



## Planning and Transportation Committee

**Date:** TUESDAY, 27 OCTOBER 2020  
**Time:** 10.30 am  
**Venue:** VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

**Members:**

Deputy Alastair Moss (Chair)	Alderman Robert Hughes-Penney
Oliver Sells QC (Deputy Chairman)	Deputy Jamie Ingham Clark
Munsur Ali	Shravan Joshi
Randall Anderson	Alderwoman Susan Langley
Peter Bennett	Oliver Lodge
Mark Bostock	Natasha Maria Cabrera Lloyd-Owen
Deputy Keith Bottomley	Andrew Mayer
Henry Colthurst	Deputy Brian Mooney (Chief Commoner)
Deputy Peter Dunphy	Sylvia Moys
Alderman Emma Edhem	Barbara Newman
John Edwards	Graham Packham
Helen Fentimen	Susan Pearson
Marianne Fredericks	Judith Pleasance
Tracey Graham	Deputy Henry Pollard
Graeme Harrower	James de Sausmarez
Sheriff Christopher Hayward	William Upton QC
Christopher Hill	Alderman Sir David Wootton
Michael Hudson	

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### Accessing the virtual public meeting

**Members of the public can observe this virtual public meeting at the below link:**

<https://youtu.be/aMVNn6O-gGs>

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**John Barradell**  
Town Clerk and Chief Executive

# AGENDA

## Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**  
To agree the public minutes and summary of the meeting held virtually on 6 October 2020.  

**For Decision**  
(Pages 1 - 26)
4. **OUTSTANDING ACTIONS**  
Report of the Town Clerk.  

**For Information**  
(Pages 27 - 30)
5. **1-12 LONG LANE, LONDON, EC1A 9HF**  
Report of the Interim Chief Planning Officer and Development Director.  

**For Decision**  
(Pages 31 - 256)
6. **TOWER BRIDGE HV SYSTEM REPLACEMENT AND INCREASING RESILIENCE**  
Report of the City Surveyor.  

***N.B: - To be considered alongside a Non-Public Appendix at Agenda Item 18***

**For Decision**  
(Pages 257 - 268)
7. **CITY CORPORATION RESPONSE TO THE PLANNING WHITE PAPER**  
Report of the Director of the Built Environment.  

**For Decision**  
(Pages 269 - 292)
8. **RESETTING OF DEPARTMENTAL BUDGETS 2020/21**  
Report of the Chamberlain.  

**For Information**  
(Pages 293 - 304)

9. **TRANSPORT STRATEGY KERBSIDE REVIEW - ACTION PLAN**

Report of the Director of the Department of the Built Environment.

**For Information**  
(Pages 305 - 324)

10. **PUBLIC LIFT REPORT**

Report of the City Surveyor.

**For Information**  
(Pages 325 - 328)

11. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

Report of the Interim Chief Planning Officer and Development Director.

**For Information**  
(Pages 329 - 336)

12. **VALID PLANNING APPLICATIONS RECEIVED BY THE DEPARTMENT OF THE BUILT ENVIRONMENT**

Report of the Interim Chief Planning Officer and Development Director.

**For Information**  
(Pages 337 - 340)

13. **REPORT OF ACTION TAKEN**

Report of the Town Clerk.

**For Information**  
(Pages 341 - 346)

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

16. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

**For Decision**

## Part 2 - Non-public Agenda

17. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held virtually on 6 October 2020.

**For Decision**  
(Pages 347 - 348)

18. **NON-PUBLIC APPENDIX 3 TO AGENDA ITEM 6 - TOWER BRIDGE HV SYSTEM REPLACEMENT AND INCREASING RESILIENCE**

To note the non-public appendix 3 to Agenda Item 6 – Gateway 3 Issue – Tower Bridge HV System Replacement and Increasing Resilience.

**For Decision**  
(Pages 349 - 350)

19. **NON-PUBLIC REPORT OF ACTION TAKEN**

Report of the Town Clerk.

**For Information**  
(Pages 351 - 352)

20. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

21. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

## PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 6 October 2020

**Minutes of the meeting of the Planning and Transportation Committee held via Microsoft Teams at 10.30 am**

### **Present**

#### **Members:**

Deputy Alastair Moss (Chair)	Sheriff Christopher Hayward
Oliver Sells QC (Deputy Chairman)	Christopher Hill
Munsur Ali	Alderman Robert Hughes-Penney
Randall Anderson	Deputy Jamie Ingham Clark
Peter Bennett	Alderswoman Susan Langley
Mark Bostock	Oliver Lodge
Deputy Keith Bottomley	Deputy Brian Mooney (Chief Commoner)
Henry Colthurst	Barbara Newman
Deputy Peter Dunphy	Graham Packham
John Edwards	Susan Pearson
Marianne Fredericks	Judith Pleasance
Tracey Graham	Alderman Sir David Wootton
Graeme Harrower	

#### **Officers:**

Gemma Stokley	- Town Clerk's Department
Julie Mayer	- Town Clerk's Department
Leanne Murphy	- Town Clerk's Department
Rhiannon Leary	- Town Clerk's Department
Shani Annand-Baron	- Media Officer
James Gibson	- IS Services
Dipti Patel	- Chamberlain's Department
Deborah Cluett	- Comptroller and City Solicitor's Department
Paul Wright	- Deputy Remembrancer
Alison Bunn	- City Surveyor's Department
Jessica Lees	- City Surveyor's Department
Carolyn Dwyer	- Director of the Built Environment
David Horkan	- Department of the Built Environment
Elisabeth Hannah	- Department of the Built Environment
Craig Stansfield	- Department of the Built Environment
Gordon Roy	- District Surveyor
Craig Stansfield	- Department of the Built Environment
Paul Monaghan	- Department of the Built Environment
Ian Hughes	- Department of the Built Environment
Bhakti Depala	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Toni Bright	- Department of the Built Environment
Gemma Delves	- Department of the Built Environment

Neel Devlia	- Department of the Built Environment
Thomas Creed	- Department of the Built Environment
Kieran Mackay	- Department of the Built Environment
Joanna Parker	- Department of the Built Environment
Ted Rayment	- Department of the Built Environment
Emmanuel Ojugo	- Department of the Built Environment
Amrith Sehmi	- Department of the Built Environment
Holly Smith	- Department of the Built Environment
Kurt Gagen	- Department of the Built Environment
Rachel Pye	- Markets and Consumer Protection
Robin Whitehouse	- Markets and Consumer Protection
Ruth Calderwood	- Markets and Consumer Protection

**Also In Attendance:**

Alderman Alison Gowman  
 Amir Eden - Executive Chair of Living Bankside  
 Tony Bartle - Head of Real Estate at Nomura Bank, Angel Lane,  
 Heather Sibley - Man Group, Swan Lane  
 Councillor Adele Morris - representative of Borough and Bankside Ward and Vice  
 Chair of Planning Sub-Committee A and Licensing Committee, Southwark  
 Michelle Lovric - Living Bankside  
 Barnaby Collins – DP9

**Introductions**

The Town Clerk opened the meeting by introducing herself and stating that the Committee was quorate.

A roll call of Members present was undertaken.

The Town Clerk highlighted that the meeting was being recorded as well as live streamed and would be made available on the City Corporation’s YouTube page for a period of time after the meeting had concluded. With this in mind, it was confirmed that participants in the meeting had all individually agreed and given their consent to being recorded and that all personal data would be processed in accordance with the Data Protection Act 2018. The Town Clerk highlighted that, for further information on this, viewers could contact the City Corporation using the details provided on the public webpages.

**1. APOLOGIES**

Apologies for absence were received from Shravan Joshi, Natasha Lloyd-Owen, Andrew Mayer, Sylvia Moys, Henry Pollard and James de Sausmarez.

**2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

**3. MINUTES**

The Committee considered the public minutes and non-public summary of the virtual meeting held on 8<sup>th</sup> September 2020.

## **MATTERS ARISING**

**Princes Street** (page 24) – A Member who had raised concerns around trip hazards on the pavements at Princes Street at the last meeting thanked Officers for responding to her on this point. She stated that she had since had the opportunity to send them some photographs of the site and the issues here.

**22 Bishopsgate** (page 24) – A Member who had raised concerns around the size of the trees installed at 22 Bishopsgate stated that she was yet to have a response from Officers on this point and asked that they look into this matter and report back.

**Any Other Business that the Chair considers urgent and which the Committee agrees should be considered whilst the public are excluded** (page 26) – A Member stated that, whilst further discussion had taken place on the Tulip Inquiry during non-public session at the last meeting, there was no justification for the matters discussed to remain non-public and asked that this therefore be moved into the public minutes of the last meeting ahead of these being finalised and published. The Chair agreed with this proposed amendment which was also seconded. The Town Clerk undertook to make the amendment.

**RESOLVED** – That, subject to the amendment above and moving the minutes of the non-public discussion on the Tulip Inquiry into the public minutes of the virtual meeting held on 8<sup>th</sup> September 2020, they be approved as a correct record.

### 4. **OUTSTANDING ACTIONS**

The Committee received a report of the Town Clerk detailing the Committee's outstanding actions.

### **RECEIVED.**

### 5. **SWAN LANE PIER, 1 SWAN LANE LONDON EC4R 3TN**

The Committee considered a report of the Interim Chief Planning Officer and Development Director regarding an application for Swan Lane Pier, 1 Swan Lane, London EC4R 3TN, specifically the erection of a new pier within the River Thames at Swan Lane, to comprise a refurbished landside access platform; new canting brow and pontoon; dredging and filling of river bed; repair and reinstatement of campshed and riverbank; replacement of mooring pile and installation of additional mooring pile.

The Town Clerk drew Members' attention to the fact that a supplementary document pack containing additional background papers had also been circulated and published yesterday afternoon.

Officers presented the application to Members reporting that the site in question was located at the end of Swan Lane, between London Bridge and Cannon Street railway bridge. It was highlighted that, adjacent to the pier itself, was Riverbank House – an office building – with Seal House situated to the right-hand side of this, which had recently received planning permission for

redevelopment. Members were informed that a pier had previously existed on this site but had fallen out of use in 2012 with only two dolphin structures and a landside access platform now remaining at the existing site. Officers reported that the application sought permission for the erection and reinstatement of a new pier with associated works. The extent of the works would include a refurbished landside access platform, a new canting brow and pontoon, a replacement and a new mooring pile, the dredging and filling of part of the riverbed and the repair and reinstatement of the campshed and riverbed. The application stated that the works would provide a multi-use pier with two berths for embarking and disembarking only. One berth would be used primarily as a mooring for larger event charter vessels. The application also stated that the pontoon berth would have the capacity to support freight operations, charter vessels and passenger ferry services such as river taxis and cruises as well as emergency response operations. It was noted that one particular vessel was referred to throughout the application – namely the Ocean Diva – which had been the subject of the majority of objections received.

Members were shown an image of the existing elevation at low tide which showed the existing dolphins in the riverbed. The proposed elevation at low tide depicted the canting brow, the pontoon and the two mooring piles to the left. The proposed elevation at high tide depicted how the pontoon would raise up and that the majority of the proposed structures (with the exception of the canting brow) would be the same height as the river wall. Further images showed an existing cross section of the site at low tide and the existing relationship between the existing dolphin and the riverbank. The same cross section was then shown with the proposed pontoon and pier at low tide and, similarly, at high tide. Members were also shown an image of a close up of the pontoon itself, depicting access via the canting brow to the first of two levels and a smaller access ramp down to the lower level. It was proposed that larger vessels would moor to the left-hand side of the pontoon as shown in the image. Some CGIs of the proposed pier and pontoon were also shown. Close up images of the land access platform were shown. Here, the proposed platform lift was also visible which would provide level and inclusive access to the pier itself. An image depicting the access point as you approach Swan Lane Pier at the end of Swan Lane was shared. This showed the access platform and the existing steps up to the platform itself leading to the canting brow.

Officers went on to share images depicting the extent of the dredging that would be required as well as the area to be infilled in the riverbed to accommodate the camp shed which would enable vessels to be moored at this location.

In terms of the representations received, Officers reported that a total of 836 objections had been lodged across three separate consultations – 238 of these in response to the latest consultation exercise. A detailed summary of these were set out within the report but Members were informed that the principal issues related to noise disturbance (primarily from the Ocean Diva) as well as the adverse impact of passengers embarking and disembarking from the vessels onto the pier. With regard to the principle of the development, Officers reminded the Committee that both the London Plan and the City's Local Plan



supported the use of the river for transport and recreation, highlighting that Local Plan Policy actually went as far as to encourage the reinstatement of Swan Lane Pier itself. The principle, therefore, of a new pier and associated works was acceptable, subject to its versatility to allow for freight operations. It was noted that the application did contain a freight proposal but this was only designed for the smallest type of cargo bike and was not therefore considered to offer a sustainable and feasible freight operation facility and, as such, failed to meet the policy requirements. With regard to noise and disturbance, it was acknowledged that the operation of any pier had the potential to generate issues in this respect. However, it was considered that adequate controls could be secured by way of condition and Section 106 agreement to minimise the impact of this. Such measures might include, for example, limiting the number of passengers in any vessels, the frequency of use of the pier, the length of time permitted for mooring, restriction of music when moored and management plans around the embarkation and disembarkation of passengers and restrictions on the servicing of any vessels from the pier. With controls such as these in place, it was considered that the impact from any vessel and its use of the pier could be adequately mitigated such that there would not be a significant adverse impact on the amenity of the area. With regard to trip generation, it was noted that whilst there was the potential for a large number of people to be embarking and disembarking at the pier, an Event Management Plan had been submitted with the application which, amongst many other measures, specified that there would be staggered arrivals and departures as well as designated pick-up and drop-off points via a booking system for disembarkation. It was therefore not considered that the proposal would have a significant adverse impact on the capacity of the network or on the public transport system.

In conclusion, Officers stated that the proposal was considered unacceptable as it would not provide a sustainable and feasible freight operation when it was considered that this was an absolute requirement when seeking to reinstate Swan Lane Pier. For this reason, it was recommended that planning permission be refused.

The Chair thanked Officers for their presentation. The Town Clerk introduced four registered objectors (Amir Eden, Executive Chair of Living Bankside, Tony Bartle, Head of Real Estate at Nomura Bank, Angel Lane, Heather Sibley, Man Group, Swan Lane and Councillor Adele Morris, representative of Borough and Bankside Ward and Vice Chair of Planning Sub-Committee A and Licensing Committee, Southwark) and invited them each, in turn, to address the Committee.

Mr Eden began by underlining that the scheme had attracted 836 objections with over 2,200 people signing a petition against it. Objectors included Southwark Cathedral, Tower of London, Shakespeare's Globe Theatre, the River Thames Society and the London Wildlife Trust. It had also been called in by the Mayor of London because of strategic concerns and failed to comply with the London Plan. Mr Eden went on to comment that few would object to the installation of a truly green pier with a gentle footprint on the Thames that was policy compliant and offered public transport, connectivity, healthy

journeys, viable light freight, enhanced biodiversity and increased accessibility to the river. He emphasised that this, however, was not that pier. He noted that this pier was co-funded by and bespoke designed as a City of London base for Europe's biggest party boat – the Ocean Diva. It was not the reinstatement of a historic pier but the reinvention of an entire city foreshore to serve a mega party boat. Mr Eden showed an image of how the size of the Ocean Diva would dwarf the pontoon but commented that objections today were not about the boat per se and were actually about the scheme's overall impact on the environment, public realm, offices and homes as well as the burden it would place on the emergency services. Mr Eden highlighted that for those wanting to see an image of the Ocean Diva they could not, underlining that, in all of the CGIs provided, the pier fades to white where the Ocean Diva would be. However, without the Ocean Diva, there would be no need for a dredge of 2,200 meters to create a private, underwater harbour with even the applicant admitting that this sediment would be too toxic to dispose of at scene. Mr Eden noted that there was no compensatory biodiversity enhancement offered as required by the London Plan. He added that archaeologists feared for the foreshore of Roman London under these proposals. The proposed use of this private pier also entailed the unwelcome colonisation of prime City public realm. The City of London Police had raised concerns about crowds, noise and disorder and Mr Eden commented that partygoers were not commuters and often brought loud noise, litter, urination, vomiting and safety risks to others as well as to themselves. He went on to state that light and noise pollution would become a problem for hundreds of long-term riverside residents including children trying to live, work and sleep well with earshot of this scheme. As an agent of change, the scheme offered insufficient mitigation to protect amenity. In Mr Eden's opinion, the applicant had inaccurately suggested that noise would be reduced over water. However, he commented that the science showed that it was, in fact, amplified. He added that Londoners also had a right to decent air quality and noted that, whilst ULEZ did not cover the river, marine emissions, sadly, did not know the difference between the river and nearby offices, schools or homes and neither did noise or light pollution. Mr Eden went on to refer to the applicant's green claims for a new electric Diva but questioned where the substantiation for its construction, use of futuristic tech, recharging infrastructure and draw on the City grid came from. He added that objectors were very concerned that these green claims would not and could not be fulfilled for years and that there would be minor variations made later that would revert back to the use of old, dirty tech.

Mr Eden concluded by reporting that, at a public meeting last May, all of the objectors worries were dismissed with the applicants stating that they run a 'superb' operation and that there would therefore be no noise, light or air problems. Given that the Ocean Diva was currently based in Amsterdam, objectors had subsequently we reached out to citizens there. Mr Eden reported that the response received from them had been to instruct objectors here to fight this application to save their public realm.

Mr Bartle began by reporting that the old Swan Lane Pier had closed in 2012 after many issues with party boats. Disappointingly, this scheme reverted back to the party boat model but on a massively increased scale.

Mr Bartle went on to state that none of the highways, environmental or amenity issues raised by the Mayor had been resolved and, in his opinion, they could not be. He commented that the applicants were trying to insert their business into a location that was deeply incompatible with their operation: incompatible with policy, security, health and safety requirements and incompatible with safeguarding the amenity of existing City firms. He remarked that, currently, office workers in the vicinity enjoyed fresh air and views from the Riverside Walkway but highlighted that this was a narrow space with no parking, no cycle racks, no drinking fountain and no public toilets. With the addition of 1000 or even just 200 Ocean Diva partygoers, this public realm would quickly become impassable and intolerable. Mr Bartle too commented on the fact that none of the CGIs showed this pier doing the one thing it was specifically designed to do: embark and disembark up to 1500 Ocean Diva passengers. Congestion on the Riverside walk was inevitable. Whilst the applicants state that servicing would take place at Newham, they also state that fresh food and flowers would come via Swan Lane. Mr Bartle commented that food and flowers for 1000 people certainly seemed like servicing, yet he noted that this scheme offered no Service Management Plan. Mr Bartle reported that local public transport here halved at 1am but noted that the applicants downplay the number of taxis and Ubers that the Ocean Diva would draw here. He added that the Mayor had wanted 'robust measures' against the taxi problem. Instead, what was being offered were 'dream scenarios' of marshals controlling up to 1000 as they arrive and exit on a timed basis. This would inevitably lead to the blocking of the Red Route with the arrival of multiple taxis and Ubers and make the local area intolerable.

Mr Bartle noted that the City of London Police have said, 'the area is not equipped to deal with the large numbers of people leaving the main party boat, regardless of the projected dispersal arrangements. He added that he found the applicants offers for noise reduction to be equally unrealistic on the core issue of partygoers' elevated voices and unsociable behaviour on the Riverside Walk. The applicants claim to have made concessions yet limiting parties to 1000 people four times a year would simply mean that up to 999 people would be permitted at all other times of the year and with no litter or cleansing plan proposed. Another concession offered by the applicants was to spend longer at Swan Lane between events but this would mean that, for up to eleven hours a day, a party-boat as big as a building would be moored yards from our 24-hour offices. He commented that, at high tide, the top of the boat and partygoers on top deck would be eye-to-eye with his staff up to level 2.

Mr Bartle concluded by stating that this scheme would degrade the functionality, privacy, safety and thus the value of adjacent properties, reducing their attractiveness for tenants. The City's Local Plan provides that office stock and quality must be protected.

Ms Sibley began by highlighting that Swan Lane is a small, busy dead-end road that services Riverbank House and Seal House. She added that it would also be the only vehicular access to the Pier and that, with no turning circle, the

potential for congestion was clear. Ms Sibley underlined that access must be retained at all times for vehicles servicing Riverbank House and that any waiting vehicles – whether food delivery, taxi set-down or pick-up, or cargo bikes – would reduce Swan Lane to single track lane. Access to Man Group's car park and loading bay could be severely impeded as a result and impeding access to the car lifts here would lead to other vehicles backing up, maybe even onto Upper Thames Street, a Red Route. Air quality would also be reduced by the inevitable idling vehicles.

Ms Sibley went on to report that this scheme failed to take into account that Seal House at 1 Swan Lane is currently empty pending redevelopment and that Seal House's loading bay is also on Swan Lane. Once this 11-storey building is fully occupied with a retail outlet on Riverside Walk, congestion in Swan Lane will intensify greatly.

It was noted that the applicants claim that freight is a cornerstone of their scheme, yet freight had been marginalized to a single small daily delivery. In some reports, the applicants claim that there is a sorting office on the pier, but others say that freight would arrive pre-sorted. Some reports say that the bikes would ride down to the pontoon - others say that they cannot. In any case, Ms Sibley highlighted that the pier's design allowed for only smaller bikes and so larger bikes would need to use Riverside Walk or Swan Lane for both waiting and loading, thereby adding further to congestion. Couriers would need to carry manual loads up and down the brow which would not be an efficient or streamlined form of last-mile delivery. Ms Sibley commented that this scheme would take some vans off of the City's roads each year, however, the number would be vastly overshadowed by the traffic generated by Ocean Diva passengers accessing the site via taxi and car hire.

Ms Sibley concluded by stating that this scheme was a lost opportunity for a sustainable, truly river-related mixed-use pier with a meaningful freight service and that she therefore welcomed the Planning Officer's recommendation to refuse.

Councillor Morris began by stating that whilst this application was for the pier, it was also to facilitate the Ocean Diva. She referred to the fact that the Mayor had mentioned the impact on navigation and that the current plan was to back the Ocean Diva under London Bridge into its Swan Lane berth. She highlighted that the Millennium of Peace had wedged under Westminster Bridge last year causing major disruption and that, in Venice, the MSC Opera had crashed into the embankment. Just last year, 27 people had died in a Budapest leisure boat collision. Councillor Morris commented that an incident on a vessel this big would put an unprecedented burden on the emergency services and questioned how 1000 partygoers could be evacuated with any urgency onto a pier that was just a quarter of the size of their boat. It was noted that the London Plan stated terror and crime must be designed out of new schemes, however it is not clear how this has been considered either with the pier or the boat.

Councillor Morris reported that the City's Environmental Health Officer wanted this pier closed by 11pm and no events on Sunday but that the applicants have asked for permission to operate until 1am, seven days a week. She added that the alcohol licence for the Ocean Diva would be issued by Newham Council and could permit the boat to continue causing disturbance along the river until 3am, docking back in Newham.

Councillor Morris noted that the London Port Health Authority (LPHA) is charged with river noise enforcement but that they now wanted this done by riparian councils. However, it was reported that this is already a complex process for council noise teams to respond to the many complaints received about noise on the river from party boats – with moving noise particularly difficult.

Councillor Morris concluded by underlining that London does not need another luxury paywall pier. She stated that what London needs is a pier giving more public access to the river, more public transport and a viable freight offer and urged the Committee to accept the Officer recommendation to refuse this application.

The Chair thanked all four objectors for their contributions and invited questions from Members. The Town Clerk reported that the objectors were also joined by Michelle Lovric of Living Bankside who would assist in responding to any queries.

The Chief Commoner queried whether it would be possible for the Committee to be shown an image depicting the full scale of the Ocean Diva so that they might get a real idea of its proportions and size. Ms Lovric commented that the objectors had sought CGIs of the vessel in place at high tide or low tide but noted that none had been produced. The Chair suggested that Officers may also want to respond on this point in due course.

The Deputy Chairman also questioned why it was not possible to see CGI images of the Ocean Diva in situ at the Pier. He questioned whether it was the same vessel that was currently moored in Amsterdam. Ms Lovric responded by stating that the objectors were not entirely clear on this point. She reported that the applicants claimed that they were building a third boat that would run on lithium ion batteries, be carbon neutral and have a recharging facility somewhere on the Thames. However, the Clean Maritime Plan stated that such facilities would not be available for another ten years. Objectors were therefore unclear as to whether the boat had already been built and had serious concerns that permission for this pier, should it be granted, would be used as a place saver to bring in one of the two Ocean Divas that were already in existence. It was noted that the original Ocean Diva was 282 feet long and the Ocean Diva Futura was a little shorter but that both ran on the old, dirty fuels and combustion engines. All of the noise and air quality assessments that had been carried out around this project were based on a boat with no emissions and no noise.

The Town Clerk introduced Barnaby Collins, Board Director of DP9, speaking in favour of the application, and invited him to address the Committee.

Mr Collins reported that there had been a pier at Swan Lane for over 400 years with a long history of river related use. The City of London granted planning permission in 1989 for an additional pontoon and before this, in 1985, for the permanent mooring of a floating restaurant and functions venue. In 2012, the pier and pontoon were removed as both had fallen into disrepair, but the two dolphins and other parts still remained. Mr Collins underlined that the current planning application simply sought to reinstate the pier and pontoon to provide facilities for legitimate, river related activities such as freight and charter vessel embark and disembarkation – not permanent mooring. He highlighted that policy CS9 of the City Plan promotes “functional uses of the river through retaining Swan Lane Pier” and that the proposal before the Committee fully complied with the City’s adopted Local Plan. He added that policies VT4 and of the draft new City Plan also sought the reinstatement of Swan Lane Pier which is what the application proposes with the Officers report confirming that it is compliant. He went on to state that the City’s Transport Strategy promotes “a reinstated Swan Lane Pier as a point to transfer weight for last-mile delivery on foot or by cargo bike” and that the proposal aligned exactly with this objective.

Mr Collins commented that Swan Lane Pier would never be and should not be a fully-fledged freight transfer terminal. To accommodate the necessary construction materials for this and the full range of freight delivery would require a significantly larger pontoon, landside cranes and HGV onward distribution which was not considered appropriate or desirable. Proposals here included light weight, last-mile goods delivery with goods received by boat, exactly as per the recent DHL launch at Millennium Pier, sorted and then delivered by cargo bike – all from the pontoon with no landside land required. At full capacity, this would be expected to remove between 2500-5000 van deliveries from the City’s roads annually. In addition, the proposals were for a zero emissions facility with all vessels, including charter vessels, attending required to be emissions free making these the first of their kind.

With regard to charter vessels navigating the Thames, Mr Collins underlined that planning authorities could not control matters such as noise and air quality but that, via this planning application for the pier, it was possible to condition such matters. The applicant had unilaterally proposed noise limitations to prevent disturbance and, as previously noted, has proposed zero emission vessel use only.

Mr Collins noted that the City’s transport Officers had objected to the proposal on the basis that it was not proven to be viable for a full variety of cargo cycles or freight operators however, this was not a policy requirement and no evidence had been produced to substantiate that the proposal is unworkable. In fact, the report noted that smaller cargo bikes could operate here successfully and it was highlighted that the applicant may wish to operate the facility itself using such bikes or in partnership with other providers such as DHL who, incidentally, use the smaller bikes proposed here at their operation at Millennium Bridge which was launched just last week.

In summary, Mr Collins stated that the application complies fully with the City's development plan and could make a significant contribution to the City's desire for more sustainable, last mile delivery. It would reinstate a 400-year-old pier, would utilise zero emission vessels, control noise emissions and take vehicles off of the City's roads. It was noted that there were no design objections and that the GLA were supportive of the proposal in principle, the EA were satisfied and the PLA supportive. He therefore expressed his surprise at the fact that the application was recommended for refusal.

The Chair thanked Mr Collins for his contribution and invited questions from Members.

The Deputy Chairman asked the same question of Mr Collins that he had previously asked of the applicant and asked whether an image of the Ocean Diva in relation to the proposed pier and the riverside was available. Mr Collins reported that he did not have an image to hand and reiterated that this application was for the pier itself and that any number of vessels would be able to use the pier including emergency vessels, charter vessels and freight delivery vessels. The Deputy Chairman responded by stating that the difficulty with this was therefore that this application potentially involved the mooring of a vessel of unlimited size. Mr Collins stated, once more, that this application was not for a particular vessel.

A Member questioned the enforcement measures and the protections that would be put forward via Section 106 to deal with noise and dispersal issues and whether the applicant had come across instances where these had been effective. She commented that they did not appear to be effective at Tower Pier in relation to the embarking and disembarking of party boats and underlined that the main issue appeared to be once passengers had left the boats it was very difficult to manage their behaviours once the boat had left the pier. She went on to report that, in her experience, boats moored at Tower Pier, disembarked very quickly and departed with a lot of passengers behind noisily trying to find onward transport. She therefore questioned how enforceable these conditions would be and who would enforce them. Finally, she commented that she did not think that the size of the boat would have anything to do with the noise that was generated by passengers as a small group could often be as problematic as a larger group. Mr Collins reported that, had the pier not been taken apart in 2012 and remained in existence, there would be nothing that the City could do as a planning authority to control noise disturbance from visiting vessels. However, because of the concerns now raised, the applicants had unilaterally proposed conditions or Section 106 obligations for things such as Event Management Plans, noise control measures and noise assessments thus enabling the City as a planning authority to have power through non-compliance with these conditions or legal agreements to enforce compliance as set out within the original agreements and allow them to have some form of control over the vessels themselves rather than over the pier only.

Another Member remarked that the applicants had, rather obviously, suggested that the pier would not be suitable for heavy freight and HGVs however, it

seemed that what was being proposed was the absolute minimum offering that might be termed as light freight. He therefore questioned why they had not taken the opportunity, in light of the City's policy, to put forward a significant light freight offering. Mr Collins responded by reiterating that this was not an appropriate site for anything more than light freight delivery which meant parcels that could ordinarily be delivered by hand or by cycle. He added that the pontoon itself could handle 45,000 litres of light freight goods per day which was expected to take between 2,500-5,000 vans off of the City's roads. Heavy freight would require landside crange to take goods off of the pontoon and take them landside with vehicles larger than cargo bikes then required for onward delivery which was not felt to be appropriate.

A Member commented that, as she understood it, there were no mooring piles on the site at present, she therefore questioned whether the new mooring piles were going to be placed/spaced as proposed due to the size of the Ocean Diva or whether this particular vessel would still be able to moor here if they were to be placed elsewhere. She also went on to question, with regard to freight bikes, whether these would sit in Swan Lane with light freight being carried up to them given that there was only a small disabled lift proposed for the pier. Mr Collins reported that he understood that there was one existing mooring pile on site and that the second pile proposed would be spaced so that it could allow a very broad range of vessels to embark and disembark here. Mr Collins went on to share images of the DHL bullet cargo bikes that were launched at Millennium Pier last week. These were 145litre sized bike and the images produced as part of the application showed how these particular bikes could be cycled down the canting brow onto the pontoon to be loaded with freight and either pushed or cycled back up again. Bikes would therefore not be left queuing on the riverside.

Finally, Officers reported that whilst there were various images available of the Ocean Diva, this application was for the pier itself and so no images of the vessel at this location had been provided in either the applications or the objections. A good indication, however, was the plan showed within the Officer presentation showing the extent of dredging proposed and the campshed which demonstrated that it was intended that a large vessel would be able to moor against the pier.

Seeing no further questions of Mr Collins, the Chair asked that Members now move to any general questions they might have outstanding and to debate the application.

A Member spoke to state that he agreed with the Officer recommendation and did not support this application which he viewed as a missed opportunity in terms of freight. He commented that the majority of the objections received related to noise and light pollution, access and hourly limitations and noted that all of these issues would need to be faced in future if there were real ambitions to turn this location into a freight hub.

Another Member remarked that the Officer report recommended refusal but only on the narrow ground that the proposed pier would not "provide for a



sustainable freight offering” which would mean that it was not compliant with planning policy. However, he doubted whether this point was uppermost in the mind of the 836 people who had submitted objections and the 2200 people who had signed the petition. He went on to state that the notion of the river Thames as a major freight thoroughfare belonged to the past although he accepted that some greater use of the river for this purpose was desirable as reflected in planning policies. The objector presentations today had set out more intuitive causes for concern and included material planning considerations such as the problems caused by up to 1000 partygoers disembarking down a narrow lane after having consumed alcohol and competing for cabs. However, this matter was dismissed within the report as something that could be managed through an Operational Management Plan to be agreed with the applicant – he stated that he found this to be unconvincing and added that the City of London Police, on whom the bulk of any failure to comply with the plan would inevitably fall, stated that “the area is not equipped to deal with the large numbers of people leaving the main party boat regardless of the projected dispersal arrangements”. This significant representation did not, however, appear to be taken into account in the report. The Member clarified that he intended to vote against this application and in favour of the officer recommendation to refuse not only on the narrow ground of the proposed pier not being viable for meaningful freight traffic but also on the more important grounds of amenity, noise from crowds landside, pedestrian congestion, potential disorder and others raised by the objectors. He suggested that other Members sharing these same concerns should voice them so that, if this application were to be refused and the applicant were to subsequently appeal the decision, the reasons for refusal were broadly based and not based solely on one instance of non-compliance with policy.

Another Member spoke to state that he agreed with all of the reasons for refusal set out by the previous speaker and remarked that this was a very unique application in that it was the first time that he could recall being asked to deliberate over an application for a pier as opposed to a building. Simply put, he stated that he felt that this was the wrong application in the wrong place. He added that he was not against the reinstatement of Swan Lane Pier, neither was he against the greater use of the River Thames for carrying light freight, nor would he be against the introduction of a pier that facilitated business commuters coming into the City. What he was against, was something which could end up as a ‘noose around the City’s neck’ where the Committee were essentially being asked to grant permission for a huge party boat to moor in what was also a residential area. He added that he took great exception to not being able to see images of the Ocean Diva and that way in which it had been faded out in the CGIs submitted and found this to be very suspicious. He concluded by stating that he felt that the applicant had put forward a weak case and that he felt that the Committee would therefore be unanimous in refusing this application and would want to avoid inflicting a problem on the City, its residents and its businesses that they could well do without.

The Deputy Chairman spoke to endorse the words of the previous speaker and added that he was sad to see that this application had been made in this way

given that there were so many better things that could have been done by the applicant at this site for the community as a whole. This, however, appeared to be an entirely self-centred, commercial proposal of the worst kind that did nothing for the City as a whole. He reiterated that being unable to see the nature of the vessel that would be going up and down the river was disappointing and underlined that no assurances or clarity had been given by the applicants' representative today on this matter. He concluded by stating that this application should therefore be refused.

Another Member spoke to state that she had previously fought long and hard for increased use of the river, particularly in terms of freight and fully appreciated that this application was not about a specific vessel but about a pier. She went on to say that she was therefore deeply saddened to see that this opportunity to use this pier for some meaningful freight operation had been pushed aside in favour of the party boat experience. She added that Swan Lane Pier was an incredibly important pier, one of the oldest piers on the river and, reported that in the old days of London Bridge, passengers would take a boat to Swan Lane Pier, disembark and cross the bridge to get to the other side and on to another boat because the currents under the bridge were too treacherous for the lightermen to sail through. She added that the issue here was the suggestion that an Event Management Plan was enforceable when it was clearly not and was practical. She stated that, for all the Section 106 agreements and license conditions that vessels may have, they sailed in, disembarked rapidly and left piers leaving local authorities to deal with issues around noise and any disorderly behaviour. The Member therefore agreed that one of the main reasons for refusing to grant this application was this. She underlined that the City's planning team had just one Enforcement Officer and that it was impossible for him to be everywhere at once and that, by the time breeches were brought to his attention, the nuisance had passed.

The Chair asked that Officers give some thought to the various amenity issues that were now being raised by Members during the debate and how these might be reflected in any decision should the application be refused.

The Chief Commoner spoke to endorse everything that had already been said during the debate in objection to this proposal. He commented that there was actually documentary evidence to suggest that Swan Lane Pier was older than 400 years old and that Thomas Moore had had to disembark here and walk further on to the Tower of London because of the powerful undercurrents here. He added that the proposed number of partygoers that would frequent the Ocean Diva was simply unsustainable and unmanageable. He also agreed that the applicants' failure to show the Committee the full extent of the vessel was suspicious.

Another Member spoke to underline that it was important that the City's various departments worked together on matter such as this and that it was therefore important to heed the representations made by the City of London Police on this application. Secondly, he underlined the fact that it was important to take into consideration City residents and, as a long-standing resident himself, he was of the opinion that this proposal totally excluded those living in and around

the vicinity of the site. For this reason, he would also be voting to refuse the proposal.

An Alderman commented that Mr Collins had seemed to suggest that the scale of freight that could be managed under this proposal would not, in fact, be a breach of planning policies. He sought clarification from Officers on this point. Officers responded by reporting that the various policies both within the existing Local Plan and the emerging Local Plan as well as the London Plan did require pier proposals to provide for river transport which included freight operations. It was also noted that the Transport Strategy, whilst not a policy document, also set out the City's ambitions for transport across the City generally and referred to the importance of freight transport. It was reported that colleagues in Transportation had had significant dialogue with logistics companies as to how this might operate and that it was important to ensure that any freight proposals did exactly as they were supposed to do and were technically proficient. In terms of meeting those policies, Officers were satisfied that the freight offering under this proposal did not provide a realistic freight option and was therefore not compliant.

Another Member spoke to state that he did not understand how arrivals would be managed under the proposals and commented that they would seemingly involve a substantial number of taxis, a larger number than was suggested within the report. He commented that this should also therefore be considered as a ground for refusal unless there was a specific policy reason as to why this was inappropriate.

The Chair highlighted that the table at paragraph 40 of the report set out a number of regulatory issues and this Committee's locus of control as local planning authority against its powers as highway authority, the PLA, the Marine Management Organisation, the Maritime Coastguard Agency and Port Health Authority and where certain remits lie. What Members had underlined, unanimously, however was that not only is there an issue regarding freight but that they wanted to expand this by stating that they did not believe that the impact on amenity (particularly residential) could be sufficiently ameliorated by the proposal. The Chair asked Officers for their thoughts on this. Officers stated that, as set out within the report, the impact of the proposals on general amenity of the area and nearby residents was a material planning consideration and this was why Officers had reverted back to the applicant on a number of occasions to inform them that they would need to demonstrate what the actual impact of the number of people using this pier would actually be. Ultimately, the applicant had responded with additional details including an Event Management Plan and Operational Management Plans and Officers had considered this although they had not set out all of the specific conditions and specific Section 106 obligations that would be required and would need to be very tightly controlled. It was, however, considered that this may mitigate the adverse impacts on local amenity. With regards to the concerns raised by Members today, it was reported that these would need to be taken into account. Therefore, if the application were to be refused, it was suggested that Officers draft some words to reflect these concerns and seek final approval for these from the Chair and Deputy Chairman before any refusal was issued. Officers

read a form of draft wording as follows “ that the impact of the proposal in respect of the embarkation and disembarkation of a significant number of passengers would result in significant noise disturbance and inconvenience and have a detrimental impact on amenity of nearby occupiers contrary to

The Committee then proceeded to vote on the recommendations before them within the report. The vote was conducted by rollcall led by the Town Clerk with those Members present and eligible to vote asked to also confirm that they had been present for and able to hear the entirety of this item.

Votes were cast as follows: IN FAVOUR – votes  
OPPOSED – 0 votes  
There were no abstentions.

The application was therefore unanimously refused.

**RESOLVED** – That the application be refused for the reason set out in the attached schedule but that this also be expanded upon to increase the grounds for refusal to include amenity, transport and servicing issues as debated today with the final wording around the grounds for refusal to be delegated to the Interim Chief Planning Office and Development Director in consultation with the Chair and Deputy Chairman.

**6. LONDON WALL CAR PARK - VENTILATION, ELECTRICAL, FIRE ALARM AND SPRINKLER WORKS - GATEWAY 2**

The Committee considered a Gateway 2 – Project Proposal Report of the City Surveyor in respect of London Wall Car Park – Ventilation, Electrical, Fire Alarm and Sprinkler Works.

Members noted that the project would involve the installation of a new ventilation system, upgrading the power supply, the replacement of the current electrical installation (including the replacing of lighting to LED) and would also see the replacement of the sprinkler system, carbon monoxide and fire alarm system at the site. Officers clarified that the project was to address the main areas identified within a recent Fire Risk Assessment and compliance issues that have been raised and would complete works identified as being due within the Forward Maintenance Plan as well as future proofing the car park itself.

Members were informed that the structure of the car park was a highways structure and so funding was also being requested to instruct fire and structural consultants to review the design to ensure that it was compliant. Members were being asked to approve a sum of £240,000 to enable works including a detailed M&E survey, detailed design, upgrade of the electrical supply and to complete tender documents for the next Gateway. Finally, Members were asked to note that there was a current total estimated cost for the project of £1.1million excluding risk.

**RESOLVED** – That the Committee:

1. Approve a budget of £240,000 be to carry out enabling works, including an upgrade of electrical supply and more detailed surveys to prepare the M&E design and tender documents to reach the next Gateway;

2. Note that the total estimated cost of the project is £1,155,000 (excluding risk);
3. Note that here is a Costed Risk of £260,000 (post-mitigation);
4. Note that the total estimated cost of the project is £1,415,000 (including risk); and
5. Note that an element of funding for this project was approved 'in principal' by the Resource Allocation Sub Committee, with draw down subject to further approval at the next Gateway.

7. **CAR PARK & ON-STREET PARKING BAY TARIFFS**

The Committee considered a report of the Director of the Built Environment in respect of Car Park and On-Street Parking Pay tariffs. Members noted that it had been over three years since the last full-scale parking tariff review, and with demand for parking places increasing as the City moves towards recovery from Covid-19, a review was timely.

Officers reminded Members that, earlier this year, they had brought forward a report on how the Transport Strategy related to carparking and on-street parking bays going forward and, at the time, Officers had set out that there would be a further report later in the year in relation to reviewing carparking and pay and display tariffs. Officers reported that the long-term strategy for the City had, for many years now been about discouraging commuting by car – something that was reiterated within the Transport Strategy.

Members were reminded that the most recent change introduced in terms of tariffs had been a move to emissions based on-street parking in terms of pay and display. It was noted that this had been successful and well received both within the industry and with the public as well as contributing to a reduction in the number of high polluting vehicles using these bays.

Officers reported that the costs of the City's operations, particularly in terms of carparks continued to gently rise as a result of things such as the organisation's commitment to the London Living Wage for staff operating here. It was highlighted that, were it not for COVID-19, this report would be a relatively straightforward continuation of the Transport Strategy. However, the current pandemic had clearly had an impact on the way that people were now choosing to work and travel into the City with all of the data currently available showing a significant rise in those choosing to come into the City by car as opposed to public transport. The City and TfL's position on this was that they could not rely upon a car-led recovery longer-term and that there were simply not enough parking spaces to accommodate all those who may wish to drive in. With this in mind, it was highlighted that pricing remained a legitimate means of addressing capacity issues particularly as the City was now reaching the point where some of its carparks were full and pay and display bays were reaching approximately 90% capacity at peak times during the day. In addition to this, it was also noted that emissions from vehicles in the City were on the rise again.

Officers concluding by stating that the recommendation within this report was essentially a continuation of the long-term strategy of the Transport Strategy through this process, to continue to manage demand, to use necessary

mechanisms to reduce emissions by encouraging the use of less polluting vehicles and to continue to drive a differentiation in on-street parking bays between high-polluting and low-polluting vehicles. Officers were aware of the need for a degree of flexibility given that the situation was very dynamic and underlined that they would continue to monitor the way in which vehicles return to the City.

A Member referred to the Car Park Tariff Benchmarking document at Appendix 1 and commented that it appeared that, for short-term parking, the City were significantly less expensive than the vast majority of other locations but, for longer-term or all day parking, the City charged significantly more. He questioned the reasons for this. Officers reported that longer-term parking for a day was just an extension of the hourly rate. In commercial car parks, however, you tended to find that they would discount so that the longer you park, the cheaper the rate. This had been something that City policy had traditionally gone against in an attempt to discourage the idea of commuting by car.

Another Member questioned whether, in an attempt to work towards zero emissions, the City had considered making more of a statement by freezing the costs of parking for zero emissions vehicles and modelling the differential onto all other types of traffic. Officers responded by reporting that what they were looking to do was to continue to align with the long-term strategy which was that, eventually, the City wanted to try and reduce all vehicle emissions and car journeys beyond anything other than essential. In this respect, the ability of the system to have differential pricing bands for three different kind of emissions to date had been a real technological advantage and had allowed this messaging to continue. Officers reported that, when looking to introduce emissions charges, TfL had discovered that, eventually, you would reach a position where there would be lots of clean vehicles on the roads but that this would still pose issues in terms of congestion. The longer-term message was around wanting cleaner vehicles but also fewer vehicles on the City's streets.

A Member questioned whether the City would be continuing to allow coaches to use the Tower Hill Coach carpark free of charge for the first half an hour for drop-offs and pick-ups. She also questioned why, considering that the City wanted to encourage more vehicles to use its carparks to ensure that there was free thoroughfare through its streets, it was currently cheaper for coaches to park in bays as opposed to the dedicated coach park at Tower Hill which covered a whole floor and therefore impacted on income. Officers confirmed that the short, free of charge period for drop-offs and pick-ups for coaches would continue at Tower Hill in an attempt to discourage them for parking up elsewhere in the vicinity for this purpose. In terms of differential rates between Tower Hill and on-street bays, Officers reported that these were, to an extent, historical and had evolved from the charges at the coach park at St Paul's when it had been in existence and the parking that had been in place around the Barbican Centre with those rates more akin to on-street parking as opposed to rates for coach parking at the Tower. Members were informed that coach parking at Tower Hill was very specific in that it was driven by the need to facilitate pick-ups and drop-offs and longer term parking requirements for those visiting the Tower of London and Tower Bridge and that charges here were

therefore equivalent to other comparable facilities elsewhere in London. Very different requirements and priorities had been considered in setting these two particular tariffs.

The Comptroller and City Solicitor spoke to clarify that there was reference in the report to the use of on-street parking reserve and that, whilst this was fine in terms of off-street parking, as far as on-street parking tariffs were concerned, there was a judgement that clarified that the availability of on-street parking reserve and how it should be spent was not relevant in terms of setting parking tariffs.

**RESOLVED** – That the Planning and Transportation Committee:

1. Approve the three-year pricing strategy for on-street parking bays, as set out in paragraph 19 of this report with effect from January 2021; and
2. Approve a three-year pricing strategy for parking charges in relation to Baynard House, London Wall, Minories and Tower Hill public car parks, as set out in paragraph 19 of this report, with effect from January / February 2021.

**8. HIGHWAYS ACT 1980 LICENCE AND CONSENT CHARGES**

The Committee considered a report of the Director of the Built Environment recommending a new set of charges for the Highways Act 1980 licences and consents and setting out a rationale for their calculation so that they can be updated more regularly and on a consistent basis going forward.

A Member noted that the charges had not been reviewed for at least 20 years and suggested that this Committee ought to therefore agree an appropriate period of review going forward. He added that he felt that it was very important for the City to recover costs when undertaking work for developers. The Chair welcomed this suggestion for more regular reviews. Officers accepted that the charges ought to be reviewed more frequently and reported that they had actually been reviewed approximately 8 years ago but were unsure as to why that review had not resulted in a report to this Committee to reform the charges at that time. It was suggested that in future an annual review of the charges reflecting changes in officers' charge out rates and any other relevant changes in the financial context would be preferable.

**RESOLVED** – That Members agree the recommended charges set out in the summary table at Appendix 1 to this report for section 176(1) licences (in relation to bridges); section 177(1) licences (in relation to buildings); section 179(1) consents (in relation to vaults, arches, cellars and building foundations); section 180(1) consents (in relation to openings into cellars and vaults); and section 180(2) consents (in relation to pavement lights and ventilators)

**9. LOCAL FLOOD RISK MANAGEMENT STRATEGY 2021-27**

The Committee considered a report of the Director of the Built Environment in respect of the Local Flood Risk Management Strategy 2021-27.

A Member raised a question on the impact of the completion of the Thames Tideway Tunnel and whether, once this work was complete, the tunnel would reduce the likelihood of sewers backing up and causing flash floods in the Blackfriars foreshore area. Officers reported that they did not expect these works to have a significant impact on surface water flooding. It was reported that Tideway had undertaken some modelling on this, and that Officers could look to share the results of this with Members outside of the meeting.

Another Member questioned why the Committee did not have, as a companion to this report, the City Corporation's Risk Management Strategy, to see how the new Flood Risk Management Strategy might change the mitigation strategies going forward and how that might reduce any ongoing risk in this particular area on the Corporate Risk Register. Officers undertook to liaise further on this matter.

Another Member commented that she did not feel that the Thames Tideway works would resolve flooding issues and highlighted that Tideway had themselves indicated, at the outset of this project, that it would not deal with all of the flooding issues. Surface run off was also an important issue and necessitated the use of things such as green roofs. The Member went on to note that along the riverside there was a significant issue with drainage particularly the area around Millennium Bridge which flooded frequently. She underlined that the regular maintenance of street drains was extremely important. The District Surveyor responded to comment on flooding along the Embankment and at Millennium Bridge House and reported that Officers had carried out investigations here and found that the drain carrying this water went in through an electrical intake part of the building. With the redevelopment of this site, this defect would be corrected in due course.

Another Member sought assurances that this document had been cross referenced and fully aligned with the Climate Action Strategy which was going to the Court of Common Council for final approval later this week. Officers confirmed that the two documents had been cross referenced and that there were links to the Climate Action Plan within the Local Flood Risk Management Strategy document itself.

The District Surveyor commented that the Thames Tideway Tunnel project was principally to remove pollution that flooding can cause in the system where it was currently discharging directly into the Thames. It would not, however, necessarily reduce the overall impact of actual flooding within the City or prevent flooding in the system.

**RESOLVED** - That Members approve a 6 week public consultation of the City of London's Local Flood Risk Management Strategy 2021-2027, in line with the requirement in the Flood and Water Management Act Section 9 (6) which states that: "*A lead local flood authority must consult the following about its local flood risk management strategy— (a) risk management authorities that may be affected by the strategy (including risk management authorities in Wales), and (b) the public*"



10. **BUSINESS AND PLANNING ACT 2020**

The Committee received a report of the Remembrancer in respect of relevant provisions of the Business and Planning Act 2020, which came into effect on 22 July, as it affects the interests of the Planning and Transportation Committee.

Members noted that the Act introduced a new temporary regime for table and chair licences intended to help food and drink outlets trade and comply with social distancing guidelines. It also automatically extended on-sales alcohol licences to permit off-sales, allowing the sale of alcohol for consumption off-premises during the times that on-sales are permitted.

**RESOLVED** - That the requirements of the temporary regime be noted.

11. **PUBLIC LIFT REPORT**

The Committee received a public lift report of the City Surveyor for the period 22/08/2020 – 17/09/2020.

A Member expressed concern around issues with the new lift at Blackfriars Bridge and questioned who paid for the necessary repairs to this. The City Surveyor reported that Officers were working on the lift and that the City paid for these repairs but that there was a sum set aside from the developer that they were able to draw down on for these. She clarified that these funds were in place for the lifespan of the lift. The City Surveyor went on to report that some of the City's lifts were experiencing issues associated with lack of use during the current pandemic and, as a result, Officers were now considering if the maintenance regime ought to be amended and increased in frequency to help address this.

Another Member highlighted that the Blackfriars Bridge lift and the Millennium Inclinor had both been out of service at the same time and commented that this had a real impact on disabled access down onto the riverside. She questioned whether the City were clearly identifying alternative accessible routes in these circumstances. The City Surveyor reported that such signs were posted whenever lifts were out of service. It was reported that the Inclinor was now back in service, but that Officers had to bear in mind that it would be out of service for a period of time whilst it was replaced. This would make the effective functioning of the Blackfriars Bridge lift all the more important. The Member came back on this point to question whether the developer would be offering any assistance in terms of costs whilst the Inclinor was out of service ahead of its replacement to ensure that access to the riverside was adequately maintained. The City Surveyor reported that she was in active discussion with the developer on the replacement offering but was unaware that this point had been explicitly covered. She undertook to raise this with them going forward.

The Chief Commoner commented that it was his understanding that the developer would be offering a parallel operation whilst the Inclinor was taken out of service. The City Surveyor undertook to gain absolute clarity on this point in future discussions with the developer.

**RESOLVED** – That Members note the report.

12. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

The Committee received a report of the Interim Chief Planning Officer and Development Director providing Members detailing development and advertisement applications determined by the Interim Chief Planning Officer and Development Director or those so authorised under their delegated powers since the report to the last meeting.

**RESOLVED** – That Members note the report.

13. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**

The Committee received a report of the Interim Chief Planning Officer and Development Director providing Members with a list detailing development applications received by the Department of the Built Environment since the report to the last meeting.

Officers reported some major applications had been received since the report to the last meeting – namely Custom House for a new proposed hotel scheme and 55 Gracechurch Street for an office-led development scheme. It was anticipated that these would come to Committee in due course and it was expected that further, similar, large applications would be coming forward in the coming months.

The Chair thanked Officers for all of the work that was continuing to happen behind the scenes at both application and pre-application stage.

The Chief Commoner questioned whether Officers were seeing continued vitality in term of planning applications and whether they had any sense as to whether the City was likely to return to full occupancy going forward. Officers reported that the Planning Department remained very busy in terms of pre-application discussions and that, at the present time, they were seeing an almost unprecedented level of new schemes coming forward at the pre-application stage. Officers and developers were hopeful that these pre-application discussions came forward as planning applications. The Chair added that he felt that it was important that Members vocalised this point as much as possible. He added that there were some sound policies coming forward in the form of the new City Plan, the Transport Strategy and others and it was evident here that both international and UK based developers were still very much interested in investing in development in the City in the medium and longer term.

Another Member requested that some publicity and press coverage be given to the two large applications reported by Officers now that they were in the public domain as the receipt of these applications would appear to be encouraging in present circumstances.

Members discussed the need to balance residential and office developments going forward as part of the City's recovery. The Chair commented that emerging policies were very clear on where certain types of development were and were not appropriate and that the current pandemic had increased focus on the most efficient use of available space in all sorts of ways. The City would respond to demands as they emerged although it was not expected that any changes going forward would be so seismic that office space for businesses would no longer be required.

In response to comments around a return to Guildhall, the Director of the Built Environment underlined that a number of her staff had been present in the City throughout the pandemic delivering vital services such as cleansing and waste collection. She added that the Guildhall was now open for staff to return if necessary and that a lot of her team were now visiting the City to carry out things such as site and building control inspections and were now also taking the opportunity to access the Guildhall too.

Members also suggested that the amenities made available to both residents and businesses in the City would need careful consideration going forward – this included access to free Wi-Fi and the provision of supermarkets and other essential stores.

*At this point, the Chairman sought approval from the Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.*

**RESOLVED** – That Members note the report.

**14. REPORT OF ACTION TAKEN**

The Committee received a report of the Town Clerk advising Members of action taken by the Town Clerk since their last meeting in consultation with the Chair and Deputy Chairman and in accordance with Standing Order Nos 41(a) and 41(b).

**RESOLVED** – That Members note the report.

**15. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

**Thames Tideway Tunnel and Tower Bridge**

A Member commented that a recent press report had stated that the boring machine was edging towards Tower Bridge itself and there were concerns that it might have an impact on the bridge. She questioned whether there was any truth in this and how the impact of these works was being monitored. She also mentioned the recent failure of the Bridge when it became stuck open and questioned whether the Committee might, at some point in future, have a report on Tower Bridge.

The Chair commented that there were various reports on Tower Bridge that came to this Committee but asked that he and the Member seek to discuss this

specific point further outside of the meeting and consider how a more holistic report might be produced.

16. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

**Zahur Khan**

The Chair reported that Zahur Khan, Director of Transportation, was due to leave the organisation shortly and he wished to place on record the Committee's thanks to him for all of his work and for leading from the front on transportation issues, particularly with regard to Ludgate Circus and Beech Street which was currently under Judicial Review. The Chair wished Zahur the best of luck on his promotion with another Local Authority.

17. **EXCLUSION OF THE PUBLIC**

**RESOLVED** - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

<b><u>Item No(s)</u></b>	<b><u>Paragraph No(s)</u></b>
18	3
19-20	-

18. **NON-PUBLIC MINUTES**

The Committee considered the non-public minutes of the virtual meeting held on 8 September 2020 and approved them as a correct record.

19. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions raised in the non-public session.

20. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There were no urgent, additional items of business considered in the non-public session.

**The meeting closed at 12.42 pm**

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Chairman

**Contact Officer: Gemma Stokley**  
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**PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS**

<b>Item</b>	<b>Date</b>	<b>Action/ Responsible Officer</b>	<b>Progress Update and Date to be progressed/completed</b>
1	18 March 2019 2 April 2019 30 April 2019 24 May 2019 18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019 28 Jan 2020 18 Feb 2020 6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020	<p align="center"><b><u>Daylight/Sunlight – Alternative Guidelines</u></b></p> <p align="center"><b>Chief Planning Officer and Development Director</b></p> <p>A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight, and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.</p>	<p>UPDATE: Following a report to the 30 July Committee Members requested that this matter remain on the list of Outstanding Actions until a further report was brought back to them responding more specifically to the various points raised and taking into account any BRE guideline changes.</p> <p><b>Further Update: 8 October 2020 –</b> A Training Programme questionnaire was circulated to all Members of the Committee for completion by no later than 19 October 2020. The responses will help inform and tailor-make a 12 month programme of training for the Committee going forward which not only meets Members ambitions but is also affordable to the Department. Daylight/Sunlight Training is one of the areas of training specifically mentioned and which Members may highlight as a priority going forward.</p> <p><b>To be completed: Target of Autumn 2020</b></p>
2	18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019	<p align="center"><b><u>Construction Works</u></b></p> <p align="center"><b>Chief Planning Officer and Development Director</b></p> <p>A Member referred to the many construction sites within her Ward that were causing noise/disturbance issues. She asked if officers</p>	<p><b>To be completed: Target of Autumn 2020</b></p>

	<p>28 Jan 2020 18 Feb 2020 6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020</p>	<p>could look at how this matter might be improved and more effectively controlled and questioned whether any restrictions could be placed on construction when applications were first approved/granted consent.</p> <p>The Chair reiterated that Members had also requested, at the last meeting of this Committee, that Officers consider what powers, if any, might be used with regard to construction time periods and how construction in any given area might 'dovetail'.</p>	
3	<p>6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020</p>	<p style="text-align: center;"><b><u>Member Training</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director / Director of the Built Environment</b></p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning &amp; Transportation Committee are expected to undertake regular training.</p>	<p><b>UPDATE: 8 October 2020</b> – A Training Programme questionnaire was circulated to all Members of the Committee for completion by no later than 19 October 2020. The responses will help inform and tailor-make a 12 month programme of training for the Committee going forward which not only meets Members ambitions but is also affordable to the Department.</p>



4	<p>23 June 2020  14 July 2020  8 Sept 2020  6 Oct 2020</p>	<p align="center"><b><u>Barbican and Golden Lane Conservation Area</u></b>  <b><u>SPD</u></b></p> <p align="center"><b>Interim Chief Planning Officer and  Development Director</b></p> <p>A Member highlighted that a Conservation Management Plan was still awaited for this area in the form of a Supplementary Planning Document. He added that this was originally approved by this Committee in October 2018 and that he had requested an update on progress on several occasions since. He asked that this also now be included within the list of Outstanding Actions so that it was not lost sight of entirely.</p>	<p>UPDATE: The Interim Chief Planning Officer and Development Director reported that Officers were scheduling to bring this matter to Committee in Autumn 2020 and that the document was currently in draft form.</p> <p><b>To be completed: SPD to Committee in November 2020.</b></p>
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# Agenda Item 5

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	27 October 2020
<b>Subject:</b> 1 - 12 Long Lane London EC1A 9HF Demolition of existing buildings and structures to basement level and construction of a eight storey office (Class B1) building with basement and lower basement with retail (Class A1/A2/A3) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.	<b>Public</b>
<b>Ward:</b> Farringdon Within	<b>For Decision</b>
<b>Registered No:</b> 18/01020/FULMAJ	<b>Registered on:</b> 18 October 2018
<b>Conservation Area:</b>	<b>Listed Building:</b> No

## Summary

Planning permission is sought for the demolition of the existing buildings and structures on the site and the construction of an eight storey office building with a part single part two storey basement, with retail uses at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

71 objections have been received across four public consultations from residents and their representatives regarding the proposed development (27 from November 2018; 31 from December 2019; 7 from March 2020; 6 from September 2020).

The objections relate to the height, design and massing of the scheme, its impact on views of historic buildings and other landmarks, the potential impact of the development on residential amenity including loss of daylight and sunlight, noise and overlooking from the proposed amenity terraces, noise from construction works, light pollution, adverse impact on the character of the Culture Mile, and the impact of the development on the local environment, include the wind microclimate, traffic and pedestrian comfort levels.

The proposed development would provide a total of 8,069sq.m of flexible and enhanced office floorspace within a single building and ancillary retail units that would provide active frontages in a prominent location next to public transport links within the Culture Mile. The development would provide opportunities for an enhanced public realm within and around the site.

The proposed development in terms of its height, massing, materials, architectural design and greening would enhance the visual appearance of this part of the City. The setting of nearby listed buildings would not be

harmed. The development would provide a visually positive contribution to the character of this part of the City. It would not harm the setting of any nearby heritage assets and would not detract from views along Long Lane or views into and out of the surrounding conservation areas.

The height and mass of the proposed development has been designed, through revisions, to sufficiently minimise the potential impact on the amenities of nearby occupiers in relation to privacy, overlooking, noise, daylight and sunlight.

The proposed development is considered to comply with the Development Plan as a whole and to be appropriate subject to conditions, CIL payments and a Section 106 agreement being entered into to cover matters set out in this report.

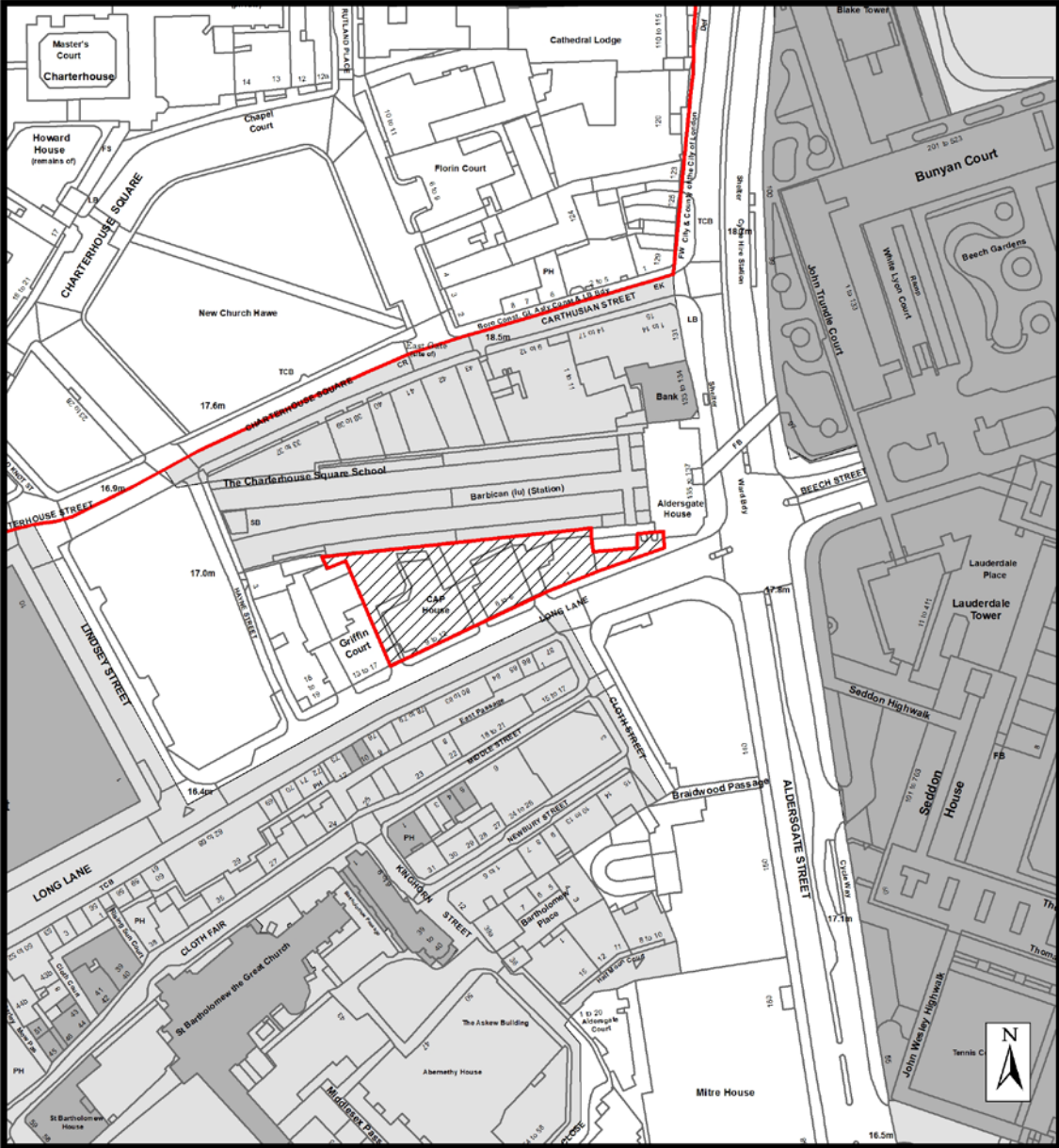
### **Recommendation**

It is recommended that planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

Planning obligations and other agreements being entered into under section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highways Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.

That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in 'Planning Obligations' under Section 106 and any necessary agreements under Section 278 of the Highways Act 1980.

# Site Location Plan



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ADDRESS:  
1-12 Long Lane

CASE No.  
18/01020/FULMAJ

- CITY BOUNDARY
- ▨ SITE LOCATION
- LISTED BUILDINGS
- CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT



Current view on Long Lane looking west.



View down Long Lane with proposed scheme



Proposed Long Lane elevation

## **Main Report**

### **Application Site and Surroundings**

1. The application site is an urban block of three, six storey office buildings (1-5, 6-8 and Cap House, 9-12 Long Lane) situated on the north side of Long Lane.
2. 1-5 Long Lane, at the eastern end of the site, was constructed in the 1970s with basement, ground and four upper floors. A fifth upper floor was subsequently added. The freehold title for the building includes an open space to the east of the building, which forms part of the application site. The space is currently occupied by external seating associated with a café (Class A1) within the ground floor of the building. 6-8 Long Lane and Cap House, 9-12 Long Lane are 1960s office buildings with single basements, ground and four upper floors. The total floor area for the site is 5,595sq.m (GIA).
3. Immediately to the north and east of the site is the Barbican Station. Immediately to the south is Long Lane and a terrace of four storey office buildings. Immediately to the west is Griffin Court, 13-17 Long Lane, a five-storey office building with two additional mansard storeys, that provide residential accommodation. Further to the west is the recently completed Farringdon East Crossrail Station oversite development.
4. The site lies within the Culture Mile area and within a Retail Link.

### **Proposal**

5. Planning permission is sought for the demolition of the existing buildings and structures on the site and the construction of an eight storey office (Class B1) building with a part single part two storey basement, with retail uses (Class A1/A2/A3) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.
6. The development would provide a total of 8,069sq.m of office floorspace and 731sq.m of retail floorspace (total floorspace 8,800sq.m GIA).
7. The building would be constructed so that the footprint of the basement and upper floors would run parallel with the London Underground lines to the north of the site. The basements and ground floor would abut the retaining wall of the railway, while the upper floors would cantilever to sit directly above the retaining wall.
8. The lower basement level would be located towards the western part of the site in order to accommodate plant. The upper basement level would accommodate cycle storage, associated facilities, retail floorspace, a bin store and plant.
9. The ground floor would accommodate a central office reception, with retail units to either side. It is proposed that the eastern retail unit would



have no physical separation between the office reception, to allow activity to flow between the two uses internally.

10. The area to the rear of the ground floor would provide an area for servicing, a UKPN sub station, stair and lift cores and access to the basement cycle store.
11. The ground floor open space, at the eastern end of the site, would be retained as part of the proposal and would be landscaped to provide an open seating area in conjunction with the proposed adjacent retail use and publicly accessible open space.
12. The upper floors of the building would be solely in office use (Class B1).
13. The building massing / floor plates of the building would begin to step back at fifth floor level to respond to the immediate townscape and neighbouring buildings. The setbacks provide the opportunity for amenity terraces at sixth and seventh floor levels and urban greening at each set back level.

### **Consultations**

14. The application has been advertised on site and in the local press. Nearby residential properties have been individually consulted.
15. Revisions have been made to proposals in response to residents' concerns and officers' requests, which has led to three additional consultations being undertaken in December 2019, March 2020 and September 2020.
16. The revisions that have been consulted on as part of the application are:
  - December 2019: A reduction in massing through the removal of the ninth floor and plant enclosure above and a reduction in the footprint of the seventh and eighth floors.
  - March 2020: The alterations involved a set back to the elevations on the north west corner of the building at fifth to eight floors to minimise the daylight impact on Griffin Court.
  - September 2020: The additional changes introduced through this revision include the removal of the eighth floor and the further setting back of the fifth, sixth and seventh floors from the western end of the building to minimise the daylight and sunlight impact on surrounding properties. A small change to the parapet and articulation of the south west corner of the proposed building has been introduced to enable the western parapet line to be slightly reduced whilst maintaining the overall architectural form of the building.
17. Whilst there has been some support from residents for the principle of the demolition and replacement of the existing buildings, to date, a total number of 71 objections have been received across the four consultations periods (27 from November 2018; 31 from December

2019; 7 from March 2020; 6 from September 2020). The objections and responses are summarised in the table below.

18. One letter of support from a local resident has been received, which refers to the proposal's attractive design and the continued renewal and improvement of the area, through increased activity and animation along Long Lane and the provision of new retail units and flexible working space / café.
19. Copies of all letters and e-mails received from residents in response to the consultations are attached to the report.

Topic	Objection
Design and Heritage	<ul style="list-style-type: none"> <li>• The height and massing are out of scale and would adversely affect the character of Long Lane and have detrimental impact on surrounding conservation areas.</li> <li>• The proposed building would impact on views of St. Paul's Cathedral, the Old Bailey, historic churches and other landmarks.</li> <li>• The proposed building should match the height of the Crossrail oversite development and other surrounding buildings.</li> <li>• The proposed building would not integrate with the plans for the Culture Mile.</li> <li>• The excessive use of blue faience is attention seeking and lacks contextual sympathy.</li> <li>• If approved the development will set a precedent for future developments which would further destroy the character of the area.</li> </ul>
Residential Amenity	<ul style="list-style-type: none"> <li>• The proposed development would adversely impact the daylight and sunlight received by neighbouring residential properties.</li> <li>• The proposed terraces would increase noise nuisance and overlooking of nearby residential properties.</li> <li>• The hours of use of the terraces should be limited by condition.</li> <li>• Adverse impact of construction noise.</li> <li>• The electric lighting within the building would disturb residents in the surrounding properties at night.</li> </ul>
Transport and Highways	<ul style="list-style-type: none"> <li>• Missed opportunity to provide improved pedestrian access to the Barbican London Underground station.</li> <li>• The increased floorspace would create overcrowding at street level, both by pedestrians and motor vehicles.</li> <li>• Concern over railway safeguarding during demolition and construction</li> </ul>
Environment and	<ul style="list-style-type: none"> <li>• A larger building would increase wind speeds in the local area.</li> </ul>

Sustainability	<ul style="list-style-type: none"> <li>• The proposed urban greening should be included at the lower levels of the building to provide public benefit.</li> <li>• The proposed greening would die if not maintained properly.</li> <li>• The proposed greening appears to be self-serving rather than beneficial for biodiversity.</li> <li>• The circular economy statement is primarily focused on the new building and not the retention and re-use potential of the existing buildings.</li> <li>• The ecological appraisal is out of date.</li> </ul>
Submission details	<ul style="list-style-type: none"> <li>• The application is missing existing and proposed east elevation drawings.</li> </ul>

20. The Barbican Association object to the proposal on the grounds of its unacceptable height and mass and the consequent loss of residential amenity on the grounds of loss of light, overlooking and noise pollution.
21. The Lead Local Flood Authority has raised no objections to the development subject to the imposition of a condition regarding details of sustainable urban drainage systems (SuDS) within the development.
22. Historic England has been consulted and have raised no objections to the proposal in its current form.
23. London Underground have raised no objection to the proposal subject to the condition that the development is not commenced until detail design and method statements for all foundations, basement and ground floor structures have been submitted and approved in writing by the local planning authority, in consultation with London Underground.
24. Transport for London (TfL) objected to the application on the grounds that short stay cycle parking was not provided within the public realm area of the development site. This has now been addressed through revisions to the proposals. TfL has also sought assurance that the cycle parking would be delivered in accordance with the London Cycling Design Standards, which would be required by condition.
25. Natural England have raised no objections to the application.
26. Network Rail have confirmed that they have no objections to the proposals.
27. The views of other City of London departments have been considered in the preparation of this development scheme and some detailed matters remain to be dealt with under conditions and in clauses in the Section 106 agreement.

### **Policy Context**

28. The development plan consists of the London Plan and the City of London Local Plan. The Mayor of London and the City of London have prepared draft plans which are material considerations to be taken into account in the determination of both applications.

29. The Draft London Plan is at an advanced stage. It takes forward many of the policy positions of the existing plan whilst strengthening and adding to others. On the 13th March 2020 the Secretary of State directed the Mayor not to adopt the Plan due to it not addressing a number of national policies in respect of housing ambition, small sites, industrial land and aviation, meaning it will be some time before the plan is adopted. It has passed through the Examination in Public so is to be afforded some weight with the matters addressed by the Secretary of State being less relevant to this site.
30. The draft City Plan 2036 was agreed by the Court of Common Council in May 2020 for pre-submission, Regulation 19, consultation. The Plan is therefore a material consideration in the determination of planning applications. Regulation 19 consultation has been paused until early 2021 to enable the City Corporation to update policies in light of changes to the Use Class Order, but the fundamental principles in relation to this application remain unchanged.
31. The London Plan and Local Plan policies and supplementary planning guidance documents that are most relevant to the consideration of this case are set out in Appendix A to this report.
32. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2019 and the Planning Practice Guidance (PPG) which is amended, as necessary.

### **Considerations**

33. The Corporation, in determining the planning applications, 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, any local finance considerations so far as material to the application, and other material considerations. (Section 70(2) Town & Country Planning Act 1990); and
  - 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).
34. In respect of sustainable development, the NPPF states at paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' For decision-making this means 'approving development proposals that accord with an up-to-date development plan without delay...'
35. Paragraph 127 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.

36. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 190 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.
37. In considering the planning applications before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.

#### Principal Issues to be Considered

38. The principal issues in considering this application are:
  - The appropriateness of the proposed uses.
  - The appropriateness of the bulk, massing and design of the proposals.
  - The impact of the proposals on local townscape views and strategic views in the London Views Management Framework.
  - The impact on designated and non-designated heritage assets.
  - The proposed public realm improvement works.
  - The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight and light pollution.
  - Transport, servicing and cycle parking provision.
  - The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability; and
  - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.

#### Proposed Uses

##### Office Accommodation

39. The site lies within the North of the City, a Key City Place as defined within Core Strategic Policy CS5 and within a rejuvenation area. Policy CS5 supports implementing proposals for the rejuvenation, intensification and further improvement of this area. The existing office provision comprises 5306sq.m (Class B1) within three adjacent buildings. The proposal for 8,069sq.m (GIA) Class B1 office floorspace consolidates office accommodation within a single building over eight floors.

40. The proposal is in accordance with Core Strategic Policy CS1 to provide additional office floorspace to meet the projected long term economic and employment growth to 2026 and encouraging high quality office accommodation. It is welcomed that the proposal comprises flexible floorspaces in accordance with Policy DM1.3 to promote small and medium sized businesses in the City which can accommodate a range of developer's needs. The proposal comprising a mix of commercial uses with ancillary retail units is in accordance with Policy DM1.5 which will contribute to the vitality of the area and provide a service to the workforce and visitors.

#### Retail Uses

41. The site is not within a designated Principal Shopping Centre (PSC) but is located within a Retail Link. Local Plan Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character. Policy DM 20.2 (Retail Links) aims to encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Retail Links.
42. The retail provision within the existing building comprises one retail unit occupied by Pret a Manger totalling 289sq.m (GIA). A total of 731sq.m (GIA) of flexible retail floorspace (Class A1/A2/A3) is proposed across two retail units at ground and lower ground floor levels and would be positioned either side of the centrally located office reception on Long Lane. The units would provide additional retail provision which is complementary to the City's business function and would provide facilities which would enhance the environment of the Retail Link. It is welcome that this stretch in a prominent location on a Retail Link close to Barbican Station and the new Elizabeth Line Station would provide retail units enabling an active frontage in an area which currently lacks animation.

#### Design and Heritage Considerations

##### Existing Site and Surroundings

43. Nos 1-12 Long Lane comprises three office buildings (1-5, 6-8 and 9-12 Long Lane) dating from the 1960's and 1970's on the north side of Long Lane and east side of Griffin Court. The three blocks are clad in brick, concrete and render and comprise basement, ground and five upper storeys. They are not considered to be of aesthetic, cultural, historic or evidential significance. The buildings are architecturally unremarkable and not considered to be heritage assets or significant contributors to the setting of nearby listed buildings.
44. The application site is not within a conservation area. It lies to the north of the Smithfield Conservation Area, to the south of Charterhouse Square Conservation Area and to the east of the Barbican and Golden Lane Conservation area. The development site is visible in views into and out of the surrounding conservation areas.
45. The site is within the wider settings of several listed buildings, including the grade II listed Barbican Estate located to the east on Aldersgate

Street, the Grade II\* listed Smithfield Central Market buildings to the west on Long Lane and West Smithfield and the Grade II listed buildings at Nos. 74 and 75 Long Lane. Some distance from the site on the northern side of Charterhouse Square are the listed buildings of The Charterhouse and its precinct (Grade I) and the St Bartholomew's Medical College buildings and railings, including nos 12a, 12-13 and 14 (Grade II). On the east side of Charterhouse Square is Nos 4 and 5 Florin Court (Grade II).

#### Design - Proposal

46. The three existing, six storey buildings are proposed to be replaced by one development which would be divided into three bays along Long Lane to create a vertical rhythm alluding to the former smaller plots.
47. The new building would rise sheer up to fourth floor and then would progressively set back from fifth to seventh floors to minimise the visual bulk of the top three storeys. The stepped upper levels would be recessed so to not appear prominent in views from street level.
48. The building would be clad in high quality materials including blue terracotta, white terracotta, Portland Stone, glazed white bricks, green walls, green roofs, anodised bronze aluminium and glazing. The materials as well as greening would create visual richness and depth to the facades. Samples of materials and greening would be reserved by condition.

#### Long Lane and Griffin Court Elevations

49. The proposed Long Lane elevation is separated into three clearly identified bays of fluted faience which project out from a secondary recessed plane with punched openings. This articulation creates depth and layering of the facade. The bays give the entire frontage a rhythm and verticality that reflects earlier historic plots on this site and effectively breaks up the horizontal mass.
50. The stone clad 'secondary plane' of the Long Lane façade wraps around and along the western, side elevation. The regularity of the punched window rhythm continues around to the west facing facade. At fifth floor the masonry façade sets back opposite Griffin Court and steps back even further at sixth and seventh floors on Griffin Court and Long Lane.
51. The central bay includes coloured faience 'fluted' piers that span from first to fourth floor. This effect creates a verticality to the central bay that highlights the office entrance below. Stone spandrels at each floor pick up horizontal lines and would be enriched with a decorative carved motif.
52. The profile of the convex pattern of blue fluted faience on the eastern bay would be read against the sky, providing an attractive crenelated termination to the façade. The Central and Western bays on Long Lane feature white faience on the main facades, articulated with stone and coloured faience detailing. The detailing and use of materials would

enrich the character of the facades and reinforce the difference between the three bay facades and the Portland stone recess.

#### North Elevation Facing Charterhouse Square

53. The northern elevation would be clad in white glazed brick from first to fifth floor with stone banding at every two floors. The windows are arranged in bays and separated by brick piers in a double order with a blue faience spandrel panels that add richness to the facade. The proposed light-coloured brick would provide visual continuity with the existing brick arches that form the retaining wall to Barbican Station at the rear of the site below ground level.
54. A central bay of the facade is proposed to be clad in stone (where the core is) and replicates the same fluted motif that occurs on the Long Lane side. The glazed sixth floor sets back facing Charterhouse Square. The plant enclosure would be clad in a green wall.
55. In order to minimise light spillage into Charterhouse Square, the amount of glazing proposed on the northern elevation is reduced compared to the Long Lane facade.

#### Terraces and Roof

56. The terrace spaces at fifth, sixth and seventh floors are proposed to be planted and on the sixth floor the glazing would be interlocked with green living walls. The plant enclosure at seventh floor would be wrapped in green living walls to soften its appearance in longer views, such as from the Barbican and across Charterhouse Square. The greening at the upper levels would soften the visual bulk of the building as well as provide benefits in terms of biodiversity, thermal cooling and visual amenity. Details of the hard and soft landscaping, vertical greening, balustrades and lighting on the terraces would be reserved by condition.

#### Bulk, Height and Design

57. The proposed modelling of the facades, splitting into three bays and setting back of the top of the building at 5th, 6th and 7th floors would effectively break down the massing and minimise the visual bulk of the building in views from street level. The north side of Long Lane is characterised by large modern buildings of varying heights. The proposed height, bulk and massing are considered appropriate to this northern side of Long Lane, outside of a conservation area. The proposed building would respect that character and contribute positively to the appearance of the area, including views into and out of surrounding Smithfield, Barbican and Golden Lane and Charterhouse Square Conservation Areas.
58. The height of the building would be one storey higher than the height of the recently constructed Crossrail oversite development on Lyndsey Street and Long Lane, which forms the western end of the same street block. However, in views from the west the oversite Crossrail development would appear as a comparable height as the proposed



development due to the considerably set back at 6th and 7th floors, following negotiation to reduce the massing of the building.

59. The detailed design and materials are considered to be of high quality and appropriate to the area. The additional height and bulk have been reduced through negotiation to ensure that the building would sit comfortably in this location. The impact would be a new building which provides architectural richness and uses traditional materials, maintaining the visual positive contribution to the character of this part of the City and enhancing the setting of nearby listed buildings and conservation areas.

#### Impact on the Setting and Significance of Listed Buildings

60. In considering whether to grant planning permission for development which affects the setting of a listed building, the local planning authority should have special regard to the desirability of preserving the building's setting or any features of special architectural or historic interest which it possesses.

#### Smithfield Central Market Building – Grade II\*

61. The proposed development would be seen behind the distinctive south eastern cupola of Smithfield Market, in views along the northern side of Long Lane. The cupola would remain the predominant feature in this part of the view due to its height, which exceeds that of the proposed development. The contrasting materials of the proposed building would enable the cupola of the listed Smithfield Market to be clearly identified and appreciated in views from West Smithfield.
62. The new Farringdon East Crossrail Station would be a prominent element in the middle ground of the view from West Smithfield, seen behind Smithfield Market. This would screen the western and rear parts of the proposed development.
63. The ability to appreciate the heritage value of listed Smithfield Market would be preserved. The wider setting of the listed Eastern and Central Meat Market would not be harmed.

#### Barbican Estate – Grade II

64. The listed 1980's Barbican Estate lies to the east of the site on the far side of Aldersgate Street. Its distinguished by its massive scale, tall towers and brutalist concrete architecture and gardens. The new proposed development would be significantly smaller in scale and height and would not harm the wider setting and views of the Barbican Estate.

#### 74 and 75 Long Lane – Grade II

65. These domestic scaled buildings are on the southern side of Long Lane, and the application site is on the northern side of Long Lane, forming part of the wider setting of the listed buildings. The proposed development would replace an existing 1980's building with a new building of high-quality design and materials. As such the wider setting would be slightly enhanced.

### Charterhouse Square

66. The Charterhouse and its precinct (grade I) and the St Bartholomew's Medical College buildings and railings, including Nos 12a, 12-13 and 14 (grade II) are some distance from the site on the northern side of Charterhouse Square and separated in terms of direct view by a terrace of buildings on Charterhouse Street. On the east side of Charterhouse Square is Nos. 4 and 5 Florin Court (Grade II).
67. The setting of the listed buildings that make up the Charterhouse precincts and St Bartholomew Medical College on the north side of Charterhouse Square and that of 4 and 5 Florin Court, would not be adversely affected by the proposals due to the relative distance of the buildings, the presence of other taller buildings that characterise the setting and trees blocking the view of the proposed development. The top floor of the building would be visible only in wintertime. The proposed development would not be unduly prominent in the view in the context of the surroundings and distance. The settings of these listed buildings would not be harmed by the proposed development.
68. The proposed height and bulk of the building would not over dominate or detract from the settings of the nearby listed buildings, the Barbican Estate, 74 and 75 Long Lane and the Central and Eastern Smithfield Market Buildings. The proposals would not detract from views of or harm the wider settings of any of the nearby listed buildings, including those listed buildings around Charterhouse Square. The proposals would not harm the significance of the settings of any nearby listed buildings.

### Impact on Nearby Conservation Areas

69. The impact would be a new building of high quality design which provide the architectural richness, traditional materials, greening and appropriate height and massing, contributing positively to views into and out of the surrounding Smithfield, Barbican and Golden Lane and Charterhouse Square Conservation Areas. The character and appearance of these conservation areas would not be harmed by the proposed development.

### Views of St Paul's Cathedral and LVMF

70. The site does not fall within the St Paul's Heights Limitation Policy Area.

### Townscape and LVMF Views

71. The site falls within the LVMF View 1A.2 from Alexandra Palace towards St Paul's Cathedral. The development would not be visible in the protected view and therefore there would not be any change or impact on this view.
72. The proposal has been assessed in terms of its impact on 11 views of the surrounding townscape as set out in the Addendum Built Heritage, Townscape and Visual Impact Assessment document prepared by Montagu Evans submitted as part of this revised application.

73. The views from Charterhouse Street, outside no 55, Hayne Street, West Smithfield outside No 8, Long Lane outside Nos. 53 and 76 and the junction with Aldersgate Street, Cloth Fair, corner with Middle Street, Barbican, Ben Johnson Place, Charterhouse Square at the Gatehouse and Charterhouse Precincts from the centre of the Green have been assessed and taken into consideration. The proposed development would not result in any harm to any of the views identified in the Addendum Built Heritage, Townscape and Visual Impact Assessment. The settings of the listed buildings featured within these views would not be harmed by the proposals.
74. The new development would not detract from the views into or out of surrounding conservation areas, including views east along West Smithfield, Charterhouse and Long Lane, south from Hayne Street and Charterhouse Square, north from Cloth Street or west from the Barbican Highwalk and Aldersgate Street. The proposals would enhance the views out of and into nearby conservation areas.
75. The Crossrail over site development at the junction of Long Lane and Hayne Street has now been completed in the life time of the application and would block the view of the western façade of the proposed development in views looking east from West Smithfield.
76. In terms of the townscape, the Built Heritage Townscape Visual Impact Assessment concludes that the impact the development has on the townscape is beneficial. Officers concur with this assessment and consider the impacts of the proposed development on townscape views is minor to major beneficial. The views affecting the settings of nearby listed buildings, including views from The Green at Charterhouse, across Charterhouse Square, views of the East and Central Meat Market, 74 and 75 Long Lane and the Barbican Estate, have been assessed to be beneficial in terms of the Proposed Development's enhancement of the townscape, view and setting of designated heritage assets.

#### Public Realm

77. The area to the east of the building would be re-landscaped including a range of seating, Sheffield bicycle stands and a living green wall. The proposals would provide an enhancement to the public realm and an attractive open amenity space.

#### Conclusion

78. The proposed development in terms of its height, massing, materials, architectural design and greening would enhance the visual appearance of this part of the City. The setting of nearby listed buildings would not be harmed. The development would provide a visually positive contribution to the character of this part of the City.
79. It would not harm the setting of any heritage assets and would not detract from the views along Long Lane or views into and out of the surrounding conservation areas.

### **Inclusive Design and Accessibility**

80. The proposed office reception and ground floor retail units would offer direct level access from long lane. Access to the office reception would be via revolving doors and adjacent pass doors that would be required to be available for use while the office is open.
81. All building floors, including the basement, would be accessible via a bank of four lifts. Accessible toilets would be provided on each office floor. An accessible shower and toilet facility would be provided at lower ground floor level.
82. The proposed cycle facilities would include space for adapted cycles and would be accessible via the good lifts located within the service area.

### **Archaeology**

83. The site is in an area of archaeological potential outside the Roman and medieval walled City where remains from Roman to post medieval periods have been recorded. An Historic Environment Assessment setting out the archaeological potential and impact of the proposed building has been submitted with the application.
84. There is high archaeological potential for Roman remains, including burials and occupation close to a major Roman road into the City, later medieval remains due to the proximity of the site to the Charterhouse precinct and the growth of building development along the road in the medieval and post medieval periods.
85. There are three existing buildings on the site which have basements at different depths, and it is considered that only early remains would survive below the basement slabs. Archaeological survival is considered higher for all periods outside the building basements and in the existing car park areas. The northern boundary of the site would have been affected by the railway construction.
86. The proposed building would have two basements and new piled foundations which would remove any surviving archaeological remains. The upper level basement/lower ground floor would cover the full extent of the building footprint. The lower level basement would cover approximately 30% of the site.
87. Archaeological evaluation is necessary to provide additional information on the nature, character and date of archaeological survival and help design an appropriate mitigation strategy.
88. Conditions are recommended to cover archaeological evaluation, a programme of archaeological work and foundation design.

### **Residential Amenity**

89. The application site is close to the edge of the Smithfield Residential Area. Local Plan Policy DM21.3 Residential Environment states that the amenity of existing residents within identified residential areas will be protected by resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements

likely to cause disturbance and requiring new development near existing dwellings to demonstrate adequate mitigation measures to address any potential detrimental impact.

### **Daylight and Sunlight**

90. Local Plan Policy DM10.7 Daylight and Sunlight resists development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'. 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.
91. Policy DM21.3 requires development proposals to be designed to avoid overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation.
92. The BRE guidelines 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 (such as schools, hotels and hostels):
  - **Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
  - **Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq.ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.
  - **Sunlight to windows: Annual Probable Sunlight Hours (APSH):** sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours (APSH),

or less than 5% APSH between 21 September and 21 March; and receives less than 0.8 times its former sunlight hours as result of a proposed development; and has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

#### Daylight and Sunlight Assessment

93. The application is supported by a daylight and sunlight report which assesses the impact of the proposed development on the daylight and sunlight received by neighbouring residential properties and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light.
94. The properties that have been assessed are Griffin Court, 13-17 Long Lane, 74-75, 76, 78-79 and 80-83 Long Lane, 38-39, 40 and 41-43 Charterhouse Square, 12 and 15 Carthusian Court, 4-5, 15-17, 18-21, 22, 23 and 24-25 Middle Street, 3 Hayden Street, 3 Cloth Street, Lauderdale Tower, Seddon House and John Trundle Court.
95. An initial daylight and sunlight report was submitted with the application in 2018. The City Corporation commissioned BRE to undertake an independent review of the report. The review confirmed officers' concerns that there were a number of significant adverse impacts on the daylight and sunlight received by neighbouring properties, most notably Griffin Court, 13-17 Long Lane and properties in Charterhouse Square.
96. Following revisions to the scheme the latest daylight and sunlight report has been the subject of a further review by BRE. The comments below relate to the latest proposals and not earlier iterations of the proposed development.
97. Reductions in daylight to all windows at 3 Hayne Street, 15 Carthusian Court, 74-75, 76 and 78-79 Long Lane, 4-5, 18-21, 22, 23 and 24-25 Middle Street, Seddon House, Lauderdale Place and John Trundle Court would be within the BRE guidelines. The impact on daylight distribution (no sky line) for one living/kitchen/diner in 3 Cloth Street would be outside the guideline. This is a deep room and the area losing direct access to sky light would be the area at the back of the room; the loss of amount of light, measured by the vertical sky component (VSC), is well within the guidelines. This is therefore assessed as a minor adverse impact for this room only.
98. There would be noticeable reductions in daylight to more windows and/or rooms at Griffin Court (13-17 Long Lane), Charterhouse Square, 12 Carthusian Street (Carthusian Court), 80-83 Long Lane and 15-17 Middle Street. These are addressed below.

#### Griffin Court (13-17 Long Lane)

99. This building is immediately to the west of the application site. It has commercial uses on the lowest five floors. The upper two floors are in residential use.

100. Seven windows on the fifth floor in the side facing the new development would experience reductions in daylight outside the BRE guidelines. Currently, most of the windows have very good access to light, with vertical sky components ranging from 25 to 36%. With the new development in place, they would lose between 20 and 40% of their VSC, with residual values of between 15 and 26%. For one bedroom there would also be an impact on daylight distribution.
101. Flat 2 on the fifth floor would lose light to its kitchen and to two of its living room windows (one of which appears to be the main window). Another living room window, and the bedroom window, face out into Long Lane and would be unaffected. Loss of daylight to this flat would be classed as a moderate adverse impact. Flat 4 on the fifth floor appears to have all its windows in this side of the building. For the living room windows, at the north end of the façade, the loss of light would be within the BRE guidelines, but there would be noticeable losses to the bedrooms and kitchen. This is considered to be a minor adverse impact overall.
102. The daylight results for this property are significantly better than for the previous design of the proposed development. With the new design, reduction in light to the sixth floor would be within the BRE guidelines.
103. The affected windows are close to the site boundary (the commercial part of the building goes right up to the boundary, but the flats on the upper floors are set back). In these situations, the BRE guidelines suggests comparing the reduction in light, as a result of the proposed development, to that for a mirror image building, the same height and distance from the boundary as the existing building. The daylight report has undertaken this assessment; for all the windows the loss of light caused by the proposed development would be less than that for the mirror image comparator. This indicates that a loss of light outside the BRE guidelines could be expected for Griffin Court, as it is a tall building with windows set close to the boundary.

#### 38-39 and 40 Charterhouse Square

104. 38-40 Charterhouse Square is a private school for children aged 3-11. In numbers 38-39, reduction of light was only analysed to the ground floor windows; The submitted report states that the upper floors are not part of the school.
105. Loss of daylight to the nursery at number 38 would be within the BRE guidelines. The reduction to VSC to one window in number 39 would be marginally outside the BRE guidelines, and the impact on daylight distribution would be within the guidelines.
106. In number 40, reduction of the vertical sky component would be outside the BRE guidelines for three of the windows analysed, but only marginally. There would be a noticeable impact on daylight distribution to four of the six rooms analysed. Daylight provision is particularly important for young children, and the impact of this reduction would be dependent on the use of the rooms and whether children would be in the rooms all day. In the absence of detailed information on the specific

use of the rooms, a minor adverse impact is suggested; the results are notably better than for the previous massing proposed.

#### 41-43 Charterhouse Square

107. 41-43 Charterhouse Square incorporate residential apartments on the upper floors; there are offices on the ground floor. The rear windows face south towards the proposed development site across Barbican station.
108. Except on the top floor of number 43, and a small number of secondary windows that do not directly face the proposal site, all the windows on the southern side of this property, would have a loss of light outside the BRE guidelines. Windows on the main façade would have relative reductions in vertical sky component of between 20-40%. Daylight distribution would also be adversely affected in some of these rooms, with three rooms in 42 Charterhouse Square losing over a third of their daylit area.
109. It is noted that the south facing windows on this property have balconies above and adjacent fire escapes which block a proportion of light available to these windows. In such circumstances the BRE guidelines suggest an extra calculation be undertaken without these obstructions in place. The submitted report includes this additional assessment. Without the balconies and fire escapes, the relative reductions in VSC would generally be between 20% and 23%, which is marginally outside the BRE guidelines. At first floor level VSC levels would reduce from the current 25-27% to 20% with the new development in place. At second floor level VSC levels would reduce from 28-29% to 22%, and on the third floor from 29-31% to 22-25%. These reductions in daylight are notably less than for the previous massing proposed and the residual VSC values would be considered to be good for an urban location.
110. The apartments at Charterhouse Square have large windows, and normally this would allow adequate daylight with lower vertical sky components, typically in the 18-25% range. However, the apartments are unusually deep in plan (around 20 metres front to back), which means that a greater access to daylight is needed to achieve daylight distribution throughout the depth of the room. In this scenario the parts of the room furthest away from the window would have greater sensitivity to a potential loss of a view of the sky as a result of a reduction in the vertical sky component. Consequently, the increased height and massing proposed as part of the new development would result in larger non-daylight areas on the first and second floors within some of these flats.
111. Overall, taking account of the impact of the existing balconies and fire escapes on the amount of sky visible from the windows of these apartments, and the depth of plan of the rooms that the windows serve, the overall impact of the proposed development is considered to be minor to moderate adverse.



### 12 Carthusian Street (Carthusian Court)

112. This building is to the north east of the development site, on the other side of the Barbican station. The lower four floors of this building are in office use. The top three floors are in residential use. A reduction in the vertical sky component to one of the 35 residential windows assessed would be marginally outside the BRE guidelines. However, the room that the window serves benefits from another window that would meet the BRE guidelines. Four of the 24 rooms assessed would experience an adverse effect on their daylight distribution, however, the losses of light are not far below the BRE guidelines, and the overall impact is considered to be negligible to minor adverse impact.

### 80-83 Long Lane

113. 80-83 Long Lane is a four-storey building directly to the south of the application site. The lower three floors are in office use, but records suggest that there is a flat on the third floor. Reduction of light to all the windows of this flat would be outside the BRE guidelines (there appear to be no windows on the south side). Daylight to the windows is already obstructed by the existing buildings on the application site, with vertical sky components of 23-24%. Following redevelopment, the VSCs would be reduced to 15-19%, with the living room windows experiencing the greatest reduction. The living room would also experience a noticeable impact on its daylight distribution. The daylight results are better than for the previous massing proposed on the site and the overall loss of daylight is considered to be a moderate adverse impact.

### 15-17 Middle Street

114. 15-17 Middle Street is a residential property located to the south of the application site. There are 13 windows in this property that have been assessed: eight would meet the BRE guidelines, and the reduction in daylight to the five remaining windows would be marginally outside the BRE guidelines. The report submitted daylight report suggests larger impacts on daylight distribution to five of the rooms served by the windows assessed, though these findings are based on assumed room layouts. The overall daylight impact to this property is considered to be minor adverse.

### Effects on Sunlight

115. Loss of sunlight is not an issue for many of the above properties as most of them face northwards. Only the school and a couple of the flats in Charterhouse Square would experience a reduction in sunlight outside the BRE guidelines, but in the winter months only. This is considered to be a minor adverse impact.
116. For an earlier revision to the scheme, the submitted daylight and sunlight report analysed overshadowing of the roof terrace garden on top of 41 and 42 Charterhouse Square. There was a reduction in sunlight on March 21, but the terrace still met the BRE guideline of two hours of sunlight in total. While no such analysis has been given in the latest report, the results would be better given the reduced massing of

the proposed development compared to the earlier revision to the scheme.

#### Daylight and Sunlight Conclusions

117. Of the buildings assessed, the majority of the surrounding properties would not experience any noticeable reductions in the daylight that they currently receive. The properties that would experience noticeable reductions in daylight are those that are closest to the application site; Griffin Court, 41-43 Charterhouse Square and 80-83 Long Lane. Overall, the impact on daylight for these properties is notably less than for the previous massing proposed on the site.
118. It is noted that the affected windows in Griffin Court are close to the site boundary and that a reduction in light outside the BRE guidelines could be expected.
119. The impact on daylight to properties in Charterhouse Square can, in part, be attributed the presence of existing obstructions to windows and the depth of the rooms that the windows serve. Without these obstructions in place the windows in these properties would experience only minor reductions in daylight and would retain good levels of VSC.
120. 80-83 Long Lane is an isolated residential property on the stretch of Long Lane directly opposite the development site. Whilst it would experience some moderate impacts on the daylight received the residual levels of daylight to the property's windows are considered to be good for a dense urban location.
121. Loss of sunlight is not an issue for many of the properties assessed as many of the windows face northwards. Where windows have been assessed only a small number would experience a loss of sunlight, and in the winter months only.
122. 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.

#### Proposed Roof Terraces: Privacy, Overlooking and Noise

123. The proposal includes accessible set back office amenity terraces at the western and southern areas of the building at sixth and seventh floor levels. The terraces would include a mixture of hard and soft landscaping and would provide outdoor amenity space for the office occupiers.
124. Policy DM10.3 'Roof Gardens and Terraces' of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not: immediately overlook residential premises; adversely affect rooflines or roof profiles; result in the loss of historic or locally distinctive roof forms, features or coverings; or impact on identified views.
125. Residents have raised objections that the proposed terraces would give rise to increased noise nuisance and overlooking over nearby

residential properties and have suggested that the hours of use of the roof terraces should be limited by condition.

126. The proposed terrace at seventh floor has been designed and located to help ensure that there would be no direct overlooking of the adjacent residential properties on the upper floors of Griffin Court, 13 – 17 Long Lane. The terrace has been set back from the western edge of the building and the layout has been designed to include a landscaped buffer zone along their western perimeter, to further reduce the potential for overlooking. The western end of the proposed terrace at sixth floor level is considered to have the potential to overlook the residential premises at Griffin Court. Therefore, a condition is recommended restricting access to the western end other than for maintenance purposes or in the case of emergency.
127. The hours of use of the terraces would be restricted by condition so that cannot be used or accessed between the hours of 21:00 on one day and 08:00 on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.
128. Conditions are included requiring that no amplified or other music shall be played on the roof terraces and that no live or recorded music that can be heard outside the premises shall be played. Promoted events would be prohibited by condition.
129. The location and design of the proposed terraces, and the inclusion of the above conditions, are considered to be sufficient to safeguard the protection of the amenity of adjoining residential premises, and the area generally.

#### Light Pollution

130. Policy DM15.7 'Noise and Light Pollution' of the Local Plan requires that "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."
131. Residents have raised concerns that the electric lighting within the development would disturb occupants of the surrounding residential properties at night.
132. The proposed development would be predominantly of a traditional masonry construction with punched window openings. The proposed office use with retail units at ground floor level would be the same as the existing buildings on the site. Whilst the development would be of a larger scale than the existing buildings it would benefit from the inclusion of passive infrared (PIR) light sensors that would limit the quantum of internal lighting that would be used unnecessarily. The PIR sensors would ensure that the office floorplates would not be lit when they are not in use.
133. The development has targeted BREEAM credit Pol 04 'reduction of night time light pollution', which seeks to ensure that external lighting is concentrated in the appropriate areas and that upward lighting is

minimised, reducing unnecessary light pollution, energy consumption and nuisance to neighbouring properties.

134. A condition has been included which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity.

### **Transport, Servicing and Cycle Parking**

#### **Public Transport**

135. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site is located close to Barbican Underground station and the Farringdon East Crossrail / Elizabeth Line station. The site is close to several bus routes running close by on Aldersgate Street and Goswell Road.

#### **Servicing and Deliveries**

136. Servicing of the building would take place off street within a loading bay located at the west of the site. The loading bay would be accessed from the alley between Cap House and Griffin Court, (historically known as White Hart Court), which would be gated with a replacement gate that would be set back 8m from the highway to ensure vehicles would not obstruct the footway. Details of the gate would be secured by condition.
137. The loading area would accommodate two to three vehicles at any one time, up to and including 8m long vehicles. Service vehicles would be able to exit and enter the site from the highway network in a forward gear.
138. Deliveries made by vehicles larger than 8m would be required infrequently. The applicant has committed to ensuring any such deliveries are organised with the City of London's Traffic Management team. The submission of detail on how this would be managed would be provided in a final delivery and servicing plan, which would be secured through the Section 106 Agreement.
139. The applicant has predicted that there will be 30 deliveries per day to service both the offices and the retail units. The servicing for the office units will be managed through a physical consolidation centre, and a cap limiting the number of daily deliveries to 20 would be written into the Section 106 Agreement.
140. The development would be subject to the requirement for a delivery and servicing plan, which would be secured through a Section 106 Agreement. Deliveries would be prohibited between the hours of 11pm one evening and 10am the following day, 12noon - 2pm and 4pm – 7pm. These restrictions will be written into the Section 106 Agreement. This will allow a total of 8 hours for deliveries to take place, which would be enough to accommodate 20 deliveries.

141. The Cleansing Team have confirmed that the waste storage and collection facilities comply with their requirements and are acceptable.

### Cycle Parking

142. The Intend to Publish London Plan cycle parking standards require a minimum of 116 long-stay (111 for the office use and 5 for the retail use) and 50 short-stay (11 for the office use and 39 for the retail use) cycle parking spaces.
143. The proposals include the provision of 115 long stay cycle parking spaces at lower ground floor level. The mix of cycle parking would include 54 double stacker stands and 7 spaces for larger adapted bicycles.
144. The long stay cycle parking would be accessed via a lift and staircase from the loading area. The shared use of the loading area by delivery and servicing vehicles and cyclists will be managed by prohibiting deliveries during peak times at which cyclists would arrive and leave and providing demarcated routes for cyclists and pedestrians.
145. 10 short stay cycle parking spaces are proposed in the form of Sheffield stands in the area of public realm to the east of the building, which sits within the application red line boundary. While the total provision of short stay parking falls short of the required 50 spaces, the proposals are considered acceptable due to the limited amount of public realm available to the applicant and the aspirations for the public realm to also deliver valuable outdoor amenity space.
146. The proposals include 14 showers and 136 lockers (1 shower per 10 cycle parking spaces, and more than one locker per each cycle parking space) in line with the City of London's minimum recommended provision.

### Section 278 Agreement

147. A Section 278 agreement for improvements to the walking and cycling environment, in line with the 10 Healthy Streets indicators and to deliver the City of London's wider Smithfield Public Realm project, including the potential for footway widening and greening, would be secured through the Section 106 agreement.

### Environment and Sustainability

#### Wind Microclimate

148. A desktop wind study has been undertaken for the proposal. The wind microclimate for the development would be required to have areas suitable for frequent and occasional sitting, standing and walking.
149. The proposed development is eight storeys high and the uplift in height is not significantly greater than the existing six storey buildings on the site. The surrounding townscape comprises a mixture of building heights ranging from four to eight storeys.
150. The desktop assessment concludes that the proposed wind conditions around the site would remain acceptable for the proposed uses and

would be broadly in accordance with the City of London Wind Guidelines. This includes the open space to the east of the building which is likely to be suitable for sitting and the entrances to the offices and retail units along Long Lane. It is anticipated that there would be a negligible impact to the wind conditions at the Barbican Station entrances and platforms.

151. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy 7.6, Intend to Publish London Plan Policy D8, Local Plan 2015 policy DM10.1 and policies S8 and DE2 of the draft City Plan 2036 and the guidance contained in the Wind Microclimate Guidelines for Developments in the City of London.

### Circular Economy

152. The circular economy statement submitted with the application has stated that the developer will make the following circular economy and resource efficiency commitments:
- A pre-demolition audit to identify the potential for the re-use and recycling of existing on-site materials so that at least 80% of demolition and excavation material can be diverted from landfill.
  - The new development would be designed to be in use for over 25 years.
  - An end of life strategy to ensure that the building structure, materials and services can be reused at the end of the building's life, as may be required.
153. A pre-commencement condition has been included requiring the submission of a detailed Circular Economy Statement, providing details of how the building would adhere to the following circular economy principles: build in layers, design out waste, design for longevity, design for flexibility and adaptability, design for disassembly and using systems, elements or materials that can be re-used and recycled.

### Energy Consumption

154. This development is assessed against the current London Plan carbon target of 35% reduction in carbon emissions compared with the Building Regulations.
155. The submitted Energy Strategy follows the London Plan hierarchy set out in Policy 5.2 regarding carbon reductions and shows that the development has been designed to achieve a carbon reduction of 14.1% compared with Part L of the Building Regulations requirements. This would be achieved through energy efficiency measures including connection to the Citigen district heating network, both of which are welcomed and enhance the credentials of the scheme. On the basis of this predicted shortfall a carbon offsetting contribution would be required for this development which would be secured by the S106 agreement to capture any changes in carbon performance between design and completion of this development.

156. It should be noted that through the detailed design stage carbon reduction had been assumed to be higher (nominally 31.97%) based on past performance of the Citigen network. However, the most recent figures have recently been provided and the performance is much lower. The network's plant and equipment is due for an upgrade which is expected to improve performance due to technological advances. The final carbon offsetting payment would be calculated on completion of the building, which would provide opportunities for an improvement in the carbon performance of the development.
157. A condition is recommended which would require the applicant to submit an updated energy strategy to seek improvements in carbon reduction prior to the commencement of development.
158. The proposal is considered to accord with policies 5.2, 5.3, 5.5, 5.6, 5.7 of the London Plan, policies CS15, DM15.1 and DM15.3 of the Local Plan and policy DE1 of the draft City Plan 2036 which relate to carbon dioxide emissions, sustainable design and decentralised energy.

#### BREEAM

159. BREEAM assessments have been submitted for the office and retail elements of the scheme. The assessments demonstrate that the office element has been designed to achieve a BREEAM rating of "Excellent" against the 2018 new construction criteria. The Retail element (731 sq m) has been designed to achieve a BREEAM rating of "Very Good". The retail element does not include fit out therefore an "excellent" rating is not achievable.
160. The findings of the submitted assessments are considered to be acceptable. A condition has been included requiring the submission of a post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating).

#### Urban Greening and Biodiversity

161. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces. Vertical greening and green roofs are proposed at fifth, sixth and seventh floor levels as well as landscaping at ground level. The development would provide 250sq.m of intensive green roofs, standard/multi-stem trees and 304sq.m of green walls. The proposed greening would provide an Urban Greening Factor of 0.3 which complies with the expectation of the draft London Plan Greening Policy G5.
162. Chapter 10 of the Design and Access Statement entitled 'Sustainability & Biodiversity' sets out that the development site would not result in the loss of biodiversity value, as landscaping proposals will deliver a net benefit to biodiversity. The proposal includes planting of suitable flora species and habitat aids for birds and invertebrates. Native and non-native plants will be planted within the green wall and on the roof

terraces, including species providing pollen, nectar and berries. It is proposed that nest boxes are located either on the plant screens, green walls or other appropriate vertical surfaces on the roof tops.

163. The proposed greening would enhance the visual and environmental amenity of the building and the area. Details of the greening would be reserved by condition.

#### Noise and Vibration

164. In City development schemes most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Construction Management Plan and Construction Logistics Plan required by condition.
165. During operation of the building, noise and vibration would be generated from mechanical plant. Noise levels from mechanical plant in the completed development would need to comply by condition with the City of London's standard requirement that noise output should be 10dB below background noise levels and conditions have been included relating to restricting hours of use of the office terraces. Hours of use of the office amenity terraces would be controlled by condition.

#### Flood Risk and Sustainable Urban Drainage

166. 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 Urban Drainage Systems (SUDs) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2036.
167. A Flood Risk Assessment has been submitted in support of the proposal. The site is in Flood Zone 1 (land assessed as having a less than 1 in 1000 annual probability of river or sea flooding), it is within one of four Local Flood Risk Zones identified within the City of London. In accordance with the NPPF the proposed uses of the development would be appropriate in Flood Zone 1.
168. Flood risk from surface water, ground water, sewers and artificial water bodies is deemed to be low on site and the development would not lead to an increase in impermeable area when compared to the existing site.
169. A SUDS scheme is proposed in conjunction with the development. This would include measures such as attenuation tanks and green and brown roof. Conditions are recommended to provide detailed designs and layouts of the proposed SUDs components (restricting surface water flow rates to no greater than 5 l/s) and lifetime maintenance plan for the SUDs scheme.
170. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, CR3 of the draft City Plan 2036, policies 5.12 and 5.13 of the London Plan and policies SI12 and 13 of the Intend to Publish London Plan.



## Air Quality

171. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral. Developers are expected to install non-combustion energy technology where available; construction and deconstruction 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 7.14 of the London Plan and policy SI of the Intend to Publish London Plan.
172. The submitted Air Quality Impact Assessment (AQIA) has assessed the construction and operational phases of the development.
173. During the demolition and construction phase, the assessment suggests there is likely to be a higher risk of dust soiling and PM<sub>10</sub>, releases. Through good site practice, the implementation of suitable mitigation measures and adhering to City of London (CoL) Code of Practice, the impact of dust and PM10 releases could be minimised. Conditions have been recommended for a Construction Management Plan be submitted which would include measures for controlling dust and pollution during the demolition and construction phases of the development, as well as requiring a scheme for protective works to be submitted and approved prior to any works commencing.
174. For the operational phase, the development would be car free with only service vehicles coming to and from the site. The AQIA states that the building would be connected to the Citigen district heat network and therefore would have no significant detrimental impact on air quality.
175. In order to ensure the proposed development minimises emissions and exposure to air pollution during the operational phase of the development, the Air Quality Officer has recommended a condition requiring an Air Quality Report to be submitted and approved prior to any plant being commissioned and installed.
176. The proposed development would be air quality neutral, therefore mitigation or additional off-setting would not be required (other than the conditions recommended during the demolition and construction phases of the development). Subject to conditions the development would have minimal impact on local air quality. The scheme meets the air quality neutral benchmarks. The proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, policy 7.14 of the London Plan and policy SI of the Intend to Publish London Plan.

## **Planning Obligations and Community Infrastructure Levy**

177. 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.

178. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
179. From 1<sup>st</sup> April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. 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).
180. CIL contributions and City of London Planning obligations are set out below.

#### MCIL2

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£587,600	£564,096	£23,504

#### City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
City CIL	£240,375	£228,356	£12,019
<b>City Planning Obligations</b>			
Affordable Housing	£64,100	£63,459	£641
Local, Training, Skills & Job Brokerage	£9,615	£9,519	£96
Carbon Reduction Shortfall ( <i>as designed</i> )	£97,512	£97,512	£0
Section 278 Design and Evaluation	£50,000	£50,000	£0
S106 Monitoring Charge	£2,750	£0	£2,750
<b>Total liability in accordance with the City of London's policies</b>	<b>£464,352</b>	<b>£448,846</b>	<b>£15,506</b>

### City's Planning Obligations

181. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.
- Highway Reparation and other Highways Obligations
  - Local Procurement Strategy
  - Local Training, Skills and Job Brokerage Strategy (Demolition)
  - Local Training, Skills and Job Brokerage Strategy (Construction)
  - Delivery and Servicing Management Plan (including Consolidation)
  - Travel Plan (including Cycling Promotion Plan)
  - Carbon Offsetting
  - Utility Connections
  - Section 278 Agreement
  - Cultural Plan (in accordance with the Culture Mile Look and Feel Strategy)
  - Public Route Access and Public Realm Specification (Eastern Public Space) to align with the Concept Design set out in the Smithfield Public Realm project.
182. 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.
183. The scope of the s278 agreement may include, but is not limited to, vehicle crossover works on Long Lane, tree planting and improving crossings, footways and carriageways in the vicinity of the site to accommodate increased pedestrian and cyclist movements.

### Monitoring and Administrative Costs

184. 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.
185. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

### Site Specific Mitigation

186. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the area. In some circumstances, it may be necessary additionally to seek site specific mitigation to ensure

that a development is acceptable in planning terms. Other matters requiring mitigation are yet to be fully scoped.

### **Conclusion**

187. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft London Plan and the draft Local Plan and considering all other material considerations.
188. The proposed development would provide a total of 8,069sq.m of flexible and enhanced office floorspace within a single building and ancillary retail units that would provide active frontages in a prominent location next to public transport links within the Culture Mile. The development would provide opportunities for an enhanced public realm within and around the site.
189. The proposed development in terms of its height, massing, materials, architectural design and greening would enhance the visual appearance of this part of the City. The setting of nearby listed buildings would not be harmed. The development would provide a visually positive contribution to the character of this part of the City. It would not harm the setting of any nearby heritage assets and would not detract from views along Long Lane or views into and out of the surrounding conservation areas.
190. The height and mass of the proposed development has been designed, through revisions, to sufficiently minimise the potential impact on the amenities of nearby occupiers in relation to privacy, overlooking, noise, daylight and sunlight.
191. The proposed development is considered to comply with the Development Plan as a whole and to be appropriate subject to conditions, CIL payments and a Section 106 agreement being entered into to cover matters set out in this report.

## **Background Papers**

### **Application Documents**

Historic Environment Assessment 03 July 2018 MOLA  
Flood Risk Assessment 15 August 2018 Elliot Wood  
Statement of Community Involvement September 2019 Concilio  
Noise Impact Assessment 18 September 2018 Hilson Moran  
Air Quality Assessment 20 September 2018 Hilson Moran  
Existing and Demolition Drawings 21 September 2018 Emrys Architects  
Delivering and Servicing Plan September 2018 Caneparo Associates  
Workplace Travel Plan September 2018 Caneparo Associates  
Transport Assessment September 2018 Caneparo Associates  
Landscape Statement September 2018 Farrer Huxley  
Planning Statement September 2020 Montagu Evans  
Statement of Community Involvement September 2019 Concilio  
Sustainability Statement 20 September 2018 Hilson Moran  
BREEAM Office Pre-Assessment 20 September 2018 Hilson Moran  
Climate Change Risk & Adaptation Strategy 20 September 2018 Hilson Moran  
Desktop Wind Study 20 September 2018 Hilson Moran  
Ecological Appraisal 20 September 2018 Hilson Moran  
Energy Strategy 20 September 2018 Hilson Moran  
Letter 24 September 2018 Montagu Evans  
Heritage, Townscape and Visual Impact Assessment October 2018 Montagu Evans  
Design and Access Statement 16 October 2018 Emrys Architects  
Delivery and Servicing Plan November 2019 Caneparo Associates;  
Transport Assessment November 2019 Caneparo Associates;  
Workplace Travel Plan November 2019 Caneparo Associates  
Planning Statement Addendum November 2019 Montagu Evans  
Landscape Assessment November 2019 Farrer Huxley  
Letter 13 November 2019 Montagu Evans  
Letter 5 March 2020 Montagu Evans  
Daylight, Sunlight and Overshadowing Report 29 July 2020 Point 2 Surveyors  
Design and Access Statement Addendum 29 July 2020 Emrys Architects  
Letter 30 July 2020 Montagu Evans

Landscape Addendum: Urban Greening Factor August 2020 Farrer Huxley  
Heritage, Townscape and Visual Impact Assessment Addendum August  
2020 Montagu Evans

Circular Economy Statement 27 August 2020 Hilson Moran

Materials Efficiency Statement 27 August 2020 Hilson Moran

BREEAM 2018 NC Pre-Assessment Report (offices) 13 October 2020 Hilson  
Moran

BREEAM 2018 NC Pre-Assessment Report (retail) 13 October 2020 Hilson  
Moran

Desktop Wind Study (issue 05) 13 October 2020 Hilson Moran

### **Internal Consultation Comments**

E-mail 07 November 2018 Patrick Hegarty, Open Spaces Department

Memo 21 November 2018 Vimal Varma, Community Facilities Manager

Memo 03 December 2018 Stefanie Hughes, Air Quality Officer

Memo 14 December 2018 Department of Markets and Consumer Protection

### **External Consultation Comments**

E-mail 08 November 2018 Thames Water

E-mail 16 November 2018 Natural England

Letter 22 November 2018 London Underground

Letter 26 November 2018 Historic England

E-mail 27 November 2018 Transport for London

E-mail 30 November 2018 Crossrail Safeguarding

E-mail 23 December 2019 Network Rail

E-mail 24 December 2019 Transport for London

Letter 08 February 2020 BRE

E-mail 12 March 2020 Thames Water

E-mail 13 March 2020 London Underground

Letter 17 March 2020 BRE

E-mail 18 March 2020 Natural England

E-mail 08 September 2020 London Underground

E-mail 18 September 2020 Natural England

Letter 21 September 2020 Historic England

Letter 02 October BRE

## **Public Consultation Comments:**

### **November 2018**

Online 14 November 2018 Dr Stuart Morganstein  
Online 14 November 2018 Dr Stuart Morganstein  
Online 14 November 2018 Mr Patrick Marber  
Letter 18 November 2018 Mollie Bickerstaff  
Online 18 November 2018 Ms Clare Fielding  
Online 19 November 2018 Dr Orlando Figes  
Online 24 November 2018 Mrs Sarah Mann  
Email 25 November 2018 Dr Natasha Curran  
Email 28 November 2018 Mr Fred Rodgers  
Online 28 November 2018 Ms Olivia Forty  
Online 29 November 2018 Dr Marion Ano  
Letter 29 November 2018 Lauderdale Tower House Group  
Online 30 November 2018 Mrs Ann Hodson  
Online 30 November 2018 Mr Kevin Hodson  
Online 30 November 2018 Mr Nigel Bolt  
Online 02 December 2018 Ms Deborah Anness  
Online 03 December 2018 Ms Pauline Fasoli  
Online 03 December 2018 Mr James Torr  
Email 05 December 2018 Seddon House Group  
Letter 06 December 2018 Barbican Association  
Online 06 December 2018 Mrs Susan Cox  
Email 12 December 2018 Joyce Wood  
Online 16 December 2018 Mrs Yukimi Rabnott  
Email 18 December 2019 Mr Fred Rodgers  
Online 02 January 2019 Richard & Jane Wentworth  
Letter 15 January 2019 Mr Fred Rodgers  
Online 16 January 2019 Mr Giordano Suergiu  
Email 31 January 2019 Mr Fred Rodgers  
Online 31 March 2019 Mrs Kirstin Kaszubowska

### **December 2019**

Online 12 December 2019 Mr Keith Greenfield  
Email 13 December 2019 Mr Richard Wentworth

Online 16 December 2019 Mr Patrick Marber  
Online 16 December 2019 Mrs Debra Marber  
Email 21 December 2019 Sir Anthony Holland  
Online 27 December 2019 Dr Patricia Marsden  
Online 29 December 2019 Mrs Sarah Mann  
Email 30 December 2019 Ms Deborah Anness  
Email 30 December 2019 Mr Giordano Suergiu  
Online 30 December 2019 Mr David Lawrence  
Online 01 January 2020 Dr N Deakin  
Online 05 January 2020 Mr Stephen Gocke  
Online 06 January 2020 Mrs Susan Cox  
Online 08 January 2020 Dr Duncan Greig  
Online 10 January 2020 Prof Richard Lynch  
Online 10 January 2020 Mr Roland Jeffery  
Online 11 January 2020 Dr Adrian Tanovic  
Online 17 January 2020 Mr Ian Burton  
Email 20 January 2020 Dr Max Pemberton  
Letter 20 January 2020 Lauderdale Tower House Group  
Online 20 January 2020 Mr John Bryden  
Online 20 January 2020 Ms Judith Brown  
Online 21 January 2020 Baroness Murphy  
Online 21 January 2020 Mr Anthony Richards  
Online 21 January 2020 Mr Richard Stone  
Online 21 January 2020 Mr Oliver Pauley  
Online 21 January 2020 Dr Nicholas Deakin  
Online 22 January 2020 Mrs Lesley Stewart  
Online 24 January 2020 Mrs Ann Hodson  
Online 24 January 2020 Mr Kevin Hodson  
Online 24 January 2020 Mr Graham Wallace

### March 2020

Online 10 March 2020 Mr Patrick Marber  
Online 11 March 2020 Ms Clare Fielding  
Email 13 March 2020 Sam Anker  
Online 13 March 2020 Mr Richard Stone



Online 14 March 2020 Ms Kate Biro  
Letter 23 March 2020 Mr James Torr  
Online 10 April 2020 Mrs Sarah Mann  
Online 02 June 2020 Mr Mark Chester

September 2020

Online 10 September 2020 Mr Richard Stone  
Online 11 September 2020 Mr Michael Callow  
Online 21 September .2020 Ms Tamzin Lawrence  
Letter 07 October 2020 Barbican Association  
Letter 08 October 2020 Mr Fred Rodgers  
Online 11 October 2020 Mrs Olivia Chopin

## **Appendix A**

### **Relevant London Plan Policies**

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

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

Policy 3.19 Support development proposals that increase or enhance the provision of sports and recreation facilities.

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

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

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

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

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

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

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

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

centres.

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

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

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

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

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

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

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

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

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

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

Policy 6.9 Developments should provide secure, integrated and accessible

cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Superhighways and facilitate the central London cycle hire scheme.

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

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

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

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

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

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

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

Policy 7.6 Buildings and structures should:

a be of the highest architectural quality

b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm

c comprise details and materials that complement, not necessarily

replicate, the local architectural character

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

e incorporate best practice in resource management and climate change mitigation and adaptation

f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

g be adaptable to different activities and land uses, particularly at ground level

h meet the principles of inclusive design

i optimise the potential of sites.

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

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

Policy 7.10 Development in World Heritage Sites and their settings, including any buffer zones, should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and Outstanding Universal Value.

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

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

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

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

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

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

**Relevant Intend to publish London Plan policies – 20/00214/FULMAJ & 20/00235/FULL**

- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- Policy S5 Sports and recreation facilities
- Policy E1 Offices
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SL13 Sustainable drainage

- Policy T1 Strategic approach to transport
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Parking
- Policy D1 London's form, character and capacity for growth
- Policy D3 Optimising site capacity through the design-led approach
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries

**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).

**Relevant Draft City Plan 2036 Policies**

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

- HL2 Air quality
- HL3 Noise and light pollution
- HL4 Contaminated land and water quality
- S2 Safe and Secure City
  - SA3 Designing in security
- S3 Housing
  - HS3 Residential environment
- S4 Offices
  - OF1 Office development
- S5 Retailing
  - RE2 Retail links
- S8 Design
  - DE1 Sustainability requirements
  - DE2 New development
  - DE3 Public realm
  - DE5 Terraces and viewing galleries
  - DE6 Shopfronts
  - DE8 Daylight and sunlight
  - DE9 Lighting
- S9 Vehicular transport and servicing
  - VT1 The impacts of development on transport
  - VT2 Freight and servicing
- S10 Active travel and healthy streets
  - AT1 Pedestrian movement
  - AT2 Active travel including cycling
  - AT3 Cycle parking
- S11 Historic environment
  - HE1 Managing change to heritage assets
  - HE2 Ancient monuments and archaeology
- S14 Open spaces and green infrastructure
  - OS2 City greening
  - OS3 Biodiversity
- S15 Climate resilience and flood risk
  - CR1 Overheating and Urban Heat Island effect
  - CR3 Sustainable drainage systems (SuDS)



CR4 Flood protection and flood defences  
S16 Circular economy and waste  
    CE1 Zero Waste City  
S23 Smithfield and Barbican  
S24 Culture Mile Implementation  
    SB1 Culture Mile Impacts  
S27 Planning contributions

### **Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)**

- Air Quality SPD (July 2017);
- Archaeology and Development Guidance SPD (July 2017);
- City Lighting Strategy (October 2018);
- City Transport Strategy (May 2019);
- City Waste Strategy 2013-2020 (January 2014);
- Protected Views SPD (January 2012);
- City of London's Wind Microclimate Guidelines (2019);
- Planning Obligations SPD (July 2014);
- Open Space Strategy (2016);
- Office Use SPD (2015);
- City Public Realm (2016);
- Culture Mile Strategy (2018);
- Cultural Strategy 2018 – 2022 (2018).

### **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.

#### ***CS3 Ensure security from crime/terrorism***

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 Seek 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 Promote high quality environment***

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

***CS12 Conserve or enhance heritage assets***

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

***CS13 Protect/enhance significant views***

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

***CS15 Creation of sustainable development***

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

***CS17 Minimising and managing 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 Minimise flood risk***

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

### ***CS20 Improve retail facilities***

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 Protect and provide 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.

### ***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.

### ***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.

### ***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;

- d) include signage only in appropriate locations and in proportion 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 of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

### ***DM12.1 Change affecting heritage assets***

- 1. To sustain and enhance heritage assets, their settings and significance.
- 2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage

assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

#### ***DM12.4 Archaeology***

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

#### ***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***

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.

#### ***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.

#### ***DM18.3 Flood protection and climate***

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

### ***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.

### ***DM20.2 Retail links***

To encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

### ***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: 18/01020/FULMAJ

1 - 12 Long Lane London EC1A 9HF

**Demolition of existing buildings and structures to basement level and construction of a eight storey office (Class B1) building with basement and lower basement with retail (Class A1/A2/A3) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 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 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.

- 4 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.

- 5 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.

- 6 None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Local Planning Authority which:-
- (i) Accommodate the proposed location of the Crossrail structures including tunnels, shafts and temporary works,
  - (iii) Mitigate the effects of noise and vibration arising from the operation of the Crossrail railway within the tunnels and other structures.
  - (iv) Mitigate the effects on Crossrail, of ground movement arising from development.
- The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required by paragraphs 1(i), 1 (iii) and 1(iv) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied.
- Reason: To ensure that the development does not impact on transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and Land for Industry and Transport Supplementary Planning Guidance 2012.
- 7 None of the development hereby permitted shall be commenced until a method statement has been submitted to, and approved in writing, by the Local Planning Authority to include arrangements to secure that, during any period when concurrent construction is taking place of both the permitted development and of the Crossrail structures and tunnels in or adjacent to the site of the approved development, the construction of the Crossrail structures and tunnels is not impeded.
- Reason: To ensure that the development does not impact on transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and Land for Industry and Transport Supplementary Planning Guidance 2012.
- 8 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces and panels of brickwork to show bond, mortar and pointing;
  - (b) detailed drawings of the proposed new facade(s) including typical details of the stonework, faience, brickwork, fenestration and entrances;

- (c) details of green roofs, green walls and soft landscaping to upper terraces and ground level;
- (d) details of the ground floor entrance(s);
- (e) details of the flank wall(s) of the proposed new building;
- (f) details of windows and external joinery;
- (h) details of soffits, hand rails and balustrades;
- (i) details of external lighting;
- (j) details of junctions with adjoining premises;
- (k) details of the integration of window cleaning equipment and the garaging thereof, plant, plant enclosures, flues, fire escapes and other excrescences at roof level
- (l) details of plant, plant enclosures and ductwork to serve the Class A use(s);
- (m) details of the access gates to White Hart Court.

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.

- 9 The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:
- provide details on all structures
  - acommodate the location of the existing London Underground structures
  - there should be no opening windows or balconies facing the LU elevation
  - demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land
  - demonstrate that there will at no time be any potential security risk to our railway, property or structures
  - accommodate ground movement arising from the construction thereof
  - mitigate the effects of noise and vibration arising from the adjoining operations within the structures
- The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.
- Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and Land for Industry and Transport Supplementary Planning Guidance 2012.

- 10 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.  
REASON: To prevent pollution of the water environment in accordance with the following policy of 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.
- 11 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.  
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.
- 12 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.  
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 13 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.  
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 14 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 installation on the building.  
REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 15 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 A uses. 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 uses 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.
- 16 No cooking shall take place within any Class A 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. 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.
- 17 (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.

- 18 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.

- 19 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, rainwater pipework, pumps, green roofs, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s from no more than one distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 62m<sup>3</sup>;

(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

- 20 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

- 21 Except as may otherwise be approved in writing by the Local Planning Authority, no development shall be carried out in advance of the building lines as shown on the deposited plans.  
REASON: To ensure compliance with the proposed building lines and site boundaries in accordance with the following policies of the Local Plan: DM16.1, DM16.2.
- 22 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety
- 23 No servicing of the premises shall be carried out between the hours of:  
(i) 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; or  
(ii) 07:00hrs and 09:00hrs, 12:00hrs and 1400hrs, 16:00hrs and 19:00hrs, Mondays to Fridays.  
Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.  
REASON: To manage traffic, avoid congestion and manage the safe and convenient movement of pedestrians and cyclists in the area and to reduce air and noise pollution, in accordance with the following policies of the Local Plan: DM15.7, DM16.1, and DM16.2, DM21.3.
- 24 The terraces hereby permitted shall not be used or accessed between the hours of 21:00 on one day and 08:00 on the following day and not at any time on Saturdays, 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.
- 25 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.
- 26 No live or recorded music that can be heard outside the premises shall be played.  
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.
- 27 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.

- 28 All unbuilt surfaces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 29 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s) shall be submitted to and approved in writing by the local planning authority before any works affected thereby 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.

- 30 Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 31 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.



REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

- 32 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.  
REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. 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.
- 33 No piling or construction of basements using penetrative methods shall take place until it has been demonstrated that there would be no unacceptable risk to below ground utilities infrastructure, details of which shall be approved in writing by the Local Planning Authority in liaison with Thames Water before such works commence and the development shall be carried out in accordance with the approved details.  
REASON: To ensure that below ground utilities infrastructure is protected in accordance with the following policy of the Local Plan: DM2.1.
- 34 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.
- 35 Permanently installed pedal cycle storage shall be provided on the site in accordance with the London Cycling Design Standards and maintained throughout the life of the building sufficient to accommodate a minimum of 130 pedal cycles (120 of which would be long stay. 10 of which would be short stay), 5% of which must be able to accommodate larger adapted pedal cycles). The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist

in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

- 36 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 37 The pass door shown adjacent to or near to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.  
REASON: In order to ensure that people with mobility disabilities are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.
- 38 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, providing final details on how the development hereby approved will adhere to circular economy principles where reasonably possible. The Statement shall be completed in accordance with the Mayor of London's Circular Economy Statement Guidance (Draft) and 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 so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: Draft London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.
- 39 The terraces proposed at the western end of the development at fifth and sixth floor level shall not be accessible other than for the purposes of maintenance or 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.
- 40 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved

survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 41 The A1, A2 and A3 uses within the development site shall be used for shop, financial and professional services and caf?/restaurant purposes as indicated on the ground floor and basement plans hereby approved and for no other purpose of the Schedule to the Town and Country Planning (Use Classes) Order 1987, (including any purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 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 uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.

- 42 Prior to the occupation of the development a lighting strategy shall be submitted to and approved in writing by the Local Planning Authority to demonstrate mitigation of the impact of internal and external lighting on light pollution and residential amenity. The development shall be carried out and maintained in accordance with the details of the approved lighting strategy.

Reason: To ensure that the lighting design of the development does not have an adverse impact in respect of light pollution and residential amenity in accordance with the following policies of the Local Plan: DM10.1, DM.15.7.

- 43 Before any construction works hereby permitted are begun an updated energy strategy comprising a detailed assessment of further measures to improve carbon dioxide emissions savings shall be submitted to and approved in writing by the local planning authority.

REASON: To minimise carbon emissions and provide a sustainable development in accordance with the following policy of the Local Plan: DM15.1, DM15.3. 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.

- 44 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: Site Plan, Drawing nos. 1506-0200-AP-001 PL03, 1506-0200-AP-002 PL06, 1506-0200-AP-003 PL06, 1506-0200-AP-004 PL03, 1506-0200-AP-005 PL03, 1506-0200-

AP-006 PL03, 1506-0200-AP-007 PL03, 1506-0200-AP-008 PL05, 1506-0200-AP-009 PL05, 1506-0200-AP-010 PL05, 1506-0200-AP-011 PL05, 1506-0300-AP-001 PL04, 1506-0300-AP-002 PL04, 1506-0400-AP-001 PL05, 1506-0400-AP-002 PL06, 1506-0400-AP-003 PL06, 1506-0400-AP-004 PL06, 1506-0400-AP-005 PL07, 1506-0400-AP-006 PL07, 1506-0400-AP-007 PL05, 1506-0600-AP-001 PL01, 1506-0600-AP-002 PL01, 1506-0600-AP-003 PL01.

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Core Strategy/ Unitary Development Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

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

- 2 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sq.m

Retail £165 sq.m

Hotel £140 sq.m

All other uses £80 per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

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

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning

permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: [www.planningportal.gov.uk/cil](http://www.planningportal.gov.uk/cil)).

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

- 3 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 4 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 5 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
  - (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
  - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.
  - (c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath,

over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Declaration, alteration and discontinuance of City and Riverside Walkways.

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

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

(i) Carriageway crossovers.

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

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

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

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:

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

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

(g) Use of the premises for public entertainment.

(h) Approvals relating to the storage and collection of wastes.

(i) The detailed layout of public conveniences.

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

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

(l) Methods of odour control.

7 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

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

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

(c) Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the

Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d) Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.

#### Air Quality

(e) Compliance with the Clean Air Act 1993

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

#### Boilers and CHP plant

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

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

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



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

#### Standby Generators

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

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

- 8 Transport for London has indicated its preparedness to provide guidelines in relation to the proposed location of the CrossRail structures and tunnels, ground movement arising from the construction of the running tunnels, and noise and vibration arising from the use of the running tunnels. Applicants are encouraged to discuss the guidelines with the CrossRail Engineer in the course of preparing detailed design and method statements.

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## **Background Papers**

### **Public Consultation Comments:**

#### **November 2018**

Online 14.11.2018 Dr Stuart Morganstein  
Online 14.11.2018 Dr Stuart Morganstein  
Online 14.11.2018 Mr Patrick Marber  
Letter 18.11.2018 Mollie Bickerstaff  
Online 18.11.2018 Ms Clare Fielding  
Online 19.11.2018 Dr Orlando Figes  
Online 24.11.2018 Mrs Sarah Mann  
Email 25.11.2018 Dr Natasha Curran  
Email 28.11.2018 Mr Fred Rodgers  
Online 28.11.2018 Ms Olivia Forty  
Online 29.11.2018 Dr Marion Ano  
Letter 29.11.2018 Lauderdale Tower House Group  
Online 30.11.2018 Mrs Ann Hodson  
Online 30.11.2018 Mr Kevin Hodson  
Online 30.11.2018 Mr Nigel Bolt  
Online 02.12.2018 Ms Deborah Anness  
Online 03.12.2018 Ms Pauline Fasoli  
Online 03.12.2018 Mr James Torr  
Email 05.12.2018 Seddon House Group  
Letter 06.12.2018 Barbican Association  
Online 06.12.2018 Mrs Susan Cox  
Email 12.12.2018 Joyce Wood  
Online 16.12.2018 Mrs Yukimi Rabnott  
Email 18.12.2019 Mr Fred Rodgers  
Online 02.01.2019 Richard & Jane Wentworth  
Letter 15.01.2019 Mr Fred Rodgers  
Online 16.01.2019 Mr Giordano Suergiu  
Email 31.01.2019 Mr Fred Rodgers  
Online 31.03.2019 Mrs Kirstin Kaszubowska

#### **December 2019**

Online 12.12.2019 Mr Keith Greenfield  
Email 13.12.2019 Mr Richard Wentworth  
Online 16.12.2019 Mr Patrick Marber  
Online 16.12.2019 Mrs Debra Marber  
Email 21.12.2019 Sir Anthony Holland  
Online 27.12.2019 Dr Patricia Marsden  
Online 29.12.2019 Mrs Sarah Mann  
Email 30.12.2019 Ms Deborah Anness  
Email 30.12.2019 Mr Giordano Suergiu  
Online 30.12.2019 Mr David Lawrence  
Online 01.01.2020 Dr N Deakin  
Online 05.01.2020 Mr Stephen Gocke  
Online 06.01.2020 Mrs Susan Cox  
Online 08.01.2020 Dr Duncan Greig  
Online 10.01.2020 Prof Richard Lynch  
Online 10.01.2020 Mr Roland Jeffery  
Online 11.01.2020 Dr Adrian Tanovic  
Online 17.01.2020 Mr Ian Burton  
Email 20.01.2020 Dr Max Pemberton  
Letter 20.01.2020 Lauderdale Tower House Group  
Online 20.01.2020 Mr John Bryden  
Online 20.01.2020 Ms Judith Brown

Online 21.01.2020 Baroness Murphy  
Online 21.01.2020 Mr Anthony Richards  
Online 21.01.2020 Mr Richard Stone  
Online 21.01.2020 Mr Oliver Pauley  
Online 21.01.2020 Dr Nicholas Deakin  
Online 22.01.2020 Mrs Lesley Stewart  
Online 24.01.2020 Mrs Ann Hodson  
Online 24.01.2020 Mr Kevin Hodson  
Online 24.01.2020 Mr Graham Wallace

#### March 2020

Online 10.03.2020 Mr Patrick Marber  
Online 11.03.2020 Ms Clare Fielding  
Email 13.03.2020 Sam Anker  
Online 13.03.2020 Mr Richard Stone  
Online 14.03.2020 Ms Kate Biro  
Letter 23.03.2020 Mr James Torr  
Online 10.04.2020 Mrs Sarah Mann  
Online 02.06.2020 Mr Mark Chester

#### September 2020

Online 10.09.2020 Mr Richard Stone  
Online 11.09.2020 Mr Michael Callow  
Online 21.09.2020 Ms Tamzin Lawrence  
Letter 08.10.2020 Mr Fred Rodgers  
Online 11.10.2020 Mrs Olivia Chopin

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Dr Stuart Morganstein

Address: 5 Defoe House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: There has been no assessment of the impact of the proposed building on the light reduction into my Flat at the western end of Defoe House with a view onto Long Lane. There was an assessment for Lauderdale Tower but not Defoe. Before any application is considered the developers should be asked to provide the same information for Defoe House.

I believe that the proposed building is too high and will block the light especially in Winter when the sun is low. The proposed building, by rising 5 floors above the existing building will significantly change the character of that part of Long Lane.

I intend to object to this building in its proposed form.

# Comments for Planning Application 18/01020/FULMAJ

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Case Officer: Bhakti Depala

## Customer Details

Name: Dr Stuart Morganstein

Address: 5 Defoe House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: This proposed building will block the light into my flat on the 4th floor of the Western end of Defoe House. The developers did a light loss assessment for the flats in Lauderdale Tower but not for Defoe house which looks straight down Long Lane. Before any planning application is considered they should prove the same level of light investigations as they have done for the other buildings. We have an unobstructed view which will be seriously blocked by this proposed building which is significantly higher than any other building on Long Lane. At the height proposed it will block out the sunlight especially in the winter when the sun is low.

I will continue to object to this building initially until the developers provide as the minimum, the same level of detail on the impact on the western end of Defoe House as for Lauderdale. I believe that the planning processes should be halted until this has been provided and time given to consider the findings.

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Case Officer: Bhakti Depala

## Customer Details

Name: Mr Patrick Marber

Address: 43 Charterhouse Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment:Has any light survey included the residential properties of 41, 42 and 43 Charterhouse Square which directly face the back of this proposed building?

I have lived here for 22 years and I believe this proposed building will substantially reduce light to our property.

Furthermore, construction noise will be immense. We have been living with major crossrail construction for years. Now the city of london want to allow yet more noise in exactly the same area? I object to this application.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Ms Clare Fielding

Address: 282 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I support this redevelopment, it will greatly improve the street scene along Long Lane and remove the somewhat tired buildings currently on site. It will be of benefit to have the two proposed additional A1/A3 units.



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Dr Orlando Figes

Address: 612 Seddon House London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: There is nothing to recommend this proposal, which is clearly an attempt to profit from the grabbing of extra office space, at the expense of residents' amenities. The design is ugly - especially the bulky 7th-floor eastern end, which is a crude attempt to max out on the office space. The loss of light to surrounding residential properties is of concern - despite the optimistic light survey, which uses measly words to support the proposal. There is no account in it of the loss of view (of the trees on Charterhouse Square) for residents of Lauderdale Tower and Seddon House who would be boxed in completely by surrounding office blocks by this development. Finally, there is the noise of building, which residents have lived with patiently for several years - do we deserve more for an unnecessary development?

**I object to this planning application on the grounds that the proposed new building is too high and offers little improvement to its immediate neighbourhood on Long Lane.**

A further four or five floors over and above the roof level of the existing buildings on this site will significantly change the character of what's left of our historic Ward.

I am glad to see, from the proposed South elevation drawings, that stepped terraces with planting are included in the design. I appreciate that this could contribute favourably to local biodiversity and air quality provided the proposed planting is maintained over time, but regret to see that these terraces only appear at the proposed new high level. The first five floors have no terracing and present no improvement to what is currently a bleak and unappealing street frontage. Adding a few trees to a crowded pavement is better than nothing, but isn't good enough. I should be glad to see the existing buildings changed, but preferably for the better.

The poor air quality in the neighbourhood of West Smithfield is a matter of increasing concern to everyone who lives here, residents, visitors and office workers too. I note the relevant impact assessment in the proposals for this development say it will be "air quality neutral". More can be done. I would like to see more effort in these proposals to help make life in and around Long Lane better for everyone.

[Redacted signature]

*18 November 2018*

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Sarah Mann

Address: 9 Defoe House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: Height & loss of residential amenity

I object to the height of the proposed development. The additional 5 floors are out of scale with the height line of Long Lane north side and will encourage yet higher building. They will detract from the general residential amenity of the City. The cross rail development is observing the height limitation. So should this building.

Every increase in height reduces daylight and sunlight and increases air disturbance at street-level making the area a less desirable place in which to work. The building will block scarce and wonderful views of the evening sky and setting sun which I enjoy from our flat in spring and autumn and reduce our residential amenity by damaging our enjoyment of this area.

The impact at street level of the workers who will occupy the additional 5,123 square metres of space will add to existing heavy overcrowding at street level, at the tube entrance and adjacent bus stop and its sprawling queues reducing the quality of life and inhibiting movement.

St Paul's vista

I object to the building breaching the height limit in the WSCA.

## Sunlight and daylight analysis

I object to the fact that this development will block daylight and sunlight from my flat. I object to the fact that the analysis does not include the impact on my flat and those of my neighbours in the West end of Defoe House whose bedrooms and living rooms look directly onto the site. Sunlight and daylight are valued elements of a good quality living environment and reduce heating costs.

I object to the fact that the analysis does not include the impact of loss of sunlight on the open public space of Beech Gardens (with its well-publicised new planting). This is a popular area to which city workers come to enjoy direct sunlight.

## Loss of privacy

The terraced roofs will overlook our property and their use for recreational purposes is likely to add to noise and disturbance to adjoining flats.

**From:** Natasha Curran  
**To:** [PLN - Comments](#)  
**Subject:** Re: Comments for Planning Application 18/01020/FULMAJ  
**Date:** 25 November 2018 19:02:38

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Just noticed some strange 'auto- corrects". Sorry, it should have read:

This development would follow Crossrail and Barts Square developments, both of which have been very disruptive for City residents in terms of noise, vehicle access and transport disruption. City residents have had a poor experience of Saturday, early morning and evening noise going beyond the permitted hours. The height of the building is considerably taller than those around it. Whilst I welcome the improvement to the aesthetics, it's height is out of keeping with being directly next to a conservation area. If the building is granted permission, I would ask the planning committee to seriously consider the mental health of its residents in preventing Saturday working and to reducing it's height.

Please would you alter.

Thank you,  
Natasha

On Sun, 25 Nov 2018 at 18:59, <[PlnComments@cityoflondon.gov.uk](mailto:PlnComments@cityoflondon.gov.uk)> wrote:

Dr Natasha Curran,

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below.

Comments were submitted at 6:50 PM on 25 Nov 2018 from Dr Natasha Curran.

### Application Summary

**Address:** 1 - 12 Long Lane London EC1A 9HF

**Proposal:** Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

**Case Officer:** Bhakti Depala

[Click for further information](#)

### Customer Details

**Name:** Dr Natasha Curran

**Email:** [REDACTED]

**Address:** [REDACTED]

### Comments Details

**Commenter Type:** Member of the Public

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

**Reasons  
for  
comment:** - Noise  
- Other

**Comments:** This development would follow Crossrail and Barts Square developments, both of which have been very disruptive for City residents in terms of noise, vehicle access and transport disruption. City residents have had a poor experience of Saturday, really morning and evening noise going beyond the permitted hours. The height of the building is considerably taller than those around it. Whilst I welcome the improvement to the aesthetics, it's height is out of keeping with being directly next to a conservation area. If the building is granted permission, I would ask the planning committee to seriously consider the mental health of its residents in preventing Saturday working and to reducing its height.

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Website: <http://www.cityoflondon.gov.uk>

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Ms Olivia Forty

Address: 6 John Trundle Court Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am a neighbour and member of the architectural sector and I am objecting to the development at 1-12 Long Lane, concerning the height of the proposal.

Firstly, the height of the proposal is not in keeping with its surroundings. While buildings on the Moorgate side of the Barbican are much taller, those on the western side are relatively low. This would set a precedent for more tall buildings in the Smithfield area. The new Crossrail building, for example, has a much more human scale (at 6 stories).

Likewise, if this proposal is accepted, the planned second phase of this project on the corner of Long Lane and Aldersgate St would likely be accepted as well. This would introduce a completely different scale to the frontage of Aldersgate Street.

I am opposed to the top 5 stories of the proposal, those which step back. I understand that stepping back is a way to pretend that the top few stories are 'invisible', but I feel that 5 stories doing so is excessive. Although possibly less visible from street level, these top stores will certainly be in plain view from John Trundle Court, Seddon House, Lauderdale Tower and all the other offices and residential buildings mentioned in the daylight report.

Regarding the daylight report, it is stated that flats in John Trundle Court will lose 9% of daylight in winter, which I would argue is substantial, rather than 'negligible'. Again, if precedent is set by this proposal then it will likely encourage taller buildings and this will definitely cause substantial

daylight losses.

Whilst green space on ground level will be a benefit to the area, greenery on the roof is neither accessible to the public, nor beneficial in terms of drainage. 'Biophilia' does not mean invisible or sustainable, and I would argue is a means of 'greenwashing' the proposal.

Reducing the proposal by 4 or 5 stories would, in my opinion, improve the architectural quality of the building and maintain the existing neighbourhood scale.



**From:** Frederick Rodgers  
**To:** [PLN - Comments](#)  
**Subject:** 18/01020/FULMAJ  
**Date:** 28 November 2018 16:42:42

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Attn Bhakti Depala

Dear Ms Depala,

I propose submitting a comment on the above but have been unable to find any eastern elevations - either existing or proposed with the submitted drawings. These are not referred to in the schedule of drawings nor do any appear to have been posted on the portal.

The main view anyone living in the Barbican will have of the proposed development is from the east and it would be interesting to see what that view will be before submitting any comments. Could you please let me know if you will be requiring copies of the existing and proposed eastern elevations.

Also the London Underground consultee comment requires there to be no opening windows or balconies facing its elevation. Presumably the fact that the proposed northern elevation shows a number of widows doesn't conflict with this requirement?

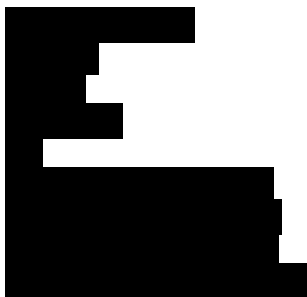
It seems neither TfL nor London Underground appears to have any concern for the safety of passengers using Barbican station during construction of the proposed building which, of course, adjoins the platforms, not merely the tracks. No doubt, if planning permission is granted, there will be conditions covering the safety of underground passengers during both de-construction and construction.

Finally, in view of the much vaunted Culture Mile, an opportunity appears to have been lost for a proper plan to be established for the redevelopment of the application site along with the Barbican station. This could incorporate both desperately needed passenger lifts to both western and eastern platforms as well as a new bridge between the station and Beech Gardens.

I look forward to hearing from you.

Best regards,

Fred Rodgers



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

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Case Officer: Bhakti Depala

## Customer Details

Name: Dr Marion Ano

Address: 63, West Smithfield London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to this planning application on the grounds that the proposed new building is too high for the area.

It will rise above the neighbouring buildings, interfering with views across a conservation area, and blocking morning light that currently falls into the historic area of St Bartholomew the Great, and West Smithfield.

Something of this height and bulk will dominate the conservation area and do serious damage to the skyline and views from West Smithfield, St Bartholomew's, and around the market, taking away the prominence of the market as a visual focal point.

Reducing the height of the proposed building by 4-5 stories would enable the development to go ahead while keeping it in line with the current scale of its environment and not casting a pall over a significant historic area.

# Lauderdale Tower House Group

Richard Tomkins, chair  
Lauderdale Tower House Group  
[REDACTED], Lauderdale Tower  
Barbican  
London EC2Y 8NA

Tel: [REDACTED]

Email: [REDACTED]

29 November 2018

To the City of London planning officer

PLANNING APPLICATION NUMBER 18/01020/FULMAJ – ONE LONG LANE

The Lauderdale Tower House Group is the recognised tenants' association for Lauderdale Tower, a block of 117 flats in the Barbican Estate. Our block is in close proximity to the site of the proposed One Long Lane development.

We wish to object to the planning application on the following grounds:

1. The height of the proposed development would be greatly in excess of the established height line observed by all other buildings in Long Lane. Significantly, these buildings include the OSD (Over Station Development) now under construction above Crossrail's ticket hall in Long Lane, which was granted planning permission for development up to the existing height line only after a protracted planning process involving an appeal to the secretary of state. If One Long Lane were allowed to breach this firmly established height line, a new height line would be set and other property owners in Long Lane would build or extend upwards to take full advantage of it. Long Lane, already deprived of sunlight for much of the day, would become a darkened canyon and there would be negative effects on the Smithfield Conservation Area immediately to the south (which includes the south side of Long Lane) and the Charterhouse Conservation Area immediately to the north. (The north side of Long Lane forms a narrow strip between the boundaries of these two conservation areas.)

We note that the applicants have sought to mitigate the effects of the greatly increased height by terracing the upper storeys of the proposed development. However, all the existing buildings along the north side of Long Lane have already been extended upwards and these upper extensions have themselves been set back from the frontage to mitigate the loss of light. If the new development were permitted, this older mitigation would be lost

and the new mitigation would begin at a higher level. So, regardless of the terracing, Long Lane would be more closed-in than it is now and there would be greater loss of light, especially if or when other property owners in Long Lane followed suit.

We also note that the mitigation would only conceal the uppermost terraces from a point on the pavement immediately in front of the proposed development. The upper storeys would be clearly visible as a new and unattractive intrusion into the skyline from both ends of Long Lane and from many other locations in the neighbourhood and would create overshadowing effects in all directions.

2. As the applicant's planning statement acknowledges, the additional height of the proposed development would intrude into a protected view of St. Paul's. Our understanding is that this introduces a presumption against the grant of planning permission unless an overwhelming case can be made for an exception. While there may be a case for redeveloping the building up to the existing height line, no case has been made as to why One Long Lane should uniquely be allowed to exceed the height limit applying to all other buildings in Long Lane, including the OSD under construction over the Crossrail ticket hall, nor has any case been made as to why the proposed development should be allowed to intrude into a protected view of St Paul's when a building of the same height as the existing one would preserve the protected view.

3. The applicant argues that the loss of sunlight and daylight on Lauderdale Tower flats would not exceed Building Research Establishment guidelines. Whether or not this is the case, we consider that there would be significant and noticeable effects on individual flats and that the cumulative effect of the loss of light and overshadowing on such a large number of residential properties, not just in Lauderdale Tower but in other blocks within the Barbican Estate and on the neighbourhood in all directions, is not justified.

4. The development site occupies a key location on the Culture Mile. We note that the additional retail space created by the proposed development could have a positive effect at street level but we believe this would be heavily outweighed by the excessive and out-of-scale height of the building and that this would not be offset by any claim to architectural merit.

In conclusion, we respectfully suggest that the developers be invited to submit a fresh planning application which respects the protected view of St Paul's and observes the same height line as all other buildings in Long Lane including the OSD under construction above the Crossrail ticket hall.

Kind regards,

RICHARD TOMKINS  
Chair, Lauderdale Tower House Group

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Ann Hodson

Address: 111 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: My main objection is that this building will block the view of St Paul's Cathedral from Alexandra Palace. These views of St Paul's, from various points around the city, are precious and their legal protection should not be discarded in the name of profit. The plan for the Leadenhall Building had to be modified to preserve one of these views.

Secondly, the proposed height will not be in keeping with the neighbouring buildings. It will be an eyesore, dominating Long Lane rather than blending in.

Thirdly, I live in Lauderdale Tower and will be personally affected by such a large building close by.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Kevin Hodson

Address: 111 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am objecting to the proposed building on the basis of its height at 60.6m. At this height it will obstruct the view of St Paul's Cathedral from the viewing telescopes at Alexandra Park. My calculations show that the building's height must be no higher than 49m to maintain the view. The view is a 'Protected View' and is legally enforceable.

Another reason I am objecting is that the proposed building is located on Long Lane which is part of the Culture Mile. The Culture Mile links the new location of the Museum of London with the Barbican Centre with a section along a soon-to-be improved Beech Street. The Culture Mile will support art installations. The proposed building has nothing in common with these plans and will not blend in with them.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Nigel Bolt

Address: 61 John Trundle Court Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to this proposal because at 10 stories it is far too tall. The surrounding properties are a maximum of 6 stories so the new building would tower over them and would be totally inappropriate for the area.

Furthermore, as a resident of John Trundle Court, I am concerned about the inevitable reduction in daylight of such a tall building.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Ms Deborah Anness

Address: 3 Defoe House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I would object to the height of the current proposal - I feel that four floors higher would change the light into our apartment considerably.



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Ms Pauline Fasoli

Address: 62 John Trundle Court Barbican London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am opposed to this planning application on the grounds that it is too high and out of character in this historic area.

The proposed 'step back' the upper floors only means these will be less visible from street level however they will remain in full sight of those living and working in the surrounding buildings.

As a resident of John Trundle Court I am concerned about the impact such a tall structure will have on the light levels.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mr James Torr

Address: 1 Defoe House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment:1. It appears no sunlight assessment has been made of the effect of this proposal on the W end of Defoe House (nor of the same effect on Beech Gardens). This is defective process: the relevant assessments should be put in hand and made public before this proposal is considered by officers - with time given to object to those neighbours impacted beforehand. There is a potential for significant loss of amenity which is material to a proper consideration of the proposal.

2. Breaking above the height of the neighbouring buildings to the extent proposed is also out of keeping with the historic character of the area - in particular Smithfield Market leading towards the new site of the Museum of London and other environs including the adjacent Cloth Fair area to the S and Charterhouse Sq. to the N.

2.1. A mass of the size of this proposal therefore risks significantly compromising the character of the Culture Mile - as does the loss of sunlight to Beech gardens which have equally become a thriving area for culture-in-process fashion photographers and music video makers.

**From:** [JANE SMITH](#)  
**To:** [PLN - Comments](#)  
**Subject:** Comment on application 18/01020/FULMAJ 1-12 Long Lane  
**Date:** 05 December 2018 09:36:39

---

Dear Sirs

1-12 Long Lane 18/01020/FULMAJ

I write on behalf of Seddon House Group, the recognised tenants association for the residents of Seddon House, on the west side of the Barbican Estate to object to the above application.

Our objection is not to the redevelopment itself but to its height and some of its features. We note:

1. that at its highest point this building rises well above the prevailing building line. Long Lane is a narrow street of buildings of varying ages but of generally quite small scale that do not rise very high. Even the Crossrail above-site development is lower than the proposed height of this development, and one of the considerations when that application was considered was its height in relation to the surrounding buildings.

\*that it intrudes onto a St Paul's site line. This contravenes the London View Management Framework supplementary guidance policies. The applicant argues that this doesn't matter because 200 Aldersgate Street has already breached the designated view corridor height. But this is to ignore why protective policies are in place. One breach should not justify another – if it does, the policy is on its way to being completely ignored, and the cumulative effect of accepting this sort of argument is that the designated view gets ever more obscured.

\*that it will have an adverse effect on daylight to Barbican flats, including some on the west side of Seddon House. The developer says this effect will be small – and we request City officers to check and confirm that.

However, the criterion for taking a reduction in daylight seriously (not to reduce by more than 20%) ignores the fact that buildings in Aldersgate Street have steadily been getting taller, and these flats have already had their light reduced within the past 10-20 years by other buildings. The logical result of allowing taller and taller buildings, each of which removes less than 20% of a flat's light, is that by the end the flat has no daylight at all. This is similar to the cumulative effect of encroaching on the St Paul's views. The Planning committee must surely take that into account. See Local Plan policy D21.3(5).

\*The proposed building includes terraces. Terraces are increasingly popular but they are also a source of great noise nuisance to their neighbours. If this building gets permission we would ask for conditions that suitable restrict the use of the terraces – for example, that they should not be used before 9 am and after 8pm during weekdays and not at all at weekends, and that no amplified or unamplified music should be allowed. This is to preserve residential amenity (Policy D23.1).

Yours faithfully

Jane Smith  
Chair, Seddon House Group



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Susan Cox

Address: 343 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I object to these plans on the grounds of:

Height - the building is not in keeping with the historic character of the area and rises well above the established building line in Long Lane. It will be 42.5m high, 40+% higher than the Crossrail OSD and the adjoining properties. Whilst the stepping back of the terraces may make the additional height less visible from street level, they will be in plain view from neighbouring properties and will create overshadowing effects in all directions.

Protected vista - the additional height "would slightly breach the height limit....view 1A.2 from Alexandra Palace". "Slightly" is actually 5.61m! As stated in the LVMF Guidance "a devt that exceeds the threshold height of a Landmark Viewing Corridor should be refused". The argument that the threshold height has already been breached does not justify another breach and an important and significant vista ruined.

The Sun&Daylight Report suggests that the loss of light to the Barbican blocks closest to the devt will be "negligible". However there will be a significant impact on many flats and the cumulative effect is unjustified. The report also failed to include the southern end of Defoe House and Beech Gardens, the latter enjoyed not just by residents but also by the public as a welcome green oasis.

Use of terraces - if planning permission is granted we would ask that conditions restricting the use of the terraces be applied i.e. that no music be allowed and that the use be restricted to 8am -9pm on weekdays only in order to preserve residential amenity.

In summary, I object to the proposed plans as they currently stand as they are out of keeping with the area, they breach an important protected vista and reduce residential amenity for neighbouring

properties. I would therefore request that the height of the devt be reduced, preferably to match the height of the new Crossrail OSD and neighbouring properties and definitely not to obstruct the protected view of St Paul's.

**From:** Joyce Wood  
**To:** [PLN - Comments](#)  
**Subject:** Planning application ref 18/01020/FULMAJ (1-12 Long Lane) - OBJECTION  
**Date:** 12 December 2018 17:15:23

---

[REDACTED]

Dear Ms Depala,

I am writing to object to application 18/01020/FULMAJ for 1-12 Long Lane EC1A 9HF.

In particular, I object to the proposed height of the building, which, at ten stories, seems to exceed by at least twenty percent the heights of all surrounding buildings. Crossrail, a far worthier project, was made to adhere to the existing height line and there is no compelling reason to allow a precedent-setting exception in the case of 1-12 Long Lane. The proposed development would be unjustifiably out of scale with its neighbourhood.

As others have noted, the proposed development would also intrude onto a St. Paul's Cathedral sight line, in contravention of the London View Management Framework supplementary guidance policies.

The City of London is currently making great efforts to preserve and enhance the historic character of this area and to maintain an oasis of residential and cultural tranquility within it. The creation of the Culture Mile is one example and the recent designation of the Barbican/Golden Lane Conservation Area is another. The proposed development is surrounded by three Conservation Areas (Barbican/Golden Lane, Smithfield, Charterhouse Square). However, rather than complementing and enhancing the character of its surroundings, the proposed development will have a detrimental effect by dwarfing, clashing with and overwhelming other structures in its immediate neighbourhood.

It will also entail a considerable loss of amenity to residents (including myself). The Barbican and Golden Lane estates were designed with views in mind. Their availability was part of the intended character of the flats in these estates. Sec. 2.2 of the Golden Lane Estate Listed Building Management Guidelines states that, "*The views from ... the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest.*" Likewise, many west-facing Barbican flats on Aldersgate Street (including mine) enjoy rare and far-reaching views of the Old Bailey, historic churches such as St. Bride's Fleet Street and St. Sepulchre-without-Newgate, and the Millennium Wheel. These views will be obstructed or eliminated

entirely by the proposed development.

Additionally, the full-height balcony windows in the Barbican were designed specifically to admit maximum natural light. This light will be diminished, as others have already noted. Thus, in terms of both views and light, the proposed development both undermines the intended character of the Barbican estate *and* reduces the pleasantness of Barbican life.

It appears that light will also be reduced at street level in Long Lane, Aldersgate Street and possibly in Charterhouse. The photo on the front cover of Part 1 of the Heritage, Townscape and Visual Impact Assessment may be misleading both in terms of its northerly angle (which looks toward a more open section of Long Lane) and in its apparent use of the brighter light currently available in Long Lane. More importantly, the photograph addresses only the view from street level whereas sight lines would be blocked from the higher levels occupied by many residents, including myself.

Additionally, the application should, but does not, include a drawing of the east elevation.

On the wireline drawing on page 83 of Part 4 of the Heritage, Townscape and Visual Impact Assessment, it is unclear whether the lines would continue beyond the top of the photograph of the east elevation.

Finally, the application refers to consultations with affected parties. I am directly affected by this proposal but received no notice of any consultation. Again, this contrasts markedly with the Crossrail project, which made conscientious efforts to consult residents and take our concerns into account.

Thank you for the opportunity to comment.

Yours faithfully,

Joyce Wood



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Yukimi Rabnott

Address: 21 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: To the City of London Planning Officer

I am writing to object to the development plans for One Long Lane on the grounds of the proposed height of the new building. Whilst we are not opposed to redevelopment of buildings in the area and welcome the potential for retail and other amenities, the scale of the proposed building is out of proportion compared to the other historic buildings in the immediate area. We fear the proposed height would set an unwelcome precedent for future building developments along the street permanently altering the skyline and changing its character.

We are also residents of one of the lower level flats in Lauderdale Tower and are already closely surrounded by large buildings that affect the amount of light entering our flat. Our only view to the northwest skyline is through the buildings on the proposed site of One Long Lane. The proposed height of the building would completely block this view of the sky to the west & northwest, darkening our flat still further, and leaving us with only one window in our property with any direct view of sky to the north.

Thank you for the opportunity to comment on the proposals.

Yours faithfully

Yukimi Rabnott



**Representing the interests of Barbican Residents**

Helen Kay  
403 Willoughby House  
Barbican  
London EC2Y8BN

The City Planning Officer  
Department of Planning and Transportation  
City of London  
PO Box 270,  
Guildhall  
London EC2P 2EJ

06 December 2018

For the attention of the case officer Bhakti Depala

Re: Objection to Planning Application for Long Lane

I write on behalf of the Barbican Association, a Recognized Tenants' Association representing residents of the Barbican Estate, to object to elements of the application to develop Long Lane on the grounds of residential amenity.

Noise and disturbance:

We have much experience at the east end of the estate from the WeWork terraces of disturbance from exterior terraces. The noise from social events with alcohol and even people speaking on their phones has been so loud that it disturbs residents even with their doors and windows closed.

There are solutions:-

**A planning condition that limits access to the terraces between 8pm and 8am.** As someone at Schrodgers said, there are enough bars in the area for drinking after work, our colleagues do not need to do this in-house when they overlook a residential area.

**A planning condition requiring a plant barrier and gravel around the edges of the terraces.** This seems to be proving effective on the London Wall Place terraces overlooking Fore Street. The row of planters containing hedging, behind an area of gravel, stop people standing at the edge. This is good for safety, noise disturbance and 'greening' the environment.

I know that members will check the complaints logged for disturbance and there are a number from the east end of the estate. There are also the times when people just put up with it and do not complain and as is happening more frequently the times when the 24 hour line is unavailable. I say this as residents have told me they have struggled to get through during the piling stage at 21 Moorfields when loud noise has gone on throughout the night.

Kind regards,

Helen Kay

Chair, BA Planning Committee  
Deputy Chair, BA



**From:** [Depala, Bhakti](#)  
**To:** [Hodgson, Hatice](#)  
**Subject:** RE: 18/01020/FULMAJ  
**Date:** 19 December 2018 11:42:39

---

Thanks – can you please scan print and acknowledge?

Kind regards,

Bhakti

---

**From:** Hodgson, Hatice  
**Sent:** 19 December 2018 08:49  
**To:** Depala, Bhakti <[Bhakti.Depala@cityoflondon.gov.uk](mailto:Bhakti.Depala@cityoflondon.gov.uk)>  
**Subject:** FW: 18/01020/FULMAJ

Hi Bhakti

Please see comments below.

Thanks  
Hatice

---

**From:** Frederick Rodgers <[REDACTED]>  
**Sent:** 18 December 2018 23:35  
**To:** PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
**Subject:** Fwd: 18/01020/FULMAJ

Attention Bhakti Depala,

Dear Ms Depala,

I look forward to receiving a response to my email below as soon as possible. As mentioned, I need the information for my objection.

Whilst writing, I note that proposal 4 of City Corporation's Draft Transport Plan - "Enhance Barbican Highwalks" - proposes exploring the potential to add new public and publicly accessible lifts "where required through the development process". Barbican Station requires a publicly accessible lift so, presumably, this need has been discussed with the developer during pre-application discussions. Perhaps you could confirm this please.

Best regards,

Fred Rodgers

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Begin forwarded message:

**From:** Frederick Rodgers <[REDACTED]>  
**Date:** 28 November 2018 at 16:42:20 GMT  
**To:** [plncomments@cityoflondon.gov.uk](mailto:plncomments@cityoflondon.gov.uk)  
**Subject:** 18/01020/FULMAJ

Attn Bhakti Depala

Dear Ms Depala,

I propose submitting a comment on the above but have been unable to find any eastern elevations - either existing or proposed with the submitted drawings. These are not referred to in the schedule of drawings nor do any appear to have been posted on the portal.

The main view anyone living in the Barbican will have of the proposed development is from the east and it would be interesting to see what that view will be before submitting any comments. Could you please let me know if you will be requiring copies of the existing and proposed eastern elevations.

Also the London Underground consultee comment requires there to be no opening windows or balconies facing its elevation. Presumably the fact that the proposed northern elevation shows a number of windows doesn't conflict with this requirement?

It seems neither TfL nor London Underground appears to have any concern for the safety of passengers using Barbican station during construction of the proposed building which, of course, adjoins the platforms, not merely the tracks. No doubt, if planning permission is granted, there will be conditions covering the safety of underground passengers during both de-construction and construction.

Finally, in view of the much vaunted Culture Mile, an opportunity appears to have been lost for a proper plan to be established for the redevelopment of the application site along with the Barbican station. This could incorporate both desperately needed passenger lifts to both western and eastern platforms as well as a new bridge between the station and Beech Gardens.

I look forward to hearing from you.

Best regards,

Fred Rodgers

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Richard & Jane Wentworth

Address: 43 Charterhouse Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment:As residents of 43 Charterhouse Square, we object to the scale of this proposal.

Following years of disruption from the (now delayed) Crossrail permissions and the ongoing raised levels and increased volumes of the Lindsey Street scheme, we would expect to see very clear sun studies and how the Long Lane proposal will effect all the residential properties on Charterhouse Square.

We strongly object to the Long Lane proposals in their present form

Bhakti Depala  
Development Division  
Department of Planning & Transportation  
City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

15 January 2019

Dear Ms Depala,

Re: 18/01020/FULMAJ – 1-12 Long Lane EC1A 9HF

Demolition of existing buildings and structures to basement level and construction of a 10-storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works (the Application).

I am writing to object to the Application and to request that it be refused.

Apart from an apparent ambiguity in the plans submitted with the Application, including the east elevations which were only lodged last week, my main concerns are:

1. The bulk and height of the proposed development, especially when compared with the existing buildings, and the affect of the same on residents on the south side of both Long Lane and Carthusian Street/Charterhouse Square, as well as the streetscape of the former, in particular.

Whilst the upper floors of the proposed development may be terraced, the depth of the site means terracing will give very little respite to overlooked residents on the south and north, whilst increasing the loss of sunlight for residents on the north.

The additional height of the proposed development will simply leave the northern facing frontage of Long Lane and the southern facing buildings on Carthusian Street/Charterhouse Square with less daylight than the limited amount it will enjoy after completion of the Crossrail Station development.

2. The failure of the proposed development to include a solution to the lack of step-free access at Barbican Underground Station, despite proposal 19 of City Corporation's Draft Transport Strategy intending to "support and champion accessibility improvements to Underground stations".

According to the lodged Location Plan, the applicant owns land fronting Charterhouse Square on the opposite side of the station from the Application site. Whilst the aspirations of Farrer Hurley Associates, the landscape architects are for a plaza to the west (sic) of the Application site extending over the Underground Station to provide an access to it (Landscape Section, page 12) this is conditional on the redevelopment of Aldersgate House. However, the proposed development provides an opportunity now for constructing a bridge, incorporating revenue protection barriers across the Station, with lifts serving the two operational platforms.

3. The ambiguity in the lodged plans, especially the proposed eastern elevation tends to mask the appearance of the proposed development when viewed from the Barbican. Although the proposed development will have a smaller footprint than the existing buildings, due to the widening of the pavement, the proposed elevation shows a much smaller frontage than the existing elevation because of shading to show perspective unlike the treatment in the existing elevation. Whether or not that is deliberate, it is certainly misleading. And, of course, the proposed development is a lot taller than the existing buildings.
4. Whether or not the proposed development is on the Culture Mile, it is doubtful that this area needs any more retail units, cafes or the like. Animation of the streetscape is one thing but more “to let” signs are hardly welcomed or appreciated

In any event, the applicant should be required to provide drawings with the proposed elevations overlapping the existing ones for all four sides. Admittedly, the Design and Access Statement, page 73, shows an overlap of the existing building on the proposed northern elevation but it is difficult to make out a green line compared to a red line and clearer drawings are needed. However, the drawing on page 73 shows the significant affect of the proposed development on the exiting residences on Carthusian Street/Charterhouse Square.

The applicant should also be asked to explain why there are two proposed south street elevations with the lodged documents. The one showing the whole street frontage shows the proposed development in black and white whilst adjoining buildings are coloured, again adding confusion, where not necessary, unless intentional.

Whilst any greening strategy is to be welcomed, the applicant is offering it in order to gain planning permission, something that is quite obvious from the extent of the proposals. A recent tree walk through the City revealed the substantial number of recent developments where the token greening has led to trees being planted and replaced ad nauseum, along with dying and dead vegetation. Planting trees in limited spaces with very little direct sunlight, whether or not to gain planning permission, is foolhardy and the five-year maintenance planning condition is only as good as its time limit.

Green walls, along with other planting are also a problem as both nature and the lack of watering reveals in a very short time. The green walls on Bassetshaw Highwalk are already succumbing to these problems and it would be better for openness and the delivery of what is feasible instead of what impresses in the Department of the Built Environment.

Best regards,

Fred Rodgers





# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Giordano Suergiu

Address: Flat 4 17 Long Lane London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: My name is Giordano Suergiu & I am the owner of Flat 4, 17 Long Lane. I strongly object to the proposed development on the grounds of the height of the building.

My flat is specifically referred to paragraph 7 of the Daylight Report which shows that all windows in my flat face the development & would be towered over by the new floors. The report recognises that all my rooms would experience reductions in sunlight which exceed the BRE guidelines. At present the flat gets sunlight & heat from sunrise to 11:30am, when the sun then moves southward & the flat becomes darker. The new building will deprive the flat of sunlight in the morning & plunge what is already a dark flat into darkness in the afternoon (potentially unhealthy and damaging to my family's mental wellbeing). Economically, it will also have a disastrous effect on the flat's value.

Generally, the new height will be out of proportion with the buildings in the surrounding area (many of them historic) & will only encourage surrounding freeholders to make similar applications, permanently altering the skyline & changing the nature & character of the area.

I would also question whether the surrounding infrastructure is equipped to cope with the increased numbers who will be occupying/travelling to the building. The pavements on are already overcrowded and this is before Crossrail has opened. The narrow pavements at the traffic lights of Long Lane and Aldersgate Street often forces pedestrians to overspill onto the road or cross whilst

traffic is moving, making the crossing very dangerous. Has suitability of infrastructure been assessed by the applicant & the City?

Lastly, Crossrail construction has caused significant disruption on Long Lane for 4+ yrs. Granting permission for another project of this scale will lead to continued misery for residents. Let the freeholder redevelop the existing site but a 9 storey construction, depriving light & views to surrounding buildings, seems excessive & unwarranted.

RE: 18/01020/FULMAJ – 1-12 Long Lane, London EC1A 9HF  
Comments by Kieran Mackay, Transport Planner, Transportation Section,  
Transportation and Public Realm Division, Department of the Built Environment  
City of London Corporation, 25 January 2019

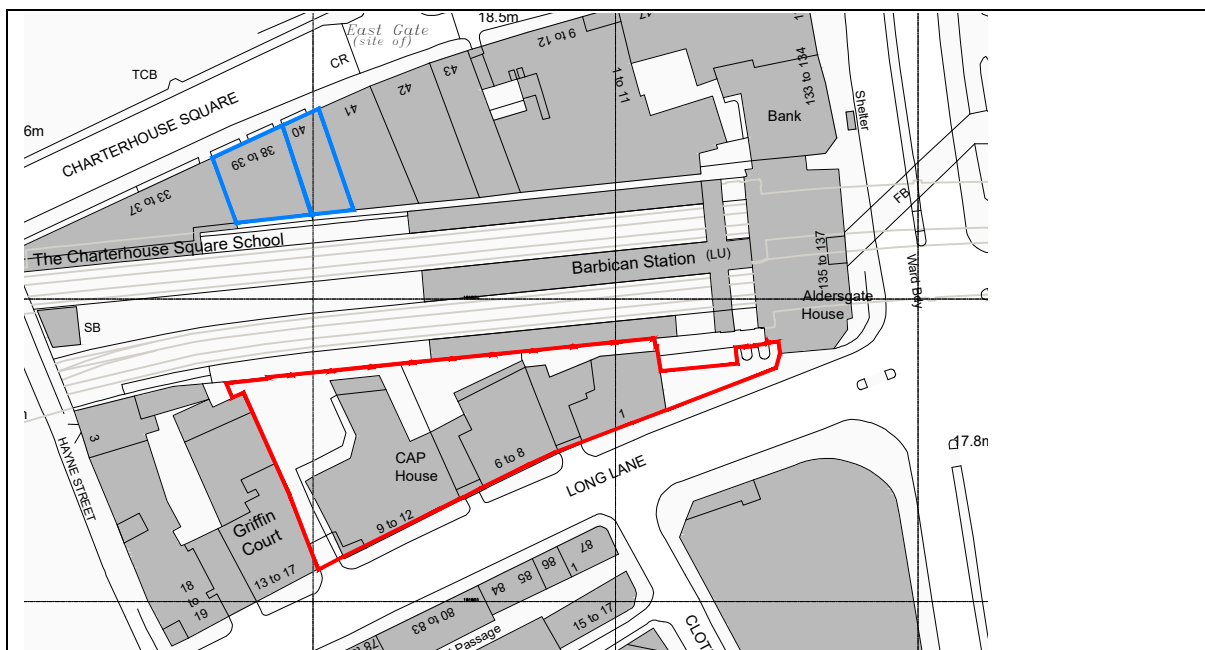
Ignoring the subjective nature of the first paragraph of his comments, I am very disappointed that Mr Mackay appears to have accepted, without question, Transport for London's advice that "achieving a secondary access to Long Lane through the development would do little to overcome the barriers to providing step free access to the station due to existing site constraints". As the result a fantastic opportunity to remedy long-standing equality deficits at an important point on the Culture Mile could be lost for years to come.

As can be seen from my sketch on the following page, a covered pedestrian walkway could be erected above Barbican Underground Station platforms between 1-12 Long Lane and 38-40 Charterhouse Square with access from and egress to 1-12 Long Lane through a TfL revenue protection barrier.

A lift shaft could be installed on the southern part of the west bound platform, where there would be sufficient space for safe access to and egress from the lift along the platform. At the Charterhouse Square side, the covered pedestrian walkway would turn to the west to connect to a lift shaft at the western end of the east bound platform. Safe entry to and access from that lift would also be along the platform.

I appreciate there will be engineering challenges with regard to the installation lift shafts and the proposed structure will itself require planning permission but there would be no "existing site constraints" that would affect my proposal.

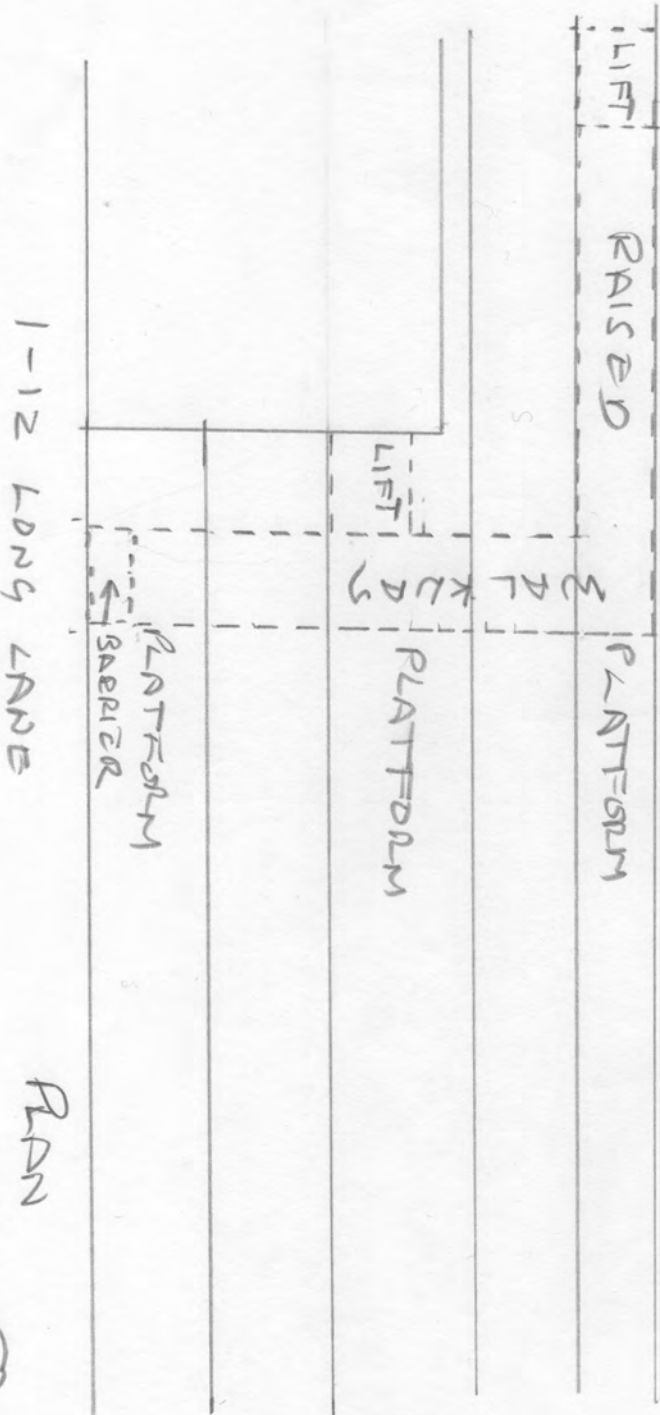
Fred Rodgers – 31 January 2019



PROPOSED STEP-FREE ACCESS TO GANTRICK UNDERGROUND  
 STATION - EAST AND WEST BOUND PLATFORMS FROM 1-12 LONG LANE



SECTION CROSS STATION



PLAN

18/01020/FULMAS

1-12 LONG LANE  
 LONDON EC1A 9HF

© FRED RODGERS 31/01/2019

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works.

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Kirstin Kaszubowska

Address: Second Floor Apartment 43 Charterhouse Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: This proposal will adversely impact the daylight within our property to a significant degree. It will inevitably impact the value of our property and the quality of our life.

I understand from the paperwork that our building (43 Charterhouse) was not considered in the daylight impact survey. Our building is residential. The ground and basement floors are commercial. Our apartment (on the second floor) is a long thin apartment with a large window at the back. This window (which will directly look on to the proposed building) provides us our core daylight across 75% of our property. Specifically our living and kitchen area.

Alongside the Crossrail and multiple other building re-developments in the near vicinity. For the past 10 years, since owning our property. Our apartment has been significantly impacted by noise. This proposal will inevitably impact us with long-term noise pollution as well as permanent loss of daylight.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Keith Greenfield

Address: Flat 8 13-17 Long Lane London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: Dear Planning Officer

We make an emotional plea to you to consider more carefully the application with respect to long standing close neighbors as we are.

The building is not consistent with the street and is completely overbearing on our modest flat. Attempts have been made to mask the height increase from ground level but the detrimental effect is severe on close resident neighbors in like us.

We have already been subject to the major construction process of the new Cross Rail station and other neighboring properties. However this application with its overbearing mass is a clear violation of our right to light and privacy within our home which was bought in the expectation that we would retain these basic human rights.

There are 3 main areas of great concern to us:

1. Reduction in light to our entire property.
2. Increase in wind due to the proximity of a larger building.
3. Introduction of overlooking upon our property.

### 1. Light

you will have seen the daylight study so i wont elaborate on that other than to ask whether anyone should be expected to tolerate a reduction of >47% reduction in light in 4 of our 5 windows! would you yourself be happy about that in your home?

### 2. Wind

As you can see from the north elevation there is a complete lack of setback between properties which means on a windy day the wind is likely to channel off the larger building and straight onto our outdoor balcony which is a highly valuable outside space.

### 3. Privacy

We have enjoyed years of privacy on our inside and outside spaces with zero overlooking. With this new building neighbors will be directly looking into our windows and from their large balcony above looking directly down on our outdoor area.

Our plea is that you consider 2 amendments

1. removal of the top 2 floors of the building in the portion closest to residential Flats 2,8 and 4 at 13-17 Long Lane
2. significant reduction in outside space which is in a position to overlook residential Flats 2,8 and 4.

Thank you

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Patrick Marber

Address: 43 Charterhouse Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I objected to this proposal first time round and I strongly object to this revised version. It remains fundamentally the same; there has been no reduction in its height. It remains a much taller building than the existent one - by two or three storeys.

1. I wish to note that the 'Daylight, Sunlight & Overshadowing Report' is economical with the truth regarding 2nd Floor, 42 Charterhouse Square. I currently rent it as a work space but it was planned and has been formerly used as a residential one bedroom flat with bedroom and sitting room and kitchen. To say otherwise is utter nonsense.

2. The 4 windows I 'own' on 3rd Floor of 42 & 43 Charterhouse Sq (W29, W30/403, W1/403, W1/18) suffering loss of light by 32.02%, 31.44%, 28.3% and 48.12%. The report blithely states that this is 'acceptable' light loss. It is not. It may be legally acceptable but it's not morally.

41-43 Charterhouse Square has been an artist based building since the 1970's. There are painters and creatives and families who have been here for decades. My family + 3 children have lived here since 1996.

If City of London waive this proposal through you'll be diminishing our quality of life and that of many around us. And for what? Another office block. This building only exists to benefit the



developer's pocket. It has zero community or aesthetic value, it doesn't improve the area, it simply darkens the neighbourhood.

Ironically, the building sits within the City of London's much vaunted 'culture mile'. Where's the cultural benefit here? Aside from three more years of noise (yet more post Crossrail) it is simply another anonymous block depriving artists of light.

I'd feel differently were it a community arts centre or gallery or sports facility but it's just more of the same. If CoL lets this building go up then at least do the right thing and reduce its height to the level of the existent building. The noise will be annoying but in 3 years time we will all have the same light we have now.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mrs Debra Marber

Address: Flat 6 42-43 Charterhouse Square LONDON

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: We have lived here since 1996.

We have celebrated the development of this area ,but to build another office block seems folly. We have tolerated Crossrail and its neverending building site of noise and mayhem and are doing so indefinitely it appears.....but to take our light away is selfish and thoughtless. Many artists live in this building but regardless of them needing light for work we need light to live. How can you feel this is justified? You have never spoken to anyone of us who live here but have dismissed this historic building as commercial.

Your light loss report may be acceptable to you but it is not morally acceptable to us, as homeowners who live here and need light as a basic life requirement

**From:** [Richard Wentworth](#)  
**To:** [PLN - Comments](#)  
**Cc:** [Abrant Ltd](#); [Patrick Marber](#)  
**Subject:** Re: Application Consultation (18/01020/FULMAJ)  
**Date:** 13 December 2019 16:03:12

---

I write in connection with **Application Consultation (18/01020/FULMAJ)**

We would like to be advised of every aspect of the rear (North) elevation of this proposal, since it not only will be exposed to public view from the platforms at Barbican below but also will be visible to all occupants on the northern side of the permanent way.

In addition, I would like very precise sun studies concerning the fall of light at all times of year and how they will impinge upon the south facing premises at Charterhouse Square.

Many thanks,

Richard Wentworth  


On 9 Dec 2019, at 16:25, [PlnComments@cityoflondon.gov.uk](mailto:PlnComments@cityoflondon.gov.uk) wrote:

Dear Sir/Madam

Please see attached consultation letter for planning application 18/01020/FULMAJ (1 - 12 Long Lane London EC1A 9HF ).

Kind Regards

Planning Administration  
Department of the Built Environment  
City of London

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**From:** [Hegarty, Patrick](#)  
**To:** [PLN - Comments](#)  
**Subject:** PT\_BXD/18/01020/FULMAJ - 1-12 Long Lane  
**Date:** 07 November 2018 18:01:00

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Dear Bhakti,

Thank you for the opportunity to comment on this application.

I welcome the commitment to urban greening in the proposals, notably the roof terrace gardens.

Whilst aspirational, the ground level public realm ideas are to be welcomed. I am slightly concerned that the street tree planting is not feasible without the widening of the footway on Long Lane. Adequate above and below ground space allowance should be made for trees of potential streetscape significance. The trees need to be planted sufficiently far away from the building to allow for the canopy to grow and for maintenance access to the building façade.

Regards

Patrick

Patrick Hegarty

Technical Manager

Open Spaces Department

City of London Corporation

**Tel:** 020 7332 3516

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**Find out more about our Open Spaces by visiting our website:**

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

## **Wells, Janet (Built Environment)**

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**From:** PLN - Comments  
**Subject:** FW: Yr ref: 18/01020/FULMAJ - Case officer Liam Hart

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

From: Ton  
Sent: 21 December 2019 13:28  
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>  
Subject: Yr ref: 18/01020/FULMAJ - Case officer Liam Hart

Dear Sir,  
1-12 Long Lane EC1A 9HF

I live in Lauderdale Tower together with my wife, Lady Holland - flat 262. For what seems an eternity Long Lane has been, until recently, reduced to one lane arising of of the development of Farringdon Station for the never yet ready Elizabeth Line!

We have no objection as such to the proposed development but would beg your Committee to impose a condition not to reduce the two way flow of traffic in Long Lane. I am sure that it makes life a little less easy for the developers but residents in the City do put up with vast amounts of inconvenience through the continuous development that seems now to be a permanent feature of life in the City.

Please acknowledge receipt of this email.

Regards,  
Sir Anthony Holland LLB MPhil MA LLD(Hon)

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Dr Patricia Marsden

Address: 81 Lauderdale Tower London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment:

I object to this application on the grounds that the height of the proposal is not in keeping with its surroundings. This would set a precedent for more tall buildings in the Smithfield area. The new Crossrail building, for example, has been limited to a much more realistic 6 stories.

I am opposed to the top 5 stories of this proposal which will have a significant impact upon daylight in surrounding residential buildings. I agree that reducing the proposal by 5 stories would improve the architectural quality of the building and maintain the existing neighbourhood scale.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mrs Sarah Mann

Address: 9 Defoe House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I am a resident of Defoe House whose flat faces west towards Long Lane.

My objection is based on the proposed height of the building. It exceeds the height of the Crossrail station, exceeds the height line of Long Lane, and - as the light survey shows - would deprive some City residents of unacceptably large amounts of natural light. As building heights increase the environment at street level deteriorates. An already busy and crowded street, which will be an important access route from the Elizabeth Line to the Barbican, will become busier, windier and less pleasant. Every increase in height of a building paves the way for yet taller and more damaging buildings in the future. This cannot be in the interest of the City or its workers and visitors.

The proposal would - for no justifiable reason - breach the protected sight lines to St Paul's by 5.61m.

For these reasons I object to the application.



## Wells, Janet (Built Environment)

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**From:** PLN - Comments  
**Subject:** FW: Application Consultation (18/01020/FULMAJ)

**From:** Deborah Anness  
**Sent:** 30 December 2019 10:20  
**To:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Cc:** Sarah Mann  
**Subject:** Application Consultation (18/01020/FULMAJ)

Please refer to my previous comments on the application re the height of the proposed building, I considered the previous building to be too tall for the space and my feelings have not changed. The proposal to rebuild on the site is not the problem, but now the height seems to be even higher, I am attaching a photograph of my current view. Our flat is on the third floor and while it is not especially beautiful we have a good amount of light and sky. People above us can see the Post Office Tower and other London landmarks. It will literally be a sore thumb whilst also stealing much of our natural light.



Sincerely Deborah Anness

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr David Lawrence

Address: 181 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I object to the development of the terrace spaces within this development unless there are clear constraints on potential noise emanating from these terraces. Noise travels very easily from rooftop terraces, and exposed spaces, to surrounding buildings, as evidenced by the historic complaints about noise from the underground station and complaints about activity on exposed terraces such as Smiths of Smithfields (complaints made to Islington council). Given the proximity of this building to residential accommodation it would be appropriate that similar conditions are applied to this building as were applied to 160 Aldersgate regarding the timing and the extent of activity permitted on these terraces.

In addition there should be restrictions on the access space to the terraces to ensure that a double door system is used to prevent the escape of any internal sounds to the exterior. Whilst I believe this is now recognised good practice where internal noise levels are high I am uncertain as to whether this is enforced in this instance.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Dr N DEAKIN

Address: 372 Lauderdale Tower Barbican LONDON

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: This development is too high for the site given the special location at the intersection of conservation areas and the listed Barbican Estate. It will overshadow Charterhouse Square.

This said, the building itself is an improvement on current buildings and thus I would support the development were it a storey or two shorter in stature.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Stephen Gocke

Address: 504 Seddon House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: My concern is reduction of light. With each development near to the Barbican eg 160 Aldersgate St, we are told light reduction will be minimal (here the reality is greater than claimed by developer) but the cumulative effect of light loss by each development near Seddon House is not taken into account. Why is this? The effect of light on Seddon House should be based on levels before any major developments have taken place nearby.

This application will see light levels presently enjoyed by Seddon House being further chipped away. Then the next application will do the same. The planners should consider the cumulative effect and prevent any further erosion.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mrs Susan Cox

Address: 343 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I object to these revised proposals.

Whilst I welcome the restoration of the protected vista of St Pauls and the 12% reduction in the mass of the building, the revised design still represents a substantial overdevelopment of the space with an increase in total floorspace of a hefty 72%. The proposed building will clearly be at odds not only with the historic character of the area but also and more significantly with the height-line of the other buildings in Long Lane. As such it will set an unwelcome precedent for other potential developments in the area. Even with the minor height reduction, the proposed development will still be c6m higher than the Farringdon OSD and will continue to overshadow both its neighbouring properties, thereby still causing significant and unacceptable levels of daylight/sunlight reduction, and the Smithfield conservation area.

Pavement congestion in an already narrow lane with traffic flow in both directions and in an area poised for significant growth with Crossrail is an additional concern.

The plans also appear to be completely at odds with the current Local Plan which, together with the Culture Mile, seeks mixed use developments with particular focus on SMEs.

The potential for noise pollution from the open terraces is another issue and we would therefore ask that conditions restricting the use of the terraces be applied i.e. that no music be allowed and that the use be restricted to 8am -9pm on weekdays only in order to preserve residential amenity.

In summary, I object to the revised plans and would request that the height of the development be further reduced, preferably to match the height of the new Crossrail OSD and neighbouring properties, in order to prevent unacceptable levels of overshadowing in what is an increasingly important cultural and historical conservation area.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Dr Duncan Greig

Address: 214 Bunyan Court London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment: The proposed building is too tall. It doesn't fit its surroundings, it will block light for residents and public podium users in the northwest part of the Barbican, it impinges on the view of the three iconic Barbican towers from the platform at Barbican station, and it will increase crowding on the narrow pavement beside Long Lane, which is already facing increased pedestrian traffic due to the new Elizabeth Line station exit.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Professor Richard Lynch

Address: 114 Thomas More House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment: I am writing to object to this proposal for two reasons.

First, its overall height will deliver a building that is over-dominant in relation to the heritage buildings and street scene in the area: arguably, this massive proposed building is a planning nightmare.

Second, the resulting increased size of the proposed building will generate significantly extra crowded pedestrian and vehicle traffic than can reasonably be accommodated on Long Lane: this is a particular concern given the extra activity that will already be generated as soon as the Elizabeth Line building opens - virtually next to the proposed development.

For the record, I would have no objection if a significantly smaller building was proposed as a revision to this proposal.



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Roland Jeffery

Address: 209 Crescent House London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I consider the proposed development is too tall by three floors. It is double the height of the present buildings on this site and will have an overbearing impact on the small buildings on the S side of Long Lane, including the GII listed No 74/75 Long lane which date from the 1590s and are two of the very few extant structures in the City that date from pre-Fire times.

The point was raised by Charterhouse that light pollution from the upper floors into Charterhouse Square (which is notably a darker area) will result. Though some modifications are said to have been made light pollution of the Square seems likely.

The images offered to assess the scheme's impact in Charterhouse Square are taken when the plane trees are in full leaf. This is severely limiting, since it does not show the impact during those months when the leaves have fallen.

The 'Community Consultation Strategy' offered in support of the development is based on a sample of 6 responses, which is nugatory. Since the immediate vicinity of the site is densely populated with residential units in all directions, this dismal showing highlights the lack of effective community consultation on the proposal.

The blue coloured, fluted & mottled faience blocks with which it is proposed to detail large areas of the elevations to Long Lane is very attention-seeking and manifests no contextual sympathy

with the close or wider surroundings of the site.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Dr Adrian Tanovic

Address: Shakespeare Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposed buildings are too tall for this historic neighbourhood. The plan shows that -- taking all the roof infrastructure into account -- they will be much taller than any adjacent building, including the newly-completed Elizabeth Line station building.

If built as planned they will severely cut out the light and overlook the ancient precinct of Charterhouse Square.

The design is not bad, but the height should be limited so it is not taller than any of the adjacent buildings.

In addition, the height of this design does not fit with the open and welcoming look planned for the Culture Mile, which attempts to integrate the Barbican, Smithfield Market, and the new Museum of London into one pedestrianised thoroughfare.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Ian Burton

Address: 141 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I object to these proposals. The building is simply too big and high for the neighbourhood, and is disproportionate in scale compared to everything in its immediate surroundings.

With both the Smithfield conservation area and Charterhouse Square nearby, this huge office building will loom large over them, spoiling the character of this part of the City. It seems to make a mockery of having a conservation area in the first place. The new office building above the Farringdon Crossrail station at the end of the street seemed to push what was acceptable to its limit, but this proposal goes even further, with something higher and even more intrusive.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr John Bryden

Address: 331 Lauderdale Tower London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: I cross aldersgate and long lane almost daily with my wife who perforce has to use a trolley for support in walking and is thereby slow

At the present time it is difficult with the volume crossing at the same time and the limited time allowed for pedestrians - we are often not able to fully cross in time.

Furthermore we compete with other pedestrians at the particularly narrow pavement at the North West corner of this junction - and we are not helped by vehicles coming from Long Lane trying to squeeze between the pavement and traffic waiting to turn Southwards out of Long Lane

How much different will it be with the proposed development?

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Ms Judith Brown

Address: 243 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this proposal. The proposed height is inappropriate to the scale of other buildings in Long Lane and the immediate area. It would have a detrimental on light levels in surrounding buildings.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Dr Baroness Elaine Murphy

Address: 382 Lauderdale Tower Barbican LONDON

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Long Lane needs new development and a building more consistent with Crossrail plans and much lower profile could be an improvement. Apart from the projected height, which will obstruct the light into Lauderdale Tower flats, paradoxically will inappropriately illuminate Charterhouse at night. Worse is the precedent this monster would set for other developments in Long Lane and vicinity. It would detract from the environment of the Barbican generally. I oppose this development.

**From:** [Max Pemberton](#)  
**To:** [PLN - Comments](#)  
**Subject:** 18/01020/FULMAJ  
**Date:** 20 January 2020 18:19:29

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Dear Planning Department

Re: Application Reference Number 18/01020/FULMAJ

I wish to register my objection to the proposed plans for the redevelopment of Long Lane. I am a resident of the Barbican and live in Lauderdale Tower. Although my flat looks in a different direction to the proposed development and therefore is not directly affected, I am very concerned about the impact on light that it will have for some of my fellow residents. I also feel that the current plans are too tall in scale for Long Lane and will dominate the street, impacting on its vista and making it feel oppressive and crowded. This would be a particular shame given that it is one of the main ways from the east to accessing Smithfield market which is due to be redeveloped.

I do not object to the development in principle at all - in fact, I should be delighted for the sight to be developed - but 10 stories is simply too high. I would urge the committee to reject the plans and request that revised plans are submitted that is not so high and therefore is more in keeping with the height of the surrounding buildings - ideally no higher than the new Cross Rail station

Thank you

Yours faithfully

Dr Max Pemberton  
372 Lauderdale Tower  
Barnican  
London  
EC2Y 8NA

Dr Max Pemberton  
Columnist, Daily Mail  
Northcliffe House  
2 Derry Street  
London W8 5TT



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Anthony Richards

Address: 62 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: My objection to the proposed development in Long Lane is based on the proposed height of the building, which would be well above the new Crossrail building and totally out of scale and character with the adjacent buildings in Long Lane. It should not be permitted to exceed the height of the Crossrail building. In addition, the proposed (amended) 9 floor height would affect adversely the afternoon and evening daylight for those lower level residential apartments in the Barbican which overlook it.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Richard Stone

Address: 201 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I welcome the proposed demolition and redevelopment of the buildings at 1-12 Long Lane. The existing buildings are old and in need of replacement.

I strongly object to the proposed scale of the redevelopment. I believe that the new structure should be in keeping with the surrounding buildings and, most importantly, it should be in keeping with the listed market buildings in terms of size and scale.

The newly built offices above Farringdon East station should serve as a model - the new development should not be allowed to be any higher than this building - i.e ground floor plus 6 floors above.

A taller structure will impact on our view from Lauderdale Tower and will reduce light for many residents lower down in our building.

The proposal is clearly designed to maximise the revenue potential for the site, but this must not happen at the expense of the physical appearance of a historic area; nor should it be allowed to have a detrimental effect on the outlook of residents.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

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(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Oliver Pauley

Address: 31 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I live on the third floor of Lauderdale Tower, on the side facing Aldersgate Street and Long Lane, and object to the proposed development for the following reasons:

- It will have a significant impact on natural light to our flat. At the proposed height it will also block out the only bit of sky visible on that side. It is significantly higher than the current building and higher than the Crossrail building which was already controversial.
- The proposed terraces are likely to generate noise.
- The proposed building at street level will narrow Long Lane for pedestrians when pedestrian traffic is likely to increase with Crossrail, Culture Mile and ongoing discussions about Beech Street, and when that corner is already constrained for pedestrians.

Oliver Pauley

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Dr NICHOLAS DEAKIN

Address: 372 Lauderdale Tower Barbican

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: My flat does not overlook this proposed development, but I am objecting given the increase in size of these proposals relative to what they replace and given the historic conservation area setting.

I am actually in favour of development BUT this is far too tall and bulky - being completely out of character for the area - and will, given the proposed terraces, be a noise nuisance for local residents, particularly those who overlook these. Very strict planning rules should be enforced for these terraces if use is permitted.

A 72% increase in size is much too tall and height should be limited to the nearby Crossrail development and nearby street scapes. Otherwise we risk a creep of unacceptable noise, light loss and sheer scale peering over the nearby listed buildings and conservation areas.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mrs Lesley Steward

Address: 132 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: The planned building is not in keeping with the area.

- . The building block light from existing buildings.
- . It should be no higher than the present building.
- . It will not be conducive to the Culture Mile.
- . The footprint of the building is too large.

# Lauderdale Tower House Group

Richard Tomkins, chair  
Lauderdale Tower House Group  
Flat 333, Lauderdale Tower  
Barbican  
London EC2Y 8NA

Tel: [REDACTED]

Email: [REDACTED]

20 January 2020

To the City of London planning officer

**PLANNING APPLICATION NUMBER 18/01020/FULMAJ**

## **1-12 LONG LANE**

The Lauderdale Tower House Group is the recognised tenants' association for Lauderdale Tower, a block of 117 flats in the Barbican Estate. Our block is diagonally opposite the site of the proposed development.

We note that the application is for a major commercial development which would replace three existing office buildings in Long Lane with a single, much larger, office complex. The new development would be much taller than the buildings it replaced and also greater in bulk – the total increase in size would be 72 per cent as measured by the increase in floorspace, rising from 5,595 square metres currently to 9,600 square metres proposed. The new development would dominate the eastern section of Long Lane and would have a big impact on its character.

We object to the planning application on the following grounds:

1. Height. The proposed development would be three storeys higher than the topmost extension of the buildings it replaced, and at least three storeys higher than any other building in Long Lane, including the new development over the Crossrail ticket hall. Significantly, the Crossrail development was limited to its existing height after a protracted planning process involving an appeal to the secretary of state. We do not consider that any development in Long Lane should be allowed to exceed the maximum height line established by the new Crossrail development, which itself was highly controversial.

2. Bulk. The upper extensions of the existing buildings are set back from the street but these would be replaced by new floors (the fifth and sixth storeys of the proposed development) which extended all the way out to the street. This would further enclose and darken Long Lane, with detrimental effects on this key axis of the Culture Mile.

3. Scale. As noted above, the new structure would be 72 per larger in floorspace than the three office buildings it replaced. With its excessive height and greatly increased mass, this very large commercial development would dominate this section of Long Lane and would have an overbearing effect on it. It would be out of character with a historic street mainly made up of small businesses.

4. Effect on conservation areas. The site occupies a thin strip of land sandwiched between the Smithfield Conservation Area immediately to the south (which includes the south side of Long Lane) and the Charterhouse Conservation Area immediately to the north. The height, mass and scale of the proposed development would be out of character with these conservation areas and would have a detrimental effect on them.

5. Loss of light. The applicant argues that in many cases the loss of light for other buildings in the neighbourhood, including Lauderdale Tower, would not exceed Building Research Establishment guidelines. Whether or not this is the case, the excessive height of the development would cause very significant loss of light in all directions and we consider that the cumulative effect of the loss of light and overshadowing on such a large number of properties in the vicinity would not be justified.

6. Pavement congestion. The pavements on the corner of Long Lane and Aldersgate Street already suffer from congestion and the problem is about to worsen with the opening of the new Crossrail ticket hall on Long Lane, next door but one to the proposed development. The congestion will become worse still as the Culture Mile develops. There is insufficient pavement capacity to accommodate an office development on this scale and the developer's suggested reconfiguration of Long Lane, even if affordable, would raise objections from other street users.

7. Noise. The applicant proposes that the development should incorporate outdoor terraces for the use of occupants. If used for social events, these terraces would produce unacceptable levels of noise for the occupants of neighbouring residential properties including Lauderdale Tower flats overlooking the proposed development.

(Signed)

RICHARD TOMKINS  
Chair, Lauderdale Tower House Group



# Memo

**To** PLN Comments  
Department of the Built Environment

**Cc** DES-DS-Admin, Vimal Varma, Lee Turner, Craig Stansfield

**From** Vimal Varma  
Community Facilities Manager  
Department of the Built Environment  
**Telephone** 020 7332 4992

**Date** 22 January 2020

**Our Ref** VV/mn/26015/C600

**Your Ref** PT\_LH/18/01020/FULMAJ

**Subject** CONSULTATION: 1 – 12 Long Lane London EC1A 9AF

The waste storage and collection facilities indicated on Drawing No. 1506-0200-AP-002 Rev PL03 and 1506-0200-AP-003 Rev PL03 comply with our requirements. This Division will, therefore, raise no objections to this application.

Should you require any further information regarding this matter, please contact me on extension 4992.

V. VARMA  
Community Facilities Manager

Encl.

FACOK



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mrs Ann Hodson

Address: 111 Lauderdale Tower London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is an ideal opportunity to build a structure of merit that is in keeping with the historic nature of the area. I object to the proposed development because:

1. It is far too high, bulky and will be an eyesore.
2. It will significantly reduce the light available for the neighbouring buildings and streets.
3. I fear that, if this monstrous building is allowed, it will set a precedent for future developments, further destroying the character of the area.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Kevin Hodson

Address: Flat 111 Lauderdale Tower, Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: My principle objection is the height and size of the proposed development and the fact that it is totally out of character with the other buildings on Long Lane.

In my opinion it should be no higher than the recent development at the nearby Crossrail station.

Offices, flats and streets in the area will suffer from a significant loss of light.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 10 storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works  
(RECONSULTATION FOLLOWING REVISED DOCUMENTS RECEIVED)

Case Officer: Liam Hart

## Customer Details

Name: Mr Graham Wallace

Address: 203 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Overall objection to scale of development - totally out of keeping with adjacent conservation areas. Potential noise problem for neighbours from social events on outside terraces. Already big problem with congested pavements often forcing pedestrians on to road. This development together with cross rail opening will make this considerably and dangerously worse. Inevitable loss of light for surrounding buildings and pavements. Why on earth should it be higher than Crossrail development - already too high. In fact I know the answer - commercial greed! But no doubt planning authority will stand above that and have real concern for the environment in its broader sense.

## Wells, Janet (Built Environment)

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**Subject:** FW: Objection to Planning Application 1-12 Long Lane London EC1A 9HF (18/01020/FULMAJ)

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**From:** Giordano Suergiu

**Sent:** 29 December 2019 22:01

**To:** [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk) < >

**Cc:**

**Subject:** Objection to Planning Application 1-12 Long Lane London EC1A 9HF (18/01020/FULMAJ)

Dear Mr Hart,

I objected to the original application (16 Jan 2019) and continue to strongly oppose the revised proposal which remains fundamentally the same. I restate my original objections and would add the following:

1. LIGHT: The small reduction in height proposed in the revised application would still cause a huge loss of light to all the windows in my flat both in terms of VSC and NSL to levels deemed unacceptable in accordance with BRE guidelines:

VSC

Both bedrooms - 66% loss of VSC to 11.72

Kitchen - 62% loss of VSC to 13.36

Living Room - 55% and 44% loss of VSC to 15.81 and 19.67

Bedroom - 66% loss to VSC to 11.72;

NSL

Bedroom - 70% loss

Bedroom - 63% loss

Kitchen - 54% loss

Living Room - 13% loss

Despite the slight improvement from the original proposal these reductions are huge. In real terms, it would mean the flat being in permanent darkness and having to have the lights on 24 hours a day. The BRE independent report on the original proposal specifically referred to the original losses counting as a MAJOR ADVERSE EFFECT and named my flat (flat 4) as the worst affected. The improvements from the new proposals are negligible and there is no reason to suspect that BRE would come to a different conclusion.

Point 2's application of the London Plan and the mirror image test to justify a departure from the BRE guidelines is also questionable. The residential typologies used as comparisons are quite frankly NOT comparable. The residential streets of Middle Street, East Street and Newbury Street are nothing like the proposed layout of the development and its relationship to nearby buildings. Furthermore, Policy 7.6bd of the London Plan, which Point 2 quote and use to justify their departure from BRE Guidelines specifically states: "*Decision makers should recognise that fully optimising HOUSING POTENTIAL on large sites may necessitate standards which depart from those presently experienced.*" There is no element of housing in the planning application of 1-12 Long Lane so how can a policy which specifically recognises that BRE

standards can be departed from when trying to optimise housing potential be used to justify the erection of a purely commercial development with zero housing?!?! This is not right - ethically or morally.

The application of the mirror image test also seems misplaced and is selectively used to justify the loss of light as "acceptable". Its application is disingenuous as it does not take into account the additional height of the proposed building - BRE expressly criticise Point 2 on this when they state "for most of the windows the loss of light would still be SIGNIFICANTLY WORSE than the mirror image comparator" as "the proposed development is MUCH TALLER than Griffin Court".

BUT the above are technical points. From a human point of view - how can I, my two year old and my imminent new arrival be expected to live in darkness? And how can point 2 deem this "acceptable"? We are human beings. We need sunlight to live and this would be completely denied to us if the development were to be approved by CoL...which brings me to my second point...

2. LOSS OF AMENITY AND PRIVACY: the 5th floor of the building would face directly into our flat. Every window would be directly opposite office windows (including my bathroom and bedrooms). This would lead to a complete loss of amenity and privacy for my family. It would mean intrusion and observation on two young children on a constant basis. How can this be deemed "acceptable"?

Please, please, please - do not approve the planning application in its current form. As stated by other residents - the development would diminish the quality of life of so many residents in the vicinity and for what? Another office building with zero community, aesthetic or cultural value. If CoL do want to approve the redevelopment of the site, please do the right thing and limit it to the level of the existing building. It would mean further years of disruption and noise but at least it would not negatively impact light and privacy of so many other residents.

Best.

Giordano Suergiu

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 9 storey office building with basement and lower basement (Class B1) with retail (Class A1/A3) at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works. (Re-consultation due to amended plans received)

Case Officer: Liam Hart

## Customer Details

Name: Mr Patrick Marber

Address: 43 Charterhouse Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:OBJECT

I have no expertise but this appears to be a very slightly revised version of the building so many of us objected to a few months ago.

The noise and disruption for all local residents and businesses remains the same. The taking of light is minutely decreased.

But it's still 9 storeys tall and therefore taller than all the other buildings in proximity to it.

Junk the top two or three storeys and it becomes undesirable but tolerable.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 9 storey office building with basement and lower basement (Class B1) with retail (Class A1/A3) at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works. (Re-consultation due to amended plans received)

Case Officer: Liam Hart

## Customer Details

Name: Ms Clare Fielding

Address: 282 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I strongly support the proposals. They continue the renewal and improvement of the area, increasing activity and animation along Long Lane and providing new A1/A3 units, plus a new flexible working space and cafe that I would definitely use when working remotely. The design of the building is very attractive.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 9 storey office building with basement and lower basement (Class B1) with retail (Class A1/A3) at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works. (Re-consultation due to amended plans received)

Case Officer: Liam Hart

## Customer Details

Name: Mr Richard Stone

Address: 201 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I welcome the proposed demolition and redevelopment of the buildings at 1-12 Long Lane. The existing buildings are old and in need of replacement.

I strongly object to the proposed scale of the redevelopment and to the latest revision for a 9-storey building in place of the original 10-storey proposal. I believe that the new structure should be in keeping with the surrounding buildings and, most importantly, it should be in keeping with the listed market buildings in terms of size and scale.

The newly built offices above Farringdon East station should serve as a model - the new development should not be allowed to be any higher than this building - i.e ground floor plus 6 floors above. This should be the absolute maximum height for the proposed Long Lane development.

A taller structure will impact on our view from Lauderdale Tower and will reduce light for many residents lower down in our building.

The proposal is clearly designed to maximise the revenue potential for the site, but this must not happen at the expense of the physical appearance of a historic area; nor should it be allowed to have a detrimental effect on the outlook of residents.



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 9 storey office building with basement and lower basement (Class B1) with retail (Class A1/A3) at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works. (Re-consultation due to amended plans received)

Case Officer: Liam Hart

## Customer Details

Name: Ms Kate Biro

Address: Flat 43, Lauderdale Tower Barbican LONDON

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The height and bulk of the proposals are completely unsuitable for the location, dwarfing not only the immediately surrounding buildings but also the brand new development above Crossrail.

A building of this scale will blight this corner, cause unacceptable loss of light and sunlight to surrounding residences and compromise the setting of the listed market buildings adjacent.

**From:** [Sam Anker](#)  
**To:** [Hart, Liam](#); [PLN - Comments](#)  
**Subject:** Planning Complaint 1-12 Long Lane  
**Date:** 13 March 2020 16:36:18

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Dear Liam,

I am writing to strongly object to the proposed planning application for **1-12 Long Lane EC1A 9HF** that you recently posted through my letterbox at 5 Middle Street.

As you probably already know, there are ongoing intense building works at 6 Middle Street next door which is highly disruptive and the builders have often breached working hours (starting too early and also working on Sunday's). This makes living here very difficult, especially considering how high the council tax is.

Having more demolition and construction work done essentially across the road is unthinkable and would cause great of distress to my neighbours and I. I would like to ask you to reconsider this planning application by rejecting in order to try to bring some semblance of peace to the community.

I am happy for this objection to be made public.

Sincerely,

Sam Anker

5D Middle Street  
EC1A 7JA

**Objection: 18/01020/FULMAJ/1 - 12 Long Lane London EC1A 9HF**

**Submitted by: James Torr, 1 Defoe House, Barbican, London EC2Y 8DN (neighbour)**

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**A.** The application incorrectly asserts that demolition has already occurred, contrives to juxtapose 140 Aldersgate St with the site, inaccurately calls Long Lane an area of “Modern Office and Commercial Development” and masks the terrace-style buildings on the South side of Long Lane.

**B.** A risk assessment must analyse the site for potential catastrophic collapse of the railway embankment where the mass of the proposed development exceeds that of the present buildings and thereby adds to the cumulative weight of the remaining buildings on the N side of Long Lane.

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**A. In this application’s key Culture Mile document, the developer inaccurately characterises the local area and the impact of this development - Addendum, Built Heritage, Townscape and Visual Impact Assessment - November 2019.**

**1.a. The Introduction gives the wrong impression of the area (p6): -**

“1.40 The Site is situated within Character Area 4 - Modern Office and Commercial Development/1.41 The intended uses of the Proposed Development remain wholly consistent with the prevailing use and character of the townscape in this location; i.e. large scale office development/To Long Lane, the Proposed Development will continue the established datum of the street, with upper storeys set back and heavily planted.”:

**The facts: -**

- **Correctly – at p32 - this document points to “the existing terrace-style buildings on the South side of Long Lane”, opposite the site.**
- **Thus it is misleading – in the introduction at p6 - to characterise “the townscape in this location” as “Modern Office and Commercial Development”.**
- **Grossly out of proportion and out of character with its environment, the proposed development will be entirely at odds with “the established datum of the street”.**
- **Like two of the three buildings presently on the site, the south terrace is mainly in brick.**
- **Alien materials - such as faience – also show Long Lane is the wrong site for this building.**

**1.b. The Visual Assessment Addendum asserts the buildings on site have been demolished (p10): -**

2.1 “... We note that the majority of the buildings on the Site have been demolished since the issue of the consent.”

**The facts: -**

- **None of the buildings on the site has been demolished and no consent has been given.**

**1.c. VIEW 5: LONG LANE, OUTSIDE NO. 53, Existing, Previous Proposed, Proposed and Cumulative, (pp 28-31): -**

- The curve in the street beyond the viewpoint hides the existing terrace-style buildings on the South side of Long Lane (including opposite the site itself). These give the street much of its character and connect it in scale and materials with Smithfield and Cloth Fair.
- The Cumulative View (p 31) is equally deceptive where it gives the incorrect impression that the proposed development is of the same height as the Crossrail Building.
- All these images, not being taken from the middle of the street, give a distorted perspective which exaggerates the relative height of the existing terrace-style buildings on the South side of Long Lane and thereby disguise the disproportionate scale of the proposed development on the North side.
- All these images appear to form a deceptive attempt wrongly to characterise “the townscape in this location” as “Modern Office and Commercial Development” and to hide the existing terrace-style buildings on the South side of Long Lane, or alter their appearance.

**1.d. VIEW 6: LONG LANE, OUTSIDE NO. 76, Existing, Previous Proposed, Proposed and Cumulative, (pp 32-35): -**

- All these images, not being taken from the middle of the street, also give a distorted perspective which exaggerates the relative height of the existing terrace-style buildings on the South side of Long Lane and thereby disguise the disproportionate scale of the proposed development on the North side.

**1.e. VIEW 8: LONG LANE, SOUTHERN CORNER WITH ALDRSGATE STREET, Existing, Previous Proposed, Proposed and Cumulative (pp 40-43): -**

- These images, taken W to E, repeat the artifice of those above taken E to W of using the curve of Long Lane to mask the existing terrace-style buildings on the South side of Long Lane (the first of these, the Frank Harris office, is artfully hidden by a tree in full leaf) - thereby further disguising the disproportionate scale of the proposed development.
- These images contrive to juxtapose the site with 140 Aldersgate St to reiterate the false impression that Long Lane is characterised by “Modern Office and Commercial Development”.

**B. Potential catastrophic collapse of the Railway embankment: -**

1. A risk assessment must analyse the site for potential catastrophic collapse of the Railway embankment where the mass of the proposed development exceeds that of the present buildings and thereby adds to the cumulative weight of the remaining buildings on the N side of Long Lane.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 9 storey office building with basement and lower basement (Class B1) with retail (Class A1/A3) at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works. (Re-consultation due to amended plans received)

Case Officer: Liam Hart

## Customer Details

Name: Mrs Sarah Mann

Address: 9 Defoe House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this development on the grounds that it will reduce the quality of life in the locality. This is because the height is excessive being much higher than other buildings nearby. The development will cast a larger shadow blocking sunlight and warmth in a city with very little sunlight at street level.

It will create more wind and raise dust.

The significantly increased interior space will add to already heavy overcrowding on the pavement. It is already (in normal times) almost impossible to walk freely on the pavement between the Barbican tube and the bus stop in Aldersgate Street.

Our flat is directly opposite the proposed new development which will have an adverse effect on our immediate environment.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a 9 storey office building with basement and lower basement (Class B1) with retail (Class A1/A3) at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works. (Re-consultation due to amended plans received)

Case Officer: Liam Hart

## Customer Details

Name: Mr Mark Chester

Address: 121 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am writing to object in the strongest possible terms to the proposed development at 1-12 Long Lane, EC1A 9HF.

I live in a west-facing, corner flat on the 12th floor of Lauderdale Tower which is diagonally opposite the site of the proposed new building.

My concerns are many and, for once, I would ask the City of London planning department to put the interests of local residents and, in particular, those of Lauderdale Tower and the Barbican in general, above those of commercial profit.

My principal and over-riding concern is the proposed increase in the height of the new building which, at an additional three storeys, will not only severely block and restrict my wonderful views but, because of the excessive and totally unnecessary height of the development, will cause very significant loss of light in all directions and, in particular, would adversely affect all those residents in the west-facing, corner flats of Lauderdale Tower as well as the residents of other nearby buildings.

I see absolutely no reason why this new proposal should exceed the maximum height line established by the new Crossrail ticket hall development lower down Long Lane which, itself, was highly controversial for its excessive bulk and height.

Whilst I also have other concerns, my other primary cause for alarm is the increased level in noise. I understand that the development will incorporate a series of outdoor terraces on the upper floors - directly opposite my flat and on the same level - and that, if used for social events, these terraces would produce unacceptable levels of noise for the occupants of neighbouring residential

properties and, in particular, those of Lauderdale Tower.

I strongly urge you to consider this planning application very seriously indeed and, as I said previously, to consider the highly detrimental and very negative impact this proposed development will have directly on the residents of Lauderdale Tower and the enjoyment of their homes.

Yours sincerely,

Mark Chest

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a eight storey office (Class E) building with basement and lower basement with retail (Class E) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works. (RE-CONSULTATION DUE TO AMENDED PLANS RECEIVED).

Case Officer: Liam Hart

## Customer Details

Name: Mr Richard Stone

Address: 201 Lauderdale Tower London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I strongly object to the proposed scale of the redevelopment and to this latest revision for an 8-storey building following the previous applications for a 9-storey/10-storey building. I believe that the new structure should be in keeping with the surrounding buildings and, most importantly, it should be in keeping with the listed market buildings in terms of size and scale.

The newly built offices above Farringdon Elizabeth Line station should serve as a model - the new development should not be allowed to be any higher than this building - i.e ground floor plus 6 floors above. This should be the absolute maximum height for the proposed Long Lane development. The developer needs to reduce it by one more floor to comply with this height limit.

A taller structure will impact on our view from Lauderdale Tower and will reduce light for many residents lower down in our building.

The proposal is clearly designed to maximise the revenue potential for the site, but this must not happen at the expense of the physical appearance of a historic area; nor should it be allowed to have a detrimental effect on the outlook of residents.



# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a eight storey office (Class E) building with basement and lower basement with retail (Class E) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works. (RE-CONSULTATION DUE TO AMENDED PLANS RECEIVED).

Case Officer: Liam Hart

## Customer Details

Name: Mr Michael Callow

Address: 161 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I write to object to this planning application for the following reasons:

1. The height and bulk of the building are out of keeping with the surrounding streetscape. Whilst the new crossrail building is itself too large for its site, this new building should not exceed that height.
2. The building will decrease sunlight for surrounding flats and the street.
3. I am concerned that use of the outdoor terraces will create noise and nuisance for surrounding flats.
4. Based on my experience of recent office development in the area, it is likely that the internal lighting in the premises will disturb residents of surrounding flats at night.

Please do reconsider the size and scale of this development.

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a eight storey office (Class E) building with basement and lower basement with retail (Class E) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works. (RE-CONSULTATION DUE TO AMENDED PLANS RECEIVED).

Case Officer: Liam Hart

## Customer Details

Name: Ms TAMZIN LAWRENCE

Address: 2 MIDDLE STREET LONDON

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: There is no denying the existing building is an eyesore, however these plans, now revised for a second time, make no improvement, in fact they would continue to worsen the situation.

1. The additional building height and mass is out of keeping in the area and negatively affects the nearby residential properties.
2. It is immediately surrounded on all sides by conservation areas yet the design thought is completely uninspired with bland materials, "green spaces" that will be filled with dead plants within months and with what will be empty office floors of lights left on 24/7. With inspiration from the market, the church, Charterhouse, the nearby terraced houses etc this could be a building of real quality that would contribute to the area. As neighbours we have been rightly restricted in what we can do to our own properties, and yet a new (unnecessarily large) office building can be constructed with basically no design merit nor consideration of the amenity of its pre-existing neighbours.
3. It will continue to set a dangerous precedent for nearby (empty) office buildings in what should be the new Cultural Mile.

This is an ideal opportunity to build a structure of merit that is in keeping with the historic nature of the area, which would attract support from the hundreds of nearby residents.

The welcome impetus from the City of London in recent years to extend the conservation areas

and the historic framework to protect and enhance what is left of this area will be undone in one oversized blot on the landscape.

100 Breton House  
Barbican  
EC2Y 8PQ

08 October 2020

Liam Hart  
Development Division  
Department of Planning & Transportation City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Dear Mr Hart

**Re: 18/01020/FULMAJ - 1-12 Long Lane EC1A 9HF**

Demolition of existing buildings and structures to basement level and construction of a 10-storey office building with basement and lower basement (Class B1) [10,854sq.m GEA] with retail (Class A1/A3) [842sq.m GEA] at ground and basement level together with ancillary cycle parking, associated servicing, plant, landscaping and other associated works (the Application).

I repeat my previous objections to the Application of 28 November 2018, 18 December 2018 and 15 January 2019.

Whilst the latest proposed amendments to the Application show a reduced massing and bulk, I consider the proposed height is unacceptable. I can't understand why the height isn't being limited to the height of the adjoining buildings, 13-17 Long Lane and the new Crossrail office development.

The Planning and Transportation Committee failed, twice, to reach a decision on the Crossrail office development application (13/00605/FULL) before a successful appeal was lodged by Crossrail. The Inspector's Report, dated 20 January 2016, contains the following:

*Implications of a reduced scheme*

*65. There is no alternative scheme before me. However other options were considered during the evolution of the scheme. Both the Council and SAVE argue for a development that would be of a smaller scale and the equivalent of two storeys lower.*

*66. In reviewing the CABE question mark over the proposed height the appellants found that the loss of a storey would result in the block appearing long and squat. That may be the case but that problem could be overcome. After all the market buildings could also be described as long and squat but are given scale by the vertical articulation and detailing of their facades. Alternatively it could mean reconsidering the option of breaking the mass up into discrete linked blocks as suggested by the Council and SAVE.*

*67 On the other hand, whilst a lower building would be less overbearing on the East Building it would have significant disadvantages: it would function less effectively as a landmark building; it would fail to provide a strong edge to the Smithfield Conservation Area and to the relatively uninspiring office blocks in Long Lane.*

However, to be fair, there was also a public financial benefit in the Inspector's conclusion:

#### *Conclusion*

*78. The appeal site lies adjacent to areas of considerable heritage value where introducing a new building is both a challenge and an opportunity. The proposal is a distinctive modern building which would successfully reference the new Crossrail station and provide a sensitive transition between the very different settings of Charterhouse Square and Smithfield Market. The important East Building of the Central Market would lose some of its dominance but this loss is plainly outweighed by the benefits to the townscape legibility and economic health of this part of the city.*

The Inspector's comments in paragraph 67 were obviously made without knowledge of the Application but these should be taken into account. City Corporation wanted the Crossrail development to be lower but the Inspector considered the approved height would be a strong "edge" to "the relatively uninspiring office blocks in Long Lane", of which 1-12 is a substantial part.

Not only, would an increase in height of 1-12 Long Lane challenge that "edge", as I understand it, there would be a valid planning reason for the height of the intervening buildings, 13-17 Long Lane to be redeveloped to the same height of a redeveloped 1-12 Long Lane, challenging that "edge" even further. That would be unacceptable but probably inescapable.

To put it bluntly, the existing roof line along the north of Long Lane between Long Lane and Lindsey Street is consistent. Any change to that line would be detrimental to the surrounding area and, in any event, unjustifiable.

There is also the continued problem of the lack of step-free access at Barbican Station, which the Application, were it to be approved, should be required to provide. An email from Tom Parker, Senior Strategic Transportation Officer at City Corporation, to me on 26 June 2019 stated that there will be step-free access for the westbound platform when Crossrail eventually opens.

However, the only approved plans I've seen for this step-access (11/00574/XRAIL) are via Crossrail's former offices at 33-37 Charterhouse Street, which are being incorporated into the Charterhouse School extension (19/00119/FUL). I understand that the owner of 1-12 Long Lane now also owns 33-40 Charterhouse Street.

Incidentally, I understand that part of the case for the change of use from offices to a school was because there was an over-supply of offices in the area. The submitted "Leasehold Office Availability Charterhouse Square and Long Lane" suggests that approving the

Application, if it was then implemented, would add more unnecessary additional office space and, of course, the school extension was approved pre-COVID.

Whilst the draft City Plan 2036 hasn't been approved and, indeed, is now being revised because of COVID, it proposes to include the requirement for any new development to achieve an Urban Greening Factor of, at least, 0.3. The submitted Landscape Report UGF Addendum suggests the proposed development would have a UGF of 0.305 but with no offered margin of error. It also shows a significant decrease from the UGF stated in Part 2 of the submitted Landscape Report - 0.38.

Even then, the proposed greening appears to be self-serving rather than beneficial to biodiversity. Showing images of sterile pelargoniums on Barbican balconies in Part 1 of the submitted Landscape Report don't give one confidence that the planting will benefit biodiversity and choosing native species doesn't necessarily help either. Worse though is the fact that the planting will need constant maintenance, something that will be impossible to enforce by condition.

The submitted Ecological Appraisal states - "The development site has been classified as being of 'low ecological value', with no supporting value within the development site for ecologically significant flora and fauna. There are no habitats or features surrounding the development site that require protection during the construction works". That may well be the case but why is it?

Why are the owners showing virtually no existing commitment to biodiversity but expecting to obtain planning permission by adding a few random trees, climbers and planting, as though enhancing biodiversity was now a lifetime ambition? By the way, whilst I appreciate that the Ecological Appraisal relies on data recorded by others, it's dated September 2018 and hasn't been updated, so the "most recent record" of sightings is from 2017.

Also, the Ecological Appraisal states - "The deciduous woodland in the open space of the Barbican Arts & Conference Centre is located 125 m to the east of the site" and "There are no ponds or waterbodies located within 250 m of the development site identified on standard OS mapping". Not only are the extensive internal lakes of the Barbican Estate and the pond outside Bryer Court within 250 metres of the site, so are the ponds in Barbican Wildlife Garden, Fann Street.

Again, since my previous objections were submitted, there has been the founding of the Architects Declare movement. Also there has been the recent realisation within the Planning and Transportation Committee of the necessity to consider the requirement for new developments to account for the embedded carbon in existing buildings. This must mean the necessity of refurbishing and repurposing, rather than deconstruction and construction.

The applicants have submitted a Circular Economy Statement but this seems to be more about the proposed building, with the only reference to the existing building being that it couldn't be either refurbished or repurposed as it was being demolished. Also that the demolition contractor will only be "targeted to maximise the opportunities for reuse,

upcycling as a priority reuse at a lower quality and recycle to prevent materials from going to landfill”.

For all the reasons stated in my previous objections and above, I ask that planning permission be refused for the Application.

Best regards

Fred Rodgers



## Representing the interests of Barbican Residents

Susan M Cox  
Chair, BA Planning Committee  
343 Lauderdale Tower  
Barbican  
London EC2Y 8NA

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

7th October 2020

**For the attention of Mr Liam Hart, Senior Planning Officer**

**Objection to application: 18/01020/FULMAJ; 1-12 Long Lane**

Dear Mr Hart,

I am writing on behalf of the Barbican Association, a Recognised Tenants 'Association representing residents of the Barbican Estate, to object to the above application on the grounds of 1) its unacceptable height and mass and 2) the consequent loss of residential amenity on the grounds of loss of light, overlooking and noise pollution.

Whilst I welcome the reduction in height and mass of the proposed redevelopment, I remain firmly of the opinion that further reductions are still necessary. Notwithstanding the 12% further diminution in the internal mass of the building, the revised design still represents a substantial overdevelopment of the space with an increase in total floorspace of a hefty 57% compared to the footprint of the existing buildings. Even with the removal of a floor, the revisions provide for an 8-storey office building which would still be higher than the 6-storey Crossrail OSD.

This means that the proposed building will clearly be at odds not only with the historic character of the area but also and more significantly with the height-line of the other buildings in Long Lane. As such it will set an unwelcome precedent for other potential developments in the area, not least as it will still be higher than the Crossrail OSD and will continue to overshadow both neighbouring properties and the historically significant Charterhouse and Smithfield Conservation areas. It also appears to be completely at odds with the current Local Plan which, together with the Culture Mile, seeks mixed use developments with particular focus on SMEs.



I am also concerned at the continued loss of residential amenity, particularly in terms of loss of light, overlooking, loss of privacy and noise and light pollution. Whilst the daylight and sunlight analysis claims that the loss of light percentages for neighbouring properties are now within acceptable limits, I would argue that they still remain at unacceptable levels. What developers deem to be “negligible” losses of light are clearly not the same as what is considered negligible to the property occupants impacted by the overdevelopment of this space.

Whilst again we welcome the developers’ proposals that the landscaped roof at fifth floor level “will not be accessible to occupiers of the office except for maintenance” our concerns over the potential for overlooking, loss of privacy and noise and light pollution have not been eased. Indeed, the accompanying document admits that this area “is level with the top floor of residential accommodation”. These concerns extend also to the sixth and seventh floors given that the developers themselves state that it “*is proposed that the sixth and seventh floor levels would be accessible to occupiers of the building and being higher than the residential have the ability to maintain privacy, once an appropriately located means of enclosure is positioned. It is proposed that the location, details and materials of these means of enclosure is secured by way of condition*”. It appears clear from this statement that the maintenance of privacy for neighbouring properties is only achievable when “an appropriately located means of enclosure is positioned” i.e. one has not yet been identified, which in itself is a worrying issue. Hence our concerns over these important and vital aspects of residential amenity have not been fully addressed. We have also previously asked for conditions restricting the use of any such outside space be applied i.e. that no music be allowed and that the use be restricted to 8am -9pm on weekdays only and would reiterate this request.

I would also like to say that I remain frustrated that the developers did not take the opportunity to discuss and implement plans to use the development to provide step free access to Barbican underground station, particularly since the owner also owns a property in Charterhouse Street. An excellent opportunity to address this long overdue and necessary provision missed. Given that embedded carbon is an increasingly important area for all sectors of the built environment to address as they strive to make buildings more resource efficient, it is also disappointing that there has been no mention of retrofitting rather than deconstruction in this project.

In summary, I object to the revised plans and would request that the height of the development be further reduced, at least to match the height of the new Crossrail OSD and its neighbouring properties, in order to prevent unacceptable levels of overshadowing and loss of residential amenity in what are significant and historic Conservation Areas.

Yours sincerely,

Susan M Cox

Chair, Barbican Association Planning Committee  
For and on behalf of the Barbican Association

# Comments for Planning Application 18/01020/FULMAJ

## Application Summary

Application Number: 18/01020/FULMAJ

Address: 1 - 12 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings and structures to basement level and construction of a eight storey office (Class E) building with basement and lower basement with retail (Class E) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Liam Hart

## Customer Details

Name: Mrs Olivia Chopin

Address: 63 Lauderdale Tower London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

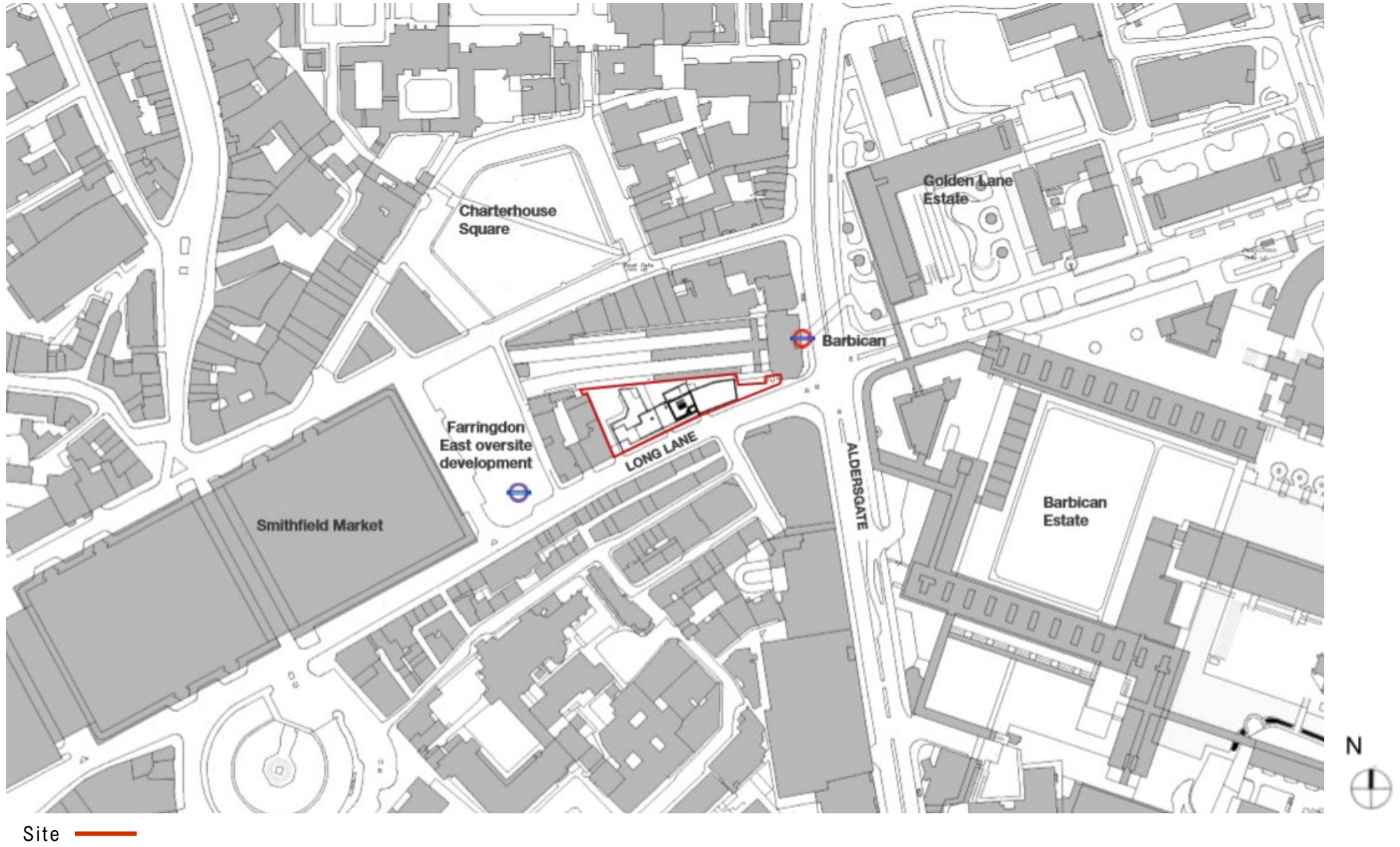
Comment: The height of the building is out of character with Long Lane, and will cause loss of light to residents of Lauderdale Tower and other neighbours.

PLANNING  
&  
TRANSPORTATION  
COMMITTEE

27 October 2020



# One Long Lane



Site location plan

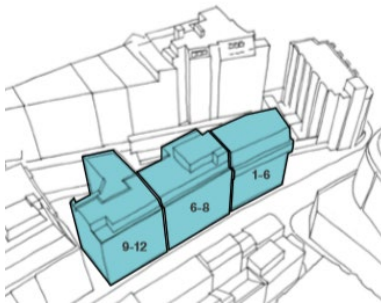
# One Long Lane



Site 

Aerial photo

# One Long Lane



Location Diagram



1-6 Long Lane - View from Aldersgate intersection



6-8 Long Lane



9-12 Long Lane - West View from Long Lane



View from Barbican Station platform

## Existing Buildings

# Existing Plans



Fig 1 | Existing 1-5 Long Lane - Basement



Fig 2 | Existing 1-5 Long Lane - Ground Floor



Fig 3 | Existing 1-5 Long Lane - Floor 1



Fig 4 | Existing 1-5 Long Lane - Floor 2



Fig 5 | Existing 1-5 Long Lane - Floor 3



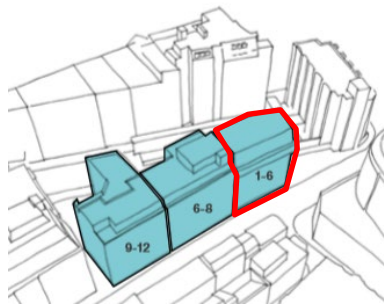
Fig 6 | Existing 1-5 Long Lane - Floor 4



Fig 7 | Existing 1-5 Long Lane - Floor 5



Fig 8 | Existing 1-5 Long Lane - Roof Plan



Location Diagram

## KEY

 Office B1	 Office B1 Core
 Retail/Restaurant A1/A3	 Loading Bay / Parking

1-6 Long Lane

# Existing Plans



Fig 1 | Existing 6-8 Long Lane - Basement



Fig 2 | Existing 6-8 Long Lane - Ground Floor



Fig 3 | Existing 6-8 Long Lane - Floor 1



Fig 4 | Existing 6-8 Long Lane - Floor 2



Fig 5 | Existing 6-8 Long Lane - Floor 3



Fig 6 | Existing 6-8 Long Lane - Floor 4

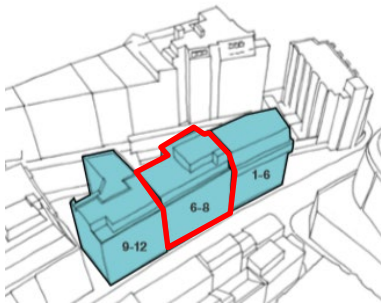


Fig 7 | Existing 6-8 Long Lane - Floor 5



Fig 8 | Existing 6-8 Long Lane - Roof Plan

Page 220



Location Diagram

**KEY**

 Office B1	 Office B1 Core
 Retail/Restaurant A1/A3	 Loading Bay / Parking

## 6-8 Long Lane



# Existing Plans



Fig 1 | Existing 9-12 Long Lane - Basement



Fig 2 | Existing 9-12 Long Lane - Ground Floor

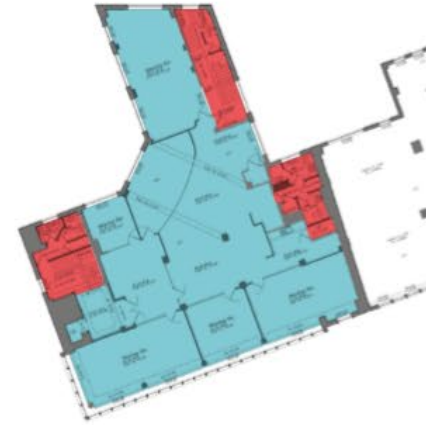


Fig 3 | Existing 9-12 Long Lane - Floor 1



Fig 4 | Existing 9-12 Long Lane - Floor 2



Fig 5 | Existing 9-12 Long Lane - Floor 3



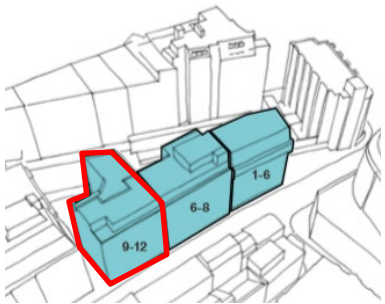
Fig 6 | Existing 9-12 Long Lane - Floor 4



Fig 7 | Existing 9-12 Long Lane - Floor 5



Fig 8 | Existing 9-12 Long Lane - Roof Plan



Location Diagram

## KEY






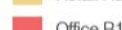

 Office B1	 Office B1 Core
 Retail/Restaurant A1/A3	 Loading Bay / Parking

# 9-12 Long Lane

# Proposed Plans



### KEY

- |   |  |   |
|---|--|---|
|  Office B1               |  Tenant Showers |  Bicycle store (A1 / B1) |
|  Retail/Restaurant A1/A3 |  Loading Bay    |   |
|  Office B1 Core          |  Refuse/Recycle |   |

## Basement Floor

# Proposed Plans

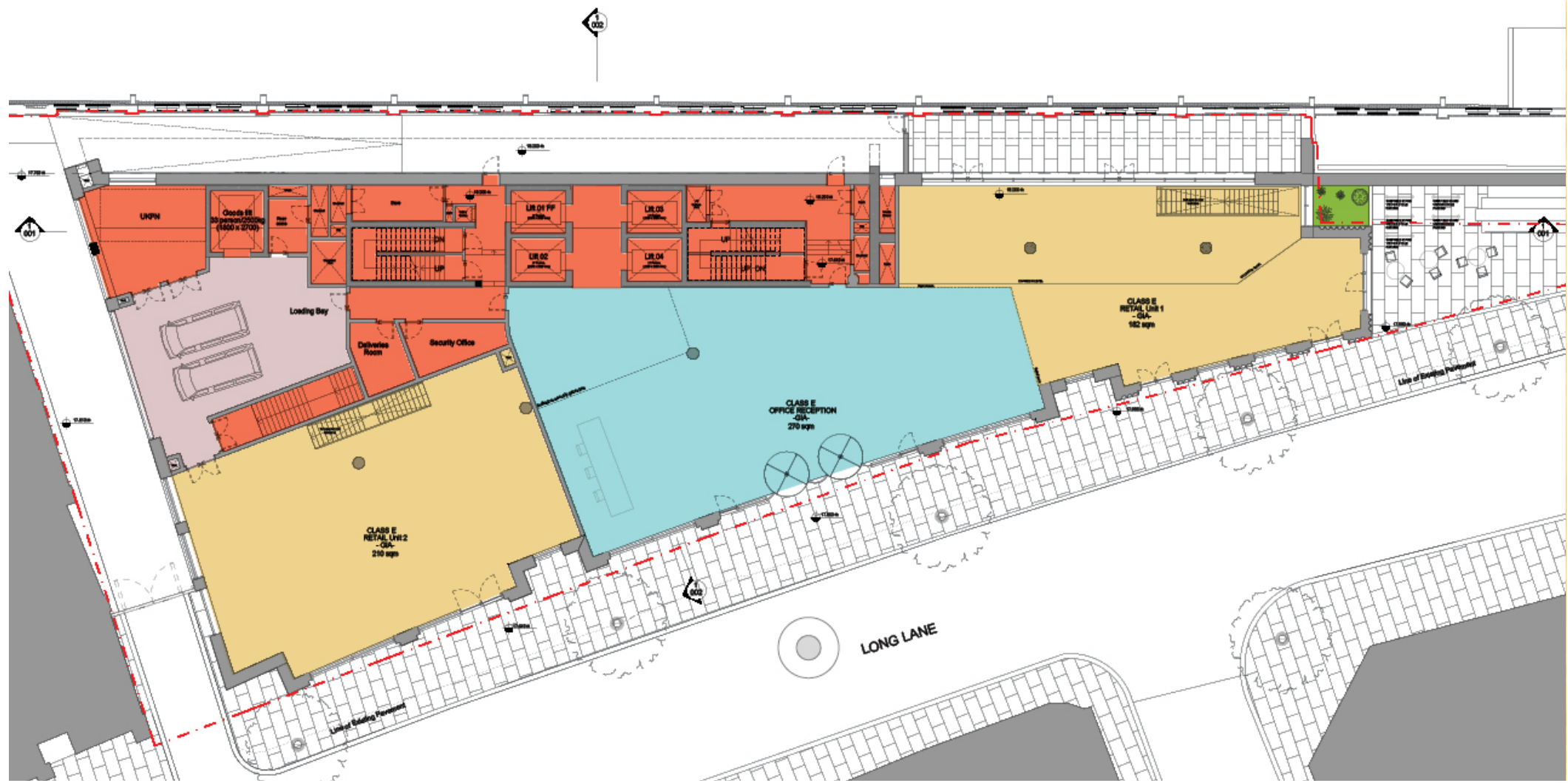


**KEY**

- |   |   |  |
|---|---|--|
| <span style="color: red;">■</span> Office B1                  | <span style="color: lightblue;">■</span> Tenant Showers | <span style="color: brown;">■</span> Bicycle store (A1 / B1) |
| <span style="color: yellow;">■</span> Retail/Restaurant A1/A3 | <span style="color: pink;">■</span> Loading Bay         |  |
| <span style="color: orange;">■</span> Office B1 Core          | <span style="color: lightblue;">■</span> Refuse/Recycle |  |

Lower Ground Floor

# Proposed Plans

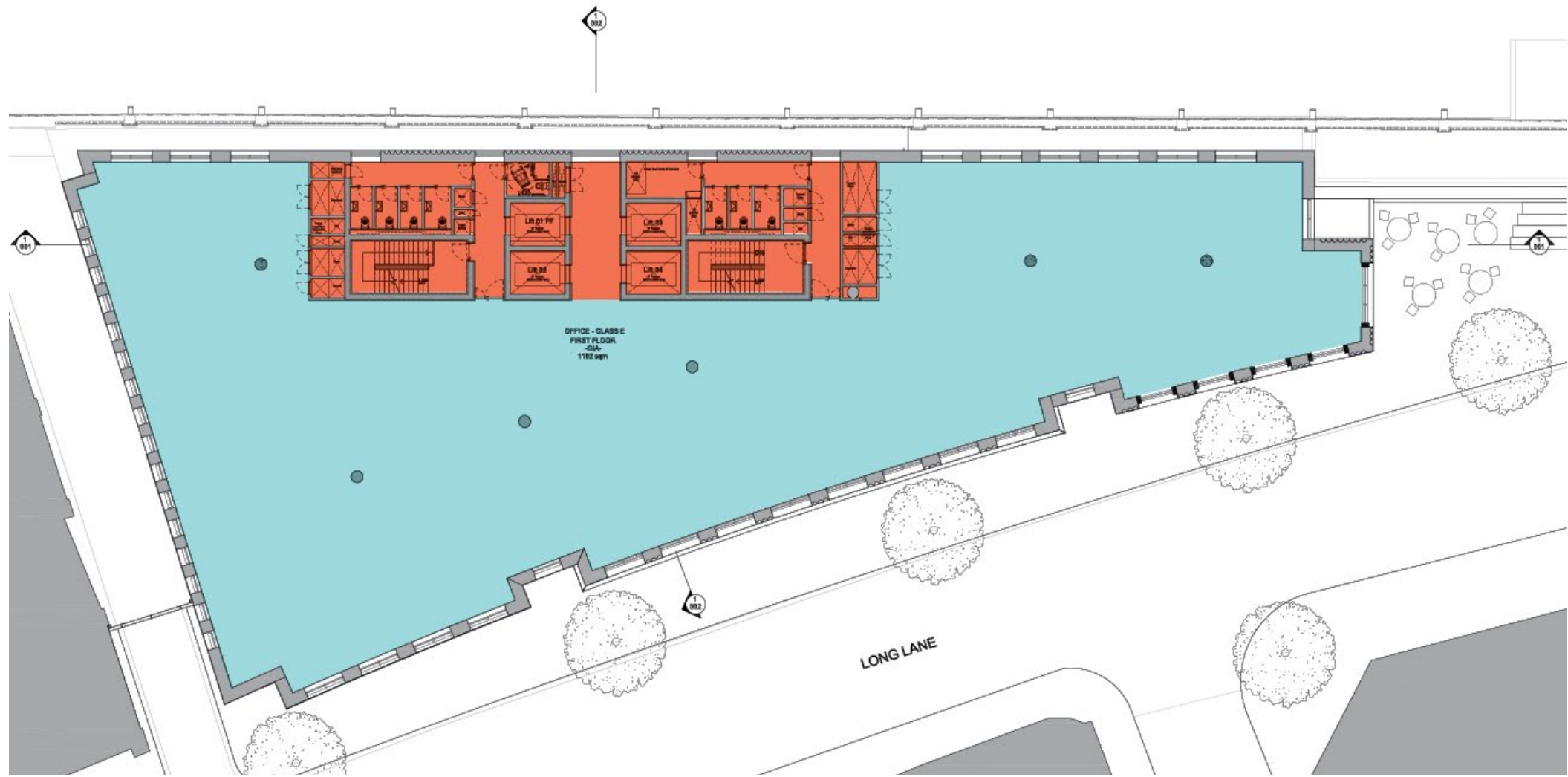


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



- |  |   |  |
|--|---|--|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #ADD8E6; border: 1px solid black; margin-right: 5px;"></span> Office B1               | <span style="display: inline-block; width: 15px; height: 15px; background-color: #4682B4; border: 1px solid black; margin-right: 5px;"></span> Tenant Showers | <span style="display: inline-block; width: 15px; height: 15px; background-color: #8B4513; border: 1px solid black; margin-right: 5px;"></span> Bicycle store (A1 / B1) |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #FFD700; border: 1px solid black; margin-right: 5px;"></span> Retail/Restaurant A1/A3 | <span style="display: inline-block; width: 15px; height: 15px; background-color: #C0C0C0; border: 1px solid black; margin-right: 5px;"></span> Loading Bay    |  |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #FF0000; border: 1px solid black; margin-right: 5px;"></span> Office B1 Core          | <span style="display: inline-block; width: 15px; height: 15px; background-color: #00CED1; border: 1px solid black; margin-right: 5px;"></span> Refuse/Recycle |  |

Ground Floor

# Proposed Plans

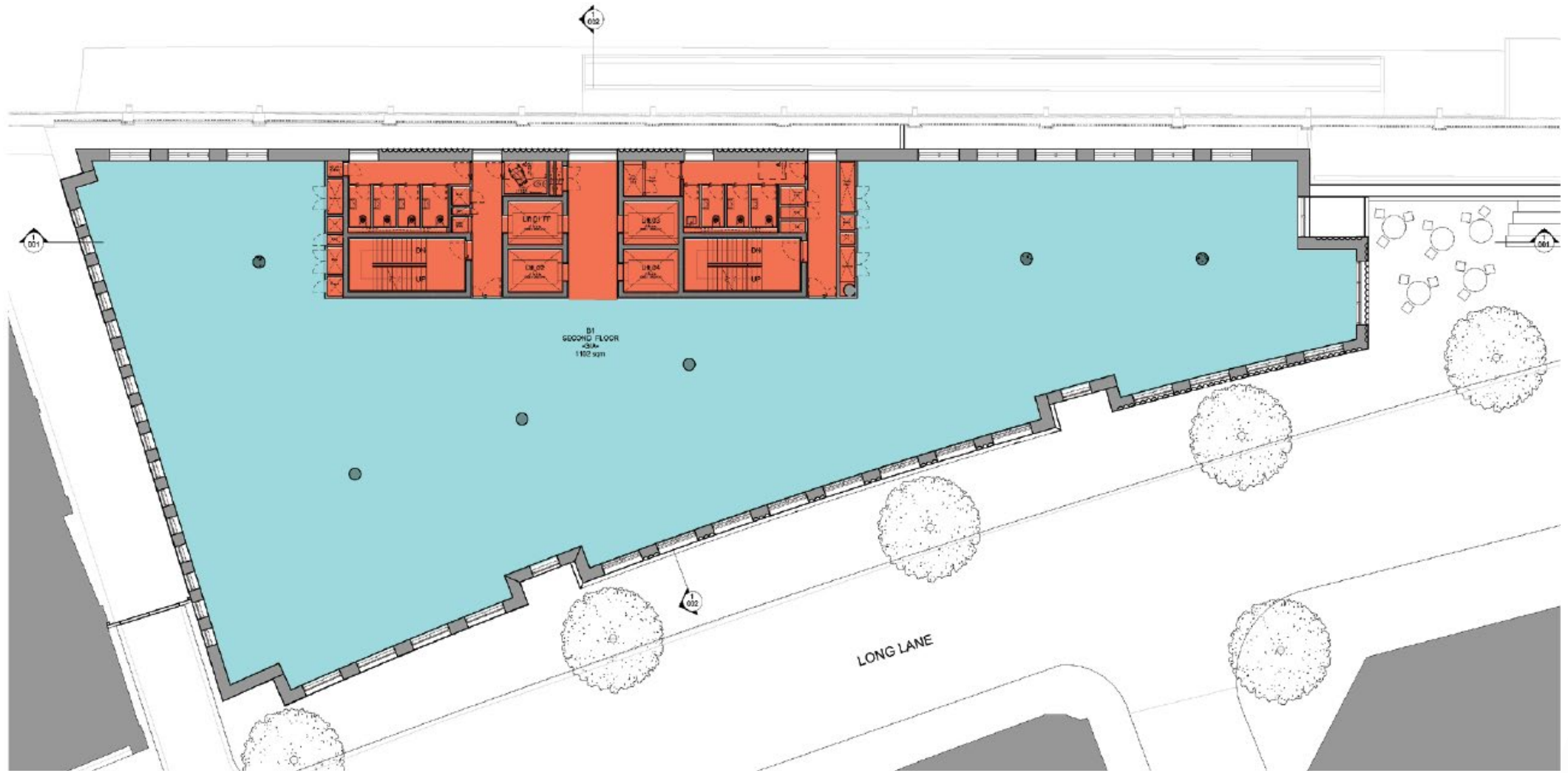


## KEY








- |   |  |   |
|---|--|---|
|  Office B1               |  Tenant Showers |  Bicycle store (A1 / B1) |
|  Retail/Restaurant A1/A3 |  Loading Bay    |   |
|  Office B1 Core          |  Refuse/Recycle |   |

## First Floor

# Proposed Plans

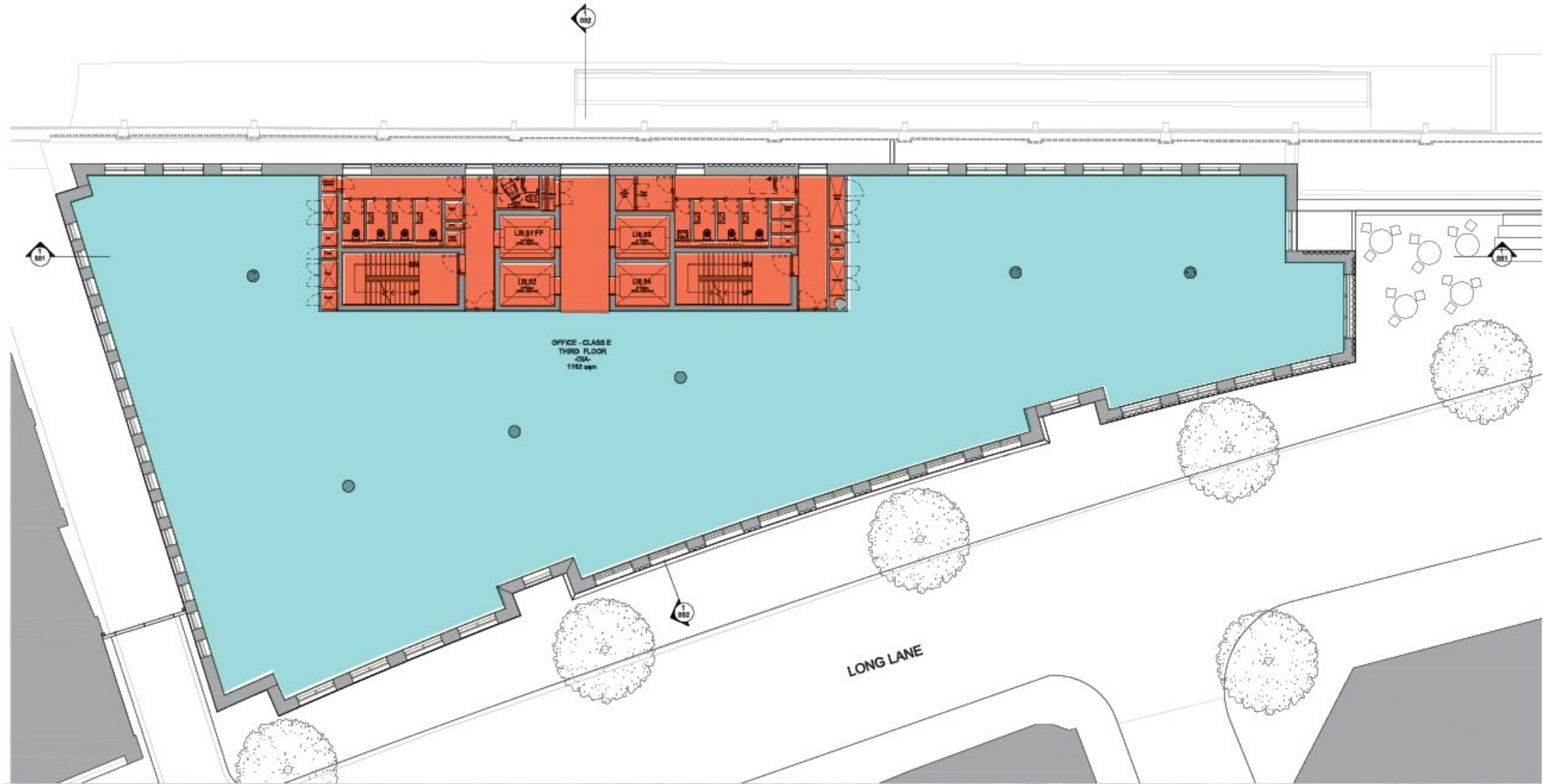


## KEY








- |   |  |   |
|---|--|---|
|  Office B1               |  Tenant Showers |  Bicycle store (A1 / B1) |
|  Retail/Restaurant A1/A3 |  Loading Bay    |   |
|  Office B1 Core          |  Refuse/Recycle |   |

## Second Floor

# Proposed Plans

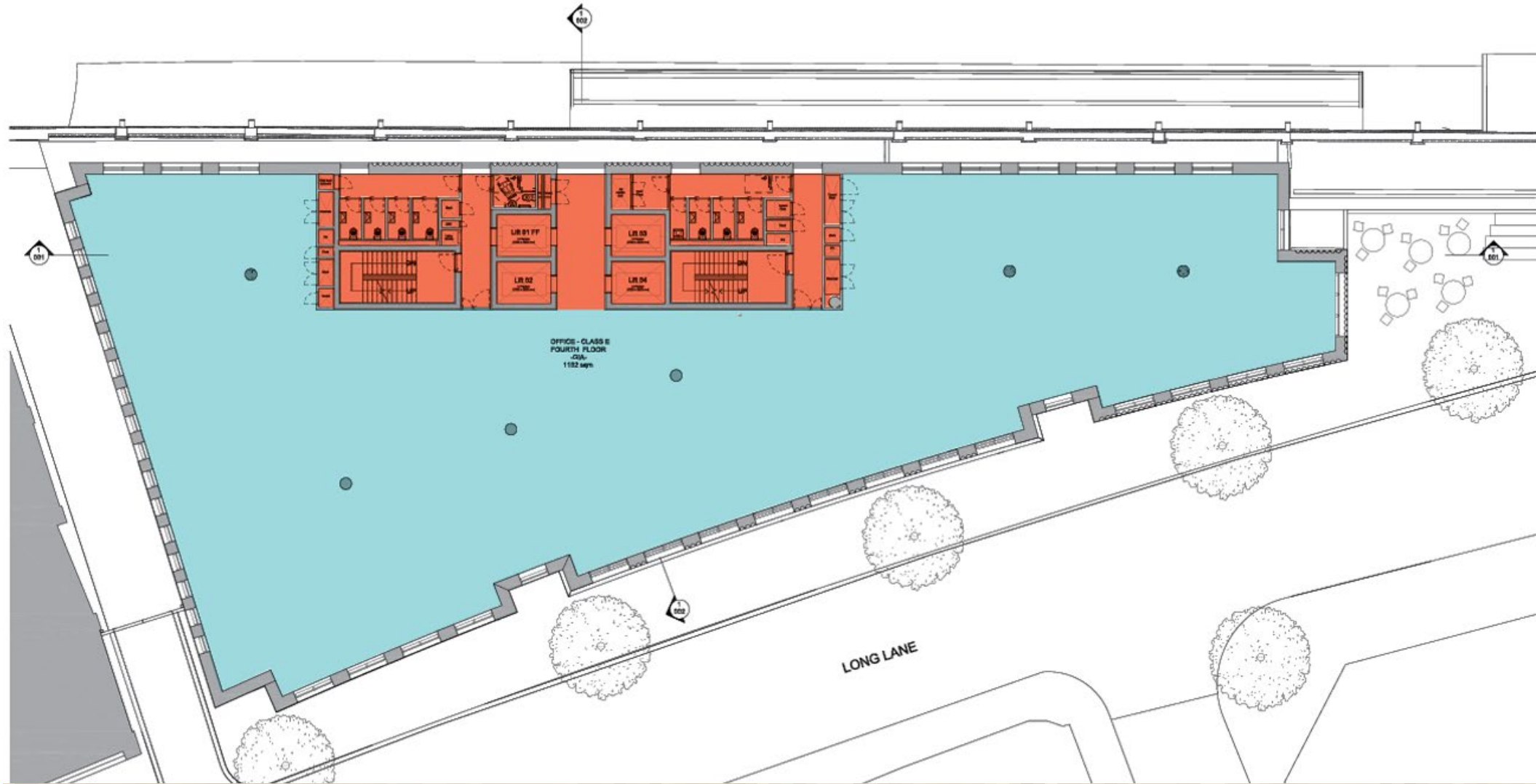


## KEY

- |   |  |   |
|---|--|---|
|  Office B1               |  Tenant Showers |  Bicycle store (A1 / B1) |
|  Retail/Restaurant A1/A3 |  Loading Bay    |   |
|  Office B1 Core          |  Refuse/Recycle |   |

Third Floor

# Proposed Plans



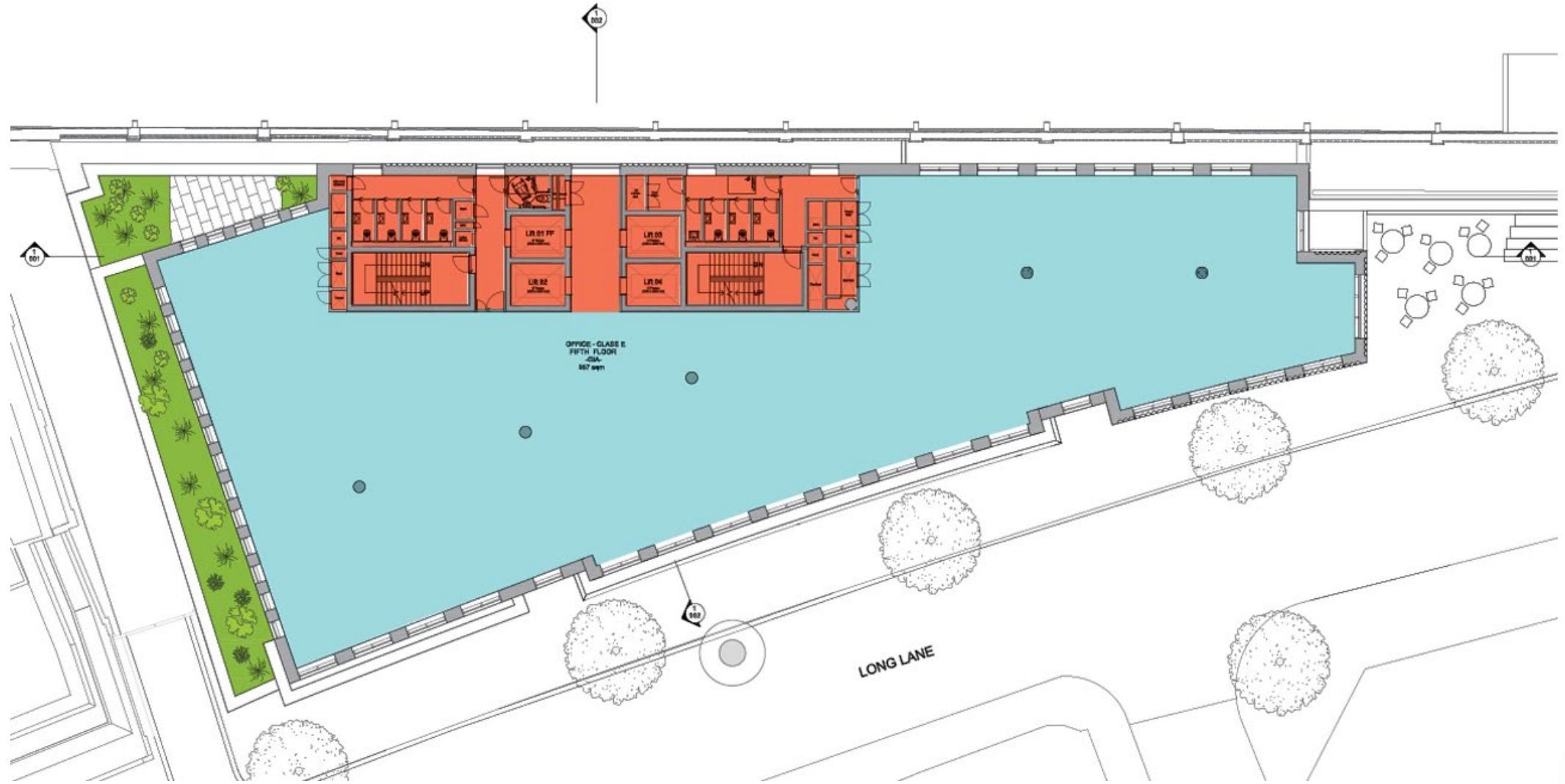
KEY

Office B1	Tenant Showers	Bicycle store (A1 / B1)
Retail/Restaurant A1/A3	Loading Bay	
Office B1 Core	Refuse/Recycle	

Fourth Floor



# Proposed Plans

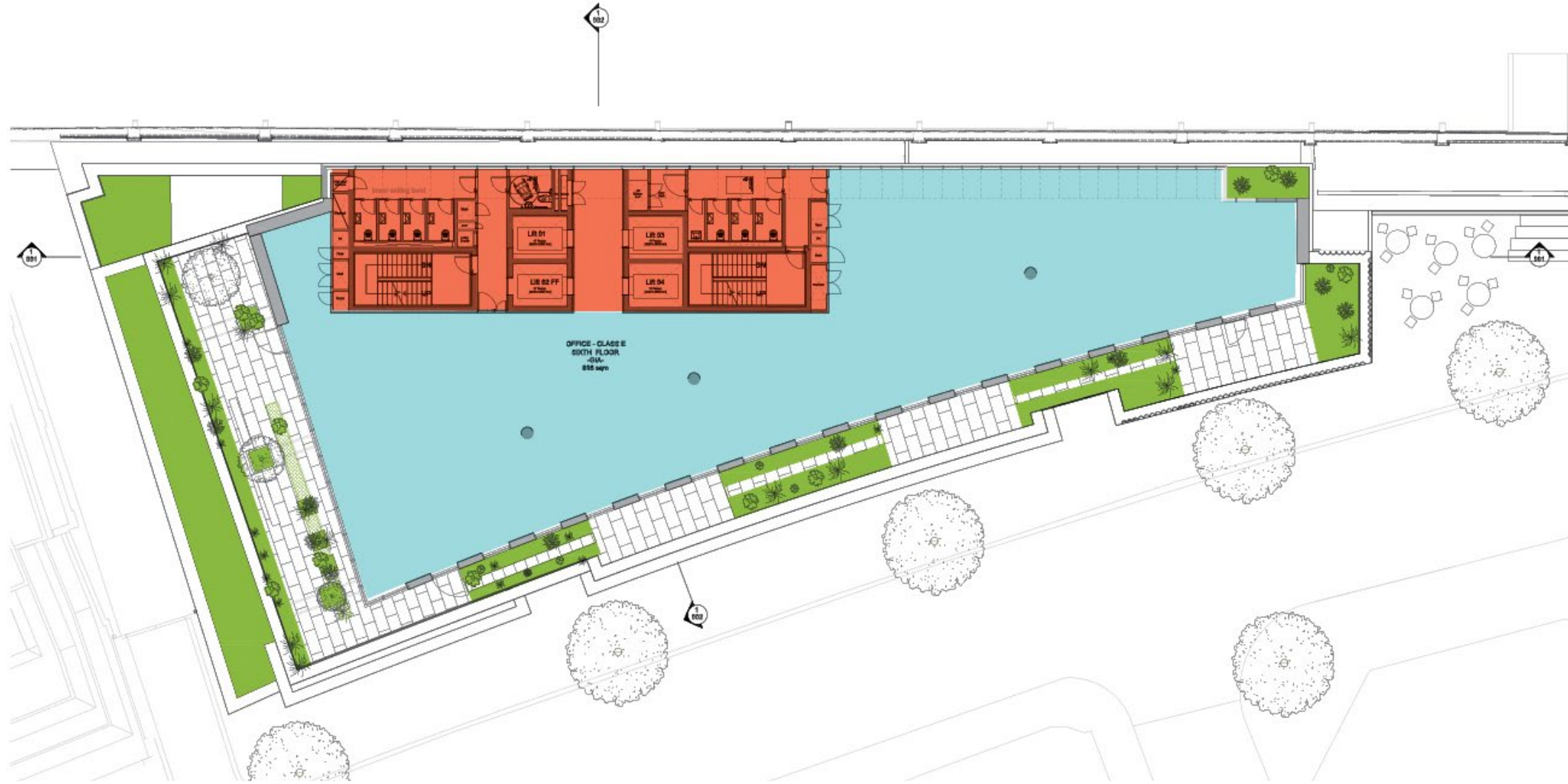


## KEY

- |                         |                |                         |
|-------------------------|----------------|-------------------------|
| Office B1               | Tenant Showers | Bicycle store (A1 / B1) |
| Retail/Restaurant A1/A3 | Loading Bay    |                         |
| Office B1 Core          | Refuse/Recycle |                         |

Fifth Floor

# Proposed Plans

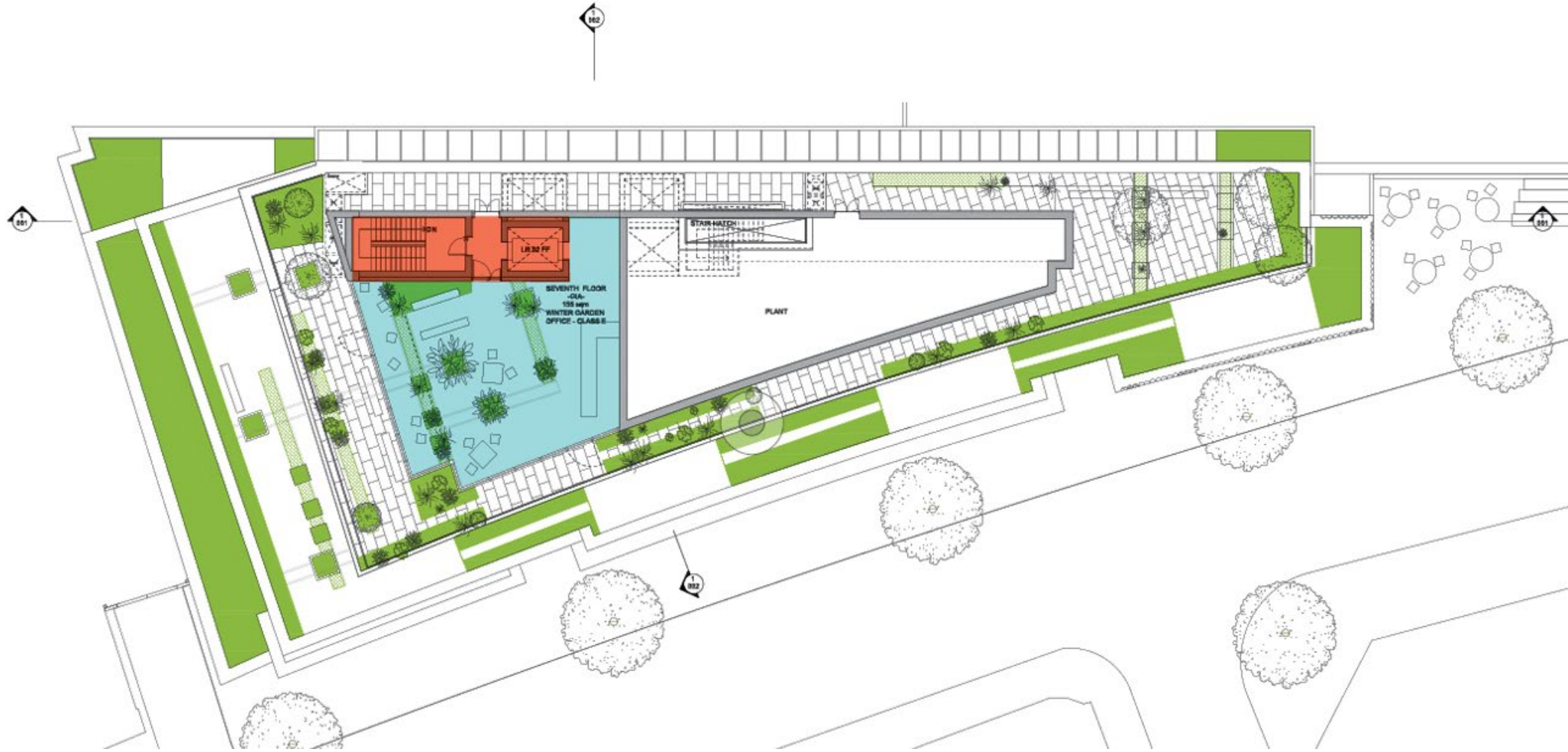


## KEY

- |   |  |   |
|---|--|---|
|  Office B1               |  Tenant Showers |  Bicycle store (A1 / B1) |
|  Retail/Restaurant A1/A3 |  Loading Bay    |   |
|  Office B1 Core          |  Refuse/Recycle |   |

Sixth Floor

# Proposed Plans

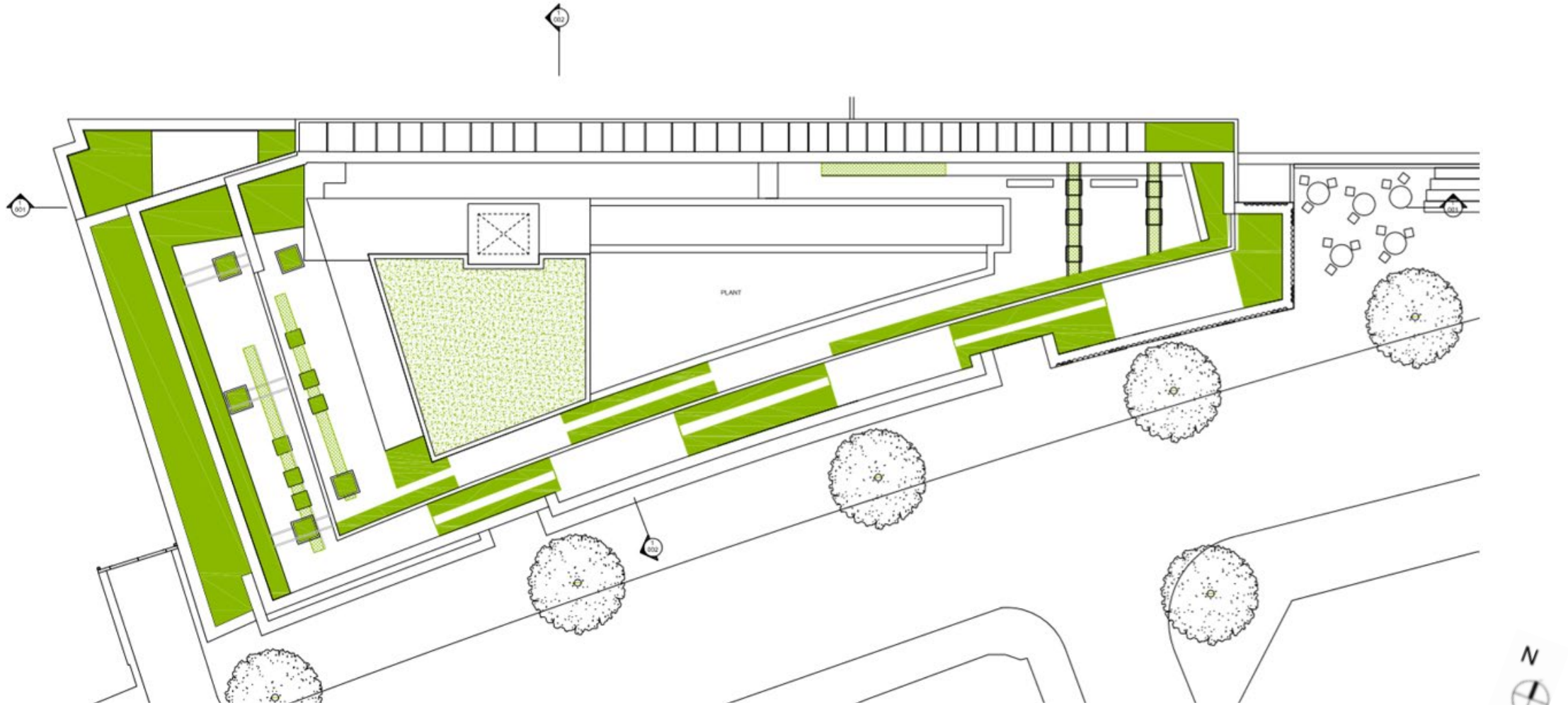


## KEY

- |                         |                |                         |
|-------------------------|----------------|-------------------------|
| Office B1               | Tenant Showers | Bicycle store (A1 / B1) |
| Retail/Restaurant A1/A3 | Loading Bay    |                         |
| Office B1 Core          | Refuse/Recycle |                         |

## Seventh Floor

# Proposed Plans



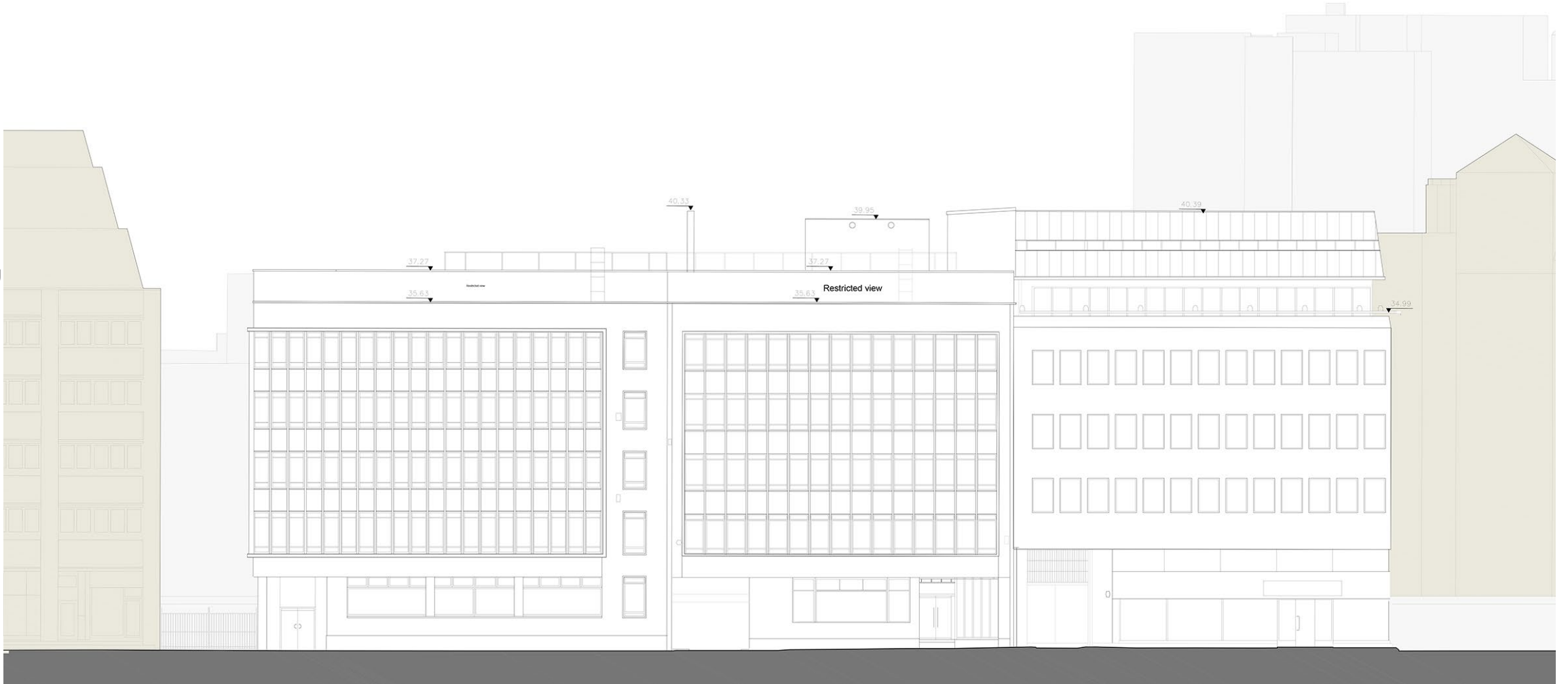
## KEY

- |   |  |   |
|---|--|---|
|  Office B1               |  Tenant Showers |  Bicycle store (A1 / B1) |
|  Retail/Restaurant A1/A3 |  Loading Bay    |   |
|  Office B1 Core          |  Refuse/Recycle |   |

Roof

# Existing Elevation

Page 233



Long Lane Elevation - South

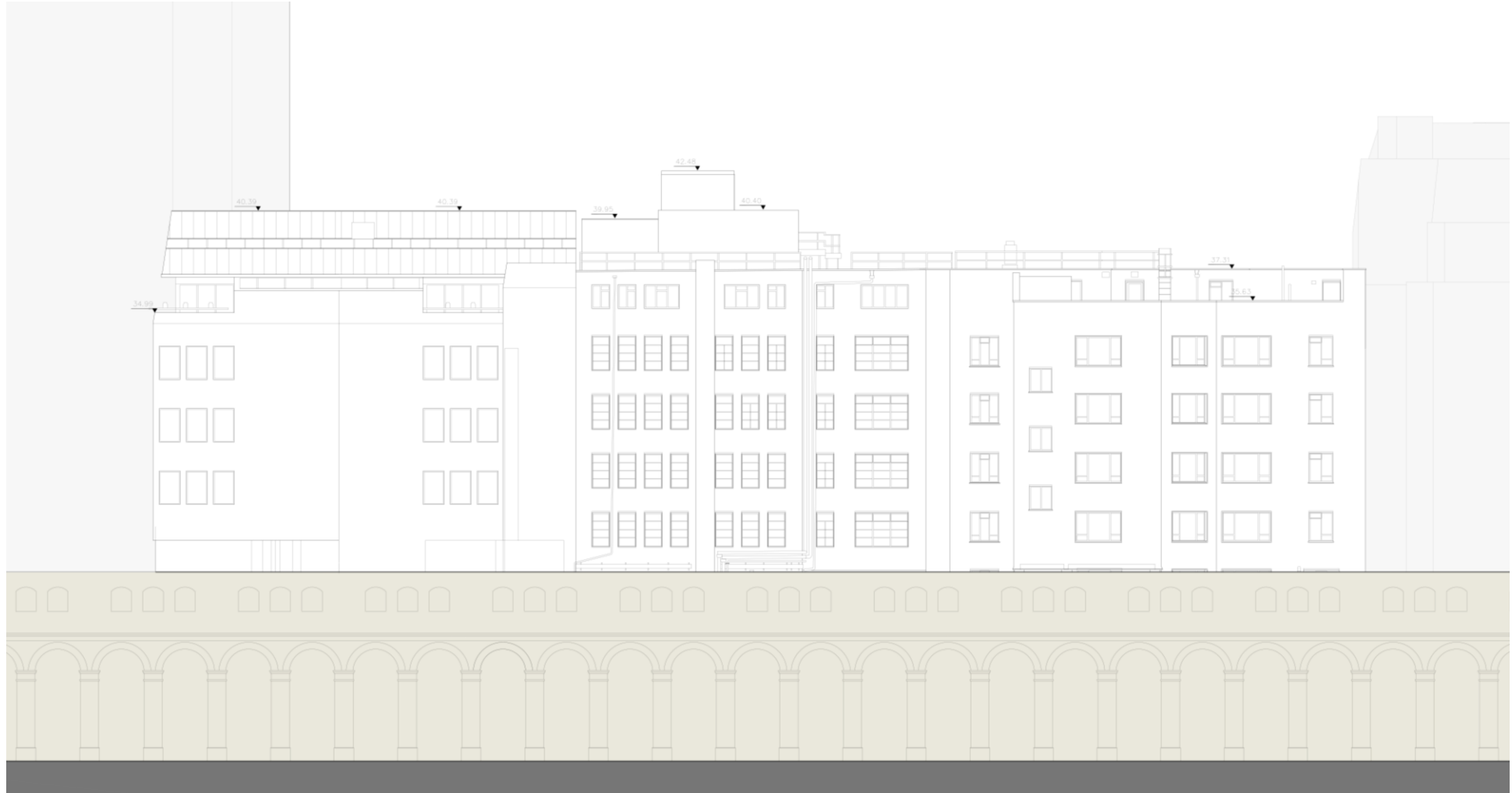
# Proposed Elevation



Long Lane Elevation - South

# Existing Elevation

Page 235



Barbican Station Elevation - North

# Proposed Elevation

Page 236



Barbican Station Elevation - North



# Existing Elevation



Datum: 14.00m.  
9-12 Long Lane - Elevation 2.

## West Elevation

# Proposed Elevation

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## West Elevation

# Existing Elevation

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Aldersgate Street - East

# Proposed Elevation

Page 240



## Aldersgate Street - East

# Proposed Long Elevations

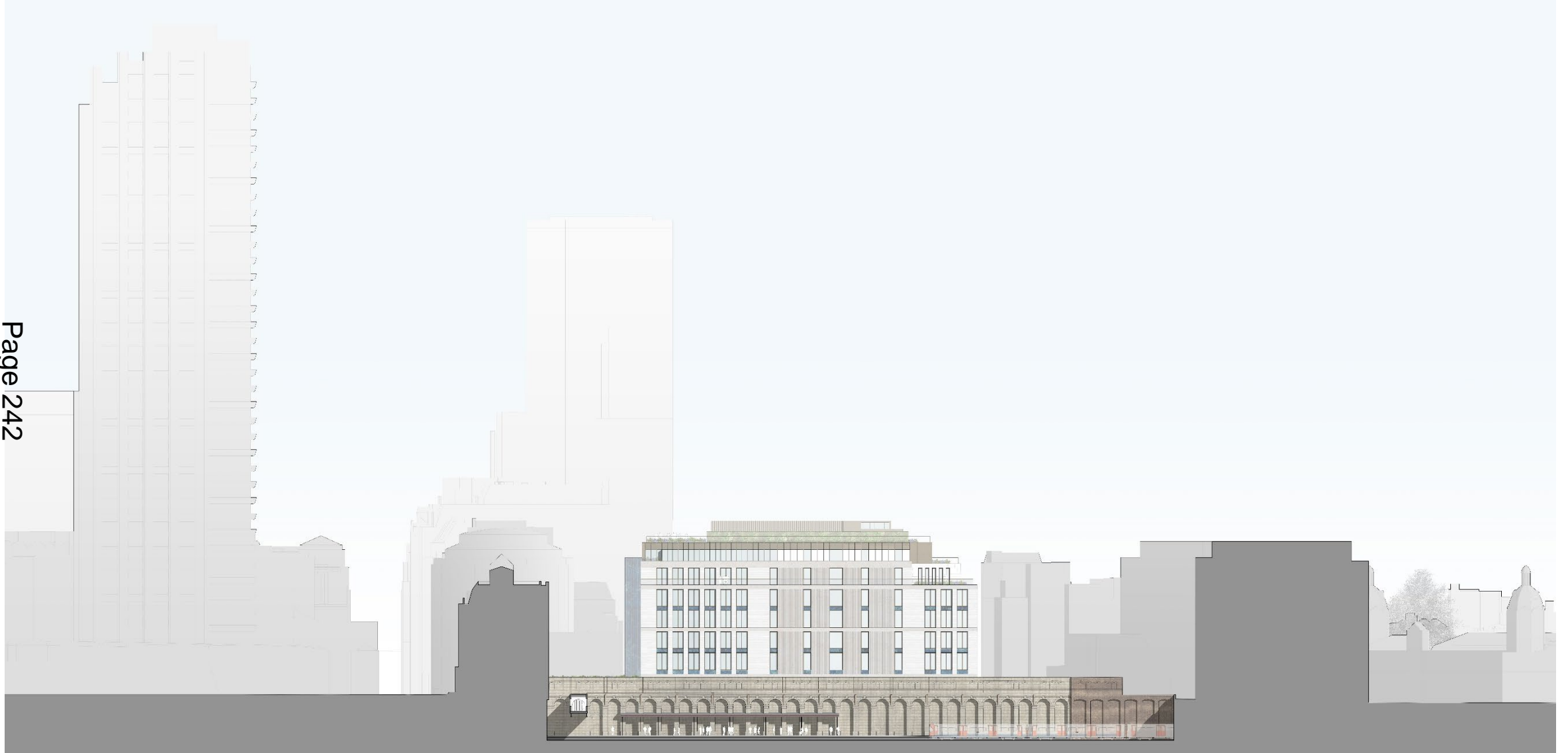
Page 241



Long Lane Elevation - South

# Proposed Long Elevations

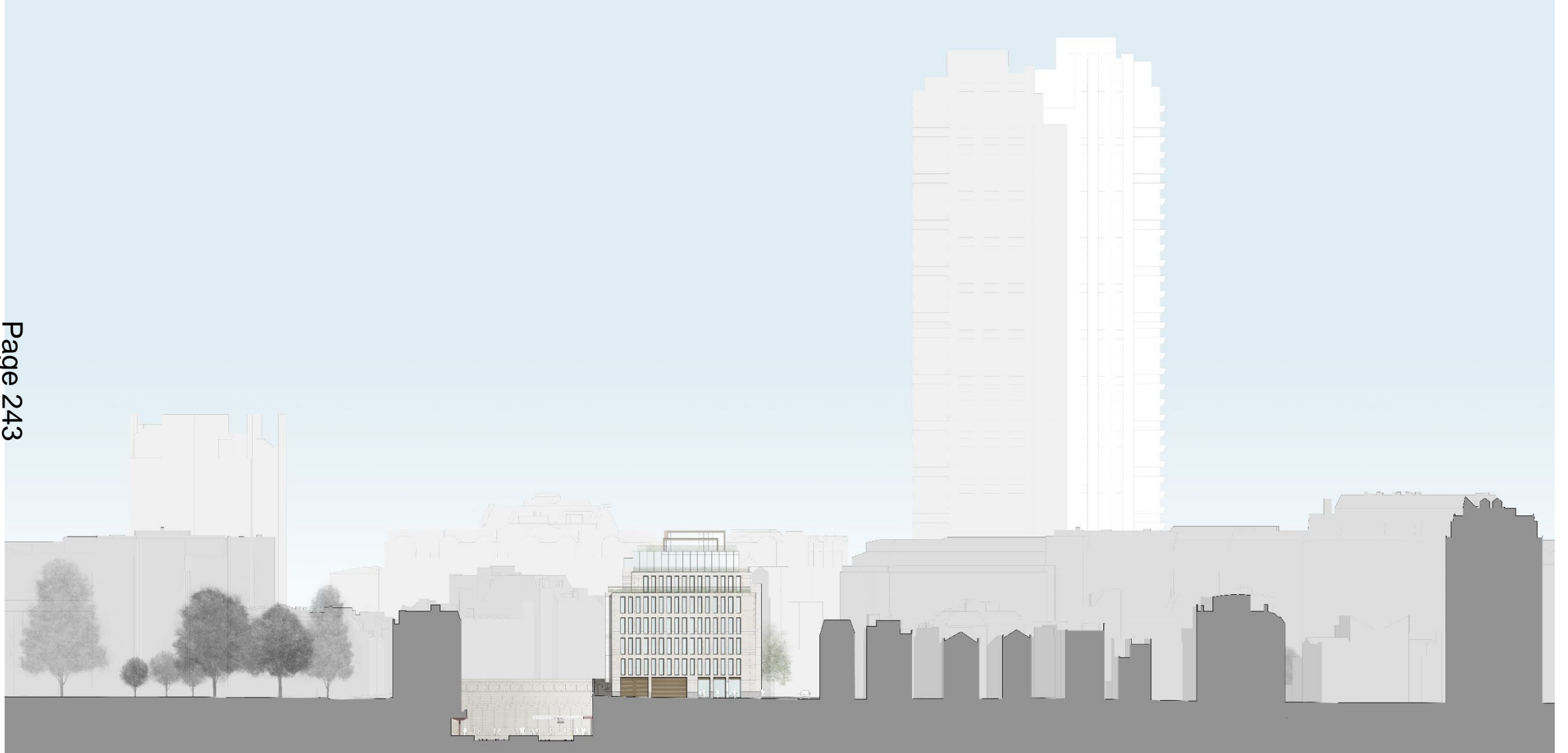
Page 242



Barbican Station Elevation - North

# Proposed Long Elevations

Page 243



West Elevation

# Cross Section

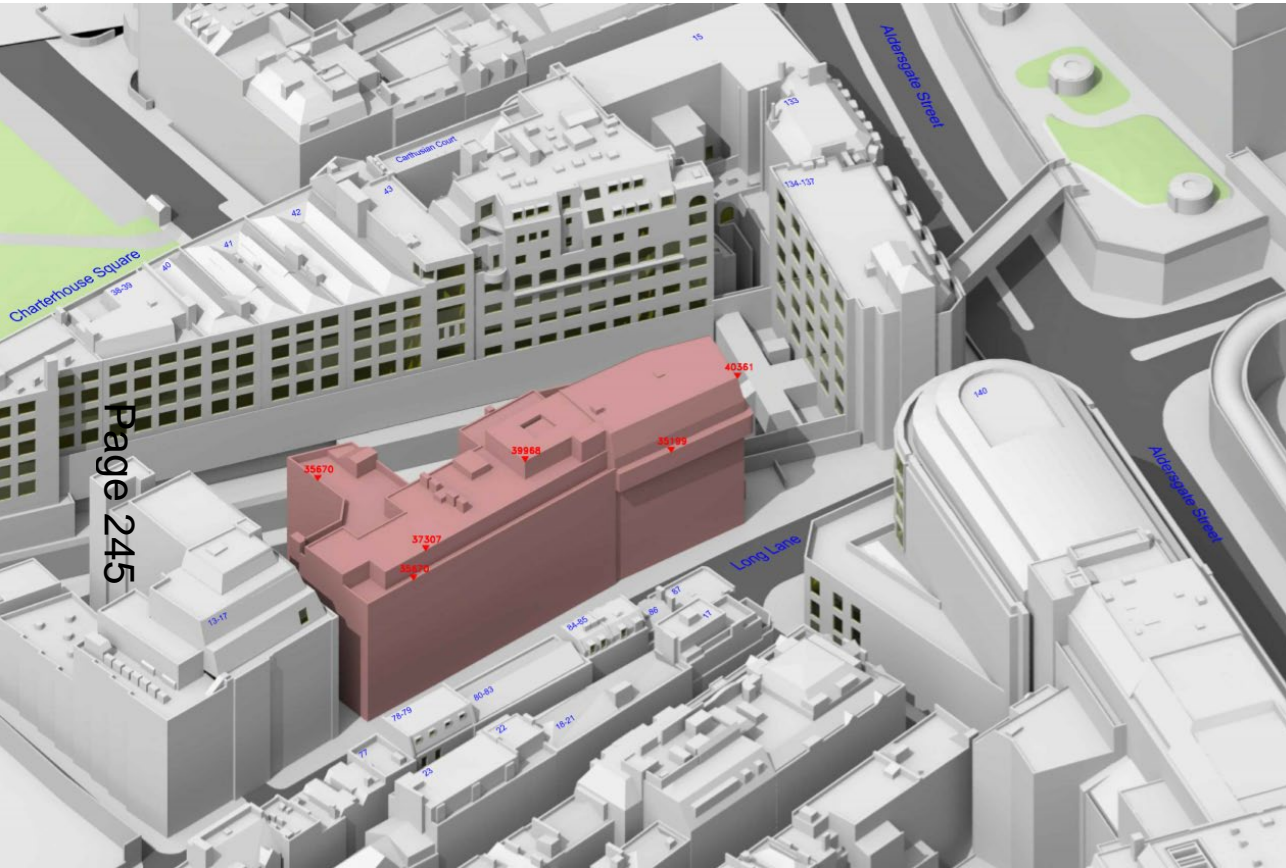
Page 244



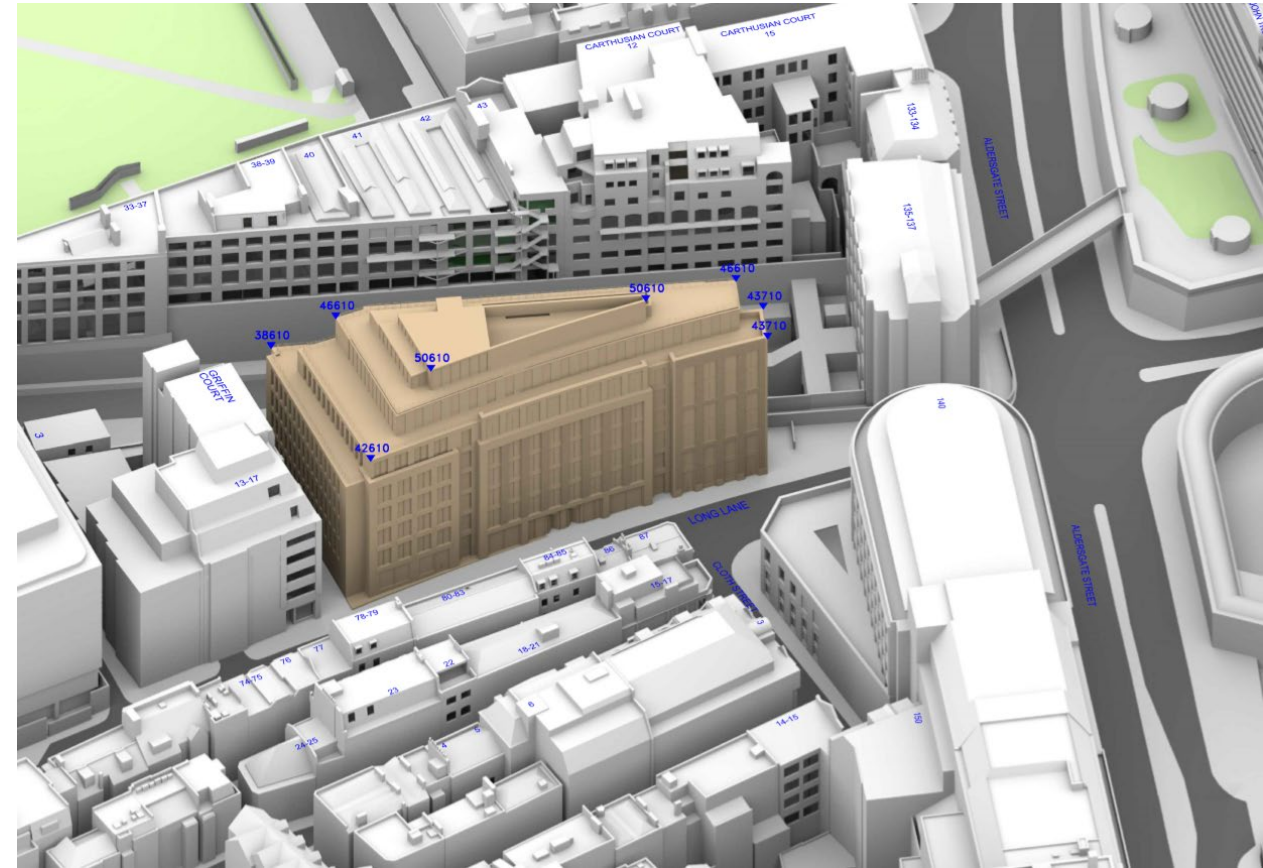
Existing and Proposed



# Daylight / Sunlight Impact



Existing



Proposed



Axonometric Views

# Street Views

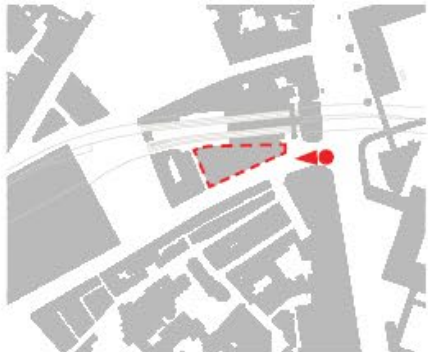
Existing



Proposed



Page 246



*Proposed views are based on verified wire line views from Miller Hare. Yellow Line represents consented local schemes.*

View looking West down Long Lane

# Street Views

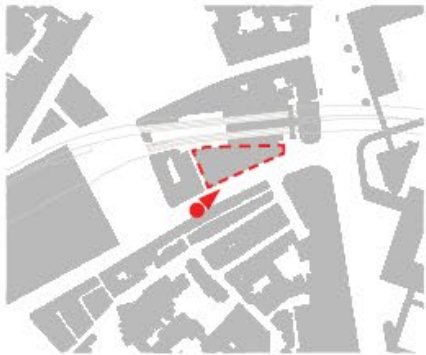
Existing



Proposed



Page 217



*Proposed views are based on verified wire line views from Miller Hare.*

View looking East down Long Lane

# Street Views

Existing



Proposed



*Proposed views are based on verified wire line views from Miller Hare.*

View from Cloth Street



# Street Views

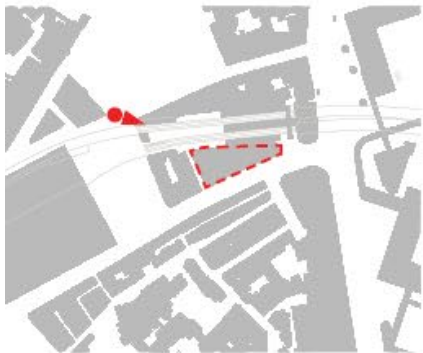
Existing



Proposed



Page 249



*Proposed views are based on verified wire line views from Miller Hare.*

View from Charterhouse Street

# Street Views

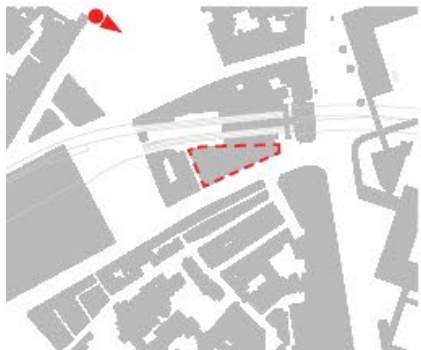
Existing



Proposed



Page 250



*Proposed views are based on verified wire line views from Miller Hare. Yellow Line represents consented local schemes.*

View from Charterhouse Square

# Street Views

Existing



Proposed



Page 251



*Proposed views are based on verified wire line views from Miller Hare. Yellow Line represents consented local schemes.*

View from Smithfields Market

# Street Views



Hummingbird View



# Street Views



View looking East down Long Lane

# Street Views



View looking West down Long Lane

# NEXT COMMITTEE

17 November 2020



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	<p><b>Total Estimated Cost of Project (excluding risk): £5,800,000</b></p> <p><b>Total Estimated Cost of Project (including risk): £8,400,000</b></p> <p><b>Change in Total Estimated Cost of Project (excluding risk):</b> No change since last report to Committee</p> <p><b>Spend and Committed to Date: £302,839</b></p> <p><b>Costed Risk Provision Utilised: £0</b></p> <p><b>Slippage: 0 months since last committee report</b></p>																
<p><b>2. Requested decisions</b></p>	<p><b>Next Gateway: 4c – Detailed Design</b></p> <p><b>Requested Decisions:</b></p> <ol style="list-style-type: none"> <li>1. That approval is obtained to proceed straight to Detailed Design stage (G4c). The G4c will be approved by the Planning &amp; Transportation and Project Subs committee members.</li> <li>2. That additional budget of <b>£431,095</b> is approved for professional fees required between Gateway 4 and Gateway 4c and for the first payment to UKPN for the installation of the new HV intake.</li> <li>3. Note the revised approved budget will be <b>£760,155</b> (excluding risk).</li> <li>4. That a Costed Risk Provision of <b>£355,000</b> is approved for Gateway 4 to Gateway 4c.</li> <li>5. That approval of Gateway 4c and Gateway 5 is delegated to the Planning &amp; Transportation and Project Subs committee members.</li> </ol>																
<p><b>3. Budget</b></p>	<p>The budget below is required to allow the project to move from Gateway 4 to Gateway 4c. The full project budget is documented in the Cost Book in Appendix 3.</p> <table border="1" data-bbox="427 1370 1401 1899"> <thead> <tr> <th data-bbox="435 1382 678 1512">Item</th> <th data-bbox="686 1382 981 1512">Reason</th> <th data-bbox="989 1382 1209 1512">Funds/ Source of Funding</th> <th data-bbox="1217 1382 1393 1512">Cost (£)</th> </tr> </thead> <tbody> <tr> <td colspan="4" data-bbox="435 1523 1393 1579"><b>Construction Fees</b></td> </tr> <tr> <td data-bbox="435 1590 678 1836">UKPN Connection</td> <td data-bbox="686 1590 981 1836">To provide a new HV Power intake (first payment only)</td> <td data-bbox="989 1590 1209 1836">Bridge House Estates Trust 50 Year Maintenance Fund for 2020/ 21</td> <td data-bbox="1217 1590 1393 1836">£180,000</td> </tr> <tr> <td colspan="4" data-bbox="435 1848 1393 1899"><b>Professional Fees</b></td> </tr> </tbody> </table>	Item	Reason	Funds/ Source of Funding	Cost (£)	<b>Construction Fees</b>				UKPN Connection	To provide a new HV Power intake (first payment only)	Bridge House Estates Trust 50 Year Maintenance Fund for 2020/ 21	£180,000	<b>Professional Fees</b>			
Item	Reason	Funds/ Source of Funding	Cost (£)														
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UKPN Connection	To provide a new HV Power intake (first payment only)	Bridge House Estates Trust 50 Year Maintenance Fund for 2020/ 21	£180,000														
<b>Professional Fees</b>																	

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	Project Management	To progress to Detailed Design stage	As Above	£20,033
	Cost Consultant	To progress to Detailed Design stage	As Above	£28,359
	MEP/Structural Engineer & Principal Designer	To progress to Detailed Design stage	As Above	£33,040
	Architect	To progress to Detailed Design stage	As Above	£26,139
	Planning Consultant	To progress to Detailed Design stage	As Above	£11,324
	Fire Engineering	To progress to Detailed Design stage	As Above	£7,200
	Transport Consultant	To develop a Traffic Management Plan and minimise disruption to the public during construction phase	As Above	£15,000
	Other Consultant	To progress to Detailed Design stage	As Above	£15,000
	Building Control	To ensure compliance with building regulations	As Above	£20,000
<b>Consequential Fees</b>				
	Surveys	To progress to Detailed Design stage	As Above	£45,000

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Planning / Listed Building Consent Application Fees	To obtain planning permission and Listed Building Consent	As Above	£10,000
Building Control Authority	To certify compliance with building regulations	As Above	£5,000
<b>City of London Internal Recharge</b>			
Legal Costs	To progress to Detailed Design stage	As Above	£5,000
Staff Costs	To progress to Detailed Design stage	As Above	£10,000
<b>Total</b>			<b>£431,095</b>

The total project costs will be split across the following financial years:

<b>Year</b>	<b>Amount</b>
2020/21	£1,698,270
2021/22	£6,482,880
2022/23	£218,850
<b>Total</b>	<b>£8,400,000</b>

Any future increase in the total estimated project costs will be discussed at the annual review of the 50-year maintenance fund.

It should be noted that all appointments have been made and will continue to be made in line with the City of London's procurement Code. Also, the appointment of UKPN will be made via an exemption as an organisation which conducts Works as a utility companies under the New Roads and Streets Works Act.

**Costed Risk Provision requested for this Gateway: £355,000** (as detailed in the Risk Register – Appendix 2). This will be funded from the Bridge House Estates Trust 50 Year Maintenance Fund for 2020/ 21.



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<p><b>4. Issue description</b></p>	<ol style="list-style-type: none"> <li>1. There has been no change to the cost, programme or costed risk provision since the previous gateway report.</li> <li>2. The previous gateway report recommended that the next report to committee would be a Detailed Options Appraisal (G4). However, following further design development and advice from the professional team, Option B, which was approved at Gateway 3 by committee, remains the preferred option to progress. Consequently, members are asked for permission to proceed straight to Detailed Design (G4c). This will avoid submission of repeat information in the next report and will allow the programme of this critical project to be maintained.</li> <li>3. Procurement options have also been discussed with the design team and it is currently anticipated that the project will be procured via a competitive and selective, single stage procurement process. However, a procurement workshop is to be undertaken in October where the project team will undertake further appraisal of the most appropriate procurement route and form of Construction Contract.</li> <li>4. In order for the project to advance to Gateway 4c, additional budget (as detailed in the table above) is requested to be approved by members. This funding will predominantly be utilised on professional fees to progress the design and for the first payment to UKPN in order to provide the new HV power intake. This needs to progress in order to maintain the programme. Please note that the existing budget that has been approved is still required to complete RIBA Stage 3 which is in progress and to complete various surveys which will provide information to inform the design. Currently the site information available is very limited and inaccurate, therefore it needs to be updated before starting detailed design.</li> <li>5. As the estimated total value of this project exceeds £5million, approval to proceed beyond Gateway 4b is required from the Court of Common Council. Once approval has been sought, it is requested that any further decisions required by the Court of Common Council are delegated to Planning and Transportation and Project Subs committee members. This will help to maintain the programme.</li> <li>6. The costed risk provision requested in this report will largely be utilised for any delays or any requirements to re-design the project if it is not possible to secure planning / listed building consent and any statutory authority approvals.</li> </ol>
<p><b>5. Options</b></p>	<ol style="list-style-type: none"> <li>1. Approve the request to proceed straight to Detailed Design (G4c)</li> <li>2. Proceed as originally planned to Detailed Options Appraisal (G4)</li> </ol> <p><b>Recommendation: Option 1 to avoid submission of repeat information to committee and to maintain the programme for this critical project</b></p>

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### **Appendices**

<b>Appendix 1</b>	Project Coversheet
<b>Appendix 2</b>	Risk Register
<b>Appendix 3</b>	Project Cost Book (Non – Public)

### **Contact**

<b>Report Author</b>	Navdeep Bhal
<b>Email Address</b>	<a href="mailto:Navdeep.Bhal@cityoflondon.gov.uk">Navdeep.Bhal@cityoflondon.gov.uk</a>
<b>Telephone Number</b>	07599512712

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# Project Coversheet

## [1] Ownership & Status

**UPI: 11520**

**Core Project Name:** Tower Bridge HV Replacement & Increased Resilience

**Programme Affiliation** (if applicable): Bridge House Estate 50-Year Plan

**Project Manager:** Navdeep Bhal

**Definition of need:** Existing infrastructure is not compliant and is at high risk of failure due to age and condition. The backup power supply is also at high risk of failure due to age and condition and does not provide enough capacity for the Bridge to maintain operations as usual. This impacts on revenue, bridge operations and reduces the ability to complete bridge lifts as required under the Corporation of London (Tower Bridge) Act 1885.

**Key measures of success:**

1. Achieve statutory compliancy of segregation of HV and LV switchgear
2. Reduce likelihood of power failure due to age and condition of existing electrical infrastructure.
3. Increase power resilience in the event of a power outage
4. Maintain power and bridge operations during works

**Expected timeframe for the project delivery:**

Original Timescales:

GW 1 – 2: Oct 2015,

GW 3 – 4: Jan 2016,

GW 5: Apr 2016.

No completion date was provided in the GW1-2

Gateway 3 Timescales:

GW 1 – 2: Oct 2015,

GW 3: Sept 2019

GW 4: May 2020

GW 5: Dec 2020

Completion: Dec 2021

Current Timescales:

GW 1 – 2: Oct 2015,

GW 3: Sept 2019

GW 4: Nov 2020

GW 5: May 2021

Completion: Dec 2021

**Key Milestones:**

Gateway 3 Timescales:

Surveys & Procure Consultants: Oct-Dec 2019

Develop designs: Jan - May 2020

GW4: May 2020

Utility and planning applications: May - Aug 2020

Tender contractor: Sept - Nov 2020

GW5: Dec 2020

Start on site: Jan 2021

Complete: Dec 2021

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**Current Timescales:**

Surveys & Procure Consultants: Jan - Jun 2020

Develop designs: Jun - Oct 2020

GW4: Nov 2020

Utility and planning applications: Sept 2020 – Feb 2021

Tender contractor: Jan – May 2021

GW5: May 2021

Start on site: May 2021

Complete: Dec 2021

**Are we on track for completing the project against the expected timeframe for project delivery?**

At GW3 there was a 41 months slippage to the original programme due to the project being put on hold after the officer responsible for the project left the department and allocation of a new internal resource. An additional 3 months of additional work to the feasibility report was needed to explore construction logistics to arrive at a more robust project programme, cost and risk assessment.

However the programme has not slipped any further since then.

**Has this project generated public or media impact and response which the City of London has needed to manage or is managing?**

No public or media impact.

**[2] Finance and Costed Risk**

**Headline Financial, Scope and Design Changes:** Committees approved the decision to explore the feasibility of 5 options proposed by City of London Engineers to fulfil the requirements of this project with the appointment of a consultant team. These options were discounted as non-workable solutions so then two alternative viable proposals were discussed. Of these two alternatives, Option B was recommended and approved by committee. Option B remains the preferred solution following further design development.

**'Project Briefing' G1 report (as approved by Chief Officer in Jan 2016):**

- Total Estimated Cost (excluding risk): £500,000 – £5,000,000
- Costed Risk Against the Project: none reported
- Estimated Programme Dates: (reported in initial GW1 - 2 report in Sept 2015)
  - GW 3 – 4: Jan 2016
  - Start on site: May 2016

*Scope/Design Change and Impact:*

**'Project Proposal' G2 report (as above):**

- Total Estimated Cost (excluding risk): as above
- Resources to reach next Gateway (excluding risk): £35,000
- Spend to date: none reported
- Costed Risk Against the Project: none reported
- CRP Requested: none reported
- CRP Drawn Down: none reported
- Estimated Programme Dates: as above

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<p><i>Scope/Design Change and Impact:</i></p> <p><b>'Options Appraisal and Design' G3 report (as approved in October 2019):</b></p> <ul style="list-style-type: none"><li>• Total Estimated Cost (excluding risk): £5,800,000</li><li>• Resources to reach next Gateway (excluding risk): £303,000</li><li>• Spend to date: £26,059</li><li>• Costed Risk Against the Project: £2,600,000</li><li>• CRP Requested: £0</li><li>• CRP Drawn Down: £0</li><li>• Estimated Programme Dates:<ul style="list-style-type: none"><li>○ GW4: May 2020</li><li>○ GW5: Dec 2020</li><li>○ Start on site: Jan 2021</li><li>○ Completion: Dec 2021</li></ul></li></ul>
<p><i>Scope/Design Change and Impact:</i></p> <p><b>'Options Appraisal and Design' G3 issues report (to be approved in October 2020):</b></p> <ul style="list-style-type: none"><li>• Total Estimated Cost (excluding risk): £5,800,000</li><li>• Resources to reach next Gateway (excluding risk): £554,210</li><li>• Spend to date: £95,000</li><li>• Costed Risk Against the Project: £2,600,000</li><li>• CRP Requested: £0</li><li>• CRP Drawn Down: £0</li><li>• Estimated Programme Dates:<ul style="list-style-type: none"><li>○ GW4: Nov 2020</li><li>○ GW5: May 2021</li><li>○ Start on site: May 2021*</li><li>○ Completion: Dec 2021*</li></ul></li></ul> <p>*Note that the duration of the design periods and construction period were unknown at previous gateway, however since involving the design team better estimates has been provided. It was recognised that design would require more time and construction less.</p>
<p><i>Scope/Design Change and Impact:</i></p> <p><b>'Detailed Design' G4c (as approved by PSC xx/yy/zz):</b></p> <ul style="list-style-type: none"><li>• Total Estimated Cost (excluding risk):</li><li>• Resources to reach next Gateway (excluding risk)</li><li>• Spend to date:</li><li>• Costed Risk Against the Project:</li><li>• CRP Requested:</li><li>• CRP Drawn Down:</li><li>• Estimated Programme Dates</li></ul>
<p><i>Scope/Design Change and Impact:</i></p> <p><b>'Authority to start Work' G5 report (as approved by PSC xx/yy/zz):</b></p> <ul style="list-style-type: none"><li>• Total Estimated Cost (excluding risk):</li></ul>

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- Resources to reach next Gateway (excluding risk)
- Spend to date:
- Costed Risk Against the Project:
- CRP Requested:
- CRP Drawn Down:
- Estimated Programme Dates:

*Scope/Design Change and Impact:*

**Total anticipated on-going commitment post-delivery [£]:**<Current Range>  
**Programme Affiliation [£]:**<(If applicable) What is the estimated total programme cost including this project:>

**City of London: Projects Procedure Corporate Risks Register**

**Project name:** Tower Bridge HV Replacement and Increasing Resilience

**Unique project identifier:** 11520

**Total est cost (exc risk)** £5800000

*Corporate Risk Matrix score table*

<b>PM's overall risk rating</b>	<b>Medium</b>
<b>Avg risk pre-mitigation</b>	<b>9.1</b>
<b>Avg risk post-mitigation</b>	<b>4.8</b>
<b>Red risks (open)</b>	<b>5</b>
<b>Amber risks (open)</b>	<b>47</b>
<b>Green risks (open)</b>	<b>9</b>

	Minor impact	Serious impact	Major impact	Extreme impact
Likely	4	8	16	32
Possible	3	6	12	24
Unlikely	2	4	8	16
Rare	1	2	4	8

**Costed risks identified (All)**

£10,625,000.00 183%

*Costed risk as % of total estimated cost of project*

**Costed risk pre-mitigation (open)**

£10,625,000.00 183%

" "

**Costed risk post-mitigation (open)**

£2,600,000.00 45%

" "

**Costed Risk Provision requested**

£2,600,000.00 45%

*CRP as % of total estimated cost of project*

- (1) Compliance/Regulatory
- (2) Financial
- (3) Reputation
- (4) Contractual/Partnership
- (5) H&S/Wellbeing
- (6) Safeguarding
- (7) Innovation
- (8) Technology
- (9) Environmental
- (10) Physical

	Number of Open Risks	Avg Score	Costed impact	Red	Amber	Green
(1) Compliance/Regulatory	12	10.0	£1,720,000.00	0	11	1
(2) Financial	2	9.0	£845,000.00	0	2	0
(3) Reputation	6	8.3	£170,000.00	1	4	1
(4) Contractual/Partnership	1	4.0	£150,000.00	0	0	1
(5) H&S/Wellbeing	2	14.0	£250,000.00	1	1	0
(6) Safeguarding	0	0.0	£0.00	0	0	0
(7) Innovation	0	0.0	£0.00	0	0	0
(8) Technology	0	0.0	£0.00	0	0	0
(9) Environmental	3	8.0	£700,000.00	0	3	0
(10) Physical	35	8.8	£6,790,000.00	3	26	6

<b>Issues (open)</b>	<b>0</b>
<b>All Issues</b>	<b>0</b>

	Extreme	Major	Serious	Minor
<b>Open Issues</b>	0	0	0	0
<b>All Issues</b>	0	0	0	0

**Cost to resolve all issues (on completion)** £0.00

**Total CRP used to date** £0.00

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<b>Committee:</b> Planning & Transportation Committee	<b>Date:</b> 27/10/2020
<b>Subject:</b> City Corporation response to the Planning White Paper	<b>Public</b>
<b>Report of:</b> Carolyn Dwyer, Director of the Built Environment	<b>For Decision</b>
<b>Report author:</b> Peter Shadbolt, Department of the Built Environment	

## Summary

On 6th August 2020, the Government published for consultation a Planning White Paper, 'Planning for the Future'. The White Paper sets out the Government's proposals for reform of the planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development. The proposed reforms are described under 3 Pillars: Planning for Development, Planning for Beautiful and Sustainable Places, and Planning for Infrastructure and Connected Places.

The principle of reform to the planning system is supported in order to deliver necessary housing, commercial and other development, through speeding up the planning system, providing certainty to developers, engaging communities earlier and more fully in the development of local plans and emphasising the importance of high quality design in new buildings and spaces. However, the ambitions underpinning the White Paper can be delivered through evolution of the existing planning system, or through selective reform, rather than through a wholesale replacement of existing mechanisms and an increase in central government direction. Alongside reform, a commitment from Government is needed to provide the necessary resources to local planning authorities to deliver timely local plans and planning decisions.

## Recommendation

Members are asked to:

- Agree the overall approach set out in this report and in Appendix 1 in relation to the City Corporation's response to the MHCLG consultation on the Planning White Paper: Planning for the Future.

## Main Report

### Background

1. For a number of years, the Government has pursued a planning reform agenda, intended to modernise the planning system, remove unnecessary bureaucracy and provide flexibility to deliver new development, particularly housing development. Most recently, in August 2020, new permitted development rights

for the upwards extension of buildings and the demolition of commercial buildings and their replacement with residential were brought forward. In September 2020, a revision to the Use Classes Order came into effect, creating a new Commercial, Business and Service Uses class, Class E, which replaces the B1 business use class and the A1, A2 and A3 retail use classes. The implications of these changes for the City of London were considered at the 8<sup>th</sup> September 2020 meeting of this Committee.

### **Current Position**

2. On 6<sup>th</sup> August 2020, the Government published for consultation a Planning White Paper, 'Planning for the Future'. The consultation period ends on 29<sup>th</sup> October 2020. The White Paper sets out the Government's proposals for reform of the planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development.
3. The White Paper recognises the importance of planning and its central role in addressing national challenges, including the economic recovery from the Covid-19 pandemic, delivering housing, sustainable development, combating climate change and improving biodiversity. Whilst acknowledging that there are examples of good planning and high performing planning departments, the Government's view is that the system is often too complex, discretionary, too slow, has insufficient focus on design, is reliant on out of date technology, and fails to deliver sufficient housing to meet needs.
4. The White Paper sets out 3 Pillars and 24 specific proposals for planning reform:
  - Pillar 1: Planning for Development
  - Pillar 2: Planning for Beautiful and Sustainable Places
  - Pillar 3: Planning for Infrastructure and Connected Places
5. This report outlines the key proposals for reform in each of the 3 Pillars and a suggested response. Appendix 1 sets out a more detailed response to each of the 24 reform proposals.

### **Overarching comments**

#### **Level of Detail**

6. The planning system is constantly evolving as it responds to changes in the external political, financial, environmental, social and health and wellbeing environments. It is essential therefore that the system evolves to meet changing demands and the City Corporation supports in principle the need for review. To ensure support for, and buy-in to, proposed changes, there needs to be a sufficient level of detail to understand what is proposed, how it will work and its implications. The White Paper sets out radical proposals for change, but a number of its proposals appear as headlines, with little supporting information or detail, for example there are broad statements about reducing the length and complexity of planning applications and reducing the size of planning statements, but no explanation as to how this accords with national or local evidence requirements or local validation requirements. Similarly, Pillar 3 on planning for infrastructure is very light on detail as to how the proposed Infrastructure Levy will be delivered in practice or what will replace existing, non-financial, s106 planning

obligations. Without this detail, it is difficult to provide positive comments on a number of aspects of the proposed planning reform. Further explanation is needed alongside a commitment to further collaboration with planning authorities and consultation once this detail has been worked through.

### **Emphasis on Housing**

7. The White Paper's proposals, whilst addressing all aspects of the planning system, are focussed on changes needed to deliver new housing to meet the Government's 300,000 homes a year target. There needs to be a greater recognition that the planning system is critical in bringing forward other development which is essential to deliver and sustain economic growth. The White Paper's proposals and detailed changes to planning guidance must address these wider development needs, including the need for commercial development, social and community facilities and transport and the need for open and green space and space for wildlife. The suggestion of pattern books to enable the replication of popular forms of development, for example, may be relevant to certain house types but cannot be applied to the variety of commercial buildings in the City.

### **Resources**

8. The White Paper recognises that there are resource constraints within local planning authorities and that additional resource is needed, but fails to acknowledge the scale of additional resource or provide specific funding. Reference is made to the continuing need to part fund planning through taxation, but also to using Infrastructure Levy funding, planning application fee funding or pre-application advice funding. A clear, sustainable approach is needed, where costs are met partly by applicants and partly by general taxation, but with a commitment to ensure fees and grants are sufficient to cover costs on an ongoing basis. The White Paper also suggests that staff resources may be released for reallocation by the simplification of processes and procedures, but fails to recognise that the revised local plan process will require additional resource and new skills to deliver within the shortened timescales. Similarly, resource will be needed to develop and deliver design guidance and design codes. The financial and staff/skills resource implications need to be addressed to provide the certainty to residents and business that the new planning system is effective and responsive to their needs.

## **Pillars of Planning Reform**

### **Pillar 1: Planning for Development**

9. This sets out a new role for local plans as the foundation of a new rule-based planning system. Local plans will be required to allocate all land as either:
  - Growth Area – areas suitable for substantial development, such as urban extensions or new towns. Land allocated as a growth area would have outline approval for the specified development, with only detailed site or technical matters determined through a reserved matters application or a local development order.
  - Renewal Area – areas suitable for development, including built up areas where small scale development or “gentle densification” (as described in the White Paper) would be appropriate. There would be a statutory presumption

in favour of development being granted in these areas for uses specified in the local plan. The planning application process would be simplified and speeded up. There would be potential for schemes which meet defined design criteria to gain automatic consent.

- Protected Area – sites where control of development is justified due to environmental or cultural designations, such as conservation areas and listed buildings, flood risk zones, important green spaces or Green Belt. Development would be subject to the grant of planning permission, as currently, by the local planning authority.
10. The local plan would be a simplified document. Standard development management policies would be set out in national guidance and would not be repeated at the local level. The local plan would continue to identify land to meet a range of development needs. There would be a new national standard methodology for setting housing targets which would be binding on the local planning authority. This methodology would have regard to the size of existing urban areas, housing affordability, nationally identified development constraints, the need for other land uses and the need to ensure sufficient land is identified to meet the wider Government target of 300,000 new homes a year.
  11. The preparation of local plans would be shortened, to 30 months, with public consultation at 2 stages: initial suggestions for land allocations and consultation on the full draft plan. This 30 month period would include the collection and analysis of evidence to support the plan, local committee approval processes and time for the Examination in Public. Plans that take longer than 30 months would be liable for government intervention.
  12. Planning applications would be shorter and standardised with a planning statement of no more than 50 pages. There would be greater digitisation of the planning process with applications determined within set 8 or 13 week time limits. Local planning authorities would be expected to delegate more decisions to planning officers.

### **Comments on Pillar 1**

13. There are a number of key proposals within the White Paper which can be supported in principle. The ambition to provide greater certainty to developers and residents over what development will be permitted, the ambition to speed up the system, to reduce unnecessary bureaucracy and to reduce the length and complexity of planning applications, are all worthy ambitions that can be supported in principle. There are, however, significant concerns around how the Government propose to realise these ambitions.
14. The White Paper proposes a fundamental change to the planning system in England, moving from a discretionary system which allows the individual impacts and merits of a scheme to be considered, to a rule-based system where proposals which accord with the local plan will be permitted. Allocating land to one of 3 designations in a central urban area such as the City of London, where there are multiple, overlapping planning, heritage and environmental designations, often on individual sites, is likely to be difficult and time consuming. The greater certainty of development attached to an allocation also requires a close assessment of the capacity for development and the detailed design of

development on individual sites at the local plan stage, effectively moving some of the role of the private developer to the public planning authority. Whilst this would give some certainty to developers, it would also limit their capacity for innovation in the form, layout and design of development, resulting in a more uniform character across an area. Simplification in the way proposed would not allow for legitimate local characteristics or local ambitions to be realised, even where such ambitions have local support.

15. The White Paper suggests that effective consultation at the local plan preparation stage would build in local support for development. However, the scaling back of the local plan process, the restriction to defined periods of local consultation and the long standing difficulty most local planning authorities have faced in engaging at the local plan stage, means that this approach is likely to result in less, not more, local support for necessary development. This would be exacerbated by the reduced capacity for member involvement within local planning authorities and the reduction in scope for comment and objection to individual applications and individual scrutiny of applications at committee.
16. The City Corporation has for many years adopted a positive approach to planning for new development, working pro-actively with developers to deliver nationally significant and important development, enhancing economic growth. This process has engaged local residents and members at plan production and individual application stages. The City Corporation considers that this current discretionary approach should continue, providing clear and transparent opportunities for democratic input, but with greater weight attached to local plan policy in the determination of applications, to provide a greater degree of certainty and expectation over acceptable forms of development.
17. Pillar 1 contains a specific proposal to move from the provision of national advice and guidance on housing needs to a mandatory target for housing delivery set by national government. An initial analysis of the methodology proposed has been undertaken by Lichfields. This suggests that the City of London's housing target could be 116, compared with the current draft London Plan target of 146 dwellings per year. Across London, however, housing delivery targets would increase from 53,000 in the London Plan to 93,500 (an increase of 79%), with some boroughs experiencing increases of several hundred percent. There appears to be no mechanism for local planning authorities to challenge the nationally set target or for local resident or business input. The City Corporation recognises that there is a shortage of housing across London and that this is impacting economic and business growth, but it remains important for local communities to be involved in decisions on the scale of new development. Nationally set targets cannot adequately reflect local circumstances, opportunities or needs. The Government methodology therefore should remain guidance, not prescription, with the local planning authority then justifying variation through the local plan process and examination.

#### **Pillar 2: Planning for beautiful and sustainable places**

18. Local planning authorities will have to prepare local design guides and codes for specific areas in consultation with the local community, having regard to the National Design Guide published in 2019 and a new National Model Design Code expected later in 2020. To assist local planning authorities a national design body

will be established. Local design guides and codes should ideally be prepared alongside the local plan to inform the local plan process.

19. There will be an expedited planning process and greater certainty for high quality development which accords with the design guides and codes. Permitted development rights will be extended within renewal areas to enable popular and replicable forms of development to be approved easily and quickly. The Government will also prepare a limited set of form-based development types/pattern books to enable increased density of development.
20. As part of this design-based approach, existing sustainability appraisal methods will be simplified and made easier to understand, whilst continuing to meet national and international environmental protection obligations. Local plans will be required to consider how land allocations can support climate change mitigation and adaptation. To complement planning reform, energy efficiency standards for buildings will be revised to help deliver the national target of net zero carbon emissions by 2050.
21. The simplification of local plan and development management processes will enable local planning authorities to reassign resources and focus more fully on enforcement of planning requirements and building regulations.

#### **Comments on Pillar 2**

22. The emphasis on achieving design quality through planning, including the use of design guides is supported in principle. The City Corporation has a highly regarded design team that works closely with developers to ensure new development is of a high quality, delivering urban greening and good growth. The proposal for further national guidance is supported, provided that it remains guidance and specifically allows flexibility for local planning authorities to reflect local character and the views of local residents and businesses. Similarly, the use of design codes for specific sites is supported, but the need for design codes should be a matter for local determination and there should not be a requirement for design codes to be prepared for all sites.
23. The production of design guidance and codes, where necessary, will have resource implications for local planning authorities, which do not appear to be adequately recognised within the White Paper. Specific information on how local planning authorities will be resourced to meet these additional requirements is needed to ensure that this emphasis on design can be effectively implemented.
24. The planning system is supported by a wide range of environmental, heritage and other assessments which are essential to ensure good planning decisions and high quality development. It is accepted that the processes underpinning such assessments have grown in complexity to the extent that the assessment becomes an end in itself rather than informing decisions and development. Simplification of the processes underpinning assessment is therefore supported, provided that the underpinning rationale for assessment and identification of impacts are retained as key parts of the planning system. A particular focus should be on making appraisals accessible to all communities to enable a wider discussion of impacts and informed decision making.

25. The emphasis on ensuring alignment of planning with actions and targets to mitigate and adapt to climate change is strongly supported. The City Corporation has adopted a Climate Action Strategy which puts climate impacts at the heart of the Corporation's activities, including planning. Nationally, guidance on climate change must allow for flexibility to align with locally agreed targets, such as the City Corporation's evidence-based net zero target for the City of London of 2040. It is also important that net zero is defined in relation to the full range of emissions, including scopes 1, 2 and 3 emissions.

### **Pillar 3: Planning for Infrastructure and Connected Places**

26. The current system of s106 planning obligations will be abolished and the Community Infrastructure Levy replaced with a new Infrastructure Levy. This will be a flat-rate charge applied as a fixed proportion of development value and paid on completion of development. The charge rate would be set nationally. Revenues will continue to be collected and spent locally. There would be greater local discretion on how Levy funds could be spent once core infrastructure obligations have been met, including potentially being used to fund council services or reduce the level of council tax.

27. A small proportion of the Levy would be earmarked to fund the activities of the local planning authority, including the costs of preparing and reviewing the local plan, design guides and codes and enforcement.

28. Local authorities would be able to borrow against projected Infrastructure Levy receipts to forward fund the provision of infrastructure. There may be provision for the Mayor in London to continue to operate a levy to fund strategic infrastructure.

29. The new Levy would replace s106 planning obligations in the delivery of affordable housing, either through an in-kind delivery of affordable housing units on-site or a financial contribution to fund delivery elsewhere. If the Levy is insufficient to fund the delivery of the required number of affordable units on-site, the local planning authority would be able to 'flip' required affordable units to market units to ensure delivery on the site as a whole.

### **Comments on Pillar 3**

30. This section of the White Paper is significantly less well developed and less detailed than the others proposals for reform. Although it sets out a number of principles underpinning the proposed Levy, more detailed information is needed to understand how the new Infrastructure Levy would work and, specifically, how the current wider range of non-financial s106 planning obligations used by local planning authorities can continue to be delivered.

31. The City Corporation has operated a CIL since 2014 alongside s106 planning obligations. This approach has worked effectively and more recent changes to CIL, such as removing the restriction on the mixing of s106 and CIL to fund infrastructure, will allow more effective infrastructure delivery going forward. The requirements for CIL and s106 in the City are well known and understood by most developers and wholesale replacement with a new system would be a retrograde step. Evolution and refinement would provide continuity and certainty. It would also enable the continued use of s106 to deliver site specific mitigation

and non-financial mitigation such as contributions towards training and skills provision, which could potentially be lost under the White Paper proposals.

32. There are elements of the proposed Infrastructure Levy that could usefully be incorporated into the existing system, such as the potential to borrow against future levy receipts and greater flexibility on how the Levy could be spent, albeit that this should continue to emphasise the need for the Levy to be used to fund necessary infrastructure and not wider council services. Extending funding beyond infrastructure and mitigation breaks the link between development and infrastructure improvements which is necessary to not only mitigate the impact of development, but also to make development acceptable to local communities.
33. In relation to affordable housing, the White Paper refers simply to affordable housing, defined in its widest sense and including a range of low-cost home ownership products. The housing need in the City of London is primarily for social rented housing, with even low-cost home ownership out of reach of many people on the City Corporation's housing register. Clarification is needed that the White Paper's definition of affordable housing includes social rented housing and provides flexibility for local definitions to meet local needs. The Levy would also significantly impact on the ability of local planning authorities to require affordable housing on site. Although there is provision for in-kind delivery, the focus appears to be on a financial contribution to enable development elsewhere. The provision within existing s106 mechanisms to require affordable housing on-site and to specifically link the delivery of market housing to on-site affordable housing provision needs to be retained. Whilst it is accepted that there are difficulties with the existing s106 mechanisms, not least extended arguments over the impact on development viability, refinement of existing mechanisms is considered to be a more effective approach than the proposed replacement.

### **Detailed Comments**

34. The White Paper sets out 24 detailed proposals to implement the three Pillars of Reform. Appendix 1 to this report sets out a more detailed response to these 24 individual proposals. It is recommended that these detailed comments be submitted to the Government alongside the comments in this report as the City Corporation's response to the White Paper.

### **Next Steps**

35. Implementation of the White Paper's proposals will require primary and secondary legislation and revised national planning practice guidance. The Government's ambition is for the new style local plans and reformed planning system to be in place before the next General Election in 2024. Meeting this timetable would require legislation to be in place by late 2021 at the latest.

### **Corporate & Strategic Implications**

36. The Government's proposed changes will deliver a reformed planning system which is underpinned by national policy requirements, with a particular emphasis on housing delivery. The proposals would reduce the scope for local flexibility to respond to local needs, including the need for commercial development to ensure economic growth, and reduce opportunities for community engagement in planning. This could impact on the City's ability to deliver an appropriate balance of development and contribute to a flourishing society, supporting a thriving



economy and shaping outstanding environments, as set out in the Vision and Objectives of the 2018-23 Corporate Plan.

### **Implications**

37. There are no direct financial, resource or legal implications arising from this report. The report identifies a number of potential resource and financial implications that could arise if the reform proposals are taken forward, but these implications cannot be assessed until Government confirms funding measures as part of its reform package.
38. There are no equalities, climate change or security implications arising from this report.

### **Conclusion**

39. The Government is consulting on fundamental reforms to the planning system in England. The proposed reforms are described under 3 Pillars: Planning for Development, Planning for Beautiful and Sustainable Places, and Planning for Infrastructure and Connected Places.
40. Pillar 1 would place much greater emphasis on the role of the local plan in managing development, requiring all land to be allocated as either a Growth Area, a Renewal Area or a Protected Area, with a much reduced requirement for the submission and determination of detailed planning permissions. Pillar 2 sets out an approach to planning which emphasises a need for a high quality of design, with local planning authorities required to prepare design guides and codes, informed by national guidance. Pillar 3 sets out new approach to the funding of infrastructure, with the replacement of s106 planning obligations and the Community Infrastructure Levy with a new Infrastructure Levy, with rates set nationally.
41. The principle of reform to the planning system to deliver a mechanism that delivers necessary housing, commercial and other development, whilst engaging with local communities and addressing key environmental requirements is supported. However, the ambitions underpinning the White Paper can be delivered through evolution of the existing planning system, or selective reform, alongside a commitment to provide the necessary resources to local planning authorities to deliver timely local plans and planning decisions.

### **Appendices**

- Appendix 1 – City of London Corporation response to the Planning White Paper’s detailed proposals

### **Background Papers**

<https://www.gov.uk/government/consultations/planning-for-the-future>

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## City of London Corporation: Detailed Response to the Planning White Paper proposals

### Pillar 1: planning for development

#### **Proposal 1: The role of land use plans should be simplified.**

The proposed approach would fundamentally change the planning system from the current discretionary system to one based on the zoning of land use. This change is presented as one that gives greater certainty to developers that proposed developments are acceptable in principle, with detailed technical matters to be considered through an application process.

Allocating land to one of 3 designations in a central urban area such as the City of London, where there are multiple, overlapping planning, heritage and environmental designations, often on individual sites, is likely to be difficult. Applying these principles to the City of London, for example, will require a site by site analysis to determine the appropriate land use designation. The City's complex framework including 27 conservation areas, over 600 listed buildings and strategic and local views protection policies, mean that land allocation is likely to be a complex and time-consuming process. Even those parts of the City that have seen significant development in recent years, such as the City Cluster of tall buildings, have a complex pattern of heritage and other constraints that is not conducive to the proposed simplified land use allocation.

The greater certainty of development attached to an allocation also requires a close assessment of the capacity for development and the detailed design of development on individual sites at the local plan stage, effectively moving some of the role of the private developer to the public planning authority. Whilst this would give some certainty to developers, it would also limit their capacity for innovation in the form, layout and design of development, resulting in a more uniform character across an area.

The City Corporation has for many years adopted a positive approach to planning for new development, working pro-actively with developers to deliver nationally significant and important development, enhancing economic growth within the current discretionary system. It is not clear what benefit there would be locally in adopting the proposed simplified approach. The City Corporation is supportive of the need for continuous improvement in planning, but considers that the current discretionary approach should continue, but with greater weight attached to local plan policy in the determination of applications and a greater emphasis on comprehensive engagement with residents, businesses and developers at the plan preparation stage.

There is much discussion in the White Paper about the role of local plans, but it is unclear how these proposals will apply at the strategic plan-making level, such as the preparation of the London Plan. It is difficult to see how a strategic plan could designate Renewal or Protected Areas which will depend on local interpretation of land use and opportunities. Whilst there may be a case for strategic designation of Growth Areas, such as Old Oak Park in London, or urban extensions, the proposals

do not seem to address the interaction between strategic and local designation of sites.

**Proposal 2: Development management policies established at national scale and an altered role for Local Plans**

It is accepted that there is a degree of overlap between national policy, strategic planning policy in the London Plan, and local policy, with unnecessary duplication potentially leading to confusion. Currently, the NPPF is a material consideration but does not carry the same statutory weight as adopted planning policy. The Government's proposals would appear to change the status of the NPPF and make it part of the statutory policy for an area, although this is not explicitly set out in the consultation document. If the NPPF is to gain statutory weight, then amendments to the NPPF and national planning practice guidance should be subject to a similar level of scrutiny as local plans, including the potential for examination in public.

Rather than relying upon a national set of development management policies, a simple re-statement that plans should not repeat national or strategic level policy could address much of this concern without the need for fundamental reform.

A significant concern for the City of London is that policy devised and set nationally often cannot reflect the specific local circumstances, or the ambitions and aspirations of local people expressed through local plans. In any revised planning system and approach to development management, there needs to remain an option for the local planning authority to reflect locally specific issues, even where these are not in alignment with national policy. Any such local interpretation would need to be justified in the Local Plan and accepted by an Inspector through examination.

For example, much of the rationale underpinning the White Paper is concerned with increasing housing supply and addressing housing shortages. For many years, planning inspectors and Government have accepted that the City of London is a commercial centre of national and international importance, where the delivery of new commercial office space is crucial to support UK wide economic growth. The City's exemption from national permitted development rights for the change of use of offices to residential exemplifies this commercial focus. To maintain this focus in the future, it will be important for the City Corporation to give priority to commercial office development, whilst making a contribution to meeting housing needs. This approach requires the ability to set policy locally and to not be constrained inflexibly by national policy.

**Proposal 3: Local Plans should be subject to a single statutory "sustainable development" test, replacing the existing tests of soundness**

The ambition to simplify the tests of soundness required for the Local Plan and to simplify some of the assessment processes underpinning Local Plan preparation is supported.

The current Duty to Co-operate and Statements of Common Ground were developed in a piecemeal fashion to replace more strategic decision making, particularly on housing matters, undertaken by the regional assemblies. However, the process that is now in place is lengthy, bureaucratic and uncertain. Reform is needed to provide a mechanism for effective strategic planning across local authority boundaries, but the

White Paper does not provide any evidence to support the Government's view that replacing the Duty to Co-operate with the sharing of information digitally will deliver effective cross boundary working or a strategic approach to planning. In the larger urban areas, including London, elected Mayors have been given responsibilities to prepare strategic planning guidance, including housing requirements. Prior to the creation of the regional assemblies, a series of joint authority working parties existed to consider cross boundary matters. These are both examples of how effective strategic planning can be delivered and should be considered alongside the sharing of information to enhance strategic planning in England.

The Sustainability Appraisal (SA) process is a key part of the plan preparation process and provides checks to ensure that the most sustainable development options are pursued. This principle needs to be retained, particularly with the imperative to deliver climate change mitigation and adaptation, the need to enhance biodiversity, reverse species decline and create new open and green spaces for nature and people, delivering healthy local environments in a post Covid world. However, current practice has developed into a bureaucratic approach to assessment, requiring the production of long and detailed reports that add little to the understanding of a Local Plan. A slimmed down and simplified approach which retains the essential requirements of the SA process would be welcome.

The continuing need for infrastructure planning is welcomed. This is critical to ensuring that development contributes to the creation of high quality spaces and places for people to live and work. It is unclear how the new emphasis on data and data driven insights will deliver improvements to the current approach to infrastructure planning, which is already based on a range of information and projections of future need. Data, on its own, does not deliver high quality outcomes, rather it is how that data is used and interpreted. More focus on how data can be used would be helpful in understanding the future approach to infrastructure planning.

**Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built.**

The Government has consulted recently on changes to the Standard Method. The City Corporation has responded to this consultation raising concerns over the way that existing stock and affordability criteria are factored into the modelling.

The proposed approach would appear to build upon the current and separate consultation for changes to the Standard Method, but would extend this to produce a method that would be binding on local planning authorities, removing local discretion over the setting of housing targets. Although the consultation does suggest that the methodology will consider other land use constraints and the need to allow for non-housing uses, it is unclear how these will be taken account of, or what weight will be attached. For the City of London, a key concern will be whether a national methodology can properly take account of the primacy attached to commercial office development in the national interest. As a minimum, any nationally derived target must have the facility for local challenge to ensure that local priorities and local needs can be properly factored into the housing need consideration. There also

needs to be a separate consultation on the detail of the new methodology before it is introduced, so that the impacts are properly understood.

The City Corporation does not support the retention of the Housing Delivery Test. This Test is a backward looking assessment of delivery over a 3 year period which does not reflect longer term delivery trends over a plan period. For areas like the City of London where housing delivery fluctuates from year to year within the context of meeting targets over a longer plan period, a focus on short term delivery gives an inaccurate picture of progress in meeting housing needs.

In this regard, rather than a top-down national approach, which is binding on local planning authorities, the alternative approach of local determination, with weight attached to the national calculation, should be taken forward. This would still require local planning authorities to justify departure from the national calculation but would allow for legitimate local constraints to be addressed. The retention of a 5 year land supply requirement would provide greater certainty of housing delivery.

**Proposal 5: Areas identified as Growth Areas would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.**

The City Corporation accepts that in areas identified for substantial new development there is merit in providing greater certainty through a Local Plan allocation as a Growth Area. The Local Plan allocation should establish the principle of development, but with the need for specific proposals to be brought forward through an application process that allows for continued local democratic and public engagement on individual developments.

For existing, largely urban sites, this granting of permission in principle through the Local Plan is not considered to be appropriate. In the City of London, for example, many sites have complex and overlapping planning designations which, although not preventing substantial development, have a significant impact on the scale and form of development that can take place. Furthermore, detailed issues of transportation access, freight and servicing have a significant impact on the type and scale of development that could be accommodated. It is difficult to see how these issues can be adequately resolved at a technical stage with permission in principle already granted through the Local Plan.

The proposed approach assumes that engagement and consultation on sites will take place at the plan-making stage, removing much of the need for detailed engagement at the application stage. Again, whilst this may be appropriate for very large sites, for smaller urban infill or redevelopment this early stage consultation cannot reflect potential local impacts which may not become apparent until detailed proposals are submitted, e.g. impacts on daylight and sunlight or freight and servicing provisions. For the reformed planning system to work effectively, it needs to have local democratic support and this will often require the ability to engage with development proposals at the point of application.

The City Corporation, nevertheless, understands the Government's concerns over the speed of planning and decision making and the need to provide certainty to the

development industry. The City Corporation would therefore support reform to the planning system in a way that gives greater weight to Local Plan allocations. If a site is allocated for a particular form of development in a Local Plan, or an area identified as suitable for a particular form of development, then there should be a general presumption in favour of that form of development, subject to compliance with other detailed provisions of the Local Plan. This would give greater certainty to developers, whilst also allowing for local policy considerations to be considered. This would have the advantage of allowing for local community engagement and objection where the detail of a proposal would have adverse impacts on local environment and amenity. In effect this would be a strengthening of the current policy that planning applications should be determined in accordance with Local Plan provisions.

**Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology**

The City Corporation agrees that there is a need to simplify and shorten the amount of information required to enable the determination of a planning application. Greater standardisation of data requirements and formats and a simplification of current assessment requirements (such as for Environmental Impact Assessments) would be beneficial, subject to there being no weakening of the protections provided by such assessments. There is scope to consider the detail of such changes outside of a wider review of the planning system.

Setting an arbitrary page limit on supporting information would be counter-productive. The amount of information required to support an application will often reflect the scheme's complexity. The design, access, sustainability and transportation assessment needed for a 300m office tower, for example, will be vastly different to the assessment needed for a single storey extension of a commercial building in the City. Even with the introduction of design guides and codes, there will be a need to present a range of supporting information to enable the local planning authority to be satisfied that a scheme accords with local plan policy in detail and does not have adverse impacts on local communities and business. The arbitrary 50 page limit should be replaced with an emphasis on shorter and more concise supporting statements and information, with the extent of additional information required determined by the local planning authority on a case by case basis.

The consultation indicates that existing 8 or 13 week time limits will be firm deadlines. This emphasis on speed ignores the quality of decision making and could result in the refusal of development where a decision cannot be made within the statutory deadlines, with such schemes then being considered at appeal, which is neither helpful to the local community, the local planning authority or the developer. The City Corporation considers that a better approach is to give greater encouragement to the use of pre-application discussions to address concerns and objections, with formal applications submitted once outstanding issues have been resolved. This could be formalised through a Planning Performance Agreement which would allow the developer and the local planning authority to agree a realistic timetable for progressing an application which reflects the specific circumstances of an application.

The proposal to return application fees if time limits are not met, or a decision is granted at appeal, is a blunt tool to speed up the decision making process and could result in applications being determined on financial rather than planning or transportation grounds.

The consultation raises other key changes:

- 1) use of national standard conditions – the City Corporation has no objection to additional guidance and model conditions being set out nationally, but there must remain flexibility to adjust such conditions to reflect local circumstances, where necessary.
- 2) Greater delegation to officers – this is supported in principle by the City Corporation which has already delegated to officers a large number of applications, with only those that raise strategic concerns or where there are 4 or more objections being considered by members. However, democratic oversight by elected members needs to be retained for larger, strategic or locally controversial schemes. The decision as to which schemes should be delegated needs to remain with local planning authorities and not be determined centrally.

**Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.**

The City Corporation supports the ambition for local plans to be more visual and map-based, but in the absence of further information on the proposed national template, it is difficult to understand what the impact of Proposal 7 will be. Any national template will need to be sufficiently flexible and adaptable to reflect local circumstances and local priorities.

The need for plans to be accessible in a range of formats, including on a smartphone, is supported. Local Plan should be easy to read and understand and not simply based around a single pdf document online. However, digital accessibility is not the same as accessibility for all communities. Not all sections of the community are able to access plans in a digital form. There needs to remain provision for plans and for consultation on plans to take place via hard copies of documents to ensure all sectors of the community have access to important decisions that impact their lives.

**Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.**

The City Corporation supports the Government's ambition to speed up the process of developing and adopting a local plan. However, the 30 month time limit is not considered to be consistent with the need to undertake meaningful community consultation and engagement, the preparation of policy supported by a robust evidence base, or ensure democratic accountability through local authority committee and cabinet processes. There is a proposal that, where a local plan is at an advanced stage of preparation at the time of the passing of primary legislation, a new plan meeting the requirements of the revised planning system should be prepared within 42 months. This seems a more realistic timeframe for all local plans, along with continued encouragement to produce plans, or alternations to plans, more rapidly, where possible,



The revised planning system places much greater weight on the role of the local plan and requires all land to be categorised into one of 3 land use categories. In urban areas, in particular, where there is a complex and overlapping series of national and local designations, it is hard to see how a robust categorisation can be undertaken and agreed, or detailed assessment of the capacity for development on individual sites completed, within the timescales set out. Allocations, which in some instances will carry with them a permission in principle or a presumption in favour of development, will need to be supported by a robust evidence base.

Delivery against the more rapid timescales set out in the consultation ultimately relies upon sufficient resources within the local planning authority to prepare and progress the Local Plan. Elsewhere in the White Paper, reference is made to a reallocation of resources to other planning functions as a result of the simplification of Local Plan processes. In fact the opposite is likely, i.e. that to deliver a robust and sound Local Plan within a shorter timeframe will require additional resource, both staff and financial.

**Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools**

The City Corporation supports the continued role for neighbourhood plans within a reformed planning system but is concerned that little information and detail on the role of neighbourhood plans is provided. The potential for expanding the scope of neighbourhood plans is mentioned. If this is taken forward, this will place additional pressure on local planning authorities who have a statutory duty to support the preparation of such plans.

**Proposal 10: A stronger emphasis on build out through planning**

The Government's proposals hinge on the assertion that local planning authorities have a wider role in delivering development beyond the granting of permission. Delivery against agreed local plan targets is a matter for the development industry and not the local planning authority. The Local Government Association has published data showing that in the 10 years from 2009/10, 2,564,600 homes were granted planning permission, yet only 1,530,680 were built. The reformed planning system needs to explicitly recognise the limitations on local planning authorities and not penalise authorities for the failure of developers to deliver the development required.

The suggested approach for substantial development sites reflects the findings of the Letwin Report and would assist delivery on the larger residential sites. It is not clear that this would be a realistic option for larger commercial development sites.

**Pillar 2: planning for beautiful and sustainable places**

**Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.**

The emphasis on local design solutions, prepared and agreed with local communities is supported. The proposed national design guide, national model

design code and the revised manual for streets can provide a framework for local decision making but should not provide an inflexible framework for local guidance. National level guidance cannot reflect locally specific circumstances, needs or the ambitions of local communities. To be effective, local planning authorities will need to be sufficiently resourced, in financial, staff and skills, to deliver local codes and ensure the allocation of sites within Local Plans.

**Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.**

The City Corporation supports the intention to create a new body which can support the production of locally supported design codes, noting that an announcement has been made on 22 September 2020 which takes this proposal forward in advance of the close of the consultation. Not all local planning authorities have the necessary resources and skills to prepare such guidance and codes and external support will be important. This national design body should provide support and not binding regulation; decisions on design guidance and codes must be taken locally.

The City Corporation supports the intention to require the appointment of a chief officer for design and placemaking. This will give additional weight to the work of planning departments.

The City Corporation is concerned that there is an assumption that simplifying local plan processes will release resource to deliver other planning priorities. Many local planning authorities have limited resources allocated to plan making with little, if any, scope for re-allocation. Furthermore, the changed nature of local plans, their greater weight and faster timescales are likely to require more resource for local plan preparation, rather than less.

**Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.**

The Government's focus is on delivering housing and this proposal, whilst welcome, will only address the housing sector, and not other key sectors of the development industry. The City Corporation expects the proposed new national design body to provide a wider range of guidance which covers all forms of development and open spaces.

**Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.**

The City Corporation supports the principles underpinning the 'fast track for beauty' and the suggested approach based on guidance in local design guides and codes. It needs to be clarified, however, that compliance with design guidance is not the sole avenue for determining the acceptability of a development proposal. The fast track approach also requires schemes to demonstrate compliance with wider local plan aspirations for an area or site.

The proposal that a masterplan and site specific design code prepared by the local planning authority will be required for sites within growth areas is supported. To ensure certainty, it should be a requirement that these additional plans are prepared alongside the Local Plan and this should be factored into the timescales for Local Plan preparation, which will need to be longer than 30 months. Examination of the detail in masterplans at the Local Plan examination will be essential to deliver local community support for larger scale development.

The City Corporation does not support further extension of permitted development rights which remove the ability of a local planning authority to manage development and transport in an area and ensure development is compatible with local community ambitions.

**Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.**

The principle of having clearer and simpler guidance on how the planning system can support measures to mitigate and adapt to climate change and maximise environmental benefits through development is supported. Similarly the City Corporation supports an enhanced role for Local Plans in ensuring development proposals support climate change mitigation and adaptation. It is important, however, that the revised system requires development in all areas, not just Protected Areas, to deliver a net gain for the environment. Development in all parts of the country, whether in Growth, Renewal or Protected Areas, needs to have at its heart an ambition to deliver high quality environments that take account of nature and will, enhance biodiversity, maintain and restore habitats and reverse species decline and create new habitats across urban and rural areas. Action on climate change mitigation and adaptation should underpin all local planning activity, with a clear requirement that new development and refurbishment must deliver against the Government's national and local targets for mitigation and adaptation.

**Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.**

The City Corporation supports reform to the process of SEA, SA and EIA. Although these processes have the protection and enhancement of the environment at their heart, they have lost focus, with an emphasis on process rather than outcome. Assessments are intended to be a continuous process, informing the design and delivery of plans and projects, but too often have been used to demonstrate compliance at the end of the development process. Reform to emphasise the need for assessment to be continuous and to inform and guide development decisions to ensure a net environmental gain from development, is needed.

The City Corporation is concerned that the White Paper focusses on the role of local plans, zoning of land and removal of bureaucracy and does not sufficiently address where environmental protection and enhancement dovetails into this process. In any revisions to environmental assessment procedures, there needs to be a requirement that environmental considerations are at the heart of the local plan and development

processes, in Growth, Renewal and Protected Areas, rather than being an add on at the end of the process. The need to protect and enhance habitats should not be limited to the 'most valuable and important habitats and species' but should be a fundamental principle that underpins the entire planning system, alongside measures to mitigate and adapt to climate change.

**Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century**

The commitment to conserving and enhancing heritage assets is welcomed. The intention to allow for sympathetic change, particularly to address climate change, is also supported, provided that measures retain an emphasis on retention of the heritage value of assets. The development of further guidance will need to involve Historic England, other heritage organisations and local planning authorities.

**Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.**

The City Corporation welcomes the commitment to delivering energy efficiency improvements and the national net zero target of 2050. The City Corporation has adopted an ambitious Climate Action Strategy which aims for net zero carbon in its own activities by 2027 and net zero for the whole of the City of London by 2040. The City Corporation is keen to work with partners and other organisations on the delivery of net zero and is happy to work with MHCLG to share its experience and research to inform the delivery of national targets. Delivery of net zero should consider emissions from all sources, covering scope 1, 2 and 3 emissions.

The City Corporation also welcomes the recognition of the important role that the planning system can play in achieving net zero carbon through new development and refurbishment. However, other than reference to the Future Homes Standard, the consultation paper provides little detail of how zero carbon can be delivered in non-housing development, through changes to transport infrastructure, or the role of green spaces, green walls and roofs and SuDS in helping to mitigate against the impacts of climate change and ensure the built and natural environments are more resilient to change. The City Corporation considers that the government could be even more ambitious and address the need to achieve zero carbon targets in non-residential development and transport infrastructure and set a challenging role for the planning system at the heart of the required transformation.

The City Corporation notes the reference to the potential to reassign planning resources to focus more fully on planning and building regulation enforcement. It is not clear whether there is an expectation that planning authorities will take on a new role of assisting in the enforcement of building regulations, but building regulations are a separate regulatory regime requiring different skills and expertise and it would be inappropriate to rely on planning officers to enforce these regulations.

**Pillar 3: planning for infrastructure and connected places**

**Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold,**

**with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.**

The City Corporation has operated a CIL since 2014 alongside s106 planning obligations. This approach has worked effectively and more recent changes to CIL, such as removing the restriction on the mixing of s106 and CIL to fund infrastructure, will allow more effective infrastructure delivery going forward. The requirements for CIL and s106 in the City are well known and understood by most developers and wholesale replacement with a new system would be a retrograde step. Evolution and refinement would provide continuity and certainty. It would also enable the continued use of s106 to deliver site specific mitigation and non-financial mitigation such as contributions towards training and skills provision, which could potentially be lost under the White Paper proposals.

There are elements of the proposed Infrastructure Levy that could usefully be incorporated into the existing system, such as the potential to borrow against future levy receipts and greater flexibility on how the Levy could be spent, albeit that this should continue to emphasise the need for the Levy to be used to fund necessary infrastructure and not wider council services. Extending funding beyond infrastructure and mitigation breaks the link between development and infrastructure improvements which is necessary to not only mitigate the impact of development, but also to make development acceptable to local communities.

Clarification is also needed on the relationship between the Levy applied at borough level in London and the Mayoral Levy. Further information is needed on the proportion of funding that could be passed to the Mayor and the Mayor's role in administering the Levy at the local level.

**Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights**

The City Corporation welcomes the intention that the Levy could be applied to schemes delivered through permitted development rights and those where there is no uplift in floorspace. This will address a gap in current CIL guidance and ensure that impacts on infrastructure delivery arising from such changes can be addressed.

**Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision**

The City Corporation considers that national policy should continue to focus on on-site delivery of affordable housing alongside market housing. The provision of off-site affordable housing or financial payments to deliver affordable housing elsewhere should continue to be the exception. In this way the delivery of affordable housing can contribute to the creation of mixed and balanced communities that address a range of housing needs.

Although the City Corporation considers that the presumption should be for on-site delivery of affordable housing, the Infrastructure Levy would enable the provision of off-site provision which will assist the City Corporation in the provision of new affordable housing on its estates outside of the City of London. However, the potential for off-site contributions or commuted sums is already set out in national guidance and such delivery does not require further change.

In relation to affordable housing, the White Paper refers simply to affordable housing, defined in its widest sense and including a range of low cost home ownership products. The housing need in the City of London is primarily for social rented housing, with even low cost home ownership out of reach of many people on the City Corporation's housing register. Clarification is needed that the White Paper's definition of affordable housing includes social rented housing and provides flexibility for local definitions to meet local needs.

**Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy**

The City Corporation welcomes the intention to give greater flexibility to local authorities in the spending of the Infrastructure Levy. However, this flexibility needs to be exercised in the context of the required infrastructure plans to ensure that the infrastructure necessary to support development and local communities is delivered. A key principle of the existing s106 planning obligations mechanism is that there is a direct link between development and the infrastructure and mitigation needed to allow that development to proceed. This direct link is also critical in ensuring local community support for development. The link between development and infrastructure needs to be retained and the City Corporation's view is that this can most effectively be achieved by maintaining and continuing with the current approach to infrastructure contributions through s106 and CIL.

**Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms. In doing so, we propose this strategy will be developed including the following key elements:** Central to the role of the planning authority is the delivery of a service for the public good, exercising the management of planning to ensure development enhances the local community, economy, environment and society. The proposals would retain an element of nationally set planning fees to offset the cost of development management, but much of the cost of local plan preparation and design guidance preparation would be met through the Infrastructure Levy. In areas where there is little development, where there are significant Protection Areas, or where the uplift in development value is insufficient to justify an Infrastructure Levy charge, it is not clear where the funding for local planning services would come from. Making planning dependent on funding from development also runs the risk that inappropriate development could be permitted to ensure continued funding, that planning decisions are made on financial grounds, or that local planning services are perceived as being too closely associated with the development industry to the detriment of the local community. This is a particular concern if development value uplift is funding the preparation of local plans which, in turn, grant permission in principle for new development.

Funding for local planning services needs to continue to come principally from a combination of application fees and general taxation/local authority funding to ensure retention of the independence of the planning function.

**Proposal 24: We will seek to strengthen enforcement powers and sanctions**

The City Corporation supports the aim to strengthen enforcement powers and sanctions to ensure that local plan ambitions are met and not frustrated and that

development accords with the aims of the local plan. The City Corporation does not accept that the changes outlined in the White Paper will deliver spare capacity which can be reallocated to enforcement – the revised and speeded up local plan process and the production of design guides and codes will require additional resource and there will continue to be a role for development management in determining applications and technical consent applications. The City Corporation therefore considers it likely that additional public funding will be needed to deliver on the ambitions for enhanced enforcement.

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# Agenda Item 8

<p><b>Committee(s):</b>          Finance – For Decision          Court of Common Council – For Decision</p> <p>Barbican Centre Board – For Information          Community &amp; Children’s Service – For Information          Culture Heritage &amp; Libraries – For Information          Epping Forest &amp; Commons – For Information          Establishment Committee – For Information          Hampstead Heath, Highgate Wood &amp; Queens - For Information          Licensing – For Information          Open Spaces – For Information          Planning &amp; Transportation - For Information          Port Health – For Information</p>	<p><b>Date(s):</b>          13 October 2020          3 December 2020</p> <p>18 November 2020          6 November 2020          23 November 2020          16 November 2020          29<sup>th</sup> October 2020</p> <p>25 November 2020          14 October 2020          2 December 2020          27<sup>th</sup> October 2020          24<sup>th</sup> November 2020</p>
<p><b>Subject:</b>          Resetting of departmental Budgets 2020/21</p>	<p><b>Public</b></p>
<p><b>Report of:</b>          Chamberlain</p>	<p><b>For          Decision/Information</b></p>
<p><b>Report author:</b>          Julie Smith</p>	

## Summary

At Resource Allocation Sub Committee on 18<sup>th</sup> September 2020 Members considered and approved recommendations for budget adjustments of £15.6m , following a request at their July Committee for an in-year re-budgeting exercise to assist in repairing the damage to the City’s budgets arising from the COVID-19 pandemic. This was seen as a vital step in ensuring that we put our finances on a sustainable footing for the Medium Term.

Members of Finance Committee are asked to recommend to the Court of Common Council the budget adjustments outlined in this report totalling £15.2m to some departmental local risk budgets, (including a reduction of £400K to the original proposal to Resource Allocation Sub Committee for Open Spaces), to address the deficit in lost income due to the COVID-19 pandemic, and set realistic budgets that Chief officers can be held to this financial year (2020/21).

Members of the relevant Service Committees are asked to note the recommended budget adjustments which, subject to the agreement of the Court of Common Council in December, will be reflected in their detailed Revised Estimates 2020/21 and proposed Budget Estimates 2021/22 reports for their approval.

The mitigating steps leading up to the recommended budget adjustments include a thorough year end budget forecast exercise as at the end of July, informed by bi lateral meetings between the Chamberlain and Chief Officers, reaching a common understanding of the need for tight budgeting. This tight budgeting has resulted in

expenditure savings in local risk budgets of £21.3m, partially offsetting an income deficit of (£39.2m). This process was followed by Member lead bilaterals in September with those service areas most impacted by COVID.

The impact of COVID-19 stands at around (£28.4m) across all risks and funds of which (£17.9m) relates to Chief Officers local risk budgets. We are hopeful of recovering an estimated £13.6m from the Government's compensation for lost fees and charges of 75p in the pound net of associated expenditure reductions which will be used to offset the appropriate budget adjustments. The remaining City Fund COVID deficit would then need to be covered by scaling back the planned addition to the major projects reserve.

Further steps proposed are to maintain recruitment controls, including the use of Consultants, aligned to the roll out of the Target Operating Model (TOM) and continuing to press for further savings where possible to preserve the reserves position. Any residual COVID deficit will then be covered, in the case of City Fund, through an offsetting reduction in the Reserve.

### **Recommendation(s)**

Members of Finance Committee are asked to:

- Note the steps already taken by officers to reduce the financial impact of the COVID-19 pandemic.
- Recommend to the Court of Common the adjusted departmental budgets totalling £15.2m outlined in this report, including a reduction of £400K to the original proposal to Resource Allocation Sub Committee for Open Spaces explained at paragraph 9.
- .
- Approve proposals to continue working with departments to identify further savings where possible.
- Approve continuation of recruitment controls aligned to the TOM which may give further savings in the year.
- As Service Committee, note the increase in budget of £1,084K for the Remembrancer

Members of the following Service Committees are asked to note the recommended budget adjustments as outlined below: -

- Barbican Centre Board: Increase of £12,452K
- Community & Children's services: Increase of £184K for Director of Community & Children's Services
- Culture Heritage & Libraries Committee – Increase of £392K for Open Spaces (Monument).

- Establishment Committee: Increase of £420K for Comptroller & City Solicitor
- Licensing Committee: £156K for Markets & Consumer Protection
- Open Spaces/Epping Forest & Commons/Hampstead Heath, Highgate Wood & Queens Committees: Increase of £66K.
- Planning and Transportation: Increase of £310K for Director of Built Environment
- Port Health:
  - Increase of £301K for Markets & Consumer Protection
  - Reduction of £148K in respect of Open Spaces (City of London Cemetery) due to increase in forecast income

## **Main Report**

### **Background**

1. On 18<sup>th</sup> September 2020 Members of Resource Allocation Sub Committee considered and approved recommendations for budget adjustments totalling £15.6m following their instruction to officers at their meeting in July, to carry out a re-budgeting exercise in the Autumn to assist in repairing the unprecedented damage to the City's budgets arising from the COVID-19 pandemic. This was seen as a vital step in ensuring that we put our finances on a sustainable footing for the Medium Term.
2. The following mitigating actions have been undertaken: -
  - Restriction of carry forwards from 2019/20 to protect the reserves position;
  - Recruitment controls; requiring a business case to recruit agreed by the Town Clerk
  - A review of high value contracts with City Procurement to see where any possible savings could be achieved and on-going monitoring to ensure value for money
  - An in-depth departmental re-forecasting exercise undertaken as at the end of July, crystallising expenditure reductions to limit COVID impact;

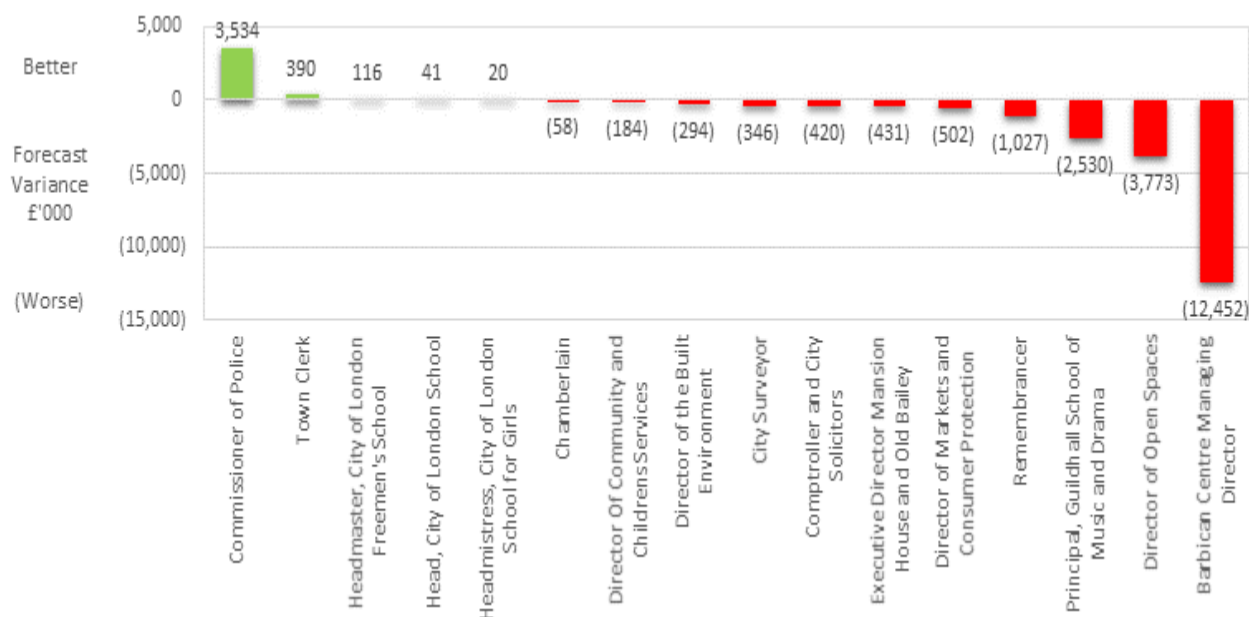
- Collaborative bilateral meetings between the Chamberlain and Chief Officers took place resulting in a common understanding of the need for continued tight budgeting;
- Member bilaterals (Chair/Deputy Chairman of RA Sub) with some Service Committee Chairmen and Chief Officers.
- A review of the Cyclical Works Programme (CWP) with the City Surveyor as unlikely to complete a significant amount of work in year due to suspension during the lockdown period; and
- Seeking government funding where possible through compensation on lost fees and charges of 75p in the pound on City Fund income.

### Current Position

3. Despite the mitigating actions being taken, we face, as a result of COVID-19, a major challenge to the health of our finances. The forecast deficit at the end of July currently stood at (£28.4m) across the funds before government compensation for income lost from fees and charges. The breakdown by fund across both central and local risk is (£16.8m) City Fund, (£7.0m) City's Cash and (£4.6m) Bridge House Estates.
4. For Chief officers' cash limited budgets, a year-end forecast over spend of (£17.9m) is forecast against a budget of (£247.9m) (7.2%).
5. The table below shows the high-level year end forecast position for Chief Officer's local risk budgets by fund:

£'000	Original budget 2020/21	Latest budget 202/21 (including carry forwards)	Forecast as at end of July	Variance
City Fund (CF) (excl. Police)	(72,503)	(74,668)	(87,919)	(13,251)
City's Cash (CC)	(43,679)	(43,967)	(48,206)	(4,239)
Bridge House Estates (BHE)	(6,186)	(6,186)	(8,741)	(2,555)
Guildhall Administration (GA)	(37,938)	(38,206)	(39,611)	(1,405)
<b>Total (excluding Police)</b>	<b>(160,306)</b>	<b>(163,027)</b>	<b>(184,477)</b>	<b>(21,450)</b>
Police	(84,884)	(84,884)	(81,350)	3,534
<b>Grand Total</b>	<b>(245,190)</b>	<b>(247,911)</b>	<b>(265,827)</b>	<b>(17,916)</b>

6. The forecast position comprises a reduction in income of (£39.2m) on an income budget of £294m, partially offset by an underspend of £21.3m on budgeted expenditure of (£542.1m); demonstrating the action taken by Chief Officers to reduce expenditure to limit the impact as far as possible of reductions in income.
7. Chief Officers' variances against net local risk budgets are shown in the chart below. The detailed breakdown by Chief Officer by Fund is shown at Appendix 1.



8. The most heavily impacted is the Barbican Centre; forecasting an overall overspend of (£12.5m) at year end. This comprises a shortfall of (£22.0m) on income due to the centre being closed, and limited activity being forecast for the remainder of the financial year due to social distancing measures. Expenditure has however, been reduced by £9.6m due to activity reductions and a hold on all non-essential expenditure. **It is proposed to reset the budget envelope from (£17,389) to (£29,841)**

9. Open Spaces is forecasting an overspend of (£3.7m) broken down as follows: -
  - (£3.1m) BHE due to income shortfalls relation to Tower Bridge. It is proposed that the Tower Bridge shortfall is covered by a reduction in transfer to BHE reserves at year end.
  - (£858k) City's Cash forecast income deficit on City's Cash. Following a Senior Member lead bilateral meeting with the Director of Open Spaces and the Chamberlain, and subsequent discussion at Resource Allocation Sub Committee on 18<sup>th</sup> September it, was concluded that there was scope to reduce expenditure and increase income further at Epping Forest. **it is therefore proposed to reduce the Open Spaces budget adjustment by £400K and reset the latest approved budget from (£11,852) to (£12,310) to cover the Monument income shortfall of £392K; the balance of £66K for income shortfalls at other Open Spaces** It is recognised that there is pressure on Epping Forest budgets which we will

continue to focus on, with an understanding this might lead to a year end overspend.

- £148k City Fund forecast under spend of £148K is due to additional income from the City of London Cemetery activity. **It is proposed to rest this budget from £564k to £712k to be utilised towards the additional costs to City Fund.**
10. GSMD is forecast to be (£2.5m) worse than budget reflecting lost income from short courses, letting student accommodation and space to external providers during summer term, removing bar and catering income and reduced fees from under-18 provision. Further losses may arise depending on the number of students returning for the new academic year. In addition, GSMD will incur additional costs for space, equipment and staffing to support socially distanced onsite as well as online teaching. The City is a joint funder with the Office for Students and there is an agreement not to reduce the City's contribution to continue to secure Higher Education Statistics Agency (HESA) Funding. It is anticipated that GSMD continue to call on their reserves; the same approach as for the City's Independent Schools (see paragraph 19).
  11. Remembrancer has a forecast deficit due to loss in income of (£1.0m) due to no private event hire taking place at Guildhall since the start of the financial year. Three of the four most lucrative months in the year - May, June, September and November - will achieve nil or very nearly nil income. **It is proposed to reset the budget from £274k to (£810k) to cover the loss of income.**
  12. The Director of Markets and Consumer Protection is forecasting an overspend of (£502k), mainly on City Fund activity (£457K) due to increased costs at the Ports in preparation for Brexit and loss of income at the Animal Reception Centre. The balance on City's Cash relates to lost income from car parking charges at Billingsgate and Smithfield Markets. **It is proposed to reset City Fund budget from (£2,240k) to (£2,697k) to cover the income deficit.**
  13. Mansion House and Old Bailey forecast overspend of (£431K) includes recovery of an overspend of (£248K) from 2019/20. At the bilateral meeting with the Executive Director further expenditure savings were discussed, **therefore no budget reset is proposed at this time.**
  14. The Comptroller and City Solicitor is forecasting an external income deficit of (£420K) due to a lack of property deals. **It is proposed to reset the budget from (£845k) to (£1,265k) to cover the income shortfall.**
  15. The City Surveyor is forecasting a net overspend across the funds of (£346K), this includes a carry forward of (£320K) from 2019/20. **It is not proposed to reset the budget for 2020/21 at this time.**
  16. The Director of the Built Environment (DBE) forecast an overspend of (£310K), mainly relates to a forecast income shortfall of (£2.5m), most significantly within off-street parking, traffic management, public conveniences, drains & sewers and building control services. However, expenditure reductions of some £2.3m through

reduction in highways repairs and maintenance, early removal of Automated public conveniences and contract savings have reduced the impact considerably. **It is proposed to reset the budget from (£20,243K) to (£20,553K) to cover the net deficit.**

17. The Director of Community and Children's services is forecasting an overspend of (£184K), the largest pressure is on rough sleepers and homelessness budget due to COVID-19, at an estimated cost of (£1.4m) until 31<sup>st</sup> March 2021. The majority of the extra costs are being absorbed by a current underspend on adults/older people social care. Income levels are estimated to be around 30% once services reopen. **It is proposed to reset the Director's budget from (£12,791K) to (£12,975K) to address the shortfall.**
18. The Chamberlain is forecasting a net overspend across the funds of (£58K). This is due to various additional essential unbudgeted expenditure, including additional staff resource for essential financial modelling work. There is also income loss in Freedom ceremonies due to the COVID 19 pandemic. **It is not proposed to reset the Chamberlain's budget at this time.**
19. The Independent Schools are managing within their reserves as shown by their breakeven position. No budget resets are therefore proposed.
20. The Town Clerks overall forecast position is a net underspend of £350K. However, this includes additional P&R income of £990k expected in relation to COVID related grants to reimburse expenditure for works undertaken by the Strategic COVID Group, which is offset by income shortfalls in Cultural Heritage. **It is not proposed, therefore, to reset the Town Clerk's budgets.**
21. The Commissioner of Police is currently forecasting an underspend of £3.5m. It is proposed to continue to monitor the Police position, recognising that any underspend will be directed to repayment of the Action Fraud loan to the City Corporation.

## **Proposals**

22. It is proposed that Finance Committee Members recommend to the Court of Council that local risk budgets are reset for the following departments as summarised in the table below: -

£'000

Department	From	To	(Increase) /Reduction	Fund
Barbican Centre	(17,389)	(29,841)	(12,452)	CF
Open Spaces	(11,852)	(12,310)	(458)	CC
Open Spaces	564	712	148	CF
Remembrancer	274	(810)	(1,084)	GA
Markets & Consumer Protection	(2,240)	(2,697)	(457)	CF
Comptroller & City Solicitor	(845)	(1,265)	(420)	GA
DBE	(20,243)	(20,553)	(310)	CF
Community & Children's services	(12,791)	(12,975)	(184)	CF
Total	(64,522)	(79,739)	(15,217)	

23. Where Chief Officers local risk budgets are not recommended for adjustment, but significant efforts have been made to mitigate the position/deliver savings, it is proposed discussions take place at year end regarding handling of any overspend positions.
24. Our current estimates indicate support from the Government for lost fees and charges on City Fund income could be in the region of £13.6m. The first claim from April until end of July was submitted at the end of September. The income recovered will be used to offset the appropriate budget adjustments proposed.
25. It is also proposed to continue with the current recruitment constraint, including the use of Consultants, aligned to the rollout of the Target Operating Model to secure further savings by the end of the financial year.
26. Further savings will also continue to be explored with departments to reduce the overall impact on the reserves position.
27. The budget in the Medium-Term Financial Plan (MTFP) for the CWP in 2020/21 is £22.8m. The latest forecast estimate for works anticipated to be completed is £10.7m. A report is being prepared by the City Surveyor outlining proposals for a revised annual programme from 2021/22.

### Financial Implications

28. The overall 2020/21 City Fund starting position would have added £27.3m to reserves to contribute to the future financing of the major projects.
29. The proposed COVID adjustments to Chief Officers local risk budgets total £15.2m (£14m City Fund and £1.2m City's Cash). The £14m City Fund adjustment can be



met by scaling back the addition to the major projects reserve to £13.3m. The City Cash adjustment of £1.2m can be funded but will impact the net asset position.

## **Conclusion**

30. Despite the mitigating actions being taken, we face, as a result of COVID-19, a major challenge to the health of our finances. Proposals to reset budgets for Chief Officers most impacted by loss of local risk income will provide realistic budgets for them to be held to.

## **Appendices**

- Appendix 1 – Chief Officers local risk end of year forecast at end of July 2020 by fund

## **Background Papers**

- Briefing 2 – Financial impact of COVID 19 – Finance Committee 19 May 2020
- Resetting of Budgets 2020/21 – Resource Allocation Sub Committee 18 September 2020.

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Chief Officer Cash Limited Budgets by Fund					
Original Budget £'000	Chief Officer	Full Year Forecast as at 31 July 2020			
		Latest Budget £'000	Forecast £'000	Variance Better / (Worse) £'000	%
	<b>City Fund</b>				
(1,755)	Chamberlain	(1,755)	(1,420)	335	19%
(5,117)	City Surveyor	(5,240)	(5,109)	131	2%
(11,168)	Director of Community and Children's Services	(12,791)	(12,975)	(184)	(1%)
(2,199)	Director of Markets and Consumer Protection	(2,240)	(2,697)	(457)	(20%)
564	Director of Open Spaces	564	712	148	26%
(20,196)	Director of the Built Environment	(20,243)	(20,553)	(310)	(2%)
(402)	Executive Director Mansion House and Old Bailey	(242)	(531)	(289)	(120%)
(17,165)	Managing Director, Barbican Centre	(17,389)	(29,841)	(12,452)	(72%)
(15,065)	Town Clerk	(15,332)	(15,504)	(172)	(1%)
<b>(72,503)</b>	<b>Total City Fund (excluding Police)</b>	<b>(74,668)</b>	<b>(87,919)</b>	<b>(13,251)</b>	<b>(18%)</b>
	<b>City's Cash</b>				0%
(99)	Chamberlain	(99)	(174)	(75)	(76%)
(16,228)	City Surveyor	(16,143)	(16,972)	(829)	(5%)
(1,052)	Director of Community and Children's Services	(1,122)	(1,122)	0	0%
(1,365)	Director of Markets and Consumer Protection	(1,668)	(1,713)	(45)	(3%)
(11,822)	Director of Open Spaces	(11,852)	(12,710)	(858)	(7%)
(3,334)	Executive Director Mansion House and Old Bailey	(3,246)	(3,388)	(142)	(4%)
(1,217)	Head, City of London Boy's School	(1,217)	(1,176)	41	3%
118	Headmaster, City of London Freeman's School	118	234	116	98%
(275)	Headmistress, City of London School for Girls	(275)	(255)	20	7%
(6,799)	Principal, Guildhall School of Music and Drama	(6,799)	(9,329)	(2,530)	(37%)
(1,391)	Remembrancer	(1,391)	(1,334)	57	4%
(215)	Town Clerk	(273)	(268)	5	2%
<b>(43,679)</b>	<b>Total City's Cash</b>	<b>(43,967)</b>	<b>(48,206)</b>	<b>(4,239)</b>	<b>(10%)</b>
	<b>Bridge House Estates</b>				0%
(45)	Chamberlain	(45)	(45)	0	0%
(2,703)	City Surveyor	(2,703)	(2,690)	13	0%
(243)	Director of Open Spaces	(243)	(3,306)	(3,063)	(1,260%)
(275)	Director of the Built Environment	(275)	(259)	16	6%
(2,920)	Town Clerk	(2,920)	(2,441)	479	16%
<b>(6,186)</b>	<b>Total Bridge House Estates</b>	<b>(6,186)</b>	<b>(8,741)</b>	<b>(2,555)</b>	<b>(41%)</b>
	<b>Guildhall Administration</b>				0%
(22,165)	Chamberlain	(22,358)	(22,676)	(318)	(1%)
(8,666)	City Surveyor	(8,686)	(8,347)	339	4%
(845)	Comptroller and City Solicitor	(845)	(1,265)	(420)	(50%)
274	Remembrancer	274	(810)	(1,084)	(395%)
(6,536)	Town Clerk	(6,591)	(6,513)	78	1%
<b>(37,938)</b>	<b>Total Guildhall Administration</b>	<b>(38,206)</b>	<b>(39,611)</b>	<b>(1,405)</b>	<b>(4%)</b>
<b>(160,306)</b>	<b>Grand Total (excluding Police)</b>	<b>(163,027)</b>	<b>(184,477)</b>	<b>(21,450)</b>	<b>(13%)</b>
(84,884)	Commissioner of Police (City Fund)	(84,884)	(81,350)	3,534	4%
<b>(245,190)</b>	<b>Grand Total</b>	<b>(247,911)</b>	<b>(265,827)</b>	<b>(17,916)</b>	<b>(7%)</b>

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<b>Committee:</b> Planning and Transportation Committee	<b>Dated:</b> 27 October 2020
<b>Subject:</b> Transport Strategy Kerbside Review – Action Plan	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	9 & 10
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>What is the source of Funding?</b>	Local Implementation Plan /City Transportation’s monitoring budgets
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	Y
<b>Report of:</b> Director of the Built Environment	<b>For Information</b>
<b>Report author:</b> Averil Pittaway	

## Summary

One of the outcomes in the City of London’s Transport Strategy focuses on street space being used more efficiently and effectively. The kerbside, in particular, is identified as an element of the street that could be made more efficient. Under proposal 14 it is set out that the use and management of the kerbside and City Corporation car parks will be kept under frequent review. The first review is to be completed by 2022 and will consider a number of changes to the way the kerbside is currently used.

To initiate this first review, a comprehensive data collection exercise consisting of a number of surveys on the use of the Square Mile’s kerbside and the City Corporation public car parks was carried out in Autumn 2019. This report summarises the findings of this data collection exercise and details an Action Plan that sets out the next steps that will complete the review.

## Recommendation

Members are asked to:

- Note the report.

## Main Report

### Background

1. The City of London Corporation is responsible for managing the kerbside on all streets within the Square Mile, except for the Transport for London Road Network. The kerbside is a key use of public space within the Square Mile that provides a variety of infrastructure and allows a number of activities to take place.

2. The City of London's Transport Strategy sets out how the City's streets will be designed and managed over the next 25 years to ensure the Square Mile remains a great place to live, walk, study and visit.
3. One of the Strategy's ten outcomes focuses on street space being used more efficiently and effectively. The kerbside is identified as an element of the street that could be made more efficient. Proposal 14 sets out that the use and management of the kerbside and City Corporation car parks will be kept under frequent review.
4. The first kerbside review is to be completed by 2022 and will consider a number of changes to the way the kerbside is currently used.

### **Current Position**

5. A comprehensive data collection exercise consisting of a number of surveys on the use of the Square Mile's kerbside and the City Corporation public car parks was carried out in Autumn 2019.
6. The data has been analysed to understand how the Square Mile's kerbside is used and managed and to identify issues or inefficiencies of its current use.
7. An Action Plan has been prepared based on the findings of the data collection exercise. This sets out the next steps to be undertaken for the kerbside review.
8. This report provides a summary of the current use of the kerbside (Appendix 1) and the Action Plan (Appendix 2).
9. To note, all data was collected pre COVID-19 and the Action Plan does not consider any short-term changes in the use of the kerbside and car parks as a response to the pandemic. Short term temporary changes to the kerbside as part of the City's transport response to COVID-19 recovery are addressed separately to this report and will be monitored accordingly. Progression of the kerbside review will however take in to account any changes to kerbside use (demand) or infrastructure (supply) in response to the pandemic that are likely to continue into the medium- or long-term.

### **Existing Kerbside Use**

10. The City of London is a Controlled Parking Zone (CPZ), meaning parking is controlled by hours and is only permitted in designated parking bays during these times (Mon to Fri 7am – 7pm, Sat 7am – 11am). The rest of the kerbside space is subject to yellow line restrictions.
11. In total, there are nearly 1,000 dedicated bays for motor vehicles on-street in the Square Mile. The vast majority are payment parking bays (623 bays), disabled bays (178 bays) and motorcycle bays (63 bays that provide approximately 1,000 motorcycle spaces). There are also taxi rest bays (31 bays), loading bays (25

bays), coach bays (18 bays). In addition to parking bays, there are also 33 taxi ranks.

12. Parking is prohibited at all times on double yellow lines, and on single yellow lines during the CPZ controlled hours. Loading is permitted at any time on a double yellow line and during displayed times where there are single kerb markings. Loading is not permitted at any time where there are double kerb markings.

13. The key findings of the kerbside surveys include:

- Overall, on-street bays are well used at most times during the day Monday to Friday. The peak time for the use of all bays is 11am on a weekday, when 72% of all dedicated bay space is occupied.
- Payment parking is highly used at all times; occupancy never drops below 50% at any time of the week. Motorcycle parking, disabled bay parking and loading bays are used far less during the evenings and weekends compared to during a weekday.
- Loading bays experience the highest turnover of parked vehicles as they have a maximum loading duration of 40minutes. 40% of vehicles parked in payment parking bays however park for longer than 3 hours. Motorcycle parking has the lowest turnover of parked vehicles; the vast majority of motorcycle parking is used for commuting purposes and therefore are parked for the duration of the working day.
- At the overall peak occupancy time in the five City Corporation car parks (12pm on a weekday), only half of the 1,400 parking spaces are occupied.
- There are five different types of loading restriction timings on-street. Loading and unloading can take place for a maximum of 40minutes at permitted times in permitted locations. The majority of loading outside of loading bays occurs in less than 20minutes.
- Signs, lines and enforcement does not discourage all drivers from illegal parking, waiting or loading at the kerbside. Most loading restrictions are in place to avoid obstruction or congestion to moving vehicles. This illegal parking and loading (as well as some legal activity) is most likely to contribute to the City having the lowest bus speeds in London (4.9mph in the morning peak).
- Half of all passenger pick ups at taxi ranks in the City occur at Liverpool Street Station and Fenchurch Street Station. Seven taxi ranks see less than ten passengers being picked up each day.

### **Summary of Action Plan**

14. The Action Plan sets out the next steps for the kerbside review to identify what changes are recommended to the use of the kerbside.

15. Within proposal 14 of the Transport Strategy, there is a list of potential changes to the kerbside to consider as part of the first kerbside review. The Action Plan addresses each change in turn and what tasks need to be completed to make a decision on the consideration.

16. In summary, the Action Plan seeks to:

- gain further data and information where there are gaps in our knowledge on the use of the kerbside. For example, engage with Disabled Badge Holders on their use of parking bays (both disabled bays and payment parking bays) and taxi drivers on their use of taxi ranks
- explore options and measures on how a number of the suggested changes could be implemented
- engage with neighbouring Boroughs and London Councils on suggested changes where there is a cross-boundary/London-wide impact
- align kerbside provision (i.e. loading restrictions) to the new City street hierarchy that has been adopted as part of the City of London Transport Strategy

17. All actions have individual completion dates, but all are proposed to be completed by mid-2022, in line with the Transport Strategy delivery target. Actions where the outcomes require a member decision will be brought to committee when completed. Any approved changes will then be subject to public consultation.

18. Once all actions within the plan have been completed, an overall final report of the completed review will also be brought to committee, by the end of 2022 at the latest.

### **Corporate & Strategic Implications**

19. The Kerbside Review Action Plan supports the following corporate objectives set out in the Corporate Plan:

- We are digitally and physically well-connected and responsive
- We inspire enterprise, excellence, creativity and collaboration

20. The Kerbside Review is a direct deliverable of Proposal 14 of the City's Transport Strategy – Make the best and most efficient use of the kerbside and City Corporation car parks.

### **Financial Implications**

21. The financial implications of the Action Plan consist of a proportion of staff time and possibly some costs associated with completing further parking surveys and data gathering. Costs of £50,000 will be met from Local Implementation Plan budget and City Transportation local risk budget.

22. The financial implications of any changes to the operation of parking, such as loss as parking income, will be considered as part of the review.



## Appendices

- Appendix 1 – Data Collection Summary Report
- Appendix 2 – Kerbside Review Action Plan

### **Averil Pittaway**

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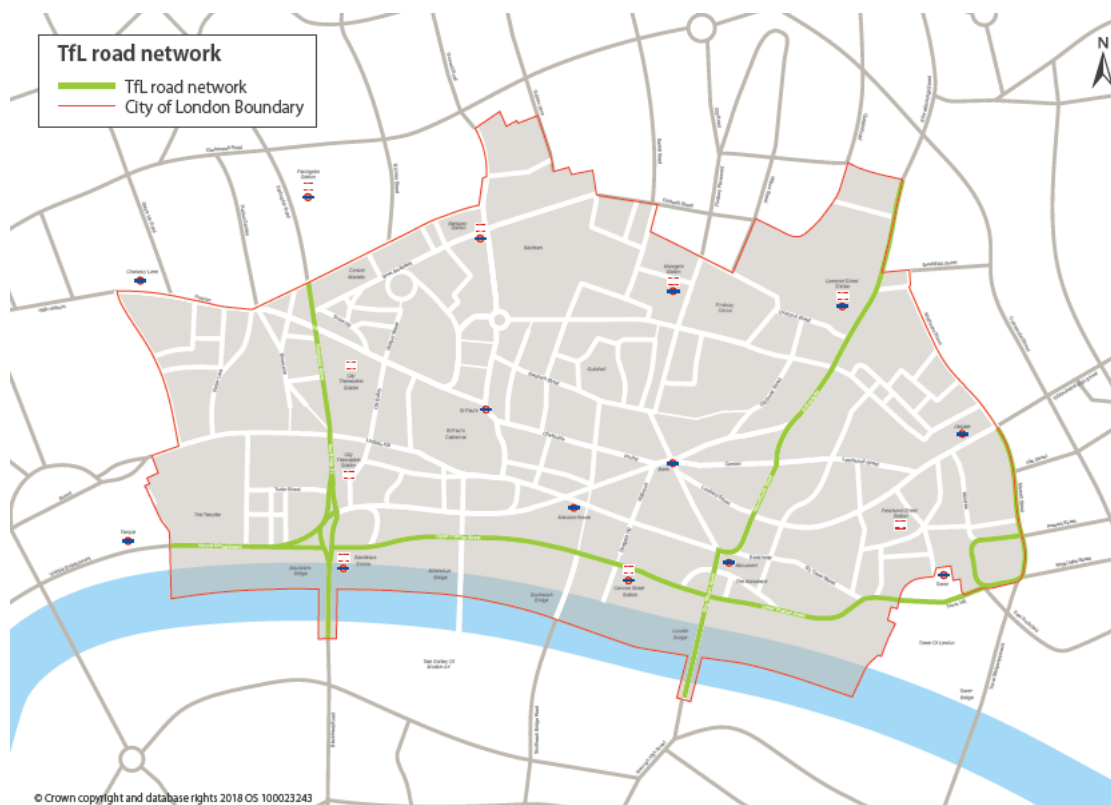
E: [Averil.pittaway@cityoflondon.gov.uk](mailto:Averil.pittaway@cityoflondon.gov.uk)

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## Appendix 1 - Data Collection Summary Report

The City of London Corporation is responsible for managing the kerbside on all streets within the Square Mile, except for the Transport for London Road Network. The kerbside is a key use of public space within the Square Mile that provides a variety of infrastructure and allows a number of activities to take place.

Figure 1. Transport for London Road Network



The City of London's Transport Strategy, adopted in May 2019, sets out how the City's streets will be designed and managed over the next 25 years to ensure the Square Mile remains a great place to live, walk, study and visit.

One of the Strategy's ten outcomes focuses on the street space being used more efficiently and effectively. The kerbside, in particular, is identified as an element of the street that could be made more efficient, and under proposal 14 it is set out that the use and management of the kerbside and City Corporation car parks will be kept under frequent review.

This report sets out the findings of a comprehensive data collection exercise on how the Square Mile's kerbside is used and managed, and an action plan for work to be undertaken on the review.

To note, all of the data in this report was collected pre Covid-19 and the action plan does not consider any changes in the use of the kerbside and car parks as a response to the pandemic. Short term temporary changes to the kerbside as part of the City's transport response to Covid-19 recovery are addressed separately to this report.

## Data Collection Results

### Kerbside Provision

The City of London is a Controlled Parking Zone (CPZ), meaning parking is controlled by hours and is only permitted in designated parking bays during these times, with the rest of the kerbside space subject to yellow line restrictions. The CPZ hours are 7am - 7pm Monday to Friday, and 7am - 11am on Saturdays.

Parking is prohibited at all times on double yellow lines, and on single yellow lines during the CPZ controlled hours. Loading is permitted at any time on a double yellow line and during displayed times where there are single kerb markings. Loading is not permitted at any time where there are double kerb markings.

Dedicated bays are provided on street for:

- Payment Parking (623 bays)
- Motorcycle Parking (64 bays providing approximately 1,000 spaces)
- Disabled Parking (178 bays)
- Coach Parking (18 bays)
- Loading (25 bays)
- Taxi Rest bays (31 spaces)
- Taxi Ranks (33 ranks providing space for 118 taxis)

In total, there are nearly 1,000 dedicated bays<sup>1</sup> (and taxi ranks) for motor vehicles on street in the Square Mile. Overall, the peak time for the use of the kerbside's dedicated bays is 11am on a weekday, when 72% of all dedicated bay space is occupied.

### Kerbside Parking Bays

#### Current Conditions

Payment parking bays are subject to charging during CPZ hours (with the first hour 7am-8am being free). During CPZ hours, the maximum parking duration is 4 hours. Payment parking is highly used at all times. The total supply of bays is nearly at full capacity during the day on a weekday. At 10am, 94% of payment parking bays are occupied. At other times, including overnight and weekends, at least half of all bays are in use. Half of vehicles parked in payment parking bays at peak times during the week are vans, and nearly half of all vans pay for more than three hours parking. There is no charge for evening or weekend use of payment parking, and occupancy levels on a Saturday evening are higher than on a weekday evening.

Motorcycle bays are used most during the working day, directly correlating with commuter travel. The peak occupancy level is 63% occupancy at 11am (however this is an approximation of space used, and is expected to be higher than this number in reality). The maximum parking duration for motorcycle parking is 24 hours, the longest maximum parking duration of all types of parking bays. During the week, the vast majority of motorcycles park for more than six hours. There is a varied split between distance travelled by motorcyclists who park on-street. Over 55% travel less than 15km, while 21% travel more than 30km.

Disabled bays can be used by Red Badge and Blue Badge holders free of charge. Red Badge holders can also use Payment Parking bays free of charge, while Blue Badge holders are

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<sup>1</sup> A number of bays/ranks provide space or parking for more than one vehicle. For example, the 33 taxi ranks provide space for 118 taxis in total

required to pay but are given an additional hour free of charge. Disabled bays have a relatively low level of use, and much lower occupancy levels than payment parking and motorcycle parking. The peak occupancy of disabled bays on a weekday is 38% at 12pm. A large proportion of disabled bays have a 0% average occupancy rate across a weekday. Some disabled spaces however are highly occupied, but as there is no maximum duration parking period the level of turnover is not known.

Coach parking is relatively well used during the week and at weekends. On a weekday, occupancy levels are highest at 4pm and 5pm, when 80% of bays are occupied.

### Identified Issues

The high occupancy rate of payment parking bays (peak occupancy of 94%) can make it difficult for those vehicles that need to park on-street to find a space (i.e. certain servicing vehicles or disabled drivers). This high occupancy level can also mean drivers are driving around the City in search of an available space, contributing to congestion and pollution. The optimal occupancy of parking spaces is 85%, so that the use of space is efficient but avoids the need for drivers to keep travelling around to find a space.

Parking for longer periods in payment parking bays and motorcycle bays reduces the turnover of spaces and is an inefficient use of valuable on-street space.

Free parking in payment parking bays during the evenings and for the majority of the weekend provides no disincentive to travel into the City by private car at these times. Likewise, providing free, long-stay on-street motorcycle spaces does not provide any disincentive to park on-street, rather than use free long-stay parking is also provided in City car parks. It also does not incentivise travel by alternative modes (walking, public transport or cycle).

It is unknown whether the low level of occupancy of disabled bays is due to there being a surplus of bays or whether they are not in the right locations. It is also unknown how many Red or Blue Badge Holders use payment parking bays. More investigation is needed by engaging with Red Badge Holders or more detailed parking surveys.

The majority of coach bay provision is located around St Paul's for tourist coaches, however most coaches do not use these to drop off or pick up passengers and instead use them to park. The bays therefore may not be required to be in such close proximity to St Pauls and it is unknown where drivers drop off and pick up their passengers.

### Other Kerbside Provision

#### Current Conditions

Taxi rest bays are relatively well used during peak hours on a weekday. 74% of rest bays spaces are occupied at lunchtime and 65% during the early evening.

Over 2,100 taxis pick up nearly 3,000 taxi passengers at City taxi ranks on a weekday. The majority (over 50%) of passenger pick-ups by taxis at taxi ranks are made at Liverpool Street Station and Fenchurch Street station. Some taxi ranks are poorly used by taxi passengers and taxis, with seven ranks having less than ten passengers picked up across 24 hours.

Loading bays are relatively well used. At peak occupancy at 11am, nearly 70% of space in loading bays is occupied. The majority of goods vehicles unload in less than 20minutes. This high turnover and the fact that occupied bays do not obstruct moving traffic makes it an efficient use of street space.

## Identified Issues

The low use of a number of taxi ranks in the City may mean they are located in the wrong place for passengers. Hailing circulating taxis rather than using taxi ranks will be contributing to congestion as taxi drivers drive around seeking fares, and the use of taxi ranks needs to be encouraged over hailing taxis.

While loading bays are an efficient use of street space, the provision of loading bays is much lower than many other types of bays, and it is likely there are limited opportunities to identify space for more loading bays on the remaining kerbside space.

## City Corporation Car Parks

### Current Conditions

There are five car parks owned and managed by the City of London Corporation that in total provide 1400 spaces for cars/vans, approximately 500 spaces for motorcycles and 400 spaces for cycles. The overall parking occupancy across all car parks of car/van spaces is relatively low. The peak occupancy occurs at 12pm when 51% (714 spaces) are occupied. At this time, there are 700 parking spaces available at City car parks in the Square Mile.

During the summer, the Tower Hill Coach park, that provides 16 coach spaces, is at full capacity. Occupancy levels are lower throughout winter.

### Identified Issues

More vehicles park on street in payment parking bays and motorcycle bays than they do in City car parks at peak times. The majority of the cars, vans and motorcycles that park on-street could be accommodated within the car parks spare capacity.

It is likely many on-street parkers are not aware of the City's car parks. For example, half of motorcyclists parking on-street were not aware of free motorcycle parking in City Car Parks.

## Yellow Line Activity

### Current Conditions

Where there are no dedicated parking bays (or taxi ranks), there are yellow lines and yellow markings to manage where parking and loading can take place. There are five different timings for on-street loading restrictions, which are mainly associated with how a street is defined in the City's street hierarchy.

Loading and unloading can take place for a maximum of 40minutes on single and yellow lines where there are no yellow markings (blips). The majority of loading/unloading is undertaken in less than 20 minutes in permitted loading areas on yellow lines. Where vehicles are parking in non-permitted areas, the vast majority of vehicles are vans and are likely to be loading or unloading.

### Identified Issues

Since the five loading restriction timings were implemented in 2015, the City of London Transport Strategy has updated the street hierarchy for City streets. It may be that some of the loading timings now do not align the updated street type of some of the City's streets. Timings may also need to be reviewed to ensure alignment with other Transport Strategy proposals.

## Obstruction and Congestion

### Current Conditions

The majority of the City's streets are still based on the City's medieval historic street pattern with many narrow streets and lanes. There are 30 different bus routes that travel through the Square Mile, and the average bus speed in the morning peak period is 4.9 miles per hour. There are also a mixture of advisory and mandatory cycle lanes on a small number of streets in the City.

### Identified Issues

Signs, lines and enforcement does not discourage all drivers from illegally parking, waiting or loading. To an extent at certain times this makes the loading restrictions redundant when trying to alleviate obstructions and congestion.

Bus speeds in the City are the lowest across the whole of London and limited space on-street means there is a low provision of bus lanes/bus priority. The size of buses and the large number of routes through the City means obstruction from both permitted and non-permitted loading activity is highly likely.

Parking in advisory cycle lanes cannot be enforced and therefore there are currently limited opportunities to ensure cycle lanes are free of obstructions. It is also not an issue only confined to cycle lanes, as cycles use all streets in the City and vehicles park and load/unload on the majority of streets in the City.

## Appendix 2 - Action Plan

### Identify opportunities to reallocate space from on-street car and motorcycle parking to increase the space available for people walking, support the delivery of cycle infrastructure and provide additional public space and cycle parking

Payment parking bays are highly used at all times. Total occupancy levels of the 623 bays are at 94% at peak times during the week and does not fall below 50% at any time, including overnight and at weekends. Motorcycle parking is well used during the working day with at least 63% of the approximate 1,000 spaces used at peak times, but spaces are used significantly less during the evening and weekends (less than 25% occupied). Nearly all motorcycles are parked for commuting purposes during the week rather than commercial use. At least half of payment parking spaces are used by commercial vehicles at peak times during the week.

Optimal parking occupancy levels are 85%, so that space is used efficiently but drivers do not need to keep driving around an area to find an available space. Strategic opportunities to reallocate payment parking and motorcycle parking will be kept under review. As motor traffic levels reduce as a result of other measures and interventions, demand for on-street parking should also reduce potentially creating excess capacity. As demand reduces, parking bays will be reallocated to keep occupancy levels at an optimum overall peak occupancy of 85%.

In standalone transport and public realm schemes, it may be necessary to reallocate car and motorcycle spaces to help deliver scheme objectives. This reallocation will count towards meeting overall peak occupancy levels of 85%. As a general principle, motorcycle spaces will be prioritised to be reallocated first over payment parking spaces, as motorcycle spaces are used for commuting purposes rather than parking provision for commercial vehicles and alternative provision is available in car parks.

Actions	Completion Date	Owner	Anticipated Costs
a. Monitor occupancy levels of payment parking, to recommend reallocations with an aim of peak occupancy levels of 85%	Repeat occupancy survey in 2021*	Strategic Transport	Surveys fees and staff time
b. Where necessary to deliver scheme objectives, reallocate car, van and motorcycle spaces as part of standalone transport and public realm projects, including reallocation as loading bays.	Ongoing (review by 2022)	All	N/A - part of specific projects

*\*exact date to be determined due to short- and medium-term impacts of COVID-19 on travel behaviour*



### Ensure adequate on-street provision of short stay commercial parking, disabled bays, taxi ranks, loading bays and coach bays

Short term commercial parking (payment parking) is highly used, with payment parking bays seeing a total 94% occupancy rate at peak times during the week. At least half of the bays during the working day are occupied by commercial vehicles. Loading bays are relatively well used. At peak occupancy at 11am, nearly 70% of space in loading bays is occupied. Coach bays are also well utilised.

Disabled bays have a low overall occupancy, and much lower occupancy levels than payment parking and motorcycle parking. The peak occupancy of 178 disabled bays is 38% during the week. Red Badge Holders can also use payment parking bays free of charge, however it is unknown how many Red Badge Holders use payment parking bays. It is also unknown whether the low level of occupancy of disabled bays is due to there being a surplus of bays or whether they are not in the right locations, and more investigation is needed.

20% of moving motor traffic in the City is made up of taxis, however many of the 33 taxi ranks are poorly used. Seven ranks have less than ten passengers being picked up across 24 hours. Half of all taxi passengers are picked up at two taxi ranks in the City (at Liverpool Street Station and Fenchurch Street Station). The low use of a number of taxi ranks in the City may mean they are located in the wrong place for passengers. Hailing taxis rather than those that pick-up passengers at taxi ranks will be contributing to congestion as taxi drivers drive around seeking for fares, and the use of taxi ranks needs to be encouraged over hailing taxis.

Actions	Completion Date	Owner	Anticipated Costs
c. Identify what level of provision is adequate for disabled bays, loading bays and coach bays and monitor the occupancy levels of all bays	August 2021	Strategic Transport	Survey Fees & Staff time
d. Engage with Red Badge Holders and City of London Access Team on the provision and location of on-street disabled bays, and the use of payment parking bays	August 2021	Strategic Transport	Staff time
e. Engage with the taxi industry on the location of taxi ranks and how to reduce empty running of taxis	August 2021	Strategic Transport	Staff time

### Identify spare capacity in City Corporation car parks and explore alternative uses for this space

Across all five of the City Corporation car parks, 50% of parking bays are unutilised at peak times. This equates to at least 700 parking spaces being available at all times. Opportunities are currently being explored and implemented to utilise spare capacity in City Corporation car parks for alternative vehicle use, including last mile logistic hubs, as part of the freight delivery programme. No further actions are therefore required as part of the Kerbside Review.

Actions	Completion Date	Owner	Anticipated Costs
Action completed in review of car parks for freight hub proposals.	-	-	-

<b>Encourage the use of car parks for long stay parking by reducing the maximum parking time for cars and vans on-street and introducing a maximum on-street parking time for motorcycles</b>			
<p>Payment parking bays can be parked in for up to 4 hours during payment times, and nearly half of all vans pay for more than three hours parking. Reducing the maximum parking time for cars and vans would allow for a higher turnover of vehicles in the parking spaces, making them more efficient. Longer stay parking can be accommodated within City car parks, and any measures that can be implemented to help encourage the use of car parks over on-street spaces needs to be explored.</p> <p>As the vast majority of motorcycles parking on-street are for commuting purposes, nearly all motorcycle parking during the week is long stay with a duration of 6 hours or more. Introducing a short-stay maximum on-street parking time for motorcycles (4 hours or less) would restrict most weekday motorcycle parking. Long-stay motorcycles would need to park off street in City car parks or other facilities, or parkers would need to move the motorcycles throughout the day. 50% of on-street motorcycle parkers were not aware of free motorcycle parking in City car parks. As an initial measure, promoting the car parks as long-term parking may encourage their use.</p>			
Actions	Completion Date	Owner	Anticipated Costs
f. Implement a three-year pricing strategy of annual changes (approved Oct 2020) to both the car park and on-street parking tariffs, with a structure that encourages longer stay parking in car parks over on-street bays.	2021 - 2023 (annual changes in Jan of each year)	Parking Services	Set-up fees
g. Explore options for reducing the maximum stay of on-street car/van parking spaces*	March 2022	Strategic Transport with Parking Enforcement	Staff time
h. Explore options for a maximum stay period for motorcyclists (and/or a charge)	August 2021	Strategic Transport	Staff time
i. Install information signs at motorcycle bays promoting free parking at City Corporation Car Parks	January 2021	Network Performance/ Parking Services	Fees & Staff time

j. Explore further measures to support the use of car parks over on-street payment parking and motorcycle bays (i.e. additional facilities in car parks to help with moving tools and materials or locker storage)	August 2021	Strategic Transport with Parking Services	Staff time
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**Introduce variable charging for motorcycle parking based on motorcycle size and emissions**

Introducing charging could be a tool to disincentivise commuter motorcycle parking, encourage mode shift to other modes and encourage motorcycles to park in City car parks rather than on-street. A variable charge based on emissions would align with the charging procedures for payment parking.

The parking policies and strategies of neighbouring Boroughs are dynamic and continuing to evolve. Westminster and Waltham Forest currently charge for motorcycle parking, Hackney are currently consulting on proposals to introduce parking charges and Camden are in the early stages of assessing the impact of motorcycle use and whether it is appropriate to implement a parking charge. It would be beneficial to have a co-ordinated approach across the Central Activity Zone to ensure changing motorcycle parking policies does not cause displacement to other Boroughs or into the City.

Actions	Completion Date	Owner	Anticipated Costs
k. Engage with local neighbouring boroughs on policy for on-street motorcycle parking to understand if policies can be co-ordinated to avoid parking displacement	August 2021	Strategic Transport	Staff time

**Extend the charging period for on-street parking bays to include evenings and weekends for non-commercial vehicles**

Payment parking bays are free of charge during evening and weekends across the City, with no maximum parking duration. Occupancy levels remain high at this time, and overall the occupancy levels do not fall below 50%. Saturday evening occupancy levels are in fact higher than evening occupancy levels during the week.

The recent implementation of emission-based charging for payment parking bays supports the City's measures to reduce air pollution and support mode shift to more sustainable travel modes. An extended charging period in to evenings and weekends would further support these measures, especially as the City continues to improve its evening and weekend offer with more bars and restaurants opening at these times, as well as improved public transport services with the introduction of the night tube on Friday and Saturday nights.

The City Corporation however wants to encourage commercial vehicles to operate in the City out of peak times by retiming to overnight and the weekend. By retaining free parking for these vehicles at evenings and weekends, retiming can still be encouraged. It would need to be explored how commercial vehicles can park free of charge at this time while other vehicles would pay, including how commercial vehicles could be

identified. There would also need to be an extension of enforcement into evenings and weekends. Consideration is also needed for people visiting City residents during evenings and weekends, and these visitors could be allowed to park for free or at reduced rates.

Actions	Completion Date	Owner	Anticipated Costs
l. Explore mechanisms to implement and enforce 'commercial vehicle' only parking (also in action t)	August 2021	Strategic Transport with Parking Enforcement	Staff time
m. Review the costs and benefits of extending the charging period for on-street parking bays, including implications of extended provision of Civil Enforcement Officers and within context of off-street parking charges	June 2022	Strategic Transport with Parking Enforcement	Staff time

**Identify opportunities to reduce obstructions caused by vehicles loading or waiting to pick up passengers, particularly at peak travel times**

Where there are no dedicated parking bays (or taxi ranks), there are yellow lines and yellow markings to manage where parking and loading can take place. There are five different timings for loading on-street, which are mainly associated with how a street is defined in the City's street hierarchy.

The majority of loading/unloading is undertaken in less than 20 minutes in permitted loading areas on yellow lines. Where vehicles are parking in non-permitted areas, the vast majority of vehicles are vans. Ensuring there is an adequate provision of loading bays will help to reduce obstructions and illegal loading and unloading.

Since the five loading restriction timings were implemented in 2015, the City of London Transport Strategy has updated the street hierarchy for City streets. It may be that some of the loading timings now do not align the street type of some streets.

Actions	Completion Date	Owner	Anticipated Costs
n. Continue to enforce CPZ restrictions to those illegally stopping or parking at the kerbside, keeping a log of any 'hotspot' areas	Ongoing (review by 2022)	Parking Enforcement	N/A
o. Review loading restrictions against streets that have been changed in the new adopted City street hierarchy	March 2022	Network Performance	Staff time

**Ensure cycle and bus lanes are kept clear of obstructions from stationary or parked vehicles**

The majority of the City's streets are still based on the City's medieval historic street pattern and as such comprise of many narrow streets and lanes. There are 30 different bus routes that travel through the Square Mile, and the average bus speed in the morning peak period is 4.9 miles per hour.

There are a mixture of advisory and mandatory cycle lanes on a small number of streets in the City.

Signs, lines and enforcement do not discourage all drivers from parking, waiting or loading, and many drivers/businesses will take the risk of receiving a Penalty Charge Notice for illegal parking or loading/unloading. To an extent this makes the loading restrictions redundant when trying to alleviate obstructions and congestion. Bus speeds in the City are the lowest across the whole of London. Limited space on-street means there is a low provision of bus lanes/bus priority. The size of buses and the large number of routes through the City means obstruction from both permitted and non-permitted loading activity is highly likely.

Parking in advisory cycle lanes cannot be enforced and therefore there are currently limited opportunities to ensure cycle lanes are free of obstructions. It is also not an issue only confined to cycle lanes, as cycles use all streets in the City and vehicles park and load/unload on the majority of streets in the City.

Actions	Completion Date	Owner	Anticipated Costs
p. Review kerbside restrictions where cycle and bus lanes are present	March 2022	Network Performance	Fees & staff time
q. When new cycle and bus lanes are implemented, ensure their design restricts or discourages vehicles from stopping/parking within these lanes	Ongoing (review by 2022)	Network Performance	N/A - Part of specific projects
r. Offer to work with businesses and delivery companies to reduce the number of illegal loading activities and help support drivers undertake permitted loading and unloading	Ongoing (review by 2022)	Co-ordination manager (Highways) with Strategic Transport	Staff time

**Extend the Controlled Parking Zone hours to evenings and weekends**

The Controlled Parking Zone, covering the whole City, is in operation from 7am - 7pm on weekdays, and 7am - 11am on Saturdays. During this time, no parking is permitted on single yellow lines. By extending the hours of the Controlled Parking Zone, the yellow line parking restrictions would be enforced for longer and help reduce obstructions to moving traffic.

If the payment parking charging times were extended to evenings and weekends, the Controlled Parking Zones should be extended to match. Otherwise, cars and vans would seek to park on yellow lines during this time rather than pay at payment parking bays.

Actions	Completion Date	Owner	Anticipated Costs
s. Review the costs and benefits of extending the CPZ hours, including implications of extended provision of Civil Enforcement Officers (as in action m)	June 2022	Strategic Transport with Parking Enforcement	Staff time

**Designate on-street car parking as ‘service bays’ during the working day (7am-7pm), with parking restricted for use by commercial vehicles**

At least half of vehicles parking in payment parking bays during the week at peak times are commercial vehicles. A lot of commercial workers require a personal vehicle to undertake their work to transport tools, equipment and parts. Comparatively, private vehicles should not be used to travel into the City, and do not require to park on-street unless the driver or passenger has an access requirement. As such, designating on-street car parking to commercial vehicles would discourage private car use and provide more parking supply for commercial vehicles. It needs to be explored however, how commercial vehicle only parking could be managed and enforced.

Actions	Completion Date	Owner	Anticipated Costs
t. Explore mechanisms to implement and enforce 'commercial vehicle' only parking. (as in action L).	August 2021	Strategic Transport with Parking enforcement	Staff time

<b>Introduce more dedicated loading bays and use technology to allow real-time management of loading activity</b>			
<p>Dedicated loading bays are the preferential location for loading and unloading to take place on-street, as it allows unloading activity to be undertaken without impacting traffic and congestion. There are 25 loading bays across the City, all of which are well used. More loading bays would reduce the amount of unloading that would need to take place on single and yellow lines.</p> <p>Real-time management of loading activity would allow the kerbside to have dynamic permissions and restrictions in accordance with parameters such as time of day. A number of new kerbside management systems have been formed over recent years, and a trial or number of trials could be an opportunity to identify what technology would work in the City context.</p>			
Actions	Completion Date	Owner	Anticipated Costs
u. Undertake an assessment to identify if any additional loading bays can be provided across the City of London, including reallocation of existing parking bays to loading bays.	March 2022	Network Performance	Fees & staff time
v. Alongside the Future City Programme, investigate methods to trial real-time management of loading activity	August 2021	Strategic Transport	Staff time
<b>Implement multi-use spaces, for example loading bay during off-peak hours, additional pavement space during the morning, lunchtime and evening peaks and a taxi rank during the evening</b>			
<p>The way the kerbside is currently managed does not allow for using the space dynamically for different functions. Being more flexible with kerbside space could improve its efficiency and allow more space to be provided for other uses.</p> <p>A trial of multi-use spaces would allow this arrangement to be tested.</p>			
Actions	Completion Date	Owner	Anticipated Costs
w. Investigate methods of how multi use spaces could be trialled in the City	August 2021	Strategic Transport with Network Performance	Staff time
x. Ensure all new loading bays are incorporated into the footway (without reducing footway widths) so that they can be used as additional pavement space when not in use. Raise existing loading bays as part of future public realm schemes.	Ongoing (review by 2022)	Network Performance	N/A - part of specific projects
<b>Reduce the maximum loading period from the current 40 minutes when the City's Controlled Parking Zone restrictions apply</b>			

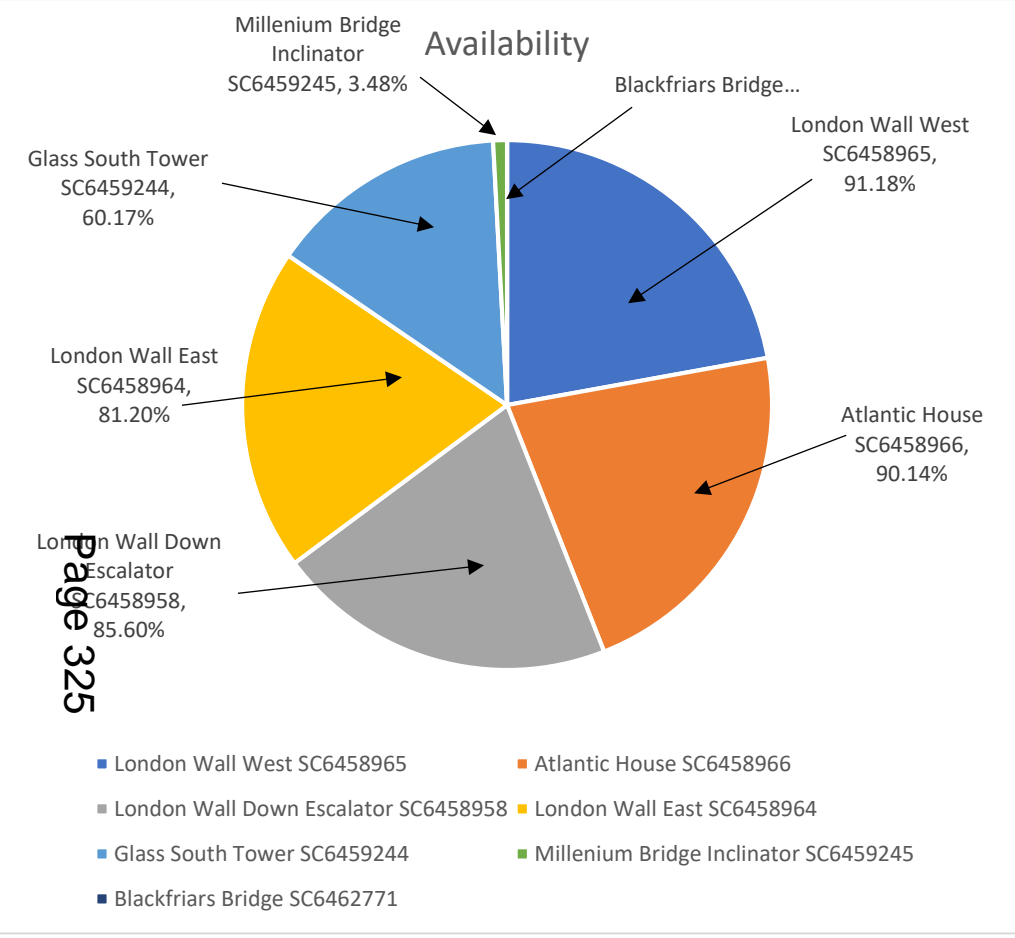
London’s local authorities use a common protocol that allows commercial vehicles 40minutes to continuously load or unload on-street. This protocol was established by London Councils in 2007 to introduce a common approach to enforcement across the whole of London. There is a perception that vehicles loading and unloading contribute to congestion and that the 40 minute duration is too generous given today’s traffic constraints and reduced network capacity. In the City, a sample of activity shows the majority of vehicles unloading at the kerbside during CPZ hours takes place in less than 20minutes. 85% take 20 minutes or less, 9% take between 20 and 40 minutes, and 5% take more than 40minutes.

Moving away from a 40minute period however would put the City out of step with the rest of London, which was the reason why the protocol was established. The protocol has now been in place for 13 years and therefore there is an opportunity to engage with local authorities and London Councils to whether Central or Greater London can continue to accommodate a 40minute delivery window. It would also be useful to collect more data on how delivery drivers use stops for multiple drop offs and whether reducing the maximum loading period would lead to more stops with less drop-offs, making delivery activity less efficient.

Actions	Completion Date	Owner	Anticipated Costs
y. Engage with neighbouring boroughs and London Councils on the current loadings timings and any aspirations to amend the maximum loading period	June 2021 (ongoing)	Strategic Transport	Staff time
z. Seek to collect data and information on how delivery drivers operate in terms of multiple drops	August 2021	Strategic Transport	Staff time



PLANNING AND TRANSPORTATION COMMITTEE REPORT 18/09/2020 – 07/10/2020



Code	Name	Time OOS	Availability
0945	London Wall Up Escalator SC6458959	0 00:00	100%
7345	Speed House Public Lift SC6459146	0 00:00	100%
7730	Wood Street Public Lift SC6458970	0 00:00	100%
7921	Little Britain SC6458967	0 00:00	100%
7997	33 King Williams Street SC6462850	0 00:00	100%
0976	Pilgrim Street SC6458969	0 00:00	100%
7999	Tower Place Scenic Lift SC6458963	0 00:00	100%
0924	Duchess Walk Public Lift CL24	0 02:39	99.45%
7740	Moor House SC6458968	0 16:41	96.52%
7998	Tower Place Public Lift SC6458962	0 20:22	95.76%
7960	London Wall West SC6458965	1 18:20	91.18%
0978	Atlantic House SC6458966	1 23:21	90.14%
0944	London Wall Down Escalator SC6458958	2 21:07	85.60%
7963	London Wall East SC6458964	3 18:13	81.20%
0916	Glass South Tower SC6459244	7 23:10	60.17%
0929	Millennium Bridge Inclinator SC6459245	19 07:16	3.48%
7964	Blackfriars Bridge SC6462771	19 23:59	0.00%

Points to Note:

- There are 17 Public Lifts/Escalators in the City of London estate. The report below contains details of the 7 public escalator/lifts that were in service less than 95% of the time.
- The report was created on 12 October 2020 and subsequently since this time the public lifts or escalators may have experienced further breakdowns which will be conveyed in the next report.

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Agenda Item 10

## PLANNING AND TRANSPORTATION COMMITTEE REPORT 18/09/2020 – 07/10/2020

Location	Status as of 07/10/2020	% of time in service Between 18/09/2020 and 07/10/2020	Number of times reported Between 18/09/2020 and 07/10/2020	Period of time Not in Use Between 18/09/2020 and 07/10/2020	Comments Where the service is less than 95%
London Wall West SC6458965	In service	91.18%	1	416 hours	Engineer attended and could not get access to the Lift Motor Room at 1 London Wall. Return follow up visit and engineer identified that the lift electrics had tripped. Lift reset and left in service.
Atlantic House SC6458966	In service	90.14%	1	411 hours	Engineer attended and found an intermittent fault with the lift communication system, issue is ongoing, but lift is back in service.
London Wall Down Escalator SC6458958	In service	90.92%	1	414 hours	Engineer attended and found the escalator emergency stop button had been activated over a weekend. Escalator brought back into service next working day.
London Wall East SC6458964	In service	81.20%	1	373 hours	Engineer attended site and found a fault with the primary safety circuit as the lift was not communicating. Parts required, engineer returned to site when received and repair lift and left in service.
Glass South Tower SC6459244	In service	60.17%	1	275 hours	Engineer attended site and found a fault with the lift car door operation. Parts required, engineer returned to site when received and repair lift and left in service.
Millennium Bridge Inclinorator SC6459245	In service	3.48%	1	440 hours	The EVAC safety system had failed, the Inclinorator was back in service on the 5 <sup>th</sup> October 2020.
Blackfriars Bridge SC6462771	Out of service	74.30%%	1	160 hours	Lift out of service for the duration of the reporting period due to a failed UPS unit. Replacement has

PLANNING AND TRANSPORTATION COMMITTEE REPORT 18/09/2020 – 07/10/2020

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					been approved and work is due to start on site on the 19 <sup>th</sup> October.
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<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation	27 <sup>th</sup> October 2020
<b>Subject:</b> Delegated decisions of the Chief Planning Officer and Development Director	<b>Public</b>
<b>Report of:</b> Chief Planning Officer and Development Director	<b>For Information</b>

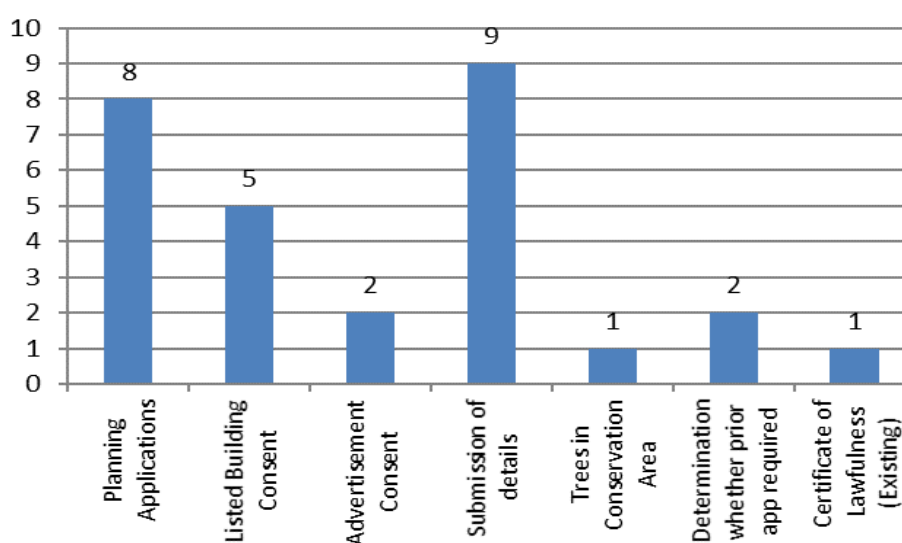
## Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since my report to the last meeting.

In the time since the last report to Planning & Transportation Committee Twenty Eight (28) matters have been dealt with under delegated powers.

Nine (9) relate to conditions of previously approved schemes. Five (5) relate to works to Listed Buildings. Two (2) applications for Advertisement Consent. Two (2) Determination whether prior app required, One (1) application for works to trees in a conservation area, and Eight (8) full applications which, including One (1) Change of Uses and 55sq.m of floorspace created. One (1) Certificate of Lawfulness (Proposed) application was Refused.

**Breakdown of applications dealt with under delegated powers**



Any questions of detail arising from these reports can be sent to [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk).

### Details of Decisions

Registered Plan Number & Ward	Address	Proposal	Decision & Date of Decision	Applicant/ Agent Name
20/00264/PODC Aldgate	Mitre Square, International House, Duke's Place, 11 Mitre Street & 1 Mitre Square London EC3	Submission of the Annual Travel Plan Review pursuant to Schedule 3 Paragraph 12.5 of the Section 106 Agreement dated 09 June 2014 (Planning Application Reference 13/01082/FULMAJ).	Approved 24.09.2020	Helical Bar Plc
20/00687/TCA Aldgate	71 Fenchurch Street London EC3M 4BR	Pruning works to 1 x Tree of Heaven, 1 x London Plane and 1 x Gleditsia.	No objections to tree works - TCA  06.10.2020	Grasshopper Ltd
20/00599/DPAR Bassishaw	88 Wood Street London EC2V 7DA	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 as to whether prior approval is required for the installation of rooftop electronic communications base station and associated works at roof level.	Prior Approval Given  22.09.2020	Mobile Broadband Network Limited
20/00337/MDC Bishopsgate	100 Liverpool Street & 8-12 Broadgate London EC2M 2RH	Details of an noise assessment report pursuant to condition 13 of planning permission 17/00276/FULL dated 5 June 2017.	Approved  08.10.2020	Bluebutton Properties UK Ltd
20/00579/MDC Bishopsgate	150 Bishopsgate London EC2M 4AF	Details of refuse storage and collection facilities to serve the retail uses pursuant to Condition 33 of planning permission 17/00623/FULL dated 27.07.2018.	Approved  24.09.2020	DP9 Limited

20/00573/FULL Broad Street	41 Lothbury London EC2R 7HF	Installation of external lighting scheme and other associated works.	Approved 22.09.2020	Pembroke Lothbury Holdings Ltd
20/00574/LBC Broad Street	41 Lothbury London EC2R 7HF	Refurbishment of 41 Lothbury comprising works to the ground floor banking hall, including new reception desk and associated areas, works to the lift lobby and including lift surrounds and speedgates; installation of a new and replacement internal lighting scheme; provision of new electrical services and routings; removal of pendant lights and replacement; replacement timber flooring with a new timber floor; removal, installation and replacement of new screen panels within the banking hall and other associated works. External repair and replacement works including external lighting; facade cleaning; replacement leadwork; repairs to pitched roofs, and masonry; and other associated works.	Approved 22.09.2020	Pembroke Lothbury Holdings Ltd
20/00675/MDC Broad Street	60 London Wall London EC2M 5TQ	Submission of details of measures to minimise transmission of structure borne sound or vibration from new plant pursuant to condition 31 of planning permission dated 27.06.2019 (19/00580/FULL).	Approved 08.10.2020	CSHV 60 London Wall SARL
20/00556/MDC Candlewick	29 Martin Lane London EC4R 0DJ	Submission of details of the ground floor screen and details of fixed joinery (ground to 2nd floor) including particulars and samples of materials and particulars and samples of the materials for the flooring pursuant to conditions 3 (a) (in part) and (c) of listed	Approved 29.09.2020	Guntas

		building consent approved 11.11.2019 (19/00524/LBC).		
19/01322/FULL Castle Baynard	1 Fetter Lane London EC4A 1BR	Alterations to windows and doors at ground floor and replacement of revolving doors with hinged doors.	Approved 29.09.2020	1 Fetter Lane @ Rent24 UK Operation Ltd
20/00603/DPAR Castle Baynard	Baynard House (Corporation Car Park) Queen Victoria Street London EC4V 4BQ	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 as to whether prior approval is required for the proposed upgrade of the existing telecommunication base station comprising the removal of six antennae, and a tripod structure and plinths, and installation of a quadruped structure with four plinths and four support poles, six antennae and one GPS antennae, and ancillary works.	Prior Approval Given 24.09.2020	Arqiva Ltd
20/00548/MDC Coleman Street	55 Moorgate London EC2R 6BH	Details of plant mountings pursuant to condition 7 of planning permission 18/01345/FULL dated 26.02.2019.	Approved 08.10.2020	Trustees of Moorgate Unit
20/00559/LBC Coleman Street	Salisbury House 29 Finsbury Circus London EC2M 7AQ	Replacement of 5 No. roof lanterns and associated repair works.	Approved 22.09.2020	Workspace Group PLC
20/00584/MDC Coleman Street	Chartered Accountants Hall Moorgate Place London EC2R 6EA	Submission of details of the final decorative scheme and the final lighting scheme and other M and E installations including the AV scheme pursuant to conditions 3 (a) and (b) of listed building consent ref 20/00044/LBC dated 10.03.20.	Approved 08.10.2020	Institute of Chartered Accountant' s



20/00657/ADVT Coleman Street	21 Moorfields, Land Bounded By Moorfields, Fore Street Avenue, Moor Lane & New Union Street London EC2P 2HT	Installation and display of: (i) one non-illuminated advert hoarding measuring 2.44m high by 36.72m wide; (ii) one non-illuminated advert hoarding measuring 2.44m high by 30.1m wide; associated with the development of the site.	Approved 08.10.2020	LS 21 Moorfields Developme nt Managemen t
19/00657/MDC Cripplegate	Former Bernard Morgan House 43 Golden Lane London	Landscaping Scheme pursuant to condition 22 of planning permission 16/00590/FULL dated 30th August 2017.	Approved 08.10.2020	Taylor Wimpey UK Limited
20/00498/FULL Cripplegate	Great Arthur House Golden Lane Estate London EC1Y 0RE	Conversion of part of the ground floor to two flats, retention of the existing estate office at part ground floor level, installation of replacement windows at ground floor to match existing, and the provision of a new disabled parking space.	Approved 06.10.2020	City of London Corporation
20/00499/LBC Cripplegate	Great Arthur House Golden Lane Estate London EC1Y 0RE	Conversion of part of the ground floor to two flats with internal and external works including: (i) reorganisation and refurbishment of the existing Estates office; (ii) internal reconfiguration and alterations including the removal and insertion of partitions; (iii) installation of replacement windows at ground floor to match existing; and (iv) the provision of a disabled parking space.	Approved 06.10.2020	City of London Corporation
20/00434/FULL Farringdon Within	25 Farringdon Street London EC4A 4AB	Erection of three cycle storage canopies and installation of eight Sheffield cycle stands within the existing cycle storage area at the rear of the building at ground and lower ground floor level.	Approved 29.09.2020	Brookfield Properties (UK PM) Ltd

20/00477/FULL Farringdon Within	The Penthouse Amen Lodge Warwick Lane London EC4M 7BY	Alterations and extensions to the penthouse apartment at sixth floor level including new solarium, green walls, glass balustrades and a rooftop plant enclosure (total increase in floorspace 55sq.m).	Approved 08.10.2020	Mr Motasim Abdellatif
20/00601/LBC Farringdon Within	41 - 42 Cloth Fair London EC1A 7JQ	Internal alterations at basement and third floor levels.	Approved 29.09.2020	Matthew Bell
20/00148/FULL Farringdon Without	St Sepulchre Without Newgate Holborn Viaduct London EC1A 2DQ	The installation of one equipment cabinet at ground level and associated development.	Approved 22.09.2020	
20/00463/FULL Farringdon Without	Inner Temple Treasury The Terrace Crown Office Row London EC4Y 7HL	Application under section 73 of the Town and Country Planning Act 1990 to vary condition 20 of planning permission dated 16/07/2019 (19/00446/FULL) to incorporate a minor material amendment to replace an existing window with louvres on the north elevation, install three louvres at basement level and three louvres at ground, first and second floor levels of the north-east lightwell.	Approved 29.09.2020	Mr Richard Snowdon
19/00174/MDC Queenhithe	Broken Wharf House 2 Broken Wharf London EC4V 3DT	Submission of details: particulars and samples of the materials to be used on all external faces of the building; new windows; new external lighting; new hand rails; new ground floor windows and entrances; new platform lift; new plant; and green roof to the entrance extension pursuant to condition 6 a, b, c, d, e, f, g and h of planning permission	Approved 24.09.2020	SACO Property Group

		17/00712/FULL dated 08 May 2018.		
20/00557/FULL Tower	10 Trinity Square London EC3N 4AJ	Replacement of glazing panels with new doors at 6th floor level terrace and installation of an external staircase to provide access between the 6th floor terrace and the central tower.	Approved 24.09.2020	Bullet Investments Limited
20/00558/LBC Tower	10 Trinity Square London EC3N 4AJ	Replacement of glazing panels with new doors at 6th floor level terrace and installation of an external staircase to provide access between the 6th floor terrace and the central tower.	Approved 24.09.2020	Bullet Investments Limited
20/00580/ADVT Tower	8 - 14 Cooper's Row London EC3N 2BQ	Installation and display of i) two internally illuminated menu boxes measuring 567mmx355mmx40mm and 1m above ground.	Approved 22.09.2020	Leonardo's Hotel London City
20/00059/CLOPD Vintry	28 Garlick Hill London EC4V 2BA	Application for a Certificate of Lawful Development for the proposed use of the upper floors as guest accommodation.	Refuse Certificate of Lawful Development 22.09.2020	Savills

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# Agenda Item 12

<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation	27 <sup>th</sup> October 2020
<b>Subject:</b> Valid planning applications received by Department of the Built Environment	<b>Public</b>
<b>Report of:</b> Chief Planning Officer and Development Director	<b>For Information</b>

## Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development applications received by the Department of the Built Environment since my report to the last meeting.

Any questions of detail arising from these reports can be sent to [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk).

## Details of Valid Applications

Application Number & Ward	Address	Proposal	Date of Validation	Applicant/ Agent Name
20/00271/FULL Aldersgate	The Turret, John Wesley Highwalk, Barbican, London, EC1A 4LA	Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows. The proposals include the rescission of part of the City Walkway.	17/03/2020	City of London
20/00247/FULL Bishopsgate	8 - 10 Brushfield Street, London, E1 6AN	Retention of air conditioning units at roof level.	29/09/2020	Stephenson House Limited
20/00703/FULL Castle Baynard	89 Fleet Street, London, EC4Y 1DH	Installation of a new boiler flue at the rear of the property with associated demolition works.	11/09/2020	Pearl & Coutts
20/00325/FULEIA Coleman Street	101 Moorgate, London, EC2M 6SL	Erection of a new building for office (Class B1) and retail/cafe (Class A1/A3) uses comprising part basement, ground, mezzanine and eight upper floors plus rooftop plant	08/04/2020	Aviva Life and Pensions

		enclosure and roof terrace. Creation of new public thoroughfare.		
20/00670/FULL Cordwainer	19 Watling Street, London, EC4M 9BR	Installation of a retractable canopy to the front elevation.	29/09/2020	Mr. Murat Buyukbay
20/00371/FULMAJ Farringdon Within	150 Aldersgate Street, 3-4 Bartholomew Place, London, EC1A	(i) Demolition of roof top plant enclosure, rear service ramp and removal of cladding to facilitate the refurbishment, recladding and extension of the existing Office (Class B1(a)) building at 150 Aldersgate Street to create a basement, ground plus nine storey building, including rear and roof top extensions, infill extensions to the rear courtyard (ground plus two storeys) to link with 3-4 Bartholomew Place; (ii) a part change of use at ground floor from Office (Class B1) to Cafe (Class A1) (41sq.m GIA); (iii) erection of a new building Office (Class B1(a)) at 3-4 Bartholomew Place comprised of basement, ground plus three storeys; (iv) the amalgamation of the two buildings; (v) the creation of new accessible and inaccessible terraces, green roofs, hard and soft landscaping, and creation of external courtyards; (vi) upgrade works to Braidwood Passage, including new lighting; and (vii) reconfiguration of the loading bay and associated works. (RE-CONSULTATION DUE TO AMENDED DOCUMENTS/INFORMATION RECEIVED)	01/05/2020	Arindel Properties Limited

20/00700/FULL Farringdon Within	26-30 Morley House, Holborn Viaduct, London, EC1A 2AT	Application under Section 73 of the Town & Country Planning Act 1990 to vary Condition 41 (Approved Plans) of planning permission dated 17th August 2020 (Ref. 17/00165/FULMAJ) to enable minor material amendments to the approved scheme including: (1) Amended hotel entrances on Holborn Viaduct; (2) Internal reconfiguration of hotel layout; (3) Internal reconfiguration to provide an internalised access link between the ground floor of the hotel and the office workspace in the lower levels of City Temple; (4) Internal reconfiguration on ninth floor from hotel guestrooms to hotel Restaurant / Bar (private guest only); (5) Alterations to address design development changes to ceiling heights, parapets and roof plant areas; (6) associated amendments to facades; and (7) the introduction of a Phasing Plan to allow a phased approach to the development.	11/09/2020	MH Viaduct LP Acting Through Its General Partner
20/00702/FULL Farringdon Within	City Temple, 31 Holborn Viaduct, London, EC1A 2DE	Application under Section 73 of the Town & Country Planning Act 1990 to vary condition 9 (Approved drawings) of planning permission ref: 17/00781/FULL dated 24th October 2017 to enable minor material amendments to the approved scheme including: (1) 4 no. replacement ventilation louvres on the Shoe Lane elevation; (2) Roof level concrete and glass brick skylights to be refurbished or replaced with polycarbonate roof-lights; (3) New roofing replacing existing felt with single ply membrane and insulation; and (4) Installation	11/09/2020	MH Viaduct LP Acting Through Its General Partner

		of fall arrest system including rail and ladder.		
20/00320/FULL Farringdon Without	40 Holborn Viaduct, London, EC1N 2PB	Alterations to the Charterhouse Street elevation at ground floor level to provide a secondary entrance and entrance canopy; and installation of glazing on the north-eastern corner with Shoe Lane.	06/04/2020	HV Freehold Sarl
20/00695/FULL Farringdon Without	Henry VIII Gate, St Bartholomews Hospital, West Smithfield, London, EC1A 7BE	Change of use of the Gatehouse to office space (Class E use) with associated external works including repairs and the installation of a new sash window within an existing opening.	09/09/2020	Barts Heritage
20/00723/FULL Farringdon Without	4 - 7 Lombard Lane, London, EC4Y 8AD	Erection of a one and two storey roof extension to form two residential units (Use Class C3) with associated amenity terraces.	22/09/2020	Mr J Adams
20/00693/FULL Farringdon Without	North Wing, St Bartholomews Hospital, West Smithfield, London, EC1A 7BE	Change of use of the North Block to a function venue, museum, office space and archive store (Sui Generis) with associated external repairs and alterations including: (i) window alteration and replacement, (ii) rooftop alterations including the formation of a rooftop plant enclosure; (ii) the formation of an access ramp and (iii) landscaping works.	29/09/2020	Barts Heritage
20/00744/FULL Farringdon Without	25 Southampton Buildings, London, WC2A 1AL	Replacement of dome lantern and refurbishment of ventilation cowl located over rotunda stairs at rooftop level.	30/09/2020	The Argyll Club (Midtown) Ltd



<b>Committee(s)</b> Planning and Transportation Committee	<b>Date(s):</b> 27 October 2020
<b>Subject:</b> Report of Action Taken	<b>Public</b>
<b>Report of:</b> Town Clerk	<b>For Information</b>
<b>Report author:</b> Gemma Stokley, Town Clerk's Department	

## Summary

This report advises Members of action taken by the Town Clerk since the last formal meeting of the Planning and Transportation Committee, in consultation with the Chair and Deputy Chairman, in accordance with Standing Order Nos. 41(a) and (b).

### Recommendation:

- That Members note the report.

## Main Report

1. Since the last formal meeting of the Committee, approval was given by the Town Clerk, in consultation with the Chair and Deputy Chairman, for the following decisions to be made under Standing Order Nos 41(a) and (b).:

### Urgency Authority – AMENDMENTS TO THE ‘AL FRESCO EATING AND DRINKING’ POLICY 2020 [16 October 2020]

2. The Town Clerk, in consultation with the Chair and Deputy Chairman of the Planning and Transportation Committee, agreed that the Policy be amended to:
  - a) Permit heaters (subject to adequate risk assessment).
  - b) Reduce the minimum distance required for pedestrians to pass on the highway to 2.2 metres (subject to footfall at the time of the application) except in areas of current or anticipated high footfall.
  - c) Make it a requirement to send to successful applicants the general advice given at any particular time from the City Police Counter Terrorism Security Advisors Team (CTSA), and that this advice be adhered to by including in the policy's licence conditions.

It should also be noted that the Licensing Committee were briefed on and are supportive of this move and intend to send a resolution to the Planning and Transportation Committee to this effect.

## Conclusion

3. Background papers for Members on the matters listed above are available from Gemma Stokley on the email address provided below.

## Appendices

Resolution of the Licensing Committee (14 October 2020).

**Gemma Stokley**  
Town Clerk's Department  
E: [gemma.stokley@cityoflondon.gov.uk](mailto:gemma.stokley@cityoflondon.gov.uk)

FROM: **LICENSING COMMITTEE**  
14 OCTOBER 2020

TO: **PLANNING & TRANSPORTATION COMMITTEE**  
URGENT

### **COVID-19 UPDATE**

The Committee received an oral update from the Director of Markets and Consumer Protection providing Members with an update on the current situation as a result of the Covid-19 pandemic.

#### **Key legislative changes:**

Members were advised that two key legislative changes had been brought in since the last meeting; the Health Protection (Coronavirus, Restrictions) (No. 2) (England) Regulations 2020 was amended on 24 September and the 12 October saw the introduction of the three tiers of system of local Covid Alert Levels in England set at medium, high, and very high.

Alongside this, the Chancellor also confirmed that the Government would expand its economic support to assist those affected by the decisions made in the upper tier. This included extending the Job Support Scheme to cover two-thirds of the wages of those in any business that is required to close. For tier 1 and 2 businesses, they would face restrictions but no financial support.

London was classed in the medium tier 1 and would continue to be subject to national restrictions. It was acknowledged, however, that this would likely change within the next week.

The following key factors were highlighted as affecting the hospitality sector:

- Face coverings, staff and customer
- Rule of 6
- Seated service and consumption, no vertical drinking
- 22:00 curfew
- Mandatory spacing between seats and tables
- Test and trace

A joint City of London Police and City of London Corporation short summary of the requirements of the new regulations was circulated to all businesses and published on the COL website which was circulated to Members. For consistency, both have adopted the Police's 4E's approach when dealing with businesses (Engage, Explain, Educate, Enforcement) with Enforcement being the last resort. Powers have been enhanced and are available should they be required with escalating levels of fines and direction orders amongst the powers.

As a result of the additional restrictions, Officers confirmed there had been an uplift in pavement licence applications (40 to date) and complaints for all settings (not just hospitality) in relation to compliance with the new Covid regulations. Officers viewed compliance with the regulations in City premises to be good and any non-compliance was generally due to a lack of understanding rather than deliberate actions.

Members were advised that as a result of the challenges to the Government's restrictions on the hospitality sector, a judicial review had been launched. This was primarily in relation to the 22:00 curfew and queried what evidence supported this restriction.

### **Key indicators stats:**

In response to Member's concerns regarding the short and long-term effects on the City's licensed trade, Officers confirmed all available data painted a very bleak picture for the trade.

### **Locally**

To date, 13 Premises Licences have been surrendered in the City since 1 April 2020, five of which occurred in the first week of October. For the same period, there have been seven new applications.

Members were informed that only 33% of food and beverage and licensed premises regulated by the City Corporation across the Square Mile were confirmed by Officers to be open.

On 2 October, the Cheapside Business Alliance area had 208 out of 288 shops open equating to 72%, compared to 66% at the start of September. In the Aldgate BID, 131 out of 160 shops, cafes, restaurants and pubs were open equating to 81%, compared to 72% at the start of September. Of the 109 closed premises across the BIDs, 12 have now permanently vacated their units equating to 7% of the total number of closed premises.

### **Nationally**

The UKH, BBPA & BII member survey which closed 16 September identified the following:

- More staff cuts were expected, with one in eight hospitality staff having been already made redundant and a further 8% likely to lose their jobs.
- Given current levels of business support, almost half of operators predicted that their businesses would fail by mid-2021, with 23% suggesting they would do so by the turn of the year.
- As such, operators were looking to simply survive as a priority and were trying to increase productivity and play a wider role in the community.

### **Trade redundancy announcements:**

- Fullers to make 1 in 10 of staff redundant. The chain employs around 5,000 staff meaning at least 500 people are likely to be let go.
- JD Wetherspoon will cut up to 130 head office jobs. The company announced that 110 to 130 head office positions were at risk of redundancy.
- Whitbread are letting 6,000 people go.
- Greene King to close 25 sites permanently with 800 redundancies.

### **What would help:**

Members and Officers saw Government encouraging office workers to stay at home, the 22:00 curfew, social distancing/reduced capacities and the loss of vertical drinking as the key influencing factors for decline in the City. It was acknowledged that the Licensing Committee was limited in terms of how it could assist; Officers provided the following actions and suggestions it could take to help:

- The Committee could support the national industry lobby where possible and appropriate, e.g. business rates holiday to be extended throughout the year 2021/22, rent debt proposal, VAT cut extension and critical regular review of Covid restrictions imposed at either a national or local level.

- Locally the City Corporation can amend the al-fresco policy to allow external heaters and reduce the 3.2m pavement licence requirement to 2.2 where pedestrian flows allow.
- It was noted that there was currently no flexibility in legislation to suspend or rebate the Late Night Levy. Officers confirmed the City Corporation has joined the GLA, LGA, London Councils and other LNL authorities and met with the Home Office yesterday to consider options which may include a legislative change to allow for suspension of the levy.

Members made the following comments:

- The Chairman reiterated how crucial it was that the Planning & Transportation Committee decreased the pavement width policy for tables and chairs, allowed for outdoor heaters and pursued using empty / little used street space for tables and chairs as this would be pivotal to hospitality premises in the City surviving.
- A Member voiced her worry and sadness for struggling City businesses that had tried to comply with the imposed restrictions throughout the pandemic making many changes at a significant cost. The Member saw the imminent London move to tier 2 as catastrophic for the hospitality sector as it would be incredibly difficult for businesses to comply with patrons unable to mix with people outside of their households.
- In response to concern for businesses being forced to pay for outside tables and chairs only for the policy to change, it was confirmed that no premises was being forced to make this change and Officers were trying to assist any premises that needed outside space now that vertical drinking was banned.
- Members fully supported the move to amend the al-fresco policy and requested that a resolution be sent to the Planning & Transportation Committee to show the Committee's support for the recommended changes.
- A Member noted that the current legislation meant that the adjacent area to a premises was now classed as on-sales and questioned what would stop a patron purchasing a take away drink and consuming it further away. The City Solicitor confirmed that this could happen if the patron was drinking in an area not habitually used for consumption. However, if this spot then became a habitual spot for patrons or more than six people were there, this would be in breach of the regulations.
- It was acknowledged that vertical drinking had always been a big feature in the City and banning this had it the hospitality industry hard. Members felt that this made it even more important for City provided areas for consumption of food and drinks in a safe and socially distanced space that could be monitored by licensed premises and the Police if needed.
- Officers confirmed that legal advice was being sought and engagement with the Planning & Transportation Committee was ongoing looking a pocket hubs and seating in the City, e.g. Middlesex Street. The Committee was also looking at all tables and chairs licence refusals to find alternative areas for outside seating.
- Officers agreed to follow up with the Planning & Transportation Committee and review areas via a health check now that new restrictions had been brought in.

- It was noted that partial road closures had been introduced in Soho and that this could be adopted in the City.

**RESOLVED** – That a resolution be made to the Planning & Transportation Committee demonstrating the Licensing Committee's support to reduce the pavement width policy for tables and chairs to support City businesses.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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of the Local Government Act 1972.

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of the Local Government Act 1972.

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