.

52. The provision of a Changing Places facility shall be provided, within the development, in line with British Standard BS 8300-2. The changing places toilet shall only be used by/for those with a need for specialist assisted toilet and changing facility. REASON: To ensure that sufficient accessible sanitary facilities are provided, and that the museum provides a fully accessible and inclusive facility in accordance with London Plan Policy S6 and Local Plan Policy 10.8 and London Plan Policy D5.
53. One electric charging point must be provided within the delivery and servicing area for the use of delivery and servicing vehicles and retained for the life of the development. REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2040 Policy VT2.
54. Pre-booked goods delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the loading bay of the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
55. The refuse collection and storage facilities 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.
56. The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development. REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
57. All residential premises in the development shall be designed and constructed to attain the following internal noise levels: Bedrooms- 30dB LAeq,T* and 45dB LAmix Living rooms- 30dB LAeq, T* *T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00- 23:00. A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building. REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of

excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

58. (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.

59. The roof terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day other than in case of emergency.

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

60. No amplified or other music shall be played on the roof terraces.

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.

61. No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.

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

62. There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public. 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 64

63. 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.
64. All ecological data gathered to support this application and gathered as part of ongoing monitoring to inform management, shall be submitted to the relevant Local Environmental Records Centre (LERC) currently Greenspace Information for Greater London (www.gigl.org.uk). REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
65. The maximum height of the building shall comply with the approved drawings and shall not exceed 55.465AOD including, plant, flues, lift over run, and other excrescences at roof level including within the plant room located at level 10. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
66. 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.
67. At all times when not being used for cleaning or maintenance the window cleaning Davit Arm, associated building maintenance and cleaning equipment, and other similar equipment shall be stored internally of the building envelope and shall at no time be stored on the roof of the building. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1
68. All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance. REASON: Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.
69. The floorspace within the development marked as Learning and Non-residential institutions – Use Class F1 (including Crypt) on the floor plans at

ground floor and lower ground floor (1,503.68sqm) hereby approved, shall be used for such uses (Class F1(c)) and for no other purpose (including any other purpose within Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that active public uses are retained to ground floor.

70. Prior to occupation, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, the cultural uses, cycle parking and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.

71. The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design and, prior to the commencement of the relevant works, these measures shall be submitted to and approved in writing by the Local Planning Authority. These design measures should refer to the SBD Homes Guide (2023) and the SBD Commercial Guide (2023).

REASON: To ensure that safety and security are appropriately considered during the later design stages of the proposed development, and in accordance with Local Plan Policy CS3 and DM 3.2, and London Plan Policy D11.

72. Prior to the occupation of the building details of a public art strategy and the proposals for within the public realm or on buildings to include, but not exclusively limited too, and unless otherwise agreed, the eastern wall to the pedestrian route under 65 Fleet Street, demonstrating: commissioning process; artistic merit; appropriateness to siting; deliverability; maintenance; management and engagement with Fleet Street BID and City Arts Initiative and wider community; shall be submitted to and approved in writing by the Local Planning Authority. The public art strategy shall be carried out as approved and so maintained.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: CS12 and DM 11.2. This is required to be prior to commencement in order to ensure that the memorials are safely removed and retained.

73. All Parish Markers and commemorative plaques on the existing buildings shall be carefully protected or removed prior to demolition commencing. If removed these shall be stored for the duration of building works, reinstated and retained for the life of the building on the new building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

74. Notwithstanding the approved drawings, the existing gates to the central courtyard, including within the archway, are to be removed and will not be reinstated.

REASON: To enhance pedestrian permeability regardless of time of day in accordance with the following policies of the Local Plan: CS10, DM10.4, DM16.2.

75. 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:

1289-GE-01 Rev 02

1289-GE-02 Rev 02

1289-GE-03 Rev 02

1289-GE-04 Rev 02

1289-GE-05 Rev 02

1289-GE-06 Rev 02

1289-BS-17

1289-BS-16

1289-BS-15

1289-BS-14

1289-BS-13

1289-BS-12

1289-BS-11

1289-BS-10

1289-BS-09
1289-BS-08
1289-BS-07
1289-BS-06
1289-BS-05
1289-BS-04
1289-BS-03
1289-BS-02
1289-BS-01

W0863-WW-ZZ-LG-DR-A-0201-Level LG Planning Plan -S2-P15
W0863-WW-ZZ-B1-DR-A-0200-Level B1 Planning Plan-S2-P14
W0863-WW-ZZ-10-DR-A-0212-Level 10 Planning Plan-S2-P10
W0863-WW-ZZ-09-DR-A-0211-Level 09 Planning Plan-S2-P09
W0863-WW-ZZ-08-DR-A-0210-Level 08 Planning Plan-S2-P09
W0863-WW-ZZ-07-DR-A-0209-Level 07 Planning Plan -S2-P10
W0863-WW-ZZ-06-DR-A-0208-Level 06 Planning Plan -S2-P10
W0863-WW-ZZ-05-DR-A-0207- Level 05 Planning Plan -S2-P10
W0863-WW-ZZ-04-DR-A-0206- Level 04 Planning Plan -S2-P09
W0863-WW-ZZ-03-DR-A-0205- Level 03 Planning Plan -S2-P10
W0863-WW-ZZ-02-DR-A-0204- Level 02 Planning Plan -S2-P10
W0863-WW-ZZ-01-DR-A-0203- Level 01 Planning Plan -S2-P09
W0863-WW-ZZ-00-DR-A-0202- Level 00 Planning Plan -S2-P13

W0863-WW-ZZ-ZZ-DR-A-0432-Tipperary Demolition Section 03-S2-P02

W0863-WW-ZZ-ZZ-DR-A-0422-Tipperary Proposed Section 03 -S2-P02

W0863-WW-ZZ-ZZ-DR-A-0421-Tipperary Proposed Section 02 -S2-P03

W0863-WW-ZZ-00-DR-A-0226- Tipperary Level 00 Composite
Demolition Planning Plan -PL-P03

W0863-WW-ZZ-00-DR-A-0222-Tipperary Level 00 Planning Plans -S2-
P05

W0863-WW-ZZ-B1-DR-A-1220- Tipperary Level B1 Demolition Plans -
S2-P04

S2- W0863-WW-ZZ-B1-DR-A-0221- Tipperary Level B1 Planning Plans-
P04

W0863-WW-ZZ-00-DR-A-0431- Tipperary Demolition Section 02 -PL-
P02

W0863-WW-ZZ-ZZ-DR-A-1224- Tipperary Level 0405 Demolition Plans
-S2-P04

W0863-WW-ZZ-ZZ-DR-A-1223- Tipperary Level 0203 Demolition Plans
-S2-P04

W0863-WW-ZZ-ZZ-DR-A-0225- Tipperary Level 0405 Planning Plans -
S2-P04

W0863-WW-ZZ-ZZ-DR-A-0224-Tipperary Level 0203 Planning Plans -
S2-P04

W0863-WW-ZZ-ZZ-DR-A-0430- Tipperary Demolition Section 01-PL-
P02

W0863-WW-ZZ-ZZ-DR-A-0420- Tipperary Proposed Section 01-PL-
P03

1289-DE-01 Rev 00

1289-DE-02 Rev 00

1289-DE-03 Rev 00

1289-DE-04 Rev 00

1289-DE-05 Rev 00

1289-DE-06 Rev 00

DS-01 Rev 00

DS-02 Rev 00

W0863-WW-ZZ-01-GA-A-1203-Level 01 Demolition Plan -S2-P04

W0863-WW-ZZ-00-GA-A-1202- Level 00 Demolition Plan -S2-P04

W0863-WW-ZZ-06-GA-A-1208- Level 06 Demolition Plan -S2-P04
W0863-WW-ZZ-05-GA-A-1207- Level 05 Demolition Plan -S2-P04
W0863-WW-ZZ-04-GA-A-1206- Level 04 Demolition Plan -S2-P04
W0863-WW-ZZ-03-GA-A-1205- Level 03 Demolition Plan -S2-P04
W0863-WW-ZZ-02-GA-A-1204- Level 02 Demolition Plan -S2-P04
W0863-WW-ZZ-B1-GA-A-1200- Level B1 Demolition Plan -S2-P04
W0863-WW-ZZ-11-DR-A-0213- Level RF Planning Plan -S2-P06
W0863-WW-ZZ-08-GA-A-1210- Level 08 Roof Demolition Plan-S2- P
04
W0863-WW-ZZ-07-GA-A-1209- Level 07 Demolition Plan-S2-P04
W0863-WW-ZZ-LG-GA-A-1201- Level LG Demolition Plan -S2-P04

W0863-WW-XX-XX-GA-A-0102- Site Plan - PL-P02

W0863-WW-XX-XX-GA-A-0100- Site Location Plan -S2-P03

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. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed online via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C79bb749481fb4aebb01c08dc265fae0d%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638427439639442980%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDA6LCJlZCJlIjoiV2luMzliLCJBTiI6IjEkaWwiLCJXVCi6Mn0%3D%7C0%7>

C%7C%7C&sdata=rGcgQXRzTRNW

RQBpRG%2Bpqnld0yLT1E01iZQ1YDGWcxo%3D&reserved=0.

Please refer to the Wholesale; Business customers; Groundwater discharges section.

2. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
3. The applicant is advised to contact TfL Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant: scaffolding: security; boundary treatment; safety barriers; landscaping and lighting. A Party Wall notice will be required to be served to Transport for London Infrastructure Protection in advance of carrying out any works near or on a party wall.
4. A Party Wall notice will be required to be served to Transport for London Infrastructure Protection in advance of carrying out any works near or on a party wall.
5. Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
6. Small refuse vehicle is expectable on this proposal but architects are reminded to work with standard RVC dimensions.
7. Waste store to be built to BS5906 specifications.
8. Waste bins cannot be left on the highway for collection.
9. Roof Gardens
The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.
10. 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.

11. Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

12. HSE – CFD Modelling

As highlighted in the advice of the Health and Safety Executive in their Gateway One response, CFD modelling is required to demonstrate that the arrangement of stairways and their access to basement is sufficient for fire safety purposes. Should CFD modelling demonstrate that this is not the case, this planning approval would need to be amended to reflect a regulation compliant design.

13. HSE – Operational Hydrant

As highlighted in the advice of the Health and Safety Executive in their Gateway One response, should an operational hydrant not be present at a suitable location to serve the site then an application would need to be made to install an operational hydrant.

14.

SCHEDULE

APPLICATION: 24/00649/LBC

65 Fleet Street, London, EC4Y 8BQ

External and Internal alterations to The Tipperary Pub including part demolition of the rear of the pub; erection of 1 storey roof extension containing student accommodation with associated expansion into northern block of 65 Fleet Street at fifth floor level. Works to improve access to Whitefriars Crypt with changes to the surrounding structure of the Crypt to allow for presentation and interpretation of the asset.

1. The works hereby permitted must be begun before the expiration of three years from the date of this consent.

REASON: To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2. Before any works hereby consented are begun, a full survey including photographic record of the exterior and interior of the Tipperary Pub shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure suitable record is kept of this version of the building in accordance with the following policy of the Local Plan:DM12.3.

3. Before any works hereby consented are begun, a full survey including photographic record of the exterior and interior of the Remains of the Former Whitefriars Convent shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure suitable record is kept of this version of the building in accordance with the following policy of the Local Plan:DM12.3.

4. Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect original external and internal features of the Tipperary Pub during the building work. These shall remain in place for the duration of the construction/ alteration work hereby permitted.

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3

5. Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect original external and internal features of the Remains of the Former Whitefriars Convent during the building work. These shall remain

in place for the duration of the construction/ alteration work hereby permitted.

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3

6. Before any works hereby consented are begun in relation to the Tipperary Pub details of the following shall be prepared by a suitably qualified professional and submitted to and approved in writing by the Local Planning Authority. All works pursuant to this consent must be carried out in accordance with the approved details.
 - (a) a full methodology for the proposed works, including a heritage method statement and a schedule of all proposed works;
 - (b) detailed condition survey of the buildings;
 - (c) Details, including method statement for works to unveil the potential survival of original or historic features, underneath existing modern fabric;
 - (d) Details, including a heritage method statement and samples of materials, of repair works (including both internal and external cleaning).

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3.

7. Before any works hereby consented are begun in relation to the Remains of the Former Whitefriars Convent details of the following shall be prepared by a suitably qualified professional and submitted to and approved in writing by the Local Planning Authority. All works pursuant to this consent must be carried out in accordance with the approved details.
 - (a) a full methodology for the proposed works, including a heritage method statement and a schedule of all proposed works;
 - (b) detailed condition survey of the buildings;
 - (c) Details, including method statement for works to unveil the potential survival of original or historic features, underneath existing modern fabric;
 - (d) Details, including a heritage method statement and samples of materials, of repair works (including both internal and external cleaning).

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3

8. During the works, if hidden historic features are revealed they should be retained in-situ. Works shall be halted in the relevant area of the building and the Local Planning Authority should be notified immediately. Failure to do so may result in unauthorised works being carried out and an offence being committed.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

9. Prior to the commencement of relevant works, a method statement shall be submitted to and approved by the local planning authority setting out the methodology for the safe removal, storage and reinstatement of the wooden panelling located on the rear wall of the ground floor bar of The Tipperary. The development shall be carried out in accordance with the approved details.

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: DM12.1, DM12.3.

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

- (a) repairs to the mosaic at the entrance threshold ground floor
- (b) comprehensive schedule and specification of internal and external repairs
- (c) details of removal and replacement of existing timber lintels
- (d) details of any fire upgrading required to existing historic fabric
- (e) details of new internal doors, skirtings and architraves and other joinery where relevant
- (f) details of new door to the covered pedestrian route ground floor west elevation

REASON: To ensure 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: CS12, DM12.1, DM12.3.

11. Prior to the commencement of the relevant works, full details of the restoration and incorporation of building services into the retained historic cellular spaces of The Tipperary Pub shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied that the special architectural and historic interest of the listed building is conserved and enhanced in accordance with the following policies of the Local Plan: CS 12, DM 12.1, DM 12.3.

12. Before any works thereby affected are begun a Fire Strategy for The Tipperary Pub shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

13. Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect the windows during the building work, particularly the historic window glass. The agreed measures shall be carried out in full. No such features shall be disturbed or damaged or removed temporarily or permanently to facilitate protection except as indicated on the approved drawings or with prior approval in writing. Any intact historic window glass damaged during the building work shall be reported to the Local Planning Authority and shall be replaced like-for-like from a suitable approved source.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

14. Prior to the commencement of the relevant works, full details of the new link between The Tipperary Pub and No.67 Fleet Street shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied that the special architectural and historic interest of the listed building is conserved and enhanced in accordance with the following policies of the Local Plan: CS 12, DM 12.1, DM 12.3.

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

- (a) Particulars and samples of the materials to be used on all external faces of the extension around the Remains;

- (b) Details of the proposed new façade including typical details and samples of the fenestration and entrances at a scale of no less than 1:20;
- (c) Details of external artwork and historical interpretation; and
- (d) Details of signage and wayfinding for the Remains.

REASON: To ensure 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: CS12, DM12.1, DM12.3.

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

- (a) details of any proposals arising from any condition and structural surveys of the Remains of the Fromer Whitefriars Convent;
- (b) details of protection measures to the Remains of the Fromer Whitefriars Convent following completion of the development;
- (c) details of basement level, ground level and all finishes in the area of the display space of the Remains of the Fromer Whitefriars Convent;
- (d) details of the directional information and interpretative material internally and on external elevations, including the new external wayfinding; and
- (e) details of the display wall and cases within the proposed basement display and ground floors, to a scale of not less than 1:5, including materials of the display walls, cases, objects, wording and methods of illumination.

REASON: To ensure the protection of the significance and setting of the listed building and that the Local Planning Authority may be satisfied with the detail of the proposed works and to ensure a satisfactory appearance in accordance with the following policies of the Core Strategy CS12.

17. All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

Name: Ardit

- Surname: Gjoka

- Address: Goodman Style, Ludgate Circus

- Postcode: Ec4m 7lf

- Email:

- Phone number (optional):

- Message (optional):

- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:

- I consent for this letter of support to be published on City of London Corporation planning portal.

Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellants in the event of an appeal, including an enforcement appeal:

Adjei, William

Subject: FW: Letter of support for 65 Fleet Street London EC4Y 8BQ

- Name: Ashley

- Surname: Grant

- Address: Indochine, 62 Fleet Street
- Postcode: Ec4y 1ju

- Email:

- Phone number (optional):
- Message (optional):

- I support this application because:

- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation: on

- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellants in the event of an appeal, including an enforcement appeal: on

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area: on

- I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:

- I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community: on

- I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area: on
- I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation: on

- I support the proposal in that it will generate social and economic benefits for the local community: on

Letter of support for Application (24/00648/FULMAJ) for 65 Fleet Street, London -

<https://conciliocomms.com/conciliosupports-65-fleet-street/>

- Name: Andy
- Surname: Conway
- Address: Bowing, 58 Fleet Street
- Postcode: EC4Y 1JU
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal:

— I support this application because:

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
- I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community:
- I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area:
- I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation:
- I support the proposal in that it will generate social and economic benefits for the local community:

- Name: Teodora
- Surname: Bakardzhieva
- Address:
- Postcode: Ec4y1bn
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal:

— I support this application because:

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
- I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:
- I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community:
- I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area:
- I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation:

- Name: Gillian
- Surname: Jupp
- Address: Jupp, 30 Fleet Street
- Postcode: EC4Y 1aa
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal:

— I support this application because:

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
- I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:
- I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community:

- Name: Celal
 - Surname: Kanidagli
 - Address: 24 Tudor Street
 - Postcode: EC4Y 0AY
 - Email:
 - Phone number (optional):
 - Message (optional):
 - I support this application because:
 - I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation: on
 - I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal: on
 - I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
 - I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:
 - I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community:
 - I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area: - I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation:
 - I support the proposal in that it will generate social and economic benefits for the local community: on
- Letter of support for Application (24/00648/FULMAJ) for 65 Fleet Street, London - <https://conciliocomms.com/conciliosupports-65-fleet-street/>

- Name: James
- Surname: Li
- Address: Chi Noodle & Wine Bar, 5 new bridge street
- Postcode: EC4V 6AB
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellants in the event of an appeal, including an enforcement appeal:

— I support this application because:

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
- I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:
- I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community:
- I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area:
- I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation:
- I support the proposal in that it will generate social and economic benefits for the local community:

- Name: Artur
- Surname: Mihalcean
- Address: Humble Grape, 1st brides passage
- Postcode: EC4Y 8 EJ
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellants in the event of an appeal, including an enforcement appeal

— I support this application because:

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
- I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:
- I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community:
- I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area:
- I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation:
- I support the proposal in that it will generate social and economic benefits for the local community:

- Name: Matt
- Surname: Ryan
- Address: The Albion, 2-3 new bridge street
- Postcode: EC4V 6AA
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal:

— I support this application because:

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
- I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:
- I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area:
- I support the proposal in that it will generate social and economic benefits for the local community:

-
- Name: Najib
 - Surname: Haqqi
 - Address: 3 new street square
 - Postcode: Ec4a 3bh
 - Email:
 - Phone number (optional):
 - Message (optional):
 - I support this application because:
 - I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation: on
 - I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal: on
 - I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
 - I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:
 - I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community:
 - I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area: - I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation:
 - I support the proposal in that it will generate social and economic benefits for the local community:
- Letter of support for Application (24/00648/FULMAJ) for 65 Fleet Street, London - <https://conciliocomms.com/conciliosupports-65-fleet-street/>

-Name: Kendal

-Surname: Atherton

-Address: Java Java, 160 fleet street

-Postcode: EC4A2DQ

-Email:

- Phone number (optional):

- Message (optional):

-I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:

-I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal: on

- I support this application because:

- I support the proposal in that it will generate social and economic benefits for the local community

- Name: Kishan
- Surname: Thawrani
- Address: Ryman Stationery 149 Fleet Street
- Postcode: Ec4A 2BU
- Email:
- Phone number (optional):
- Message (optional): To help drive footfall

- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:

- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal:

- I support this application because:
 - Please see message above

- Name: Charlie
- Surname: O'donnell
- Address: Scotts, 65 Ludgate Hill
- Postcode: EC4M7JH
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal:
 - I support this application because:
 - I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
 - I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area:
 - I support the proposal in that it will generate social and economic benefits for the local community.

- Name: Martin
- Surname: Barnett
- Address: Paternoster chophouse
- Postcode: Ec4m 7au
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellants in the event of an appeal, including an enforcement appeal:

— I support this application because:

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area:
- I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:
- I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community:
- I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation:
- I support the proposal in that it will generate social and economic benefits for the local community:

From: PLN - Comments
To:
Subject: Letter of support for Application 65 Fleet Street London EC4Y 8BQ
Date: 21 August 2024 13:03:14

THIS IS AN EXTERNAL EMAIL

- Name: Ruby
 - Surname: Kaur
 - Address: 93 Fleet Street
 - Postcode: EC4Y 1DH
 - Email:
 - Phone number (optional):
 - Message (optional):
 - I support this application because:
 - I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation: on
 - I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellant in the event of an appeal, including an enforcement appeal:
 - I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area: on
 - I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly: on
 - I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community: on
 - I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area: on
 - I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation: on
 - I support the proposal in that it will generate social and economic benefits for the local community: on
- Letter of support for Application (24/00648/FULMAJ) for 65 Fleet Street, London - <https://conciliocomms.com/conciliosupports-65-fleet-street/>

9 September 2024

FAO: Emma Barral, City of London

**Development of 65 Fleet Street, London EC4Y 8BQ
(Planning application ref. 24/00648/FULMAJ)**

Dear Emma,

I write to set out the Guildhall School of Music & Drama's support for Dominus's planning application at 65 Fleet Street.

As you will be aware, the Guildhall school is located in the City of London. We currently educate around 1,100 students and manage one student accommodation building at Sundial Court, Chiswell Street, just outside the City's boundaries. Sundial Court can accommodate around 170 of our students.


Pending securing appropriate internal City of London approvals, we intend to engage with Dominus to explore the potential for a nominations agreement that will provide the School with access to a proportion of the proposed development's affordable rooms.

These affordable rooms are provided at levels capped by the Mayor of London. They are currently capped at no more than £193 per week, across a 38-week academic year. These levels are beneficial for our students, being significantly lower than the £231 per week that we must currently charge our students at Sundial Court.

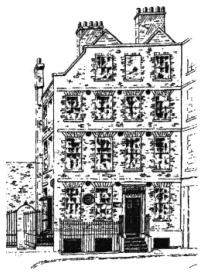
We believe our students will significantly benefit from living in such high-quality accommodation and the opportunity to mix with students studying at other Central London universities. 65 Fleet Street is also well connected overall, and a short cycle or bus journey from our campus and a comfortable walk.

We are pleased to set out our support for this planning application and look forward to the building opening, so that our students can start to enjoy living in such high-quality accommodation that is located within walking distance of our campus.

Yours sincerely,



Prof. Jonathan Vaughan
Principal



DR. JOHNSON'S HOUSE

17 Gough Square
London EC4A 3DE
Tel: [REDACTED]

Planning Department
City of London
Guildhall
PO Box 270
London, EC2P 2EJ

Planning application ref. 24/00648/FULMAJ (and associated listed building consent application ref. 24/00649/LBC)

65 Fleet Street

To whom it may concern,

I write on behalf of Dr Johnson's House to support of Dominus' proposal to redevelop 65 Fleet Street. My reasons for supporting the application are:

1. I believe this development will provide economic and social benefits to Dr Johnson's House and the surrounding area, and to the City more broadly. This development contributes to existing plans for the City and specifically the Fleet Street Quarter area by increasing the number of residents and – importantly - diversifying the demographic. This will have the potential to impact Dr Johnson's House directly by bringing potential new audiences to our doorstep, and by developing a community we are keen to serve – our charitable aims focus on education and promoting literacy and language skills and we can develop programmes to serve this new local community.
2. I believe it will add to the vibrancy of the area and increase dwell time in the City of London, thus increasing expenditure, not least with visiting family and friends. I think this will contribute to Dr Johnson's House's aims and the City Destination themes well.
3. I am pleased to see a derelict building being rejuvenated, as too many sites along Fleet Street have been empty for too long. The plans for 65 Fleet Street complement the wider development of Fleet Street and the plans for 120 Fleet Street and the new Justice Quarter currently under construction.
4. I am especially excited by the careful consideration and vision going into the cultural offering this development will deliver: from bringing the medieval crypt into public view for the first time, to providing suitable space for the general public to explore and learn about the historic significance of Fleet Street with regard to print media and the written word, to the re-opening of the historic Irish Pub, the Tipperary. Again, I can see the benefits to the existing local community, residential and business, and to the incoming residents (students within the building) and to surrounding businesses, driven by the increased footfall to the area such attractions would bring. The potential to collaborate of programming is well-received also.

I hope that you will take these comments into account in determination of the applications for planning permission and listed building consent at 65 Fleet Street.

Celine Lupp McDaid MA (Oxon) MA FRSA
The Hyde Director

Dr Johnson's House
17 Gough Square
London, EC4A 3DE

[REDACTED] / www.drjohnsonshouse.org

Comments for Planning Application 24/00648/FULMAJ

Application Summary

Application Number: 24/00648/FULMAJ

Address: 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Case Officer: Emma Barral

Customer Details

Name: Mr Tim Cutter

Address: Avison Young 65 Gresham Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Construction Logistics Plan - comments

Pg 5 - "The demolition and construction works at 65 Fleet St will generate a considerable amount of construction traffic" - Has the contractor issued a vehicle movement profile that takes due consideration of all other traffic movements in the immediate locale (not least construction traffic for the Salisbury Square Development)?

Pg 7 - Site Layout - Strip Out & Demolition - a detailed programme needs to be developed to ensure safe and efficient works delivered in a way so as to not fetter progress of the Salisbury Square Development.

This programme should indicate the dates of any pit lanes and tower crane mobilisation, erection and demobilisation.

Any scaffolding along the Whitefriars St elevation will need to coordinate and be accepted by the Salisbury Square Development main works contractor (Mace).

"Site traffic will be coordinated to avoid peak traffic hours". These times are not specified - page 15 indicates no deliveries between 08:00 - 09:00 & 17.00 - 18.00. This would need coordination and the acceptance of the Salisbury Square Development main works contractor (Mace).

Pg 8 - Figure 3 - Initial Site Layout. When will this be formed, particularly the pit lane on Fleet Street? This needs to be co-ordinated with and be accepted by the Salisbury Square Development

main works contractor (Mace).

A demonstration of how the temporary logistics space will work with the planned quantity of vehicle movements for the delivery of the Works.

For safety of pedestrians and "pedestrian comfort", a demonstration that vehicles do not impede the pavement should be provided. The actual size of proposed vehicles (i.e. rigid truck?) should be included in this demonstration.

There is no clear indication that vehicles movements include reversing up Whitefriars Street and how traffic and pedestrian movements will be managed to remove all safety risks.

Comments for Planning Application 24/00648/FULMAJ

Application Summary

Application Number: 24/00648/FULMAJ

Address: 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Case Officer: Emma Barral

Customer Details

Name: Mr tim cutter

Address: Avison Young 65 Gresham Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Construction Logistics Plan - comments

pag9 - Will a new, temporary road crossing be provided? Currently there is no safe crossing for pedestrians from Ludgate circus. Co-ordination and swept path analysis should demonstrate how site traffic movements will coordinated the adjacent pit lanes operated by the Salisbury Square Development main works contractor (Mace).

The removal of the traffic lights will naturally require approval by TfL.

NOTE - It is understood that any proposal to re-locate a pedestrian crossing will require a design from the applicant to satisfy a City Road Safety audit and TfL traffic impact assessment.

Pg 12 Pedestrian Management plans must co-ordinate with the approved CLP of the Salisbury Square Development main works contractor (Mace).

Pg 14 - If the contractor intends to utilise Datascope access control system, this should co-ordinate with, and be informed by recorded traffic movements for Whitefriars Street.

Pg 18 - Figure 9 - Delivery Routes. Route 4 "unimpeded access". All access routes need to be co-ordinated with and be accepted by the Salisbury Square Development main works contractor (Mace). The agreed SSD construction programme requires unfettered access from January 2025

for steelwork installation and access to the basement levels of commercial building, 1 Salisbury Square.

Pg 20 - Table 2. A demonstration of how these predicted vehicle movements aligns with the construction programme. The total number of movements should be split between the four routes in Figure 9.

Pg 24 - Figure 10 would indicate that access is required from Mace's temporary logistics area. All details including any reconfiguration of vehicle barriers etc and timing (i.e. during out of normal hours) must co-ordinate with and be accepted by the Salisbury Square Development main works contractor (Mace). All associated costs borne by Mace must be reimbursed by the developer for 65 Fleet Street.

Comments for Planning Application 24/00648/FULMAJ

Application Summary

Application Number: 24/00648/FULMAJ

Address: 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Case Officer: Emma Barral

Customer Details

Name: Mr Tim Cutter

Address: Avison Young 65 Gresham Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Construction Logistics Plan - comments

Pg 25 - Point 15. Wheel washing facilities need to be provided for any vehicles accessing Whitefriars Street.

Pg 28 - Early engagement with key stakeholders. This must include The Harrow pub, St Brides Church, 8 Salisbury Square etc. It is not apparent that this has been carried out at the time of the submission of the planning application.

Pg 30 6.8 Temporary Services. It should not be assumed that the (network) substations nearest to the site have capacity to serve the site. The use of local sub-stations cannot be allowed to impact the delivery of the Salisbury Square Development. Appendix A - Site entrance - this should be set in-bound from Whitefriars Street pavement to provide safe and unimpeded access for pedestrians. Appendix C - Oversailing agreements are not in place with the developer of Salisbury Square Development. It would appear that an anti-collision system designed, implemented and funded by the developer of 65 Fleet Street is required to remove the risk of collision with existing cranes operating on the Salisbury Square Development. Appendix D - Swept Path Analysis. This must be co-ordinated with and be accepted by the Salisbury Square Development main works contractor (Mace). It is not clear what impact results from abnormal loads. Temporary road markings will be required to be amended to suit new routing plan. CoL Highways should be consulted not lease to

agree safe vehicle movement from Fleet St to Bouverie Street. Vehicle access adjacent to Ashentree Court do not appear to work.

Comments for Planning Application 24/00648/FULMAJ

Application Summary

Application Number: 24/00648/FULMAJ

Address: 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Case Officer: Emma Barral

Customer Details

Name: Mr Tim Cutter

Address: Avison Young 65 Gresham Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Construction Management Plan.

A detailed, logic linked programme is required. This must be co-ordinated with and be accepted by the Salisbury Square Development main works contractor (Mace). Co-ordination and agreement of City of London Highways is required to align with the phasing Section 278 works. The removal of two temporary electrical substations adjacent to The Harrow pub needs to be identified. Pg 27 - Assembly Point needs co-ordination with Mace and all neighbouring occupiers of commercial and residential premises. Pg 57 - Detailed Logistics and Delivery Programme - Tower Crane erection and dismantling dates and all interfaces with Whitefriars Street.



Workspace
160 Fleet Street
London
EC4A 2DQ

17 September 2024

Mr. Shravan Joshi MBE
Chairman Planning and Transportation Committee
City of London
PO Box 270
Guildhall
London
EC2P 2EJ.

Dear Sir

65 Fleet Street London EC4Y 8BQ: 24/00648/FULMAJ

I am writing on behalf of Fleet Street Quarter BID. We were formally established on 1 April 2022 and represent over 350 businesses located in and around Fleet Street. We are working with our partners to create a world class destination here in Fleet Street, making it a dynamic leading business quarter with high quality public spaces.

I am writing to support the above application as it aligns closely with our priorities for the area as set out in our BID Proposal on which we were elected as follows:

1. Strategic Theme 1: Putting Fleet Street Back on the Map

This theme is about creating the FSQ as a vibrant and dynamic location that will reposition it as a place to work, visit, live and invest in. The Proposals contribute to this theme in the following ways:

The Tipperary Pub is one of London's iconic pubs with much history. The re-opening of part of the pub as an independent pub, serving Guinness and other Irish beers has proved very successful. The pub is very well used and clearly attracts people from wide area. The proposals seek to build on this success by expanding the pub and animating the street.

The partnership with St Bride Foundation will provide a new cultural space, including a free visitor experience about Fleet Street and the story of print and education space for St Bride Foundation's school programmes. It will bring the Foundation onto Fleet Street, giving it exposure to a much wider audience and will contribute to the Principle Retail Shopping Centre designation.

Whitefriars Crypt will be made significantly more visible and accessible - it will be put on the map as a unique and historic place to visit, supported by accompanying exhibitions displaying parts of the City's medieval history.

A new student community will be created by the student accommodation. This will add vibrancy, and its presence will also help other parts of the FSQ become rejuvenated with better shops and restaurants, providing a new customer base for the area.

2. **Strategic Theme 2: Creating a Connected Community**

The aim of this theme is to promote a vibrant and progressive cultural offer to attract new audiences; and to create an inclusive, innovative and sustainable business ecosystem. The proposals contribute to this theme in the following way:

- the cultural offer of a new home for the St Bride Foundation and the opening up and public access to the Whitefriars Crypt has the potential to significantly contribute to the FSQ by attracting new audiences, particularly young people, as part of the St Bride Foundation education programme.

3. **Strategic Theme 3: Clean and Green**

This theme recognises the need to make the most of the limited public squares and spaces and increase the amount of green space and access to nature, as well as tackling climate change. The Proposals contribute to this theme in the following ways:

- It provides a new and attractive landscaped public realm in the central courtyard with raised planters and seating to create pockets of social space and a venue for new conversations, assisting in general activation of the public realm.
- Retaining and upgrading the existing building with extensions and alterations is the most environmentally sustainable solution for this site, retaining over 90% of the existing structure.

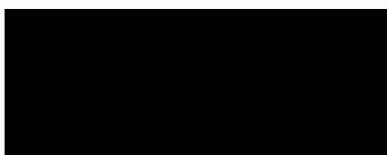
4. **Strategic Team4: Safe and Secure**

This theme aims to maintain the area as a safe place to work, visit and live and stay in and the proposals contribute to this theme in the following ways:

- Putting a previously vacant and run down building back into use, and thus deterring graffiti, begging and rough sleeping on site.
- Providing active frontages that help increase the perception of safety.
- Delivering a managed public realm that will increase safety, with visible management presence and the ability to secure the site by locking it during unsociable hours.

I sincerely hope that the Committee will take these factors into account in reaching their decision on the proposal. I believe that this development will complement the new developments currently under construction and others planned for the area and will help create a new Fleet Street business district as a desirable location for businesses to locate in, residential to live and visitors to stay in and experience.

Yours sincerely,



Lady Lucy French

CEO Fleet Street Quarter BID



The Inns of Court College of Advocacy

24 September 2024

To Whom it May Concern,

RE: PLANNING APPLICATION PROPOSALS FOR 65 FLEET STREET, LONDON, EC4Y 8BQ

I write on behalf of The Inns of Court College of Advocacy (ICCA) to express support for Dominus's (as part of Whitefriars Ltd) planning application proposals that will deliver new purpose-built student accommodation (PBSA) at 65 Fleet Street (planning ref: 24/00648/FULMAJ).

About the ICCA

The ICCA is the education and training arm of The Council of the Inns of Court (COIC), which is a registered charity, working with the four Inns of Court, (Gray's Inn, Lincoln's Inn, Inner Temple and Middle Temple) to strengthen the rule of law through excellence in professional and ethical education, and to maintain the highest standards of professional conduct.

Since the 14th century, the Inns of Court have played a central role in the training of aspiring and established barristers, holding the exclusive rights to call to the Bar. Education and training are vital to the Inns' continuation, to the practice of the law, the justice system and the public's interest in general.

The ICCA is a not-for-profit organisation which provides education, guidance and coordination in relation to the pursuit of academic and professional excellence for the Bar.

Our three areas of focus are:

1. To train the barristers of the future on the ICCA Bar Course, which is a postgraduate Bar Training Course funded by the Inns of Court and validated by King's College London;
2. To provide high-quality CPD, education and training materials to practising barristers at all levels of seniority, to pupils and to other legal professionals, nationally, pan-professionally, both nationally and internationally;
3. To promote the highest standards of advocacy and professional ethics;

The Inns of Court College of Advocacy
Rolls Passage
33 Chancery Lane
London, WC2A 1EN
T: 020 7822 0763
E: info@icca.ac.uk

The Council of the Inns of Court. Limited by Guarantee
Company Number: 8804708
Charity Number: 1155640
Registered Office:
9 Gray's Inn Square, London, WC1R 5JD

The ICCA is authorised by the Bar Standards Board (BSB) as an Education and Training Organisation (AETO). We are registered with the Office for Students and commenced Bar training in 2020.

As a not-for-profit Bar training provider, our first priority with the ICCA Bar Course is to enable every ICCA student to achieve their potential to secure pupillage and pursue a career at the Bar. 35 students studied on our first post-graduate programme in 2020/21, of whom 97% of those who applied for pupillage were successful.

The ICCA has maintained its position as the most successful provider of Bar training in respect of the BSB centralised assessments over 11 sittings, since 2021, with an average pass rate of 90.2%.

We remain true to our core values, including providing Bar training of the highest quality at the lowest sustainable cost, achieving outstanding academic and pupillage success rates, providing a Bar Course which the profession respects as directly relevant to practice and employing a fair admissions model which contributes to a more diverse entry into the profession. The ICCA attracts students and career changers from over 50 universities in a diverse and supportive community.

Our student numbers grew by 83% in 2023 and again by 17% in 2024. We will reach our capacity of 240 Part Two students per annum by 2025.

Our course cycles are distinctive in that our programme combines self-study and in-person elements. Our two in-person skills courses run from September to January and March to July.

65 Fleet Street

The 65 Fleet Street location will be very attractive to the ICCA and our students as it is so well located.

The proposed student accommodation entrance on Bouverie Street is 3 minutes' walk from some of our educational facilities at Inner Temple. Beyond this, the building is a short walk or cycle from each of the four Inns of Court, the barristers' chambers clustered within and adjacent to them and the legal quarter that surrounds all of the above.

We began talking to Dominus about these proposals at the beginning of 2024. We are currently agreeing Heads of Terms with Dominus for a Nominations Agreement that will enable at least 20 affordable rooms per annum being made available to our students. Across an academic year this means that at least 40 of our students will benefit from paying rent at levels capped by the Mayor of London. The ICCA currently has no accommodation to offer our students.

The Inns of Court College of Advocacy
Rolls Passage
33 Chancery Lane
London, WC2A 1EN
T: 020 7822 0763
E: info@icca.ac.uk

The Council of the Inns of Court. Limited by Guarantee
Company Number: 8804708
Charity Number: 1155640
Registered Office:
9 Gray's Inn Square, London, WC1R 5JD

At 2024/25 levels, the students living in this affordable accommodation will be paying circa £193 per week. Without access to an Inns funded or discounted residential scholar flat, many of our students struggle to find affordable accommodation commutable to the Inns of Court locations, and term times rarely fit neatly with the periods for which homes or rooms are available to rent. These difficulties can impact student wellbeing, which is something that we focus on significantly during the time our students are studying with us.

We are excited about the quality of accommodation being proposed. These proposals will provide our students with high-quality, professionally-managed accommodation, with a variety of attractive shared spaces and an external terrace providing opportunities for quiet study as well as mixing with other students. The mixture of uses across the development, including the St Brides Foundation cultural space and reinvigorated Tipperary pub will enhance our students' experiences.

We therefore encourage the City of London to grant planning permission for this planning application and look forward to continuing to work with Dominus bringing forward these exciting proposals.

Yours faithfully,



Lynda Gibbs KC (Hon)
Dean of the Inns of Court College of Advocacy

The Inns of Court College of Advocacy
Rolls Passage
33 Chancery Lane
London, WC2A 1EN
T: 020 7822 0763
E: info@icca.ac.uk

The Council of the Inns of Court. Limited by Guarantee
Company Number: 8804708
Charity Number: 1155640
Registered Office:
9 Gray's Inn Square, London, WC1R 5JD

This page is intentionally left blank

From: [REDACTED]
To: [REDACTED]
Subject: RE: Planning Application Consultation: 24/00648/FULMAJ [SG37810]
Date: 17 July 2024 16:36:51
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37810

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

2TAM

NATS Safeguarding

[REDACTED]
4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Public

From: [REDACTED]
Sent: Wednesday, July 17, 2024 11:19 AM
To: NATS Safeguarding [REDACTED]
Subject: Planning Application Consultation: 24/00648/FULMAJ

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 65 Fleet Street London EC4Y 1HT .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Emma Barral
Environment Department
City of London

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

Advice to the local planning authority

Advice to the local planning authority (LPA) from the Health and Safety Executive (HSE) as a statutory consultee for developments that include a relevant building.

To LPA	City of London
LPA planning ref no	24/00648/FULMAJ
Our ref	pgo-5560
Site address	65 Fleet Street London EC4Y 1HT
Proposal description	Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.
Date on fire statement	28/05/2024
Date consultation received	17/07/2024
Date response sent	30/07/2024

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('content')

Scope of consultation

- 1.1. The above consultation relates to the redevelopment of the existing building at 65 Fleet Street to comprise of a Purpose-Built Student Accommodation (PBSA) led scheme. The building splits into two blocks on ground floor and above.
- 1.2. On levels two and above, the residential levels of the building are split into two blocks (north and south block). The north block continues up to Level 6 and is served by two escape stairs. The larger south block is served by four escape stairs up to Level 7 and three of which continue up to Level 9.
- 1.3. The north block is proposed to consist of 5 upper storeys and the south block will consist of 10 storeys above ground. The top storey of the north block will be 21m above lowest ground floor level.
- 1.4. The north block is served by two escape cores; Core A1 and Core A2. Both cores continue up to the top storey at Level 05 from ground floor.
- 1.5. The south block will be 42.5m above lowest ground level. The upper levels of the building are proposed to consist almost entirely of student accommodation with a total of 871 rooms.
- 1.6. The south block is proposed to be served by four cores:
 - Core B4 from lower ground to Level 07
 - Core B3 from lower ground to Level 9
 - Core B1 from lower ground to Level 11; and
 - Core B2 from Level 0 Level 11.
- 1.7. The ground floor of the south block is proposed to consist of student apartments as well as the main entrance to the PBSA and cultural uses.
- 1.8. The north block will include a new café / bookshop as well as refurbishment and enhancement of the existing Tipperary pub. The pub is proposed to be extended into the neighbouring building to the east.
- 1.9. The Design and Access Statement (dated June 2024 – Executive Summary) states:
“The proposed development seeks to retrofit and refurbish a derelict building to deliver a...mixed-use scheme which improves upon the existing consent while providing a long-term future for a local institution, The Tipperary.”
- 1.10. The basement is proposed to consist of student amenity areas, as well as plant areas, refuse stores and a bike store. Lower ground floor is proposed to consist of a cultural and community space in addition to student accommodation and student amenity spaces. Ground floor is proposed to consist of commercial units including the existing Tipperary pub, in addition to student accommodation and student amenity.

- 1.11. Residential amenity and ancillary areas will be provided across the building:
Basement – PBSA Amenity, Cycle Store, Refuse and Plant rooms.
Lower Ground Floor – PBSA Amenity
Ground Floor – PBSA Reception
Level 10 – External terrace garden

1.12. The fire statement dated 28/05/2024 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. It is noted the fire statement was helpfully detailed and informative.

Listed building consent / The Tipperary pub

1.13. For information, page 14 of the Design and Access Statement (DAS) states that Listed building consent is also sought for: *“Improvements to The Tipperary pub...”*

1.14. Paragraph 2.04 of DAS informs that: *“The Tipperary Pub, dates to c.1667 and is Grade II listed. The Tipperary forms part of the north of the Site, adjoining Fleet Street.”*

Consultation

1.15. North Block: The north block will be provided with two escape cores, one of which will be a firefighting core on the basis its footprint will be less than 900m² in area.

1.16. South Block: The larger south block is proposed to be served by four cores up to Level 7, three cores up to Level 9 and two cores up to Level 10. It is proposed that Core B2, B3 and B4 will form firefighting shafts.

1.17. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

The following information does not contribute to HSE’s substantive response and should not be used for the purposes of decision making by the local planning authority.

Internal layout of flats

2.1. The fire statement states: *“The studio flats will generally be designed so that occupants do not have to pass within 1.8m of the cooking hob to escape. In apartments where occupants are required to pass within close proximity of cooking areas, Stove Guard devices will be provided in accordance with BS EN 50615.”*

2.2. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Public House

- 2.3. The fire statement states: *“The top storeys of the Tipperary Pub will be served by a single stair, however this forms part of the existing situation which is not being made any worse as a result of the works. The level of safety can be deemed to be enhanced due to the provision of sprinklers.”*
- 2.4. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Basement stairs - CFD (Computational Fluid Dynamics)

- 2.5. The fire statement states: *“Three of the four escape stairs serving the residential levels will continue down to basement level in accordance with code guidance. **This includes both stairs that serve level 10**, due to the need to be provided sufficient means of escape capacity from this level. However, this is considered reasonable on the basis the stairs will be fire separated at ground floor level. It will be demonstrated through CFD at a later stage that the lobby smoke ventilation will be effective in preventing the flow of smoke into the stair for a fire in the basement and will not impact on means of escape for the upper levels.”*
- 2.6. The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.
- 2.7. HSE acknowledges the applicant’s commitment that CFD will demonstrate (section 7 of the fire statement), that *‘the smoke extract system will be effective in preventing the flow of smoke into the escape stair...’*.
- 2.8. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape / Cycle stores


- 2.9. The Design and Access Statement (page 62) states: *“Any potential storage of e-bikes or scooters within the cycle store would need further review and potentially additional safety measures due to the increased risk of these bikes.”*
- 2.10. HSE welcomes the commitment to review and potentially add further safety measures.
- 2.11. Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at [E-bikes and e-scooters fire safety guidance - NFCC](#)
- 2.12. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

2.13. It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.

2.14. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Yours sincerely


Stephen Gallagher
Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](#).

This response does not provide advice on any of the following:

matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application

matters related to planning applications around major hazard sites, licensed explosive sites and pipelines

applications for hazardous substances consent

London Plan policy compliance

APPLICATION COMMENT FORM**From:** Ben Bishop, Environmental Resilience Officer**Application No:** 24/00648/FULMAJ**Development Management Case Officer:** Emma Barral**Site Address:** 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Application Received: 21/06/2024**Request for Comment Received:** 24/07/2024**Response issued:** Date response sent**Comment:**

Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Design and Access Statement, Sustainability Statement, Energy and Sustainability Assessment, Ecology Appraisal and Landscape Statement.

A Climate Change Resilience and Sustainability Statement has not been prepared and supplied at this stage and should be considered and delivered as part of the WST 05 BREEAM credit.

Overheating

- Energy and Sustainability Assessment prepared by Applied Energy
- DSY 2 & 3 weather files, caveat of mitigation strategy to enable future compliance and adaptation to account for future climate
- greenfield runoff rate for the 1 in 100-year storm
- TM59 has been used to evaluate student halls to begin to identify cooling measures, requires further assessment to take into account future climate.
- TM52 should be assessed for retail and other use types.
- At RIBA 3 development will incorporate a range of measures to minimise contributions to the urban heat island aligning with London Plan Policy SI 4.
- Solar shading and passive design measures
- Urban greening for evaporative cooling.
- Passive ventilation and heat recovery
- Minimise reliance on cooling systems.
- Use thermal mass to moderate temperature fluctuations.

Date &
Initials

APPLICATION COMMENT FORM

- Would be recommended to identify potential to provide future cool spaces for pedestrian and visitor comfort.

Flooding

- Flood risk and drainage strategy prepared by Meinhardt
- Site is located in Flood Risk Zone 1 with less than 0.1% chance of river or sea flooding.
- Site is considered low risk from ground water flooding.
- Greenfield run-off rate of 2.2l/s for 1 in 100 year storm event with an allowance of 40% for climate change.

Water Stress

- Flood risk and drainage strategy prepared by Meinhardt
- Water re-use proposed in drainage strategy prioritising irrigation, infiltration and attenuation.
- Surface water falling onto proposed development to be routed into attenuation tanks.

Biodiversity

- Landscape statement prepared by B | D Landscape Architects
- Ecology Appraisal prepared by Hilson Moran
- Proposed Urban Greening Factor of 0.301.
- No BNG assessment or strategy supplied.
- Use of extensive green/brown roofs has potential to provide positive biodiversity benefits for City of London target species.
- Variation in substrate depth and type welcomed to create a range of habitat niches and increase plant diversity.
- In BNG assessment further artificial measures should be proposed including nest boxes, invertebrate mounds/bee banks rocky piles and areas of standing water.

Pests and Diseases

- No evidence supplied, can be covered in the Climate Change Resilience Sustainability Statement (CCRSS) to be supplied as part of the condition proposed below.

Food, Trade, and Infrastructure

- As a residential use type the development should be assessed for risk to occupants based on the potential risk to supply chains, access and infrastructure failure. Can be covered in CCRSS

Recommendation:

The proposed development **is partially** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2.

The following condition should also be considered to provide details of how the development has responded to risks from climate change; this condition may be fulfilled by a satisfactory assessment in support of the BREEAM Wst 05 credit:

APPLICATION COMMENT FORM

Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development.

BB
01/08/24



Ms Emma Barral
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 0207 973 3777

Our ref: P01580083

5 August 2024

Dear Ms Barral

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**65 FLEET STREET LONDON EC4Y 1HT
Application No. 24/00648/FULMAJ**

Thank you for your letter of 17 July 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposals are for the recladding and extension of a group of buildings in the City of London. The site is located within an area that has a rich tapestry of heritage. It is situated partly within the Fleet Street Conservation Area and contains two grade II listed buildings. It is also located in close proximity to other heritage assets, including the Temples and Whitefriars Conservation Areas and the grade I listed Church of St. Bride's.

In our view, the proposals are unlikely to harm the character and appearance of the Fleet Street conservation area and have the potential to enhance the significance of the listed remains of the Whitefriars Convent. The proposals also have the potential to impact on the significance of heritage assets outside of the site through development within their setting. We recommend that further clarity is provided on those impacts and that any harm to heritage assets is adequately justified or mitigated, in accordance with policy.

Background

We understand that planning permission has been granted for a scheme of alteration and extension to the existing buildings on this site, including provision of a large roof addition over the building on the south side of the site.

Significance

The site is located on the south side of Fleet Street and comprises two blocks of



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



buildings separated by a courtyard and alleyways. The site is bounded by the narrow thoroughfares of Bouverie Street to the west and Whitefriars Street to the east, and by an existing adjacent building to the south. The northernmost block is located within the boundaries of the Fleet Street Conservation Area, which is typically characterised by buildings from a wide range of periods, many of which have historic associations with the newspaper industry. This block includes four buildings that front onto Fleet Street as follows:

- Two early 20th century office buildings that turn the corners onto Whitefriars Street and Bouverie Street. These buildings are finished in high quality stonework with carved detailing. Both buildings are considered to make a positive contribution to the character and appearance of the Fleet Street Conservation Area.
- The Tipperary public house, which has origins back to the 17th century. Although altered in the 19th and 20th centuries, the building retains its original plot width and modestly proportioned street frontage. In recognition of the heritage significance of the pub it is listed at grade II.
- At the centre of the block is a postmodern development that references the general scale and form of the surrounding buildings and provides an arched entrance way to the courtyard behind.

The southernmost block is occupied by a large building that dates from the 1990s. To the south of the block, the historic narrow thoroughfares of Magpie Alley and Ashentree Court are retained, as well as the partial remains of the former Whitefriars Convent. These remains are incorporated into the basement of the existing building on the site and include the medieval vault of the former convent, possibly dating to the 14th Century, and a small stone chamber with curved stair, probably dating to the 16th Century. In recognition of the early date and rare survival of this fabric, the structure is listed at grade II.

In the wider setting of the site are a number of conservation areas, including the Temples Conservation Area, which lies to the west and includes an enclave of late 17th Century barrister's chambers around King's Bench Walk, listed at Grade I. The Whitefriars Conservation Area lies to the south and includes a number of early 20th century newspaper printing offices, many of which are listed as fine examples of office and manufacturing premises. To the east of the site is St. Bride's Church, which is one of Sir Christopher Wren's greatest City churches. It dates from 1670-84 and has a notable tiered spire that apparently inspired the form of the wedding cake. In recognition of its high heritage significance it is listed at grade I. The above-mentioned heritage assets feature in many views originating from the River Thames, with the spire of St. Brides forming a particular point of interest.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Impact

The proposals are for the remodelling and extension of the existing buildings on the site.

To the northernmost block, the buildings are proposed to be extended at roof level in the form of mansard extensions, whilst the existing postmodern building would be re-clad.

Subject to the quality of design and execution, these proposals are unlikely to have a harmful impact on the character and appearance of the Fleet Street Conservation Area.

The south building would be re-clad and extended at roof level. The proposed extension is likely to be visible in views from the neighbouring Temples Conservation Area and would appear on the skyline behind buildings on the east side of King's Bench Walk. We note that existing developments are visible in the backdrop setting of these buildings in longer views from the west and the previous planning permission did introduce development into this area of sky space. As such, the proposed roof extension will appear on the skyline and will distract from the architectural composition of the buildings in King's Bench Walk. As such, the proposals are considered to cause a low degree of harm to the significance of the affected heritage assets through development within their setting.

In relation to the Whitefriars Conservation Area, any proposed visual impacts within the immediate area of the site are likely to be minimal due to the relatively narrow widths of the surrounding streets, which afford limited views of the site.

The submitted Heritage, Townscape and Visual Impact Assessment includes a series of images of the proposals from various vantage points along the Thames, which are intended to illustrate the potential visibility of the proposals in a number of significant views of the of the Temples and Whitefriars Conservation Areas and the church of St. Bride's. However, those images are of a very low resolution and it is not possible to assess the impact of the proposals with any certainty. Whilst we do not consider the proposals to raise any significant concerns in relation to the setting of the conservation areas as experienced in these views, it is clear that the proposed roof extension would be seen in close proximity to the church spire of St. Brides. Where any part of the spire of the church is proposed to be partially blocked from view, the proposals have the potential to cause harm to the significance of the church through development within its setting.

To the Ashentree Court elevation, the façade of the southern building would be partly



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



remodelled and extended to provide greater visibility of the remains of the former Whitefriars Convent. A new accessible public entrance would also be provided direct access off Ashentree Court. Subject to details of design of the new extension and any works to the fabric of the historic structure, the proposals have the potential to enhance the significance of the remains.

Relevant Planning Policy

The 1990 Planning (Listed Buildings and Conservation Areas) Act makes it a statutory duty for a planning authority to give special regard to the desirability of preserving listed buildings or their setting (section 16 and 66) when making decisions which affect them.

The development plan for this area is the City of London Local Plan 2015. Relevant policies include: CS10 and DM10.1, which relate to design and refer to heritage as a consideration; policies CS12 and DM12.1, which relate to the conservation and enhancement of the City's heritage and the management of change to those assets and their settings; and CS13 which relates to important views and notes the spire of St. Bride's Church.

The strategic policy framework for London is set out in the London Plan. Its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance and appreciation, and to avoid harm. It justifies this by explaining the unique sense of place created by London's historic environment, and the irreplaceable nature of its heritage assets.

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2023 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.201). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.205). Clear and convincing justification should be provided for any harm caused (para.206), and any harm should be weighed against the public benefits of the scheme (para.208).

Position

Historic England welcomes the opportunity to comment on these proposals.

The proposals appear have the potential to enhance the character and appearance of the northmost street block that fronts onto Fleet Street, subject to the quality of the final design and detailing.

The proposed works to the former Whitefriars Convent remains have the potential to enhance the presentation of this important listed historic structure and could enable



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



greater public access and understanding. We would therefore encourage you to enter into a S106 agreement to secure these potential heritage benefits, including any necessary works of repair to the historic structure, future maintenance, public access and interpretation

We would also recommend that options are explored for linking the proposed new internal space around the former convent remains to other publicly-accessible activities. For example, the London Wall at Vine Street has a linked café space that ensures that the public have visibility of the wall, that the space is well staffed, and is welcoming to the public.

We consider the proposed roof extension over the south building to cause a low level of harm to the significance of the Temples Conservation Area and the listed buildings within King's Bench Walk. In accordance with relevant policies, we would recommend that your authority seek to ensure that this harm is justified and reduced or minimised as far as possible.

In respect to the impact of the proposals on the ability to see the tower of St. Bride's Church in views from the Thames, we would recommend that the proposals seek to ensure there is no blocking or obscuring of the church spire in these views (for clarity, beyond the extent of any existing buildings or permitted schemes). As mentioned in the Impact section above, such proposals have the potential to cause harm to the significance of the church through development within its setting and in our view, such harm should be avoided, bearing in mind that the church is a grade I heritage asset of the highest significance.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 201, 205 and 208 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Claire Brady

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

From:
To:
Subject: Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ
Date: 08 August 2024 12:42:25

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ
8 August 2024

Dear Sir/Madam

Re: 65, FLEET STREET, LONDON, EC4Y 1HT

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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.

Water Comments

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully

Development Planning Department

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

Visit us online www.thameswater.co.uk , follow us on twitter www.twitter.com/thameswater or find us on www.facebook.com/thameswater. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

From: [REDACTED]
To: [REDACTED]
Subject: FW: 65 Fleet Street - 24/00648/FULMAJ, 24/00756/MDC & 24/00757/MDC
Date: 15 August 2024 15:58:57
Attachments: [image002.png](#)
[image003.png](#)

Hello,

Please scan and save as sensitive to 24/00648/FULMAJ.

Kind Regards

Emma



Emma Kate Barral MRTPI | Planning Officer
Environment Department | City of London | Guildhall | London EC2V 7HH

[REDACTED] | www.cityoflondon.gov.uk



From: Elliott, Chris <[REDACTED]>
Sent: Monday, August 12, 2024 4:16 PM
To: Barral, Emma <[REDACTED]>; McBirney, Georgia
<[REDACTED]>
Cc: Flynn, James <[REDACTED]>; Begolli, Nora
<[REDACTED]>
Subject: 65 Fleet Street - 24/00648/FULMAJ, 24/00756/MDC & 24/00757/MDC

Hi Emma and Georgia,

I'm emailing you both as I believe you are a case officer for 65 Fleet Street project, but apologies if this is not in your remit.

I met with James earlier today to discuss some delivery and servicing aspects, I just wanted to raise a couple queries that should go back to the applicant.

In the Delivery and Servicing Management Plan (DSMP), Figures 4.1 and 4.2 should

include the disabled parking bay and motorcycle spaces opposite the entrances to the service yard, within the drawing. This could create conflict for delivery vehicles wanting to access the service yard, as they have shown in their swept path analysis, if a vehicle is parked in the disabled bay.

I would also like to see the outputs of the TRICS assessment that the applicant has submitted, as part of their DSMP, just to make sure we are satisfied with their proposed delivery/servicing trip rates.

Finally, if the applicant would be able to provide estimates on the frequency of delivery activity, per vehicle type (4.6tn and 7.5tn box van). I am not 100% comfortable with the 7.5tn box van having to reverse into the service yard, in order to make deliveries, as they have shown in the swept path analysis (Fig 4.2).

Best,
Chris



Chris Elliott MRTPI | Transport Planner (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
[Redacted] www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment



-
-



Memo

To Assistant Director (Development Management)
Environment Department

Email [REDACTED]

From Paul Bentley
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 13/08/24

Your Ref: 24/00648/FULMAJ

Subject: 65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

The proposed development will be car free and space/ water heating will not be provided from a combustion source which is welcomed. No details regarding the proposed backup generator are known at this stage (to be confirmed at Stage 3). This will need to be assessed and therefore all relevant conditions have been applied.

Should the development be approved please attach the following conditions:

Air Quality Neutral Assessment

A revised air quality neutral assessment that considers the building and transport emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance.

Reason

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies S11 Improving Air Quality Part B(2)(a) and E of the London Plan

Condition M26F

Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the operation of the building.

Reason

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D

Condition M28C amended

Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available. The generator 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.

Reason

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 2019 and the London Plan Policies SI1 and SD4 D.

Condition M29

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, and must be located away from ventilation intakes and accessible roof gardens and terraces.

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide

and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

Condition M32 NRMM

Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason

To reduce the emissions of construction and demolition in accordance with London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.

In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

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.

Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: [Medium combustion plant and specified generators: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generators-environmental-permits)



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Tele phone [REDACTED]

Email [REDACTED]

Date 22/08/2024

Our Ref DS/SUDS24/0045

Your Ref PT_EB/24/00648/FULMA J

Subject 65 Fleet Street London EC4Y 1HT

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the information provided for the above application and would recommend the following conditions should the application be approved:

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 (including green-blue roofs), rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2.2l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 590m³;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;

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

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.



Your ref: 24/00648/FULMAJ

Our ref: CITY/24/34

Emma Barral

Development Management, City of London Corporation

By email only to: [REDACTED]

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

www.tfl.gov.uk

RE: 24/00648/FULMAJ, 65 Fleet Street, City of London, EC4Y 1HT

Thank you for consulting TfL with regard to this planning application reference 23/01102/FULMAJ.

Site Location

The site of the proposed development is located on Fleet Street which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is also bound by Whitefriars Street to the east and Bouverie Street to the west and Tudor Street to the south, all forming part of the City of London road network.

Bouverie Street operates a one-way system southbound off Fleet Street and Whitefriars Street operates one way north bound onto Fleet Street with the exception of cyclists both ways.

The site is also located approximately 190m west of the A201, New Bridge Street which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

The nearest bus stop is located on Fleet Street adjacent to the site named Fetter Lane, serving routes 15, 17, 26, 40, 63, 76, 341, N15, N21, N26, N63, N89, N199, N550, N551.

The closest station to the site is also Liverpool Street which serves the Central, Circle, Hammersmith & City, Metropolitan and Elizabeth Lines as well as Overground and National Rail services.

The site has a Public Transport Access Level (PTAL) of 6b on a scale from 0 to 6b where 0 is the lowest and 6b is the highest, therefore the site rank is excellent in terms of accessibility.

Cycleway 6 is located on New Bridge Street, 190m from the site, connecting Elephant and Castle to Hampstead.

The nearest station is City Thames Link approximately 285 metres east of the site along Fleet Street. The nearest London Underground station is Blackfriars at approximately 430 metres southeast and Temple station approximately 700 south west, both serving the District Line, Circle Line and Blackfriars also serving national rail.

The nearest cycle hire docking station is Bouverie Street directly outside of the site.

Neighbouring sites

It should be noted that there is a consented application for 'Land bounded by Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street'.

This site secured the closure of Shoe Lane (Stop H) bus stop located on Fleet Street directly outside of the site and has been relocated and secured via S278 agreement with TfL.

Throughout the construction there is a narrow gantry designed to enable pedestrian movement on the footway along Fleet Street, with a pitlane along Fleet Street meeting the junction adjacent to the site and Whitefriars Street. If a gantry must be retained for construction at this site, we request installation of a wider gantry with improved lighting, as the current arrangement is narrow and dark even in daylight, which is not sufficiently inclusive.

Consented scheme

A previously consented planning application (Planning ref. 19/00058/FULMAJ) was to re-provide an office-led scheme with some retail floorspace for the ground and first floors to the north of the building and flexible retail/gym/office uses at lower ground floor level.

The consented scheme was to provide a total of 32,144sqm GIA, an uplift of 1,350 sqm GIA from the existing floor area.

The existing public house is to be retained in the new application, whereas the previously consented application proposed to remove it.

Site access

Pedestrian access

There is an existing courtyard within the site connecting Bouverie Street and Whitefriars Street, which will be retained, TfL request clarity on the status of this access point. We also request whether the access will be 24/7 access in line with Policy D8 and the Public London Charter.

TfL request that new access points for the site should improve current natural surveillance and street lighting. The main access for the student accommodation will be on Bouverie Street. Given the access is off the main road network at Fleet Street, safety for the students should be prioritized and carefully considered.

Cycle access

Cyclists would access the site via Whitefriars Street providing access to basement level cycle parking using the existing servicing ramp. As well as the ramp, a cycle lift

is proposed which is described as for disabled cyclists to use. The lift should be match minimum dimensions specified in the London Cycle Design Standards (LCDS), specifically 1.2 by 2.3 metres, with a minimum door opening of 1000mm. For further guidance see: <https://content.tfl.gov.uk/lcnds-chapter8-cycleparking.pdf>

Given that student accommodation is the primary use proposed for the site, further analysis is needed to show how the relationship from the site to local Cycleways will be improved, as required by London Plan policy T5. Specifically S278 works should include the entire link route from the site to Cycleway 6 at New Bridge Street, 190m away, all of which must be assessed against and if necessary improved to comply with the Cycle Route Quality Criteria (<https://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>) This can identify any works required to link routes in the local highway network to stitch the development into local and London-wide cycling networks.

Lastly, further clarification should also be given to demonstrate how the condition of Bouverie Street and Whitefriars Street will be enhanced to provide a better walking and cycling experience, especially adjacent to delivery and servicing access points. This is necessary to ensure compliance with London Plan policies T2 and D8. Specific enhancements should be secured to ensure delivery by section 278 (S278) agreement or section 106 (S106) contribution to Corporation-delivered local highway works.

RSA and Healthy Streets Check for Designers

The Mayor's Healthy Streets and Vision Zero approaches are essential to delivering good growth in London and increasing travel by walking, cycling and public transport, as required by London Plan policies GG3, T1, T2 and others.

TfL expects all streets and public realm within and around the site to be designed in line with these approaches to help achieve the outcomes of the Mayor's Transport Strategy (MTS), which is also explicitly referenced in London Plan policy.

Considering this, we recommend that the proposed highway works are designed up in further detail to enable a Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers prior to determination.

These assessments should be audited and approved by TfL and the City Corporation's transport team before they are considered valid and considered by relevant planning decision makers at the City.

Active Travel Zone Assessment (ATZ)

The ATZ includes a day time assessment which is welcomed by TfL however, since the previously consented application, TfL now requires a 'night-time/dark hours' ATZ assessment is submitted to gain a true assessment of the walking environment paying particular attention to Healthy Streets criteria 'People feel Safe'. TfL is committed to improving women's safety, and delivering the Mayor's Strategy to Reduce Violence Against Women and Girls. For information on the issue, TfL also recommends the newly published GLA guidance: Safety in Public Space; Women, Girls and Gender Diverse People.

The daytime ATZ has been completed between 9:30-10:30 AM, assessing four routes, destination in order of route being; City Thameslink Station, LSE University Library, Chancery Lane Underground Station, Blackfriars Underground Railway Station.

To summarise the ATZ assessment, no improvements were suggested for Route 1. Route 2 identified an area of footway on Carey Street where tactile paving needs to be added. Route 3 identified the worst section being the footway prior to the Rolls Building / Fetter Lane crossing, due to Lime Bikes presence reducing the footway, which could negatively impact pedestrians who require a wider pavement such as those with pushchairs and wheelchairs. Route 4 also requires some tactile paving on the crossing at the south section of Whitefriars Street, as well as the repainting of cycle lanes to stop cyclist confusion, which is especially required given this street is where the long stay cycle parking is proposed to be accessed.

A Vision Zero analysis has been provided which confirms there have been no fatal collisions across 2020-2022 along local ATZ routes assessed, but two collision clusters of multiple serious injuries.

The first is at the crossing at the eastern end of Fleet Street, part of journey one, and the second at the crossing at the eastern end of Tudor Street, part of journey four. We therefore recommend requests the applicant engages with the City of London as the highway authority to agree highway safety improvements at these locations, meaning specific appropriate works and sufficient applicant funding.

Public Realm and placemaking

TfL request further clarification to demonstrate the relationship between the public and private spaces and how the function and hierarchy of the public realm could integrate with the land use and building blocks.

The site should operate in line with London Plan policy D8 and the Public London Charter, which highlights that all public and semi-public spaces in London should be safe, accessible, inclusive, attractive, well-connected, and easy to understand – even if privately managed, they should read as public spaces and be subject to the same rules.

We have safety concerns about the path proposed between Ashentree Court and Magpie Alley, which is poorly lit. This space needs further design attention to ensure it is safe, with appropriate street furniture and security management in place, in line with the Healthy Streets principles and policies T2 and D8 of the London Plan.

The development also needs a clear wayfinding system at key access points in the public realm to lead people to local destinations. We would be happy to support provision of Legible London signage within the site, subject to applicant funding. The City may wish to secure a wayfinding signage scheme by condition or another appropriate planning obligation, with future costing, design and delivery by TfL, prior to occupation.

Trip Generation

A multi-modal trip generation has been undertaken to assess and quantify the potential impact of the proposed development in terms of the number of trips expected to be generated by the development.

The report claims a reduction in trips, thus no impact. However, the development will clearly result in an increase in trips between 19:00 – 24:00, given the proposed change from office to student accommodation. There may also be an increase in public transport trips away from the development at AM peak hours.

Overall the site is expected to generate a total of 3176 two way trips including 1808 pedestrian and 1053 trips London Underground (LU) and National Rail trips. The application argues this is expected to be 3412 fewer daily trips than the site's existing land use.

Delivery and servicing trips appear to have been severely underestimated for the student accommodation proposed and overestimated for the other uses. This should be addressed. The projection of 28 deliveries per day for over 900 student accommodation units is completely unrealistic.

The mode share of just 6% for cycling is also too low for a car free site in the City of London. This should be increased to make the analysis robust and enable negotiation and agreement of suitable mitigation. The site is well connected to cycleways (C6 on New Bridge Street) and will have the maximum provision of long stay parking, which can cater for a mode share of at least 19%.

Pedestrian Comfort Levels (PCLs)

We request the applicant conducts a PCL assessment as walking is projected to make up 59% of trips and given the proposed land use for the site will be a favourable mode of travel. This should include full assessment of the crossings at the junctions of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, and Bouverie Street / Tudor Street.

Ludgate Circus should also be assessed as it is on the main route to City Thameslink Station. Please see the attached link for further information <https://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf>

Cycle Parking

The cycle parking proposed would comply with London Plan Policy T5, whereby there are to be 653 long stay spaces for the student accommodation and six for the other site uses. 22 short stay spaces are proposed for the student accommodation which also meets London Plan standards.

For the other uses 26 short stay spaces are proposed for the non food retail / gallery use and 26 for the retained public house. This is also supported

The TA details that 5% of all cycle parking will be provided as Sheffield stands to accommodate for larger / adapted cycles, in line with LCDS.

The cycle parking should be secured by condition and discharged in consultation with TfL. Details on bay width, access aisle width and spacing between stands should be provided, to confirm compliance with the standards in figure 8.1 of the London Cycling Design Standards (LCDS).

Cycle hire

The TA details that an under provision of short stay for the non-student accommodation short stay could be provided through expanding the current cycle parking facilities on Bouverie Street.

Given the nature of the site, we request a contribution of £100,000 to increasing capacity of the existing docking station, to support and promote active travel to and from the site.

Car parking

Given the site has the highest PTAL of 6b, TfL welcome that the site is car free. The site is proposed to have one blue badge parking space located off Bouverie Street. Despite proposed access by reversing in, subject to local highway authority support on balance this is acceptable.

TfL welcome that the blue badge space will have an Electric Vehicle Charging Point (EVCP) from the outset and request for a Parking Design and Management Plan, in line with London Plan Policy T6 to identify where additional blue badge spaces could be provided if demand exceeds current requirements.

Delivery and Servicing

A draft Delivery and Servicing Management Plan (DSP) has been submitted with the documents. The final DSP should be secured by condition.

The existing basement servicing yard can only accommodate small vans no larger than 4.5t. Therefore, proposals detail that on street provision is required on Whitefriars Street.

TfL highlight that London Plan Policy T7 identifies that on street provision is only accepted when off street is not possible and understand that work has been done to prove larger vehicles cannot be accommodated for in the service yard. The TA details four options to mitigate on street servicing, including reversing into the servicing yard, weight limits, lengthening and increasing the depth of the servicing yard. All options were discounted.

In conclusion it was identified that Option 1 (reversing) was considered the most viable, TfL do not accept reversing off the TLRN or SRN, however given access is proposed from a City of London road, this is a matter for the local highway authority.

TfL would be supportive of a high percentage of deliveries being consolidated prior to entering the site, to reduce the number of deliveries and be more sustainable.

Provision should be made to accommodate and encourage cargo bike access via Bouverie Street (the main entrance for the student accommodation). We request cycle parking stands for these types of deliveries, to prevent any blocking of vehicles / pedestrians on Bouverie Street.

Travel plan

A framework Travel Plan has been submitted with the TA this includes a student and staff mode split. As mentioned above the 6% expected baseline mode share for cycling is unacceptable, and the Travel Plan target to increase cycling by occupants by only 4% to 10% over five years is also insufficiently ambitious and must be increased.

We strongly encourage the City to consider securing funding for Cycle Hire memberships as part of the planning obligations for this development.

The Travel Plan should be secured, implemented and monitored as part of any Section 106 agreement. We also recommend that the applicant provides a staff travel plan for construction of the development.

Student move in and out strategy

A Student Move In / Out Strategy is to be prepared and we request to review the final plans once finalised. TfL should be consulted on discharge if this is secured by a separate condition to the DS and Travel Plans.

A booking system is proposed to be implemented for the site whereby cars will be parked on a stretch of 75 metres of Bouverie Street, where a single yellow line permits loading and unloading for up to 40 minutes. The students will be contacted prior to arrival to provide detail of their travel arrangements, enabling a time slot to be booked if arriving by car.

We are very concerned about the proposed arrangement due to bus operations and request that staff ensure no queuing and parking on Fleet Street. If cars arrive early they must leave the area and return at their appointed time.

Construction Management

The current Construction Logistics Plan (CLP) sets out indicative Traffic Management plan layout for Fleet Street during site construction, the final CLP should be secured by condition.

The indicative Programme Timescale indicated has an overlap with the neighbouring Sailsbury Square development, due for completion in early 2027. The applicant should therefore work in collaboration with the developers of this site to streamline access and reduce collective highway network impact. The applicant should aim to mirror the existing pit lane width and operation at a 3.2m width, rather than using a wider pitlane of 3.6 metres.

The applicant should look at off-site holding area locations that could be utilised to avoid a situation where there is delay for vehicles accessing the pit lane, that may block the nearby pedestrian crossing and cause traffic queuing.

The applicant should coordinate with TfL and the City of London to ensure that suitable provisions, such as optimised signal timings further along Fleet Street, can be made to accommodate the loss of the pedestrian crossing in the immediate vicinity of the site during the works.

TfL should be consulted once a contractor has been appointed the finalised pit lane layout emerges, as Fleet Street is on the Strategic Road Network (SRN). This includes detailing any changes to existing road widths and demonstrating that access to the adjacent bus stop Fleet Street (Stop 8570, Fetter Lane) will be safely maintained for both buses and pedestrians, which should be demonstrated showing a swept path of an electric bus stopping at this location.

For the new wider pitlane being proposed, as a worst case scenario, TfL request swept paths of two electric buses passing each other.

The indicative pit lane layout shows a potential user conflict at the kerb of Whitefriars Road and Fleet Street when Articulated Vehicles enter the pit lane. Marshal locations should therefore clearly be demonstrated in the final Traffic Management Plans.

The CLP shows Route 2 involves exiting off Fleet Street onto Bouverie Street leading to Tudor Street and onto New Bridge Street, located south of the site. We have strong concerns on this proposed routing as it uses an uncontrolled road and a give way across Cycleway 6 to give way onto New Bridge street. We would not support any construction access via this route during weekday tidal cycling peaks.

Summary

Further clarity is required on the status of access to the courtyard within the site connecting Bouverie Street and Whitefriars Street

Further information on the design of the cycle parking, including lift dimensions.

A nighttime / dark hours ATZ using the same routes as the daytime completed ATZ.

Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers for all proposed highway works prior to determination.

Further clarity is needed on the relationship between public and private space within the site.

We would be supportive of implementing a new wayfinding strategy featuring Legible London signage.

TfL must be consulted on discharge of the Student Move In Move Out Strategy.

The routes from the site to Cycleway 6 should be assessed against the Cycle Route Quality Criteria.

We request a PCL assessment of crossings at the junction of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, Bouverie Street, Tudor Street.

We request a contribution of £100,000 to increasing capacity of the existing docking station on Bouverie Street.

Further consultation with TfL is required regarding construction plans, pitlanes and impact on Fleet Street.

The final DSP, CLP and Travel Plan should be secured by condition. The Travel Plan requires more ambitious targets and funding for measures including free Cycle Hire memberships for future residents.



Concerning 65 Fleet Street Development proposal.

Planning Application PT_EB/24/00648/FULMAJ

Dear City of London Planning Team,

The City of London Police have inspected/reviewed the planned Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works on the current site of 65 Fleet Street London EC4Y 1HT.

The current proposals whilst generally acceptable, we have raised a number of concerns within the development, which will directly impact on the safety and security of the build and have a likelihood of affecting the community.

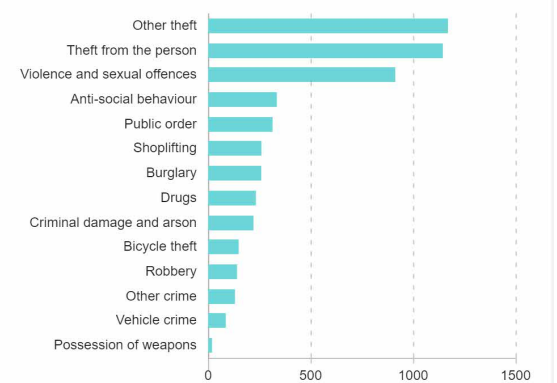
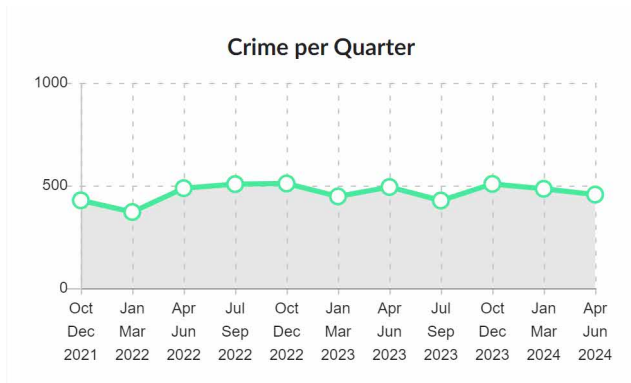
Looking at the current crime statistics for the local area, burglary, antisocial behaviour and a wide range of offences they are on par with the majority of wards within the City of London, but with the proposed redevelopment of venues within the zone will no doubt increase the footfall and ergo the crime levels.

Burglary within the western side of the City of London has been consistently higher and the primary means of burglary has been artifice burglary or daytime walk in burglaries.

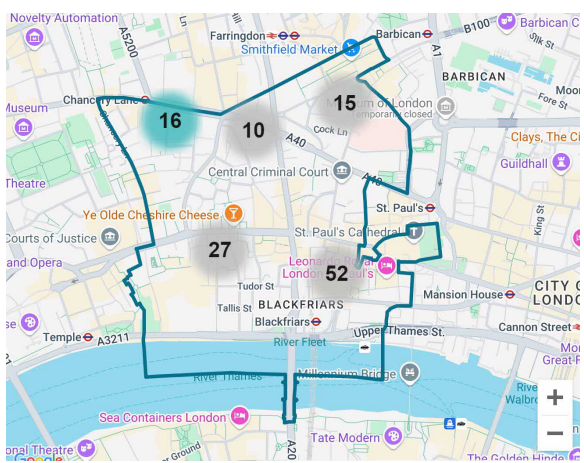
Vagrancy within this area of the City, being such a close neighbour to the London borough of Westminster has again been consistently high over the years which does bring a certain amount of associated antisocial behaviour.

Theft offences, particularly theft from the person was a prevalent offence. This development will no doubt increase the opportunity of crime within the local area.

I have included a snapshot of crime over the past 3 years to display crime patterns over the wards associated.



A snapshot from the month of July 2024 will show typical offending patterns throughout the year.



This area within the City of London is a mix of new development and historically significant buildings and alleyways. The main focus area is currently in a high state of development and it is essential that this site is held in keeping with the high standards of security and maintenance of neighbouring buildings, one of note will be the Salisbury Square development, housing the new Police Headquarters and Courts within the City of London.

Internally within the site, we would recommend further compartmentation to ensure that penetration into the site would be limited.

Due to the high number of student domiciles that have been proposed to be included into the development, City of London Police feel that it would be appropriate and proportionate to apply a condition of build to the project, that they secure a minimum of Silver Award certificate of secured by design for homes. This will help to ensure that the residents and common users will have an enhanced feeling of safety and security inside of their abodes.

Similar student accommodation sites within the City of London area have already decided to include SBD as a standard within their build environments. It has been noted that new

Student accommodation that has achieved Secured By Design have seen a dramatically lower crime output than comparable sites without accreditation.

Older adjacent sites within the local area of Fleet Street have seen the introduction of retrofitted additional security measures. The security measures that have been introduced would draw an inference that they were necessary to safeguard residents and commercial buildings due to reported crime and antisocial behaviour within the area.

Within the plans are proposals for further retail and commercial office spaces, again we would recommend that the developers be conditioned to build these integrated units to achieve a minimum Silver Award of Secured by Design Commercial.

As a result of our review we would appeal/invite City of London Planning Team to consider the proposed conditions for build.

To assist the development in achieving Secured by Design accreditation, I would seek to have Secured by Design conditions attached to any permission that may be granted in connection with this application.

The wording such that the development will follow the principles and physical security requirements to be submitted and approved in writing by planning pre-commencement, and will achieve Secured by Design accreditation prior to occupation, and be maintained thereafter. This would include the residential portion of the build meeting the SBD Homes Guide 2023 and the Commercial Venue meeting the SBD Commercial Guide 2023.

The proposed conditions are in keeping with the City of London Local Plan 2015 and proposed Plan for 2040.

The City of London Local Plan 2015

Policy DM 3.2 Security measures in new developments and around existing buildings To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;

measures to be integrated with those of adjacent buildings and the public realm;

that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;

developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;

the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;

an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

3.3.8 Design & Access Statements accompanying applications should meet the recommendations of the ALO and set out how security matters have been considered at the design stage. New development should incorporate “Secured by Design” (SBD) principles. The design should fully incorporate protective security requirements within the site boundary, as far as practicable. Building designs should provide for a high level of natural surveillance of all surrounding public areas and highway.

3.3.9 Incorporating security measures early in the design of new development or the refurbishment of existing buildings will avoid the need for later retro-fitting of security measures, which can impact on the architectural quality and design of the development.

3.3.10 All new developments need to maximise the level of security provision to reduce the risk and the likely impact. It is not always possible to provide security measures wholly within the building or development site, particularly when there is a need to provide stand-off distances to protect against potential vehicle-borne attacks, or where the building line is immediately bounded by public highway. Security features on the public highway should be considered as a last resort when all other alternative proposals have been exhausted.

Achieving Safe spaces to prevent domestic violence

Within the City of London Violence against Women and Girls Strategy, the City of London committed to providing accommodation suitable and capable of ensuring a victim of domestic violence or abuse had the feeling of safety within their home.

Regional Planning Policy – The London Plan 2021

3.11.2 New developments, including building refurbishments, should be constructed with resilience at the heart of their design. In particular they should incorporate appropriate fire safety solutions and represent best practice in fire safety planning in both design and management. The London Fire Commissioner should be consulted early in the design process to ensure major developments have fire safety solutions built-in. Flooding issues and designing out the effects of flooding are addressed in Chapter 9.

3.11.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme³⁴ published by the Police. Further guidance is provided by Government on security design³⁵. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

3.11.4 By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the

probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan/City of London Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

National Planning Policy Framework

Paragraph 98-107 within the National Planning Policy Framework explains the need and expectation to achieve well designed and safe environments that do not allow or permit the growth of crime and antisocial behaviour, by creating safe environments for residents and workers within a community. Security within the built environment is essential for ensuring that communities within the City of London can feel safe.

Under the Crime and Disorder Act '98, local authorities have a duty/statutory requirement to work with the police to reduce crime and disorder, which has been held to apply to the planning process.

City of London Police would be pleased and happy to assist with the developers on this scheme to achieve accredited status with Secured by Design.

PC Russell Pengelly

Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor

Partnerships and Prevention Hub

City of London Police | Bishopsgate Police Station | 182 Bishopsgate, London, EC2M

4NP T: [REDACTED] - Mobile :-

Email: [REDACTED]

**CITY OF LONDON
POLICE**



Advice to the local planning authority

Advice to the local planning authority (LPA) from the Health and Safety Executive (HSE) as a statutory consultee for developments that include a relevant building.

To LPA	City of London
LPA planning ref no	24/00648/FULMAJ
Our ref	pgo-5560
Site address	65 Fleet Street London EC4Y 1HT
Proposal description	Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.
Date on fire statement	28/05/2024
Date consultation received	17/07/2024
Date response sent	30/07/2024

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('content')

Scope of consultation

- 1.1. The above consultation relates to the redevelopment of the existing building at 65 Fleet Street to comprise of a Purpose-Built Student Accommodation (PBSA) led scheme. The building splits into two blocks on ground floor and above.
- 1.2. On levels two and above, the residential levels of the building are split into two blocks (north and south block). The north block continues up to Level 6 and is served by two escape stairs. The larger south block is served by four escape stairs up to Level 7 and three of which continue up to Level 9.
- 1.3. The north block is proposed to consist of 5 upper storeys and the south block will consist of 10 storeys above ground. The top storey of the north block will be 21m above lowest ground floor level.
- 1.4. The north block is served by two escape cores; Core A1 and Core A2. Both cores continue up to the top storey at Level 05 from ground floor.
- 1.5. The south block will be 42.5m above lowest ground level. The upper levels of the building are proposed to consist almost entirely of student accommodation with a total of 871 rooms.
- 1.6. The south block is proposed to be served by four cores:
 - Core B4 from lower ground to Level 07
 - Core B3 from lower ground to Level 9
 - Core B1 from lower ground to Level 11; and
 - Core B2 from Level 0 Level 11.
- 1.7. The ground floor of the south block is proposed to consist of student apartments as well as the main entrance to the PBSA and cultural uses.
- 1.8. The north block will include a new café / bookshop as well as refurbishment and enhancement of the existing Tipperary pub. The pub is proposed to be extended into the neighbouring building to the east.
- 1.9. The Design and Access Statement (dated June 2024 – Executive Summary) states:
“The proposed development seeks to retrofit and refurbish a derelict building to deliver a...mixed-use scheme which improves upon the existing consent while providing a long-term future for a local institution, The Tipperary.”
- 1.10. The basement is proposed to consist of student amenity areas, as well as plant areas, refuse stores and a bike store. Lower ground floor is proposed to consist of a cultural and community space in addition to student accommodation and student amenity spaces. Ground floor is proposed to consist of commercial units including the existing Tipperary pub, in addition to student accommodation and student amenity.

1.11. Residential amenity and ancillary areas will be provided across the building:

- Basement – PBSA Amenity, Cycle Store, Refuse and Plant rooms.
- Lower Ground Floor – PBSA Amenity
- Ground Floor – PBSA Reception
- Level 10 – External terrace garden

1.12. The fire statement dated 28/05/2024 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. It is noted the fire statement was helpfully detailed and informative.

Listed building consent / The Tipperary pub

1.13. For information, page 14 of the Design and Access Statement (DAS) states that Listed building consent is also sought for: *“Improvements to The Tipperary pub...”*

1.14. Paragraph 2.04 of DAS informs that: *“The Tipperary Pub, dates to c.1667 and is Grade II listed. The Tipperary forms part of the north of the Site, adjoining Fleet Street.”*

Consultation

1.15. North Block: The north block will be provided with two escape cores, one of which will be a firefighting core on the basis its footprint will be less than 900m² in area.

1.16. South Block: The larger south block is proposed to be served by four cores up to Level 7, three cores up to Level 9 and two cores up to Level 10. It is proposed that Core B2, B3 and B4 will form firefighting shafts.

1.17. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

The following information does not contribute to HSE’s substantive response and should not be used for the purposes of decision making by the local planning authority.

Internal layout of flats

2.1. The fire statement states: *“The studio flats will generally be designed so that occupants do not have to pass within 1.8m of the cooking hob to escape. In apartments where occupants are required to pass within close proximity of cooking areas, Stove Guard devices will be provided in accordance with BS EN 50615.”*

2.2. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Public House

- 2.3. The fire statement states: *“The top storeys of the Tipperary Pub will be served by a single stair, however this forms part of the existing situation which is not being made any worse as a result of the works. The level of safety can be deemed to be enhanced due to the provision of sprinklers.”*
- 2.4. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Basement stairs - CFD (Computational Fluid Dynamics)

- 2.5. The fire statement states: *“Three of the four escape stairs serving the residential levels will continue down to basement level in accordance with code guidance. **This includes both stairs that serve level 10**, due to the need to be provided sufficient means of escape capacity from this level. However, this is considered reasonable on the basis the stairs will be fire separated at ground floor level. It will be demonstrated through CFD at a later stage that the lobby smoke ventilation will be effective in preventing the flow of smoke into the stair for a fire in the basement and will not impact on means of escape for the upper levels.”*
- 2.6. The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.
- 2.7. HSE acknowledges the applicant’s commitment that CFD will demonstrate (section 7 of the fire statement), that *‘the smoke extract system will be effective in preventing the flow of smoke into the escape stair...’*.
- 2.8. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape / Cycle stores


- 2.9. The Design and Access Statement (page 62) states: *“Any potential storage of e-bikes or scooters within the cycle store would need further review and potentially additional safety measures due to the increased risk of these bikes.”*
- 2.10. HSE welcomes the commitment to review and potentially add further safety measures.
- 2.11. Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at [E-bikes and e-scooters fire safety guidance - NFCC](#)
- 2.12. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

2.13. It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.

2.14. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Yours sincerely


Stephen Gallagher
Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](#).

This response does not provide advice on any of the following:

- matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application
- matters related to planning applications around major hazard sites, licensed explosive sites and pipelines
- applications for hazardous substances consent
- London Plan policy compliance

Memo



To Assistant Director (Development Management)
Department of the Built Environment
Email: [REDACTED]

From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [REDACTED]
Email [REDACTED]

Date 12 September 2024
Our Ref 24/05334/NPLN
Your Ref 24/00648/FULMAJ

Subject 65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Thank you for your memorandum. I have reviewed the application and I recommend that the following conditions be attached to any consent :

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.

No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.

City of London PO Box 270, Guildhall, London EC2P 2EJ
Switchboard 020 7606 3030
www.cityoflondon.gov.uk

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.

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

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

The roof terraces on level 10 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day other than in the case of emergency.

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

No amplified or other music shall be played on the roof terraces.

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.

There shall be no demolition on the site 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 demolition 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 demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction 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 construction 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: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

All residential premises in the development shall be designed and constructed to attain the following internal noise levels:

Bedrooms- 30dB LAeq,T* and 45dB LAmax

Living rooms- 30dB LAeq, T*

*T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00.

A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building.

REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 and does not exceed NR35 in other habitable rooms attributable to the proposed commercial uses within the

development. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.

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 pub/restaurant use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

- (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 most affected 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. Noise sensitive premises includes office accommodation.
- (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. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.
- (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.

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.

Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

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 be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. 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.

No cooking shall take place within any commercial kitchen 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. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. 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.

All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: 

From: [REDACTED]
To: [REDACTED]
Subject: RE: Planning Application Consultation: 24/00648/FULMAJ [SG37810]
Date: 16 September 2024 12:07:17
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37810]

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

2TAM

NATS Safeguarding

[REDACTED]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: [REDACTED]
Sent: Tuesday, September 10, 2024 3:27 PM
To: NATS Safeguarding <[REDACTED]>
Subject: Planning Application Consultation: 24/00648/FULMAJ

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 65 Fleet Street London EC4Y 1HT .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Emma Barral
Environment Department
City of London

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

From: [REDACTED]
To: [REDACTED]
Subject: [REDACTED]
Date: [REDACTED]

THIS IS AN EXTERNAL EMAIL.

Corporation of London
Department of Planning & Transportation
PO Box 276
Canal Wharf
London
EC2A 2EJ
20 September 2024
Dear Sir/Madam
Re: 65, FLEET STREET, LONDON, EC3Y 1HT

Water Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requires the following conditions to be added to any planning permission: "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the testing and piling control) including all Thames Water sewerage assets, the local geology and character beneath the base of the pile to the full depth has been submitted, and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling control plan. Before the proposed work will be in close proximity to underground sewerage assets, the proposed work will be in close proximity to underground sewerage assets infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage assets infrastructure. Please read our guide 'working near our assets' to ensure your working will be in line with the necessary processes you need to follow if you are considering working above or near our assets or other structures. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-planning-and-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-planning-and-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
Water. Email: development.enquiries@thameswater.co.uk Please email: development.enquiries@thameswater.co.uk Monday to Friday, 9am to 5pm. Write to: Thames Water Development Services, Christchurch Court, Victoria Road, Reading, Berkshire RG1 5BN.

We are public sewer crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimise the risk of damage. We'd need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-planning-and-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharge into the public sewer. Groundwater discharge typically results from construction site dewatering, early excavation, basement installation, trenching and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be unable to approve the planning application, Thames Water would like the following information attached to the planning permission: "A Groundwater Risk Management Plan from Thames Water will be required for discharging groundwater to a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
<https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->
all depths. <https://pfl01.safelink.protection.onfwd.com/76f3d95f31552f29?www.thameswater.co.uk/28/28-colpocpoc/2/28-larger-scale-developments/2/28-working-near-our->

From: [REDACTED]
To: [REDACTED]
Subject: Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ
Date: 20 September 2024 14:50:40

THIS IS AN EXTERNAL EMAIL

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ
20 September 2024

Dear Sir/Madam

Re: 65, FLEET STREET, LONDON, EC4Y 1HT

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers: Groundwater discharges section.

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.

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a

minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Yours faithfully

Development Planning Department

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

Visit us online www.thameswater.co.uk , follow us on twitter www.twitter.com/thameswater or find us on www.facebook.com/thameswater. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: [REDACTED]



From Ms Hazel Austin
Environmental Health Officer
Environment Department
Telephone [REDACTED]
Email [REDACTED]

Date 26 September 2024
Our Ref 24/04209/NPLN
Your Ref PT_EB/24/00648/FULMA J

Subject 65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

This department acknowledges receipt for the above application and have the following comments and observations to make:

Roof Terrace Hours:

The roof terraces on levels 8,9&10, throughout the property, hereby permitted shall not be used or accessed between the hours of 08.00 on one day and 23:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

Roof Terrace Music:

No amplified or other music shall be played on the roof terraces.

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.

Fumes from Use Class E / Sui Generis affecting offices or residential:

No cooking shall take place within any Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) unit 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. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. 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.

Noise from use Class E / Sui Generis affecting offices / non offices:

The proposed Class E / Sui Generis development sharing a party element with office / non-office 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 existing neighbouring 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 be 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.

Full Lighting Strategy submission:

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

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, 15.7 and emerging policy DE2 of the Draft City Plan 2036.

Noise control:

(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.

Ventilation & Extraction Equipment:

All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

Hours of servicing:

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

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

Scheme of Protective works:

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.

Regards

Hazel Austin
Environmental Health Officer
Pollution Team

Environment Department
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: 



Historic England

Emma Barral
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00648/FULMAJ
Our Ref: 223995

Contact: Helen Hawkins



02 October 2024

Dear Emma,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works

Recommend No Archaeological Requirement

Thank you for your consultation received on 18 September 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The site is located in an area of known archaeology, and previous investigations on the site in the 1920s and 1980s revealed the remains of the medieval Whitefriars priory, as well as Roman and post-medieval remains. The medieval undercroft of the priory, now a listed building, has been preserved within the current development, albeit in a different location to where it was found.

Although some below ground excavations such as lift pits and pump pits are proposed, these will be located within the current basement footprint where archaeological remains have already been removed and are therefore unlikely to have an impact on archaeological remains of significance. The Whitefriars undercroft is to become part of a visitor centre within the site and will therefore be much more accessible to the public. This public benefit is very much welcomed.

Given that no below ground excavations are proposed outside the footprint of the current basements, no archaeological mitigation will be necessary.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Tele phone [REDACTED]

Email [REDACTED]

Date 02/10/24

Our Ref DS/SUDS24/0045

Your Ref PT_EB/24/00648/FULMA J

Subject 65 Fleet Street London EC4Y 1HT

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the relevant information for the proposed non-material amendment. The changes do not appear to impact the drainage system or proposed SUDs features as originally consented and therefore the Lead Local Flood Authority has no objection to the application.

From: Pundsack, Mark
Sent: Wednesday, [October 9, 2024 4:19 PM](#)
To: Barral, Emma; Roy, Gordon
Cc: McCallum, Kieran
Subject: RE: 65 Fleet Street - 24/00648/FULMAJ

Emma,

We will not comment on gateway 1 applications as this is HSEs role as statutory consultee.

Mark

From: Barral, Emma
Sent: Wednesday, [October 9, 2024 4:09 PM](#)
To: Roy, Gordon; Pundsack, Mark
Cc: McCallum, Kieran
Subject: 65 Fleet Street - 24/00648/FULMAJ
Importance: High

Hi Roy/Mark,

I hope you are well.

Really sorry to trouble you and I hope you don't mind me reaching out. I have been passed your details by my colleague Kierian (CC'd) in.

We are working together on the above project at 65 Fleet Street which is for the following –

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

I attach HSE comments, it would be really helpful if you are able to review the

submitted material for us.

Unfortunately, we have very tight timescales due to Committee deadlines.

I attach the submitted Fire Statements for your viewing purposes. I wasn't sure if you would comment as HSE have commented.

Kind Regards

Emma



Emma Kate Barral MRTPI | Planning Officer

Environment Department | City of London | Guildhall | London EC2V 7HH

www.cityoflondon.gov.uk

WINNER | Planning Authority of the Year





70 Cowcross Street
London EC1M 6EJ
Telephone: (+44/0) 207 608 2409
Email: enquiries@thegardenstrust.org
www.thegardenstrust.org

Emailed to Emma Barral
plncomments@cityoflondon.gov.uk
City of London Corporation

10th October 2024

Dear Ms Barral,

Re: 24/00648/FULMAJ | Partial demolition and refurbishment and extension of buildings... | 65 Fleet Street London EC4Y 1HT

Thank you for re-consulting the Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks and Gardens of Special Historic Interest in England, as per the above application.

We are grateful for the opportunity to comment on this application, which has a material impact on the significance of Inner Temple, a historic designed landscape which is Registered by Historic England at Grade II. The inclusion of this site on this statutory register requires great weight to be given to its conservation.

We have assessed the amended documents supplied, particularly the Design and Access Statement Addendum and the amended Heritage and Townscape Visual Impact Assessment (HTVIA), and are disappointed to note that, rather than any reduction in height of the building, the amended proposals simply reduce the extent of the 10th floor and step the 9th floor in a little more. Unfortunately, this does nothing to reduce the impact of the development on the setting of Temple Gardens, as can be seen in the image on p97 of the amended HTVIA, with the roof extension still rising by approx. 4 storeys above the Grade I Listed buildings of King's Bench Walk.

We stand by our previous response to this application (as submitted on 20th August 2024), and ask again that consideration is given to reducing the height of the roof extension by at least two storeys, so that the new development, when viewed from the Inner Temple RPG, appears to rise no higher than the existing buildings (Harmsworth House and 10 Bouverie Street) and the visual intrusion of this modern building into the historic RPG is lessened.

We would be grateful to be advised of your decision, or if further information is submitted.

Yours sincerely,

Dr Tamsin McMillan

Acting Conservation Officer
The Gardens Trust

*For further information, we refer you to the Gardens Trust publication *The Planning System in England and the Protection of Historic Parks and Gardens (2024)*, which is available online at <https://thegardenstrust.org/wp-content/uploads/2024/02/Parks-and-Gardens-in-English-Planning-System-2024.pdf>*

City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

11th October 2024

Dear Sir/Madam,

At its meeting on 19th September 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

24/00648/FULMAJ - 65 Fleet Street

Fleet Street Conservation Area/Castle Baynard Ward. No Ward Club rep.

The Committee received a detailed presentation on this application. Members thanked the representatives of DP9 and their associates for the explanation of their proposals and for answering questions. The Committee then considered the application.

The Committee had no objection to the proposed uses. Members acknowledged that the greater part of the site lay outside the Fleet Street Conservation Area and that there was already a large building south of the Fleet Street frontage. There were no objections to the proposals as far as they affected the detailed treatment of the buildings in the Fleet Street Conservation Area, including the added storeys and the new entrance. As far as the longer views were concerned the Committee expressed reservations about the raised height of the south block in the proposals. Members were concerned about the apparent bulk and horizontal character of the proposal shown in the views from sites on the South Bank, though accepting that the zoom images may have accentuated the harmful effects of the proposals, but were especially concerned by the effects of the proposals in the view from the Temple – View 12 in the applicant's HTVI – which the applicants Heritage, Townscape and Visual Assessment accepts might do some harm. The Committee considered this to have an adverse effect on the Temple Conservation Area.

The Committee also wondered whether the proposed recladding of the existing building in GRC would introduce an unwelcome new material into the City's townscape.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox
Secretary



Ms Emma Barral
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 0207 973 3777

Our ref: **W:** L01580082

6 August 2024

Dear Ms Barral

Arrangements for Handling Heritage Applications Direction 2021

65 FLEET STREET LONDON EC4Y 1HT
Application No. 24/00649/LBC

Thank you for your letter of 17 July 2024 regarding the above application for listed building consent.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

We have drafted the necessary letter of authorisation (attached) for your authority to determine the application as you see fit and referred the case to the National Planning Casework Unit (NPCU). You will be able to issue a formal decision once NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Claire Brady

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

Emma Barral
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00649/LBC
Our Ref: 224001

Contact: Helen Hawkins



02 October 2024

Dear Emma,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

65 Fleet Street London EC4Y 1HT

External and Internal alterations to The Tipperary Pub including part demolition of the rear of the pub; erection of 1 storey roof extension containing student accommodation with associated expansion into northern block of 65 Fleet Street at fifth floor level. Works to improve access to Whitefriars Crypt with changes to the surrounding structure of the Crypt to allow for presentation and interpretation of the asset.

Recommend No Archaeological Requirement

Thank you for your consultation received on 18 September 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The site is located in an area of known archaeology, and previous investigations on the site in the 1920s and 1980s revealed the remains of the medieval Whitefriars priory, as well as Roman and post-medieval remains. The medieval undercroft of the priory, now a listed building, has been preserved within the current development, albeit in a different location to where it was found.

Although some below ground excavations such as lift pits and pump pits are proposed, these will be located within the current basement footprint where archaeological remains have already been removed and are therefore unlikely to have an impact on archaeological remains of significance. The Whitefriars undercroft is to become part of a visitor centre within the site and will therefore be much more accessible to the public. This public benefit is very much welcomed.

Given that no below ground excavations are proposed outside the footprint of the current basements, no archaeological mitigation will be necessary.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.