Public Document Pack

# Planning and Transportation Committee

**Date:** **TUESDAY, 16 FEBRUARY 2021**

**Time:** **10.30 am**

**Venue:** **VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)**

**Members:**

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

**Enquiries:** **Gemma Stokley**
**gemma.stokley@cityoflondon.gov.uk**

**Accessing the virtual public meeting**

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

**https://youtu.be/ant70qRZbeM**

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 26 January 2021.

**For Decision**
(Pages 1 - 38)

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

**For Decision**
(Pages 39 - 318)

5. **BARBICAN LISTED BUILDING MANAGEMENT GUIDELINES - VOLUME IIIA - ARTS CENTRE SUPPLEMENTARY PLANNING DOCUMENT**
Report of the Director of the Built Environment.

**For Decision**
(Pages 319 - 512)

6. **LOCAL FLOOD RISK MANAGEMENT STRATEGY 2021-27**
Report of the Director of the Built Environment.

**For Decision**
(Pages 513 - 580)

7. **LOCAL IMPLEMENTATION PLAN - TRANSPORT FOR LONDON FUNDED SCHEMES 2020/21**
Report of the Director of the Built Environment.

**For Information**
(Pages 581 - 584)

8. **GATEWAY 5 - WEST SMITHFIELD & CHARTERHOUSE STREET (THAMESLINK) BRIDGES REMEDIAL WORKS**
Report of the Director of the Built Environment.

**For Decision**
(Pages 585 - 598)

9. **BUSINESS AND PLANNING ACT 2020 - ALFRESCO EATING & DRINKING POLICY UPDATE**
Report of the Director of Markets and Consumer Protection.

**For Decision**
(Pages 599 - 604)

10. **ANNUAL ON-STREET PARKING ACCOUNTS 2019/20 AND RELATED FUNDING OF HIGHWAY IMPROVEMENTS AND SCHEMES**
Report of the Chamberlain.

**For Information**
(Pages 605 - 610)

11. **TRANSPORT STRATEGY UPDATE: QUARTER 3 2020/21**
Report of the Director of the Built Environment.

**For Information**
(Pages 611 - 626)

12. **OUTSTANDING ACTIONS**
Report of the Town Clerk.

**For Information**
(Pages 627 - 630)

13. **PUBLIC LIFT REPORT**
Report of the City Surveyor.

**For Information**
(Pages 631 - 632)

14. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**
Report of the Interim Chief Planning Officer and Development Director.

**For Information**
(Pages 633 - 644)

15. **VALID PLANNING APPLICATIONS RECEIVED BY THE DEPARTMENT OF THE BUILT ENVIRONMENT**
Report of the Interim Chief Planning Officer and Development Director.

**For Information**
(Pages 645 - 650)

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

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

18. **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

19. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held virtually on 26 January 2021.

**For Decision**
(Pages 651 - 652)

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, 26 January 2021

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

**Present**

**Members:**

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

**Officers:**

| | | |
|---|---|---|
| Gemma Stokley | - | Town Clerk's Department |
| Emma Cunnington | - | Town Clerk's Department |
| Amelia Ehren | - | Town Clerk's Department |
| Emily Garland | - | Town Clerk's Department |
| Simon Latham | - | Town Clerk's Department |
| Rhiannon Leary | - | Town Clerk's Department |
| Shani Annand-Baron | - | Media Officer |
| James Gibson | - | Technology Support Officer |
| Simon Owen | - | Chamberlain's Department |
| Dipti Patel | - | Chamberlain's Department |
| Deborah Cluett | - | Comptroller and City Solicitor's Department |
| Alison Bunn | - | City Surveyor's Department |
| Jonathan Cooper | - | City Surveyor's Department |
| Gwyn Richards | - | Interim Chief Planning Officer and Development Director |
| Jon Averns | - | Director of Markets & Consumer Protection |
| David Horkan | - | Department of the Built Environment |
| Ian Hughes | - | Department of the Built Environment |
| Paul Beckett | - | Department of the Built Environment |
| Gordon Roy | - | Department of the Built Environment |
| Bruce McVean | - | Department of the Built Environment |

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|---|---|---|
| Maria Herrera | - | Department of the Built Environment |
| Neel Devlia | - | Department of the Built Environment |
| Elisabeth Hannah | - | Department of the Built Environment |
| Bhakti Depala | - | Department of the Built Environment |
| Peter Shadbolt | - | Department of the Built Environment |
| Matt Ball | - | Department of the Built Environment |
| Toni Bright | - | Department of the Built Environment |
| Ben Eley | - | Department of the Built Environment |
| Lucy Foreman | - | Department of the Built Environment |
| Kurt Gagen | - | Department of the Built Environment |
| Kieran Mackay | - | Department of the Built Environment |
| Tom Noble | - | Department of the Built Environment |
| Joanna Parker | - | Department of the Built Environment |
| Dom Strickland | - | Department of the Built Environment |
| Kathryn Stubbs | - | Department of the Built Environment |
| Sonia Williams | - | Department of the Built Environment |
| Rachel Pye | - | Department of Markets & Consumer Protection |

**Also in Attendance:**
Meghan Allen (Objector, NTR Planning)
Patrick Wong (Applicant, 55 Gracechurch Street)
Keith Priest (Fletcher Priest)
Philip Pryke (Fletcher Priest)
Richard Ward (DP9)
Alasdair Buckle (DP9)
Andrew Reynolds
David Stillman (DSA)
Oliver Morris (TFT)
David Hamlyn (RWDI)
Ender Ozkan (RWDI)
Jerome Webb (GIA)
Eliot Hathaway (GIA)
Richard Coleman (Citydesigner)
John Mulhaire (Momentum)
Giles Charlton (Spacehub)
Ashley Patience (DPR)
Tim Levene (Common Councillor)

**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.

The Chair then introduced himself and welcomed all those in attendance and viewing the meeting via YouTube. He also took the opportunity to welcome Doug Barrow, representing the Ward of Aldgate, to his first meeting of the Committee.

1. **APOLOGIES**

Apologies for absence were received from Deputy Peter Dunphy, Tracey Graham, Alderwoman Susan Langley, Oliver Lodge and Andrew Mayer.

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 summary of the meeting held virtually on 5 January 2021 and, subject to the addition of the points below, approved them as a correct record.

**MATTERS ARISING**

**Anonymisation of Member Comments/Contributions in Minutes** (page 6) – A Member commented that she had also requested that her name be listed amongst those Members who had voted in favour of the Motion at the last meeting. The Town Clerk undertook to amend the minutes accordingly.

**Questions to the Chair at the last meeting** (page 6) **–** A Member commented that, as the minutes recalled, he had asked two questions of the Chair – firstly why he had not ruled the motion on 150 Aldersgate Street as premature and secondly, on the use of urgent procedures. He thanked the Chair for the written response he had received on these points and highlighted that he had responded to this via email yesterday and had copied in all members of the Committee. He commented that, in respect of his first question, there was no agreement. He added however that he hoped that the Chair would never again entertain a motion to stop a debate before Officers have had an opportunity to respond to Members questions. The Member went on to state that in regard to his second question, he hoped that the Chair and Deputy Chairman would not use delegation or urgency to reduce the amount of decisions needed to be taken by the whole committee.

**186-190 Bishopsgate London EC2M 4NR** (page 21) – A Member who had voted against the Officer recommendation to approve the application asked that her name be recorded as having done so and also that her vote be recorded by name against today's application. Two other Members stated that they would also like their names recorded. The Town Clerk separately advised that, in accordance with Standing Order No 38, the names of Members were only recorded against votes if they were dissenting from a majority decision but

undertook to name all three Members who had made this request should this be the case today.

4. **55 GRACECHURCH STREET LONDON EC3V 0EE**

The Committee considered a report of the Interim Chief Planning Officer and Development Director regarding 55 Gracechurch Street, London, EC3V 0EE, specifically, demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 29 upper storeys, including office use (Class E), flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis)) a public viewing gallery and garden terrace (sui generis), new pedestrian routes, cycle parking, servicing, refuse and plant areas, public realm improvements, and other works associated with the development.

The Town Clerk introduced the item and drew Members' attention to the fact that they had also been sent a virtual site tour, a scheme brochure from the applicant and an addendum that contained two additional representations.

The Interim Chief Planning Officer and Development Director presented the application and began by highlighting that this redevelopment application also had two associated listed building consent applications for St Benet's Place and 2-3 Philpot Lane (at agenda items 5 and 6 respectively). Members were informed that the redevelopment site was situated to the west of the 20 Fenchurch Street Tower in a major key strategic site for the City and an area that the City Plan 2036 had identified as an area of intensification and consolidation of the cluster.

The Interim Chief Planning Officer and Development Director reported that the site in question was bounded to the east by the Eastcheap Conservation Area. Members were shown an image of the existing building from Gracechurch Street and from where the emerging cluster of towers could be seen as a backdrop – with Members reminded that this would be added to fairly rapidly with the addition of the new consented schemes in that area. Members were next shown images of Talbot Court to the south of the site and of St Benet's Place to the north of the site (historically a through route to Brabant Court and Philpot Lane but currently a cul-de-sac). Members were informed that the proposal was to reinstate a pedestrian route here. Images of Brabant Court to the east of the site were also shared. Images of a Northern Courtyard to the north side of the site and not in the ownership of the developer were shared from where the rear elevation of 55 Gracechurch Street was visible and 2-3 Philpot Lane was visible to the right-hand side. Members were asked to note the chimney breast on the flank elevation of 2-3 Philpot Lane – the removal of which was the subject of one of the associated listed building consent applications.

The Committee were shown existing and proposed ground floor plans of the building with the Interim Chief Planning Officer and Development Director

reporting that proposals entailed opening up the entire ground floor of the building and providing new retail elements – intended as a curated, rich and ever-changing eco-system of flexible commercial uses such as retail, food and beverages. There would be unobstructed access through the building at this level which would be open 24/7 and would create links from St Benet's Place through to Brabant Court and beyond. Additional routes would also be created through the site. The main entrance on Gracechurch Street would feature three escalators that ascended to the second and third floor office reception areas.

Members were informed that the Class E uses would comprise of approximately 2,400square meters at both ground and first floor level and a condition would ensure that these were retail uses within this use class.

The Interim Chief Planning Officer and Development Director highlighted the area highlighted in red at ground floor level stating that this was totally innovative for the City and would incorporate vehicular lifts which would rise up when servicing was required but then drop down and provide an extension to the public realm. Members were shown examples of this type of lift and assured that the City's Highways Team had looked in detail at these in terms of understanding their maintenance and reliability. The Interim Chief Planning Officer and Development Director reported that a maintenance strategy to ensure the resilience of the lift in operation was to be conditioned as part of any permission granted. The Committee were informed that this could be a ground-breaking concept and, in time, do away with the need for large, cavernous servicing bays that were often associated with large redevelopment schemes in the City. It was reported that deliveries would be off-site and consolidated with daily deliveries capped by a Section 106 agreement at 45 deliveries in any 24 hour period, there would also be a delivery servicing plan condition and no servicing would be permitted between the hours of 07:00-23:00 meaning that the area occupied by the vehicular lift could be utilised for public realm and vibrant uses.

Members were shown an image depicting public permeability around the existing site as well as of public permeability as part of the proposed scheme where the aspiration was to open up the ground floor plain with a new pedestrian route throughout the site. The Interim Chief Planning Officer and Development Director reported that a key part of the negotiations around this was to understand how these aspirations tied into the future plans for this part of the City to ensure free public pedestrian routes throughout. Members were informed that the pedestrian comfort level throughout the site was an A/B+, with the pedestrian comfort level at Gracechurch Street currently rated 'F'. With Section 278 work to widen the pavement by 2m this was set to improve to a D/C- depending on peak times.

In terms of public realm, it was reported that the scheme offered an approximately 80% increase when compared to the existing offering.

Members were informed that a minor area of stopping up was proposed and amounted to a depth of approximately 71mm across a length of 24m on the upper part of the site but there would also be 35 square meters of dedicated

public realm – a net increase therefore of 5 square meters of public highway would be gained as part of this scheme.

The Interim Chief Planning Officer and Development Director went on to talk further on St Benet's Place and Members were shown an image of the existing view of the cul-de-sac here looking east. The Committee were informed that the gates depicted were 18th century gates which had been repositioned here in 1993 and had had a nomadic existence. This proposal included the careful restoration and reinstatement of the gates upon completion of the scheme and would form part of the new pedestrian route allowing access to Brabant Court and Philpot Lane throughout. Members were reminded that this was also the subject of one of the associated listed building consent applications before the Committee today, featured at Item 5.

On Brabant Court, the Committee were shown images of the existing and proposed view looking west. To the top of the existing image, a chimney breast was visible and the Interim Chief Planning Officer and Development Director highlighted that this was the subject of the other associated listed building consent application (Item 6) where it was proposed that the flank chimney stack to 2-3 Philpot Lane be removed as part of the party wall resolution. Members were informed that the chimney was a late 19th century addition which was not considered to be of great significance or special interest. There was also a redundant fire escape situated here.

The Committee were shown basement level plans of the proposed scheme, depicting the vehicular lifts dropped down into the loading bay. Beneath this level, 492 long-stay cycle parking bays would be installed which was in excess of the London Plan target (467 spaces). There would also be 24 short-stay cycle parking spaces which was well below the target of the London Plan. This was, however, considered to be justified given the increased number of long-stay cycle parking spaces.

At first floor level, Members were shown that the proposed scheme would incorporate flexible class E use space conditioned to provide retail space. Above this, at levels 2-5, would be flexible incubator spaces for start-ups and co-working spaces for new SME's – described by Officers as a radical and welcome addition which would be secured by a 106 agreement with a view to creating a flexible and thriving eco system whereby new SMEs were able to establish themselves within the City. Above this at level 6, a new free to visit public garden terrace with its own mezzanine level would be introduced. This would include a tree walkway and, in total, would comprise approximately 1,600 square meters of garden terrace. The ground floor entrance to the garden terrace would include two dedicated lifts with a sufficient welcome area to enable security clearances and to avoid the need to queue onto the footway. This had gained the approval of both the City of London Highways Team and TfL. The garden terrace would be a public facility open from 10:00-19:00 or nautical dusk, seven days per week, excluding Christmas Day, Boxing Day and New Year's Day. The terrace would also include toilet facilities and would have a capacity of 150 people. Access and a Visitor Management Plan would be conditioned as would a Cultural Implementation Strategy as the embedding of

culture and education was key to the strategy of curating this space and the applicant had had discussions with local schools including the Aldgate School to understand how the educational offer could be enhanced. Officers commented that this past year in particular had highlighted the importance of outdoor space in terms of health and wellbeing and it was felt that this was a major benefit of the scheme which would be a popular, social and inclusive space and a catalyst for the City's weekend economy going forward. Members were shown an image of the treetop walkway views.

The Interim Chief Planning Officer and Development Director reported that, in totality, the scheme offered 34,000 square meters of flexible office space – a significant increase in what was offered at present. This would be arranged in approximately 770 square meter floorplates which was ideal for SMEs with a workforce of 100 employees with flexibility to expand or to be sub divided. There would be a 23,500 square meter increase over the existing commercial floorspace which would also be naturally ventilated.

The Interim Chief Planning Officer and Development Director shared images of the proposed scheme alongside the existing City cluster and commented that it was considered acceptable and had been thoroughly assessed in terms of the impact on views and heritage assets. A 3D image of the proposed site in relation to all of the existing and consented tall buildings within the cluster was also shared. It was highlighted that, strategically, this proposal was an important part of the development of the City cluster.

The Committee were informed that the new City Plan 2036 identified this area as an area where the cluster could intensify and consolidate to the south-west. It was also included as a renewal opportunity site and had been informed by complex 3D modelling to better understand how the growth of the cluster could be dovetailed with the need to protect important heritage views and assets. The Interim Chief Planning Officer and Development Director commented that it was expected that this particular scheme would sit at the very far south western point of the cluster, stepping up, and it wasn't expected that there would be sufficient scope for any tall building development to the south or west of this. The installation of a tall building here was, however, supported by 3D modelling as well as by policy.

The Committee were shown various images of the existing and proposed elevations depicting the schemes relationship to the existing cluster and how it would step up to meet this. Members were informed that the scheme had been through a number of thorough redesigns and amendments to lower its height and change its massing and scale to respect views of heritage assets.

It was highlighted that a number of objections had been received in relation to the impact of the proposed scheme on views of heritage assets. The Interim Chief Planning Officer and Development Director highlighted the area of intensification on an image of a view of the existing site from Waterloo Bridge and explained that the intention was to bring the building at 20 Fenchurch Street back into the cluster rather than having it appear as an outlier to this. The view looking north from the south bank of the Thames depicted how the

proposed scheme would not impact upon the critical view of the Monument and St Magnus the Martyr and would step up to 20 Fenchurch Street and the cluster beyond which culminated towards the north. The view from the North bastion of Tower Bridge that had been debated at great length at the Tulip public inquiry depicted the Tower of London to the extreme west and demonstrated how the proposed scheme would mediate between the rather strident skyline of 20 Fenchurch Street and the nearby cluster.

With regard to the view of the proposed scheme from Butler's Wharf, Members were informed that Historic England Southwark had raised concerns as to the impact of the proposal here. The Interim Chief Planning Officer and Development Director commented that the proposal would infill more of the space between the bastions of Tower Bridge and the Tower of London and recognised that there was a degree of diminishment here. However, when considered in the round, Officers were of the view that the degree of harm caused would be slight. It was highlighted that Historic England had also raised objections as to the impact of the proposal on views from the Inner Ward of the Tower of London, a World Heritage Site. An outline of the proposal from this view was shared with Officers commenting that they did not believe that the impact here would be harmful and commenting that the view from the Inner Ward was kinetic.

In terms of local views, the Committee were shown images of the existing and proposed view looking north from Lower Thames Street. From here it was recognised that the proposal would diminish the impact of the Monument from this view where it currently sat against open sky. However, the proposal had been amended to lower the height of the building so that the flaming orb and the upper storeys of the Monument remain visible against the open sky. As people moved up towards Fish Street Hill, more of the Monument would again be visible against open sky with the proposal appearing more recessive. It was highlighted that Historic England and the Georgian Group had also objected to the impact of the proposal on St Mary Woolnoth Church (a listed building) visible from Bank Junction. Here, the proposed scheme would be visible as a backdrop and was not considered to be harmful. The Interim Chief Planning Officer and Development Director reported that the 'old' City and portland stone buildings were characteristic of this view with the listed buildings in the foreground with the dynamic contrast of the new City set behind this. He added that this juxtaposition between the old and the new was distinctive from this view. It was also added that the principal point from which people approach St Mary Woolnoth was from Lombard Street from where the proposal would not be visible with the towers of the church set against open sky.

Finally, Members were shown the view from the junction of Bishopsgate and Threadneedle Street with Officers highlighting that the original scheme had been revised and pulled back to the east to ensure that the flaming orb of the Monument remained visible as a strong wayfinding element of the townscape. The same was true of the view from the junction of Gracechurch Street and Lombard Street. From Eastcheap, the proposal would add to the view of tall buildings which already dominated the skyline.

The Committee were shown an image of the proposed scheme at dusk with Officers highlighting that the scheme had very good sustainability credentials in terms of carbon emissions, whole-life carbon and circular economy principles and would achieve a BREEAM rating of 'outstanding' with conditions. In terms of daylight and sunlight and amenity to neighbouring buildings, it was highlighted that there would be a moderate adverse effect on some neighbouring buildings but, as set out within the report, this was considered acceptable within the dense urban context of this part of the City.

In terms of heritage assets, the Interim Chief Planning Officer and Development Director reported that Officers had identified the significance of 2-3 Philpot Lane, the Eastcheap Conservation Area, the Monument and Tower Bridge where any harm caused was considered to be on the lower end of the spectrum and meet an NPPS definition of 'less than substantial harm'. Whilst great weight had to be placed on this, the report set out that the wider public benefits of the scheme is considered to outweigh this.

With regard to other issues, the Committee were informed that the wind conditions were considered to be acceptable however there were conditions proposed to ensure that landscaping features were added to the public terrace to further improve wind conditions in this area. Conditions were also proposed to ensure that lighting levels were maintained and well managed. Finally, in terms of urban greening, the Committee were informed that the scheme would exceed the recommended target within the City Plan.

The Interim Chief Planning Officer and Development Director concluded by summarising the key issues in terms of the application. He commented that the development was situated within a key strategic part of the City, an area identified within the City Plan 2036 as both an extension to the City Cluster Policy Area and also a renewal opportunity area. It was of strategic importance in terms of delivering floorspace in line with projected demand. The design was considered to be of the highest quality with a significantly amended height and massing to address sensitive heritage views including St Paul's and the Monument. The scheme would provide 34,000 square meters of office floorspace – an uplift of 23,000 square meters – with the office space designed for small and medium size businesses with flexible and adaptable layouts for subdivision, expansion and also co-working. The development was estimated to generate between 700-1,200 additional jobs and increase spending in the locality, boosting local businesses and creating a post-COVID resurgence. Members were reminded that the lower five floors of the building would provide a rich, hybrid mix of spaces - retail, food and beverage, incubator workspace for start-ups, co-working space and presentation rooms – making this a vibrant, dynamic and creative offer. The ground floor of the building would be opened up 24/7, providing new pedestrian routes through the site and offering very good pedestrian comfort levels. The scheme offered an innovative, ground-breaking servicing solution for the City with two vehicular lifts which, when not in use, would become a seamless part of the ground floor public realm. It would have off site consolidation and there would be no servicing between 07:00-23:00. Long stay cycle parking exceeded the London Plan target and the building would have excellent sustainability credentials and would achieve a

BREEAM outstanding rating. A free to visit public garden terrace with an elevated walkway would provide a place for workers and visitors to escape the bustle at street level and this area would be curated with cultural and educational needs in mind, including collaboration with local schools. It would be a socially and economically inclusive space which would also introduce vibrancy to the area seven days per week and would diversify the appeal of the City to a wider audience. It was reported that the scheme was therefore considered to represent an exciting new genre of City building which addresses key City challenges. It was a permeable, external facing, welcoming building that would be attractive to SMEs and start ups and would also offer vibrant public space which would enliven the City and put it in good stead for the future. It was commented that the scheme could provide a template for others to follow and that this and the two associated listed building consent applications were therefore recommended favourably to Members.

The Chairman thanked the Interim Chief Planning Officer and Development Director for his presentation.

The Town Clerk introduced Ms Meghan Allen addressing the Committee in objection to the proposals on behalf of the owners of Alliance House which sat immediately adjacent to the application site. Ms Allen began by highlighting that the existing building at 55 Gracechurch Street abutted Alliance House from ground to eighth floor level and had a close visual relationship with it. The new building proposed through this application was also intended to abut Alliance House with the two sides remaining intrinsically linked. The application site also included the small parcel of land in the ownership and control of Ms Allen's client and she highlighted that, to date, no agreement had been reached between the two parties meaning that the development was incapable of being implemented in its current form. Ms Allen went on to state that there were five areas that her client had concerns around - potential development, impact on daylight, impact in terms of privacy and overlooking, heritage and impact of demolition and construction. Turning firstly to potential development, Ms Allen stated that her clients were concerned that the future development potential of Alliance House, an important and prominent corner plot, would be seriously jeopardised by this development proposal in its current form. She added that the client site sat at a prominent junction at the heart of the renewal opportunity area which was clearly identified within the emerging City Plan. It was within the City cluster and crucial to the regeneration of the area. Ms Allen reported that her client supported this emerging policy allocation. Unlike the application site which was outside of the allocation, Alliance House was closely related to existing City cluster buildings by virtue of its proximity and use and, if its future development were to be blighted as a result of negative impact from neighbouring developments, the overarching policy objectives of the emerging City Plan would be undermined. Secondly, with regard to daylight, Ms Allen stated that her client objected to this application on the basis that development permitted on this scale in such close proximity to Alliance House would reduce the amount of light received by existing office space. It was not felt that the daylight and sunlight report had addressed the impact on Alliance House and Ms Allen asked Members to consider the fact that this was a functioning commercial space which was ordinarily fully occupied. In its current form, it was

felt that the proposed development would almost entirely remove natural light from open plan offices situated on the lower floors in the south east corner of Alliance House resulting in reliance on artificial light. Offices on upper floors which currently receive a good level of daylight would also see a significant reduction. The application proposals would also significantly limit opportunities for natural light for any future development which would limit the form and function of future development and may well make it less viable and therefore make it at odds with the objectives of the policies around the City cluster. Thirdly, on privacy and the potential for overlooking, Ms Allen reported that he client objected to the application on the basis of the prospect of overlooking, noting that the application proposed a public viewing gallery which represented a real and intrusive risk of overlooking by numerous visitors. This was also a serious concern in relation to future development opportunities at the site. Ms Allen reported that her client's site had been identified for large scale commercial redevelopment and there were concerns that this would be hindered with the erection of this substantial building. With regard to heritage, Ms Allen noted that Officers had confirmed that this development would result in harm to the heritage significance of the Monument and Tower Bridge and their settings due to its location, height and bulk. Harm would also be caused to Eastcheap Conservation Area and 2-3 Philpot Lane. Whilst Officers had concluded that public benefit would outweigh harm, Ms Allen highlighted that Historic England had raised a number of serious concerns and has confirmed that they cannot support the proposal in its current form. They had not withdrawn their objection and the client remained concerned that heritage matters had not therefore been satisfactorily resolved. Lastly, on construction management, Ms Allen noted that this was a large project which would involve the demolition of an existing building and construction of a 29 storey building, the site was very confined and the process could therefore have significant impacts on surrounding properties. In conclusion, Ms Allen stated that her client objected to this application on the basis that it would seriously hinder the future development potential of this pivotal allocated renewal site and in doing so would undermine the objectives of the important growth and renewal policies. The development would also impact on the amenity of existing occupiers and cause harm to heritage assets. The client was also concerned about the management of the demolition and construction of the project and the significant it will have on surrounding occupants and would respectfully request that the application be refused or at least deferred to fully consider these points.

The Chair thanked Ms Allen for her contribution and invited any questions that Members might have of her.

A Member sought clarification as to whether 55 Gracechurch Street was situated in the renewal opportunity area and whether or not it was the case that this site should not be developed in order that 60 Gracechurch Street could be going forward. Ms Allen commented that the two were linked and reiterated the point that her client's site was the prominent corner plot. She stated that the development of 55 Gracechurch Street would affect what was possible on the Alliance House site at 60 Gracechurch Street and that the two therefore had to be considered together.

The Town Clerk reported that three speakers would now address the Committee in support of the application – Mr Patrick Wong (applicant), Mr Richard Ward (DP9) and Common Councillor Tim Levene. Members were informed that there were also various other representatives of the applicant present to respond to questions only.

Mr Wong introduced himself as the founder and CEO of Tenacity Group, the owners of 55 Gracechurch Street. Pre-COVID, Mr Wong reported that he would travel to London monthly and had taken the opportunity to meet face to face with some Members and Officers at various meetings and briefings – something which he had found invaluable. Mr Wong stated that, before the acquisition of 55 Gracechurch Street, various other areas of London had been considered for this proposal. However, the Square Mile with its unique blend of history, innovation and global connections was a constant draw. The applicant had sought to reflect these qualities in their proposals for 55 Gracechurch Street and Mr Wong added that he believed that London was and would remain an attractive City for great companies large or small and for talented workers. He noted that Brexit and the ongoing pandemic had created incredibly difficult challenges for business, however, his conviction and confidence in the long-term future of the City of London remained steadfast. He added that he firmly believed that the era of the office was not over and that the challenge was to create the right kind of office space going forward which reflected the increasing importance of environmental sustainability and social interaction within the five generations that now made up the workforce. He recognised that digitisation and the introduction of things such as virtual meetings had influenced behaviours and that this was here to stay but with the vaccination programmes now being rolled out across the world, would emerge a 'new normal' with higher expectations from both employees and employers alike. Mr Wong stated that he believed that the right space would attract the right companies and, in return, help them to recruit the right talent that drives growth. Providing the right type of space that allows for an experience in a quality environment both within buildings and in spaces between them would be expected. The ambition of the Corporation to embrace its new Climate Action Strategy was already testimony to this changing world and Mr Wong applauded this ambition. He stated that he felt that the City had been evolving in the right direction all along and that the applicant was embracing this change wholeheartedly. Mr Wong stated that he hoped that the proposals before the Committee which had evolved over the course of the past two years with advice from the Planning Department would be seen as an exemplar of this new mindset and that 55 Gracechurch Street could be part of this vibrant and sustainable new vision for the City of London.

Mr Ward began by stating that adopting an emerging local planning policy sought to maintain the City's position as the world's leading international financial and business centre and driver of the national economy. He noted that emerging policy sought to increase the City's office floorspace stock by a minimum of 2 million square meters from 2016-2036. Mr Ward reported that the six pillars of the scheme before Members were exemplary design, sustainability, permeability, flexibility, inclusivity and to be an enabling development. In terms of exemplary design, he stated that the building would

respond to its existing and emerging context and deliver a coherent, well-proportioned building with a strong overall sense of architectural integrity which would enhance the City cluster. In terms of sustainability, the applicant was targeting a BREEAM outstanding rating and would deliver integrated urban greening. The applicant had also adopted circular economy and whole life carbon principles with 98% of demolition waste to be reused or recycled. In terms of permeability, the applicant would reinstate a historic pedestrian route linking Gracechurch Street with Philpot Lane and significantly increase the amount of publicly accessible space on the site. Much improved pedestrian comfort levels would also be delivered along Gracechurch Street. In terms of flexibility, the applicant would provide adaptable office floorspace to meet the demands of different types of business occupiers including incubators, start-ups and other small and medium size companies. A flexible ground floor layout would also be created that was capable of responding to a changing retail environment. The applicant's innovative approach to servicing would transform the main courtyard space at the heart of the ground floor plan from a servicing bay by night to a public open space surrounded by active uses during the day. In terms of inclusivity, free public access to a sixth-floor terrace would be provided – a large green space offering views over the City and beyond. The applicant was also committed to implementing an overall cultural strategy for the development with the aim being to maximise the public offer both at ground floor and terrace level through organised events targeting local residents (including pupils at Aldgate School), City workers and visitors alike. Finally, in terms of being an enabling development, not only would the applicant deliver a new east-west pedestrian route, but the ground floor plan would also enable a potential additional north-south pedestrian route up to Fenchurch Street. The proposed development would create 2,000 new jobs and deliver over £7 million worth of Community Infrastructure Levy and Section 106 contributions. Mr Ward therefore hoped that Members would be minded to approve the application today, in line with Officer recommendations.

Tim Levene addressed the Committee as a Common Councillor for the Ward of Bridge in which this development would be located. He reported that he had monitored the project for some time and had been impressed at the ambition and vision of the developer but also the adaptability and focus on sustainability. He commented that it was probably recognised by all that there were areas of the City that needed regeneration and reimagination, particularly in the face of an uncertain future for the workplace in the face of Brexit and post-pandemic. Mr Levene stated that there were a number of aspects that led him to support this development – firstly the need for the City to remain competitive in order to continue to innovate and push boundaries and also the need to keep the City's building stock not only fit for purpose but to future proof this too. He stated that he felt that this project provided a fantastic opportunity to do just that. The development would also improve the surrounding area – not just aesthetically but with a real improved flow for pedestrians which many of his electorate had been asking for. Equally important he felt was the project creation with the focus on the future of work in mind and diversification that would create and attractive environment for a variety of different industries to thrive, in particular SMEs. Finally, Mr Levene spoke favourably on the developer's desire to create green space for City and Ward residents to enjoy daily. He added that he was

also very encouraged to learn of the developer's engagement with the local school - something that Mr Levene stated he would like to see other landlords and developers champion in the future.

The Chair thanked those speaking in support of the application and invited any questions that Members may have of them.

A Member noted that over the proposed building's whole lifecycle, the embodied carbon emissions would not meet the GLA's aspirational target of the RIBA 2030 Climate Challenge for Net Zero Buildings or the Leti (London Energy Transformation Initiative) roadmap to zero carbon buildings by 2030" and asked for the comparison between both the current building and the proposed building in terms of carbon emissions (including embodied and operational). For clarity, the Member stated that they did not want to know the figure per square meter, but the overall total to be able to compare the impact of keeping the current building versus demolishing and building this new building.

The Member went on to question whether refurbishment had been considered and whether it would it be possible, by opting to refurbish the existing site, to target more ambitious operational energy and carbon savings and to achieve better whole life carbon performance, due to the elimination of much of the embodied carbon from construction and demolition related activities. Oliver Morris, Sustainability consultant, highlighted that whilst the proposed development did not meet the aspirational GLA target it did meet the emerging GLA plan benchmark. In terms of the proposed building versus the existing, Mr Morris highlighted that the embodied carbon would be negligible for the existing building given that this was to be retained. He stated that the proposed building, through holistic design, would adopt circularity principles to look at the reuse viability of existing materials within the building alongside extending the serviceable life of products, proposed materials and building services which meant that, looking across the whole life cycle of the development in terms of recurring emissions, the proposed building would be far more efficient whole life carbon wise from an operational perspective. It was reported that the developer was further developing a methodology for reducing the embodied carbon impacts of the scheme through material reuse and extending the serviceable life of products going into the building.

Mr Morris reported that a reuse viability assessment had been undertaken for the existing building, but the intention was not to refurbish, and Mr Morris did not believe that this option had been considered given the efficiency of the proposed scheme. Mr Ward added that refurbishment of the existing building would not be able to deliver the significant public realm benefits at ground floor due to the nature of the existing structure. It was also felt that a refurbishment with an extension would not necessarily maximise the development potential of the site.

Finally, in relation to the public lifts, the Member noted that there was reference to this being supported by City of London Police and questioned where this was to be funded from and whether this would be in perpetuity. Mr Ward reported

that access to the public terrace had been discussed and designed with the Metropolitan Police and that the costs of running, servicing and maintaining this would be met by the developer.

Another Member questioned the public benefits of the development, noting that the scheme involved the removal of a gym that had occupied approximately 1,300 square meters and would not be replaced. The Member noted that a similar amount of space would be provided instead for publicly accessible open space and that prior briefings with the applicant had suggested that the capacity for this space would be approximately 160 people with the building itself capable of accommodating 1,950 workers. She therefore questioned how much of a public benefit this open space would actually be. The Member went on to query the impact of the new 24/7 passageway on residential amenity as no reference had been made to this. In terms of making a comparison between the existing gym and the proposed public offer, Mr Ward highlighted that the gym was a members only, paid facility whereas the developer was proposing free access across the public realm at ground floor level and also at sixth floor terrace level. In terms of the new 24/7 access from east-west via Brabant Court, Mr Ward reported that there were currently serviced apartments at 4 Brabant Court as opposed to traditional C3 residential. He added that he was aware that this area had been a focus for antisocial behaviour as it was a dead end and it was felt that opening this up would be a positive in terms of installing surveillance and introducing the presence of constant on-site management to tackle any anti-social behaviour in and around the area.

A Member raised a query on the public safety aspects of the vehicular lifts which he described as incredibly innovative. He noted that the lifts retracted back into the public realm when not in use and questioned how those in the vicinity would know that the lifts were about to come into operation and whether these would be fenced off in any way.
Mr Ward reported that on-site management would be physically present during the hours when the service bays came into use (between 23:00-07:00) to ensure that they were unobstructed. Bollards would also be installed.

A Member noted that the Officer's report stated that 90% of the roof garden had two hours of sunlight in March, she questioned how much sunlight the area would have when the sun was at its highest point in June. The report also stated that, despite the developer's best endeavours to date, they had failed to create a satisfactory wind climate and the Member questioned how they planned to remedy this without creating either a physical windshield which may alter the appearance of the building/ garden or the views from it. Mr Ward stated that in the Summer the majority of the terrace space would be suitable for what was defined as frequent and occasional sitting. Currently, modelling had shown that it was slightly windier towards the western side of the terrace and the applicant was continuing to look at this. Officers had proposed a planning condition which the developer had accepted and would involve the submission of further details prior to commencement of works on site which would ensure that a sitting condition was achieved. Mr Ward explained that some of the options considered to date were additional landscaping, adjusting

levels to a certain extent to create a greater barrier to the west and also a type of lightweight structure that would ensure no impact on townscape views.

On cycling and pedestrians, the Member stated that, as a cyclist, she was disappointed to see that only 20% of the required short stay cycle parking spaces would be provided (24 spaces) and questioned what would happen with cargo bikes making deliveries in the vicinity should these spaces be fully occupied given that these could often occupy large amounts of pedestrian space. The Member also questioned how 450 bikes would be able to access the long-stay spaces during peak morning and evening periods given that each of the two lifts only held two cyclists and their bicycles at a time. It was also highlighted that St Benet's Place was just 2.6m wide with an entrance of 2.3m with a bollard in the middle of this and the Member therefore questioned where cyclists waiting to gain access to the lifts would queue without adversely impacting upon pedestrian routes. Finally, the Member noted that peak figures per day for the existing building were 242 and 253 pedestrian movements whereas the proposed scheme suggested that there would be 526 and 501 pedestrian movements which was approximately double the existing figures whilst, in terms of office floorspace alone, numbers had tripled. The Member sought further clarity and commentary on these figures. John Mulhaire, the applicant's transport consultant stated that, in relation to short stay cycle parking, achieving 24 spaces had been a difficult task and a fine balance that needed to be struck in relation to delivering pedestrian through routes. He added that if all 24 spaces were occupied, there were other opportunities to park on-street in the surrounding area. He also asked Members to note that additional long-stay cycle parking spaces had been provided so that, if a cyclist were visiting an office based employee, there was scope to build in visitor access to these spots in the Management Plan for the site. This could also be detailed in the Cycling Promotion Plan which was to be produced in response to a condition. With regard to cargo bikes, Mr Mulhaire reported that there were three cargo bike bays provided within the site which had, again, been difficult to accommodate without affecting pedestrian flows and comfort levels. Mr Mulhaire added that the cargo bike provision was supplementary to the analysis that had been carried out for the servicing of the site. He recognised that, whilst these bikes were large, the parking allowed for this and it was important to note that they tended to have a very short dwell time with deliveries taking between 5-10 minutes. It was therefore thought that the provision of these three dedicated spaces was sufficient to accommodate the demands of the site. In relation to the cycle lift strategy, Mr Mulhaire reported that two dedicated cycle lifts had been provided for the development however, the analysis undertaken with the vertical transport consultants also allowed for the two goods lifts to be used during peak periods. The queuing calculation undertaken in consultation with the vertical transport consultants demonstrated that, at peak arrival times, a maximum of two cyclists may be waiting to access lifts and could do so side by side whilst still allowing pedestrians to pass by. Finally, in relation to the predicted pedestrian flows at the site, Mr Mulhaire underlined that the critical point here was that there was an existing building on site which had an existing demand in terms of pedestrian movements during peak periods and the analysis undertaken had included a net increase assessment so the proposed volumes did not include what was already happening and the figures within the

report therefore referred to a net increase of 526 during the morning peak period. Mr Mulhaire explained that this was a standard assessment undertaken for any transport assessment with an existing use on site.

The Member posed a supplementary question, seeking clarity on where the goods lifts that would also be available for cyclists to use during peak times would be situated in relation to Gracechurch Street. Mr Mulhaire reported that, in relation to the two dedicated cycle lifts, the goods lifts were located further to the east of the site. The Member questioned whether this meant that cyclists would therefore have to walk through the site to access these lifts. Mr Mulhaire confirmed that this was correct.

In relation to the question on sunlight to the terrace, Jerome Webb, the applicant's daylight/sunlight consultant reported that the amount of sunlight that would hit the amenity area in Summer/21 June had been carefully looked at as part of the design process with the assessment contained within volume 3 of the addendum 'ES'. Mr Webb went on to give the Committee the broad headlines of this, stating that the total number of potential sunlight hours on that day would be 16 hours and 38 minutes and, of that, approximately 65% of the terrace area would have in excess of 2 hours of sunlight but the majority of the 65% would exceed 4 hours and 30 minutes of sunlight. The Gracechurch Street frontage and the southern façade of the building would enjoy in excess of 5 hours of sunlight.

Another Member stated that he felt that this was a very congested part of the Square Mile containing many buildings. He asked the applicant how the construction phase of this project would progress should approval be granted and what sort of consolidated supply chain had been looked at and what impact there would be on the streets and walkways in the area during the construction phase given that these were quite narrow pavements despite the street itself being wide – he questioned what assessment of this, if any, had been undertaken. Mr Ward responded by stating that, as with every planning permission, there would be a condition attached which would require a demolition logistics plan and a construction logistics plan to be submitted and approved before anything could happen on site. This detailed work would be carried out when a contractor was appointed if planning permission were to be granted for the scheme. Mr Ward also reported that there were various neighbourly agreements that the applicant would need to sign prior to the commencement of any works. Mr Ward went on to highlight that the key principles would be the maintaining of pedestrian routes including access to Talbot Court and also the use of modern methods of off-site manufacture to make the construction process as efficient as possible.

A Member asked the applicant to clarify ownership and whether this included ownership of the land. Mr Ward reported that approximately 40 square meters of land within the red line boundary was owned by the freeholders of 60 Gracechurch Street and that the vast majority of this was proposed to be resurfaced as part of improvements to St Benet's Place and the re-opening of the east-west route. There was 5 square meters of land which had a pile basement retaining wall beneath it and was marginally over sailed by the

façade of the building above. Mr Ward reiterated that this would form part of various neighbourly agreements and negotiations that were typical of major schemes. Mr Ward reported that these conversations had started and would continue should planning permission be granted.

The Chair asked that Members now move to the substantive debate and also invited any outstanding questions that Members might have of Officers.

A Member sought confirmation on the stopping up order asking whether, if granted, this would not be made until there was a binding agreement from the developers to add the replacement public open space. Secondly, the Member referred to the chimney breast which was proposed to be removed and sought confirmation as to whether this was operational at present. Finally, the Member referred to Historic England and stated that it was his recollection that, where Grade I buildings were concerned, they had the right to direct a refusal. He questioned whether this was correct and, if so, why they had chosen not to exercise it.

With regard to the stopping up order, the Comptroller and City Solicitor reported that the order would include a requirement for the provision of the replacement highway which would come into effect when the stopping up order took effect albeit that this would inevitably lag because the new highway would need to be laid out. She added that the 278 agreement would most likely contain the arrangements for laying out and the approval of the new highway.

The Interim Chief Planning Officer and Development Director reported that the chimney breast was not in use at present. With regard to Historic England, he informed the Committee that the organisation had no power of direction of refusal as this application did not concern a listed building consent on a Grade I building. However, as with any major scheme, it could be called in, which the Interim Chief Planning Officer and Development Director felt was unlikely at this stage. The Comptroller and City Solicitor added that it was only the Secretary of State and the Mayor of London who had powers of direction. She added that Historic England were, however, advisors to the Secretary of State and could therefore make recommendations on this basis.

Another Member noted that the BREAAM rating of 88% was said to be a target and questioned who would be monitoring this and what the consequences were should the applicant fail to achieve this. Secondly, they noted that the Chief Planning Officer and Development Director had made reference to complex modelling of the City cluster that had been carried out in relation to this application and questioned whether this modelling had been carried out pre-pandemic, noting that the City Plan 2036 was set to come back to this Committee for consideration after consultation due to the extent of change within the City.

With regard to the BREEAM rating, the Interim Chief Planning Officer and Development Director reported that the City Corporation had controls to ensure that this outstanding rating was delivered under S106 and this would be monitored in terms of construction and post construction. Officers explained

that the current BREEAM rating was ‘excellent’ and that the applicant was targeting ‘outstanding’ which would be conditioned in terms of monitoring and reporting.

With regard to the 3D modelling, Members were informed that the complex work carried out here was intended to identify areas where the City could deliver floorspace and, by virtue of that, taller buildings to meet projected demand. It was highlighted that this area was particularly hampered by the processional route which had led to the proposal for this building having to be reduced in height so that it did not appear behind St Paul’s. There were also other key views which informed the capacity for growth in this area so it would not be possible to accommodate a series of 300m tall buildings here, but buildings in the region of approximately 150m which would be valuable in terms of accommodating future growth.

With regard to the City Plan process, Officers highlighted that the latest draft had been approved by this Committee in November 2020 and subsequently by the Policy and Resources Committee and the Court of Common Council. Consultation would commence this month and, if as a consequence of this there were any further material changes that needed to be made prior to examination, it would return to this Committee for approval if necessary.

A Member stated that he felt conflicted on the application. He was impressed by the opening up of the area and pedestrian flows, the pop-up servicing lifts, the incubator office spaces and the regeneration of this area of the City. He added that he was, however, concerned as to the creep of tall buildings in terms of their impact on historic buildings and the genuine need for them. He noted that this scheme had been highlighted as a means of softening the singularity of the Walkie Talkie building but added that it was very clear that this building would impact upon the Monument and Tower Bridge which he felt was regrettable. The Member also expressed concern as to wind climate and noted that the Officers report stated that in most locations wind conditions would remain either the same as existing or become windier but would continue to fall within suitable categories. He stated that he did not think that this was good enough. The Member questioned why this application had received quite so many objections from residents, businesses and historic associations and whether, if the application were to be granted, a precedent was being set in terms of overruling these objections. He also asked whether all options had been exhausted in terms of trying to improve wind conditions. Finally, in terms of future demand for City office space and the likely return of workers to the City given that many businesses were already talking about more flexible working going forward, he questioned whether growth projection figures quoted within the report had recently been revisited. This would directly impact on whether there was a genuine need for the proposed additional storeys on this site.

With regard to creep, Officers stated that they felt it was desirable to bring 20 Fenchurch Street back into the cluster and to consolidate the area and reinforce the ‘clustering’ concept. Complex 3D modelling had informed these views. The Interim Chief Planning Officer and Development Director noted that

each tall building had to be assessed on its merits within policy framework. He noted that this site was a little to the south of the edge of the Eastern Cluster Policy Area but highlighted that this was not a prescriptive boundary and that the proposal had been assessed as causing less than substantial harm that was outweighed by public benefit.

With regard to wind, it was reported that the work done in terms of wind guidelines was not intended to stop areas from getting windier given that tall buildings changed the geography of the land and led to enhanced wind conditions. The guidelines existed to ensure that wind conditions were made as comfortable as possible and it was highlighted that, under this scheme, the wind conditions around 20 Fenchurch Street to the west would actually be improved. Officers reported that the condition to improve wind conditions on the public garden terrace was not dissimilar to that imposed on 50 Fenchurch Street and was likely to involve landscaping features/planting.

With regard to the number of objections received, Officers commented that this was not unusual for a proposal concerning a tall building within a sensitive setting which would have an impact on the setting and backdrop of historic buildings. It was highlighted that changes to the backdrop did not necessarily relate to harm and Officers had found Historic England's position quite difficult to understand given that there was a juxtaposition of the new City and the old City which characterised this part of the Square Mile and was typical to the city cluster area. It was reiterated that the applicant had amended their scheme to address the harm that would be caused by the development from an early stage and this was considered to be less than substantial. The Interim Chief Planning Officer and Development Director added that any decision on this application would not set a precedent in any way as each application had to be considered on its merits and in terms of its relative impact on things such as heritage assets. He added that it was important to point out that Historic Royal Palaces had chosen not to object to the proposals with regard to the World Heritage Site and their opinion therefore clearly differed from Heritage England.

With regard to demand for office space, Officers stated that it was still felt that it was too early to say what this might be post pandemic but that their view was that, as a total quantum, the amount of office space required across London as a whole was likely to shrink as a result of the COVID pandemic but that offices would gravitate towards quality space and that they considered the City to be one of the better spaces in the capital to locate.

A Member questioned the true public benefits of the scheme compared to the harm caused to numerous heritage assets given the objections lodged by those who were experts in the field. They added that, whilst they were very supportive of opening up pedestrian routes through large developments, they did have concerns that this would be adjacent to a residential property. Finally, they added that their main concern was the public versus the private benefits to the scheme. Whilst the ground floor area would be opened up in terms of public access, this was necessary to service the retail units on site. With regard to the provision of open space, whilst more of this was definitely needed in the City, the space proposed would not, in their opinion, be sufficient for the number of

workers in the building let alone the wider public. The Member added that the suggestion that 20 Fenchurch Street had already impacted on the view of Tower Bridge to justify further harm to this was, in their opinion, not correct. The site in question was outside of the cluster, south of the Walkie Talkie, and the Member commented that they had been of the belief that the eastern cluster had been very carefully designed to ensure minimum impact on the City's significant heritage assets and listed buildings. With regard to the cultural offering of the development, the Member reported that the same claim had been made with regard to the Tulip and commented that there were many aspects of this that were undefined.

Another Member questioned the paragraphs within the Officer report relating to whole life carbon. He asked Officers to confirm whether it was correct that, given there would be no reduction in the overall carbon emissions from the building and no savings until 2034, there would be no embodied carbon or considerable contribution to emissions. If this were the case, he questioned what Officers were referring to in paragraph 409 of the report in terms of a strategy to achieve further reductions being required by condition and what level of embodied carbon could be realistically achieved/conditioned in this space. He also questioned whether offsetting had been discussed with the applicant to deal with the embodied carbon and, if so, what conclusions had been reached. The Interim Chief Planning Officer and Development Director reported that as schemes were refined at condition stage, particularly through procurement processes and early engagement with the contractors once permission had been granted, opportunities were always prioritised with regard to materials and Environmental Product declarations for example. Effectively, this involved looking at things such as the GLA's aspirational carbon guidance which included looking at increased recycle content of the materials and replacement of carbon in materials such as steel and concrete. He added that the development and construction of a building was always an evolving process and refinement could therefore always be secured through condition which was the intention here where it was hoped that Officers could work collaboratively with the developer to gain improvements in terms of embodied carbon and part of these discussions would also include offsetting.

A Member reminded the meeting that, in 2006, this Committee granted planning permission for the Walkie Talkie building which now sat within the span of Tower Bridge. He added that this application for 55 Gracechurch Street, if granted, would fill yet more of the span of Tower Bridge. However, it was not just this view that this proposed building would impact upon as the Monument's setting would also be affected and degraded – something objected to by Heritage England, the Georgian Society, the Victorian Society and the City Corporation's own Conservation Area Advisory Committee which, combined represented independent and expert views. He therefore questioned why the Officer report recommended that permission be granted. Members had been told that the proposed building would fall outside the cluster approved within the current Local Plan which should cause the application to fail. However, Members were then told that, in the draft City Plan 2036, it was 'located on the edge of the revised City Cluster Policy Area which extends the cluster to the south, incorporating the Walkie Talkie' – in other words the Walkie

Talkie mistake was to be retrospectively rectified by extending the cluster to include it and justify the erection of more tall building such as this around it. The Member commented that another justification for the report recommending permission is that, whilst the proposed building cause heritage harm, that harm was outweighed by 'public benefit' but the public benefit was disproportionately small in comparison. The report suggested that this building would make the site more permeable but this would only benefit a small number of people who walked regularly from the mid-point of Philpot Lane to the mid-point of Gracechurch Street to do so directly. Other justifications made mention of school children and greening but the Member stated that he felt that school children would benefit more from a visit to the Tower of London than the sixth floor of an office block and from visiting a park as opposed to a few trees part way up an office building. The Member commented that, despite all of this, he believed that the application would still be granted today to enable the construction of this little brother to the Walkie Talkie but encouraged all that cared about the City's heritage to call upon the Mayor of London to call in this decision and direct that it be refused.

*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.*

A Member raised a question regarding solar glare and noted that the report stated that there were 13 junctions where there was the likelihood of solar glare effects and the mitigation suggested was that drivers use their car visors. They stated that, sadly, cyclists, motor cyclists and pedestrians did not have this option and questioned how the junctions would work with 'alternative traffic signals enabling road users to use different options' and whether Officers genuinely believed that these thirteen junctions would be safe and that no further mitigation was required. The Interim Chief Planning Officer and Development Director highlighted that the report set out that it was not expected that solar glare would be an issue based on the information available (it was considered to be a minor adverse risk) and that no further works therefore needed to be carried out with regard to this. There was, however, a Section 106 obligation to review this in the event of any issues arising.

Another Member commented that it seemed, on the basis of the last few major applications considered by this Committee, there was a desire from developers to help the City Corporation to define what the new working world might look like post pandemic and stated that he had been quite enthused by what he had seen. He added that, this proposal had evolved and incorporated much change compared with when Members first start receiving information on the development approximately a year or two ago and that he also found this encouraging. He added that he was very impressed by how these proposals attempted to attract people and business back to the City and attempted to define communal areas within the building and felt that they demonstrated an understanding of the City Corporation's aspirations in terms of being a global City open for business. On the technical side, the Member stated that he

initially had some reservations as to the positioning of this tall building but had been encouraged by the graphics supplied which showed the tower set back from the main street and the frontage very much in keeping with the rest of Gracechurch Street. He stated that he was therefore supportive of the proposals as they stood but would also like to support the point already made with regard to ensuring that conditions relating to embodied carbon were as tight as possible.

A Member spoke to state that they shared some of the concerns already voiced by other Members. They questioned whether there had been any real assessment on the detriment to the potential development of nearby plots such as 60 Gracechurch Street. They added that, whilst they understood and agreed with the principles of consolidation and clustering tall buildings they had initially believed that this development was either partly within or closely neighbouring the existing cluster but it was, seemingly, outside of the classified area and they sought clarification on this point. Finally, the Member stated that they found it interesting to note that the objections received had come from a number of different respondents representing different kinds of organisations and that the breadth of these therefore gave them cause for concern. The Member added that there were also numerous comments around how the City would return to how it had operated previously, prior to COVID, but they were of the view that the time was fast approaching where the City really must reappraise its planning assumptions on office space requirements and revisit the City Plan currently out for consultation prior to inspection. In terms of cumulative impact, Officers reported that this scheme did not, in their view, compromise the development of neighbouring buildings and it was hoped that developers could work collectively alongside one another. It was highlighted that, as a planning authority, it was not possible to curate when schemes came forward. Members were informed that there were countless examples of tall buildings within the cluster that sat side by side without compromise and that this was a common dynamic here. The Interim Chief Planning Officer and Development Director clarified that the Eastern Cluster Policy Area was shown in very broad terms with no prescriptive boundary which suggested that there were opportunities for tall buildings within this area in general. Equally, there were areas within the policy area that were inappropriate for tall buildings and proposals outside of the area where the case could be made for erecting a tall building. Members were informed that this particular site sat a little to the south of the Eastern Cluster Policy Area boundary as did 50 Fenchurch Street. Officers reported that it was important to assess them in terms of their impact on things such as the skyline and heritage assets and highlighted that this was not in a sensitive area that was deemed inappropriate for tall buildings. On this particular scheme, Officers had deemed the proposals to be acceptable and in line with policy given that the City Plan 2036 advocated that this area and the area north of Tower 42 had scope for intensification and consolidation.

A Member spoke in support of the proposals which he described as being very exciting for the business city. He added that he was in no way anti-resident which was a criticism that had been levelled at Members speaking out in support of the business city in the past and underlined that he saw residents as very important stakeholders in the City of London. He went on to state that, in

his opinion, these proposals ticked many boxes and had been very imaginatively and innovatively designed. He stated that he was particularly impressed by the building's permeability at ground floor level and commented that it was rare to see an application that brought with it an 80% increase in public realm. He recognised that it was not possible for anyone to judge what the demand on office space would be post pandemic but added that he personally did not believe that the era of the office was dead but would be instead be subject to potential reinvention and that incubator space, the likes of which this development would offer, would be incredibly important. The flexibility of floorplates and the design of the office space was also going to be important. It was known that the changing tenant base in the City had already moved towards SMEs in recent years and it was suggested that this building would cater well for these. The Member added that the tying in of 20 Fenchurch Street would make sense with the addition of this proposed building that sat within the extended cluster as designated within the Corporation's City Plan 2036. Finally, the Member stated that this was a very critical time for the City of London and, as it emerged from the pandemic, this application should be viewed as a resounding vote of confidence in the future of the City and one that he hoped would be supported.

Another Member commented that he felt that some of the questions posed and comments made during the debate could be perceived as being ungenerous towards the applicant that had clearly been very innovative and responsive to issues. He added that he would like a large number of the features associated with this application such as pedestrian flow and comfort levels, flexible office space and the installation of a rooftop garden were to be applauded. In terms of harm, he commented that he felt that this had been grossly exaggerated in relation to historic views and he did not feel that the proposals were at odds with policy. He added that he felt that the design of the building was very high quality and was supportive of the social and economic inclusivity that the space would offer.

A Member spoke to revisit the point on refinement and conditions and the fact that the Committee had been told that refinement of carbon emissions could be fitted in in terms of embodied carbon and that this could be resolved after permission was granted. They stated that it was really important to note that the report specifically asserted environmental sustainability as a public benefit and specifically stated that the proposed demolition and construction of this building would reduce carbon emissions. It had therefore been helpful to them to clarify that what was really being discussed was an improvement in terms of operational carbon emissions and not embodied carbon, which was the largest aspect, as recognised within the report. They felt that this was an important distinction to make and the Member noted that it was equivalent, in terms of the City's Climate Action Strategy, to recognising that Scope 1 emissions were quick and easy to resolve but made up just 3% of emissions but that Scope 2 and 3 would require a lot more work. The Member stated that they had asked for a direct comparison of the figures for the current and proposed buildings but had not had this information and noted that refurbishment had not been considered. They added that, if the City Corporation were serious about sustainability and future proofing the City, Members should not be

misidentifying sustainability as a public benefit when this did not include the embodied carbon element. The Member commented that the word 'refinement' was quite telling in this context as this did not equate to fundamentally changing the balance. The Member therefore concluded that, having considered these matters for herself, this development was not a public benefit in terms of sustainability and carbon emission reductions. She then turned, therefore, to harm caused to heritage assets and expressed extreme concern as to City Cluster creep. It was noted that this site was described within the report as being on the periphery of the cluster but later described by Officers as being just to the south of it. The Member described the aim of using this development and potential others to 'hide' 20 Fenchurch Street as a fallacy. She then moved to assessing the building within its own context, noting that the Conservation Area Advisory Committee strongly objected to the proposals on the basis of the height and bulk of the building and that the area where this development was proposed was characterised by buildings of just 7-8 storeys. The Member added that the development would not enhance the Eastcheap Conservation Area nor neighbouring Conservation Areas and, in her opinion, would cause significant harm to heritage assets such as Tower Bridge and distract from the view of these. She also disagreed with the view that the development was of a high-quality design in the same way that buildings such as the Gherkin were for example and reported that she therefore intended to vote to refuse the application.

Another Member agreed with many of the points made by the previous speaker and added that, whilst there were no graphics shown on this, she felt that the erection of this building would create a sort of chasm with 20 Fenchurch Street and the rest of the Eastern Cluster. She went on to state that she felt that the aim was to have buildings either side of the cluster stepping down to create a gradient and that would not be achieved by this building. She recognised that, whilst there were some very good, innovative features of the development, others seemed fairly dubious and she did not think that this was the correct location for this building. If it were to be situated here, it should be lower so that views were not impeded. In its current form, the Member stated that she did not feel able to support the application.

Another Member commented that, as a City resident, he enjoyed walking through the City's historic lanes and passageways and therefore thanked the developer for the welcome improvements that their development would offer in terms of pedestrian flow and opening up dead ends. In terms of historic views, he reported that he had visited the site over the weekend and that it was almost trivial to try and find a picture angle of any of the historic sites referred to without any background interruption from modern buildings. He therefore felt that the harm caused to these assets was very small in comparison to the benefits that this development would bring.

A Member referred to paragraph 434 of the Officer report which stated that the applicant would pay the City of London's legal costs and the Chief Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies and questioned whether this was normal practice and whether this would in any way impinge upon the

professional competence of the City's officers in finalising any negotiations should planning permission be granted. The Comptroller and City Solicitor responded to state that the payment of costs in relation to the Section 106 agreement and all other stages of the 106 works including monitoring was standard for every authority and that there were statutory powers to enable these charges to be imposed where they were agreed by the developer.

A Member stated that she had listened carefully to the debate and had read the report and background papers in detail. She agreed that the comments made around incubator space, permeability and new features were interesting but felt that all of this could be incorporated in a building on this site that did not have the detrimental impact that this current scheme would have on numerous heritage assets. She agreed with the points already made with regard to environmental impact and sustainability. She commented that location was everything and that to allow the eastern cluster to roll out further towards the riverside and impact further in terms of the detrimental harm already caused by 20 Fenchurch Street in an attempt to tie this building in to the cluster was not the way to resolve the issue. The Member concluded that she was therefore of the view that this scheme was overdevelopment on this site, had numerous detrimental impacts on heritage assets (particularly the Monument and Tower Bridge) and that she did not feel that the public benefits were as they had been presented and were more to do with the viability of the building itself. She therefore intended to vote against the application.

Another Member stated that he too had listened carefully to the debate. He declared that he was a City resident and, like other members of the Committee, did not blindly support applications for new offices. He went on to state that he found Mr Wong's vision for the continuing importance of the office very persuasive and inspiring and this was backed up by his commitment to actually finance this development. He noted that the proposed development had numerous benefits and that the increased permeability for pedestrians was critical. He also highlighted the benefits of the significant greening, off-street servicing out of hours and innovative vehicle lifts and noted the high degree of reuse. The Member commented that he felt that there had been a high degree of criticism about net zero carbon but underlined that this was impossible to achieve given that it defied the second law of thermodynamics. He highlighted that the report acknowledged that there would be some harm caused to the setting of heritage assets but that, with regard to the Monument and Tower Bridge this would be very much towards the lower end of the spectrum with the images shared with the Committee during the Interim Chief Planning Officer and Development Director's initial presentation strongly enforced this judgement. In his view, the benefits outweighed the harm and he concluded by stating that he would therefore be supporting the application.

A Member commented that she had always loved the juxtaposition of old and new in the City and was particularly impressed with the permeability of this proposed development and the opening up of the area. She added that she found it interesting that Historic England were speaking against the application, but that Historic Royal Palaces had not. She also noted that Historic England had chosen not to register to speak in objection today when they had done so

previously where they had concerns. The Member added that she strongly felt that the benefits of the scheme outweighed any harm and that the idea of softening the appearance of 20 Fenchurch Street by providing some contrast to it was also a positive.

A Member stated that, after listening carefully to this debate, he was fascinated by the innovation in technology to support less energy use and hoped to also see this replicated in other applications. He felt that this application made a great statement in terms of confidence in the future of the City of London and would make a vital statement if approved in the current climate. He added that he had noted and read with care the Officer's views on heritage assets and was in agreement with these. He too noted the absence of representations from those that supported heritage assets who he felt seemed to be conspicuous in their absence. He stated that he would be supporting this application and hoped that others would do so too.

Another Member stated that she had been very impressed by Mr Wong's entrepreneurial vision – something that was much needed in the COVID and post-COVID era. She commented on the breadth and the depth of care that planning offices had clearly taken with regard to refining this application and helping Members to understand the pros and cons of it. She stated that she hoped that future applications would see this building as a positive example in terms of innovation and that she would be voting in favour of it. The Member went on to give particular mention to the concept of the roof garden terrace and the idea of providing those who were less advantaged in business - SMEs, start-ups and incubators - with an opportunity to grow.

The Interim Chief Planning Officer and Development Director reported that there was scope to amend conditions 3 and 4 in relation to circular economy and whole life carbon cycle to include ongoing operation and occupation and sought the Committee's permission to approve the final wording on these in consultation with the Chair and Deputy Chair should this application be approved.

The Committee then proceeded to vote on the recommendations before them within this report together with the recommendations at agenda items 5 and 6. 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 – 20 Votes
OPPOSED – 6 Votes*
There was 1 abstention.

The application was therefore approved.

**In accordance with Standing Order No. 38, some of those Members who had voted against the recommendation asked that their names be recorded in the minutes – they were Marianne Fredericks, Graeme Harrower and Natasha Lloyd-Owen*

**RESOLVED –** That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule and that authority be delegated to the Interim Chief Planning Officer and Development Director in consultation with the Chair and Deputy Chairman of the Planning and Transportation Committee to finalise the wording of Conditions 3 and 4 to accord with the wishes of the Committee.

5. **ST BENET'S PLACE LONDON EC3V 0EE**

The Committee considered a report of the Interim Chief Planning Officer and Development Director regarding St Benet's Place, London, EC3V 0EE, specifically, temporary removal, alteration and reinstatement of the Grade II Listed Iron Gateway in St Benet's Place.

**RESOLVED –** That listed building consent be granted for the above proposal in accordance with the details set out in the attached schedule.

6. **PHILPOT HOUSE 2-3 PHILPOT LANE LONDON EC3V 0EE**

The Committee considered a report of the Interim Chief Planning Officer and Development Director regarding Philpot House, 2-3 Philpot Lane, London, EC3M 8AN, specifically, the demolition of a chimney attached to Grade II Listed 2 and 3 Philpot Lane.

**RESOLVED –** That listed building consent be granted for the above proposal in accordance with the details set out in the attached schedule.

7. **REVENUE AND CAPITAL BUDGETS 2021/22**

The Committee considered a joint report of the Chamberlain, the Director of the Built Environment and the Director of Open Spaces presenting, for approval, the revenue and capital budgets for the Planning and Transportation Committee for 2021/22.

Members were informed that this report had been produced by the Chamberlain in consultation with relevant departments.

A Member questioned what 'planning obligations' referred to within the Staffing Summary table and also asked where enforcement sat within the budget. The Interim Chief Planning Officer and Development Director reported that there was a Section 106 office included within his division and that this comprised of two posts that monitored and administered S106 and the legal obligations. He added that planning Enforcement Officers sat within the Development Management Team in his division.

**RESOLVED –** That Members:

i) Approve the proposed revenue budget for 2021/22 for submission to Finance Committee;
ii) Approve the proposed capital budgets for 2021/22 for submission to Finance Committee;
iii) Approve the proposed 50 Year Bridges' Repairs, Maintenance and Major Works budgets;
iv) Authorise the Chamberlain, in consultation with the Directors of the Built Environment and Open Spaces, to revise these budgets to allow for any further implications arising from subsequently approved savings proposals, amended 2021/22 pay award and changes to the Cyclical Works Programme;
v) Agree that amendments to budgets arising from changes to recharges during budget setting be delegated to the Chamberlain;

8. **DBE SERVICE CHANGES & BUDGET PROPOSALS**

The Committee considered a report of the Director of the Built Environment presenting a proposed approach to identifying savings and additional income opportunities in service provision to meet the department's initial savings requirement.

Officers explained that this report examined the departmental budget in more detail.

A Member commented that everyone appreciated that a series of difficult decisions would need to be made over the next few months and that these were amongst them. He went on to specifically question toilets and the APCs and asked whether, if these were closed, the City would be prohibited from ever reopening these should patterns in the City change again and potential use therefore increase. The Chair stated that this sat within the terms of reference of the Port Health and Environmental Services Committee (PHES) and asked that the relevant Officers therefore respond to this query offline. The Member added that he had raised the matter here as he believed that the APCs had been provided under Section 106. Officers reported that the PHES Committee had agreed to mothball public conveniences for the time being and that further investigation would be carried out on the implications of this in terms of the question raised. Officers undertook to respond to the Member with further details on this in due course.

Another Member commented that they appreciated that making savings of the order required was difficult and it was clear from this and the previous report at Item 7 that significant efforts had been made to balance the budget. However, she expressed concern that, often, when there was a degree of pressure and urgency around the need to identify savings, it was easier to make opportunistic savings and to not look at the fundamental ways that business was being conducted or a service provided. She added that she was also aware that if any changes were to be made in terms of staffing structures there were implications that needed to be worked through appropriately making it unlikely that full effects could be achieved in 2021-22. She concluded by seeking some reassurance that this was not simply a list of quick wins but based on fundamental, recurring savings that Officers felt confident they could secure

with minimum impact on staffing and services. Officers responded by highlighting that there would be further savings required and that what had been done in the first instance was to consider those savings that need to be made to fit the budgetary envelope for 2021-22. The report made reference to the Target Operating Model savings that would also need to be considered where some of the elements referred to by the Member would be examined more closely by the Executive Director of the Department of the Built Environment and brought back to this Committee.

Another Member recognised that these were very difficult decisions to make particularly for a department that was at the heart of the City Corporation. She added that she was very disappointed to see budgetary reductions for things such as pothole repairs which were incredibly dangerous. She commented that there was much development going on in the City with larger and larger vehicles accessing sites and making deliveries and questioned why developers were not therefore asked to contribute to the cost of road repairs and general maintenance. She also commented on the proposed cuts to street sweeping and questioned how this was likely to impact on the attractiveness of the City for visitors and residents but also for attracting events and filming. The Member mentioned funds available from off-street parking reserves and funds generated from Bank Junction and questioned why this was not being put back into ensuring that the City was well maintained with clean, pleasant streets. The Chamberlain commented that off-street parking reserve did fund highway maintenance as well as a number of Capital schemes via a transfer into DBE budgets. Officers from the Department confirmed that somewhere in the region of £2million was transferred and that this had been underpinning highways maintenance work for quite some time. Officers appreciated that what was being proposed was essentially a change in standards but stated that it was something that they were hoping to approach with the contractor Rineys to ensure that they were still managing risk around the highway as required to meet statutory obligations. Consideration would also need to be given to the wider context of what was affordable, sustainable and what the City's ambitions were in terms of what it wants to look and feel like. Officers stated that it was expected that they would have to look at alternative means of funding going forward and clarified that developments did contribute towards funding works around their sites through what was the Section 106 process and now CIL. The Holborn Circus scheme and Aldgate schemes were cited as specific examples where developer contributions had funded a lot of regeneration. The City would also need to work alongside all of its partners, including TfL, given that their funding had also supported things like the City's resurfacing programme and that it was a challenging funding environment for all at present.

A Member commented that she endorsed the savings from the Lord Mayor's Show and noted that the report stated that the event organiser was Lord Mayor's Show Ltd and she therefore questioned whether City Fund budgets should be supporting it in this way. In light of this, she questioned whether there was any way in which this funding could be recouped from City Cash for previous years and used to protect maintenance services. Officers reported that this was certainly something that they would like to discuss with the organisers, the Chamberlain and the Policy and Resources Committee and highlighted that

some savings had been generated in the current year with the show not having taken place at all. This money had been set aside for things like maintaining the route to a certain standard for the carriage.

A Member expressed concern at the table on page 601 of the agenda pack and the reduction in standards of how both pavements and potholes were dealt with. He added that he was concerned that this could be counterproductive and could result in trip hazards and claims against the City causing insurance premiums to rise. He questioned why off-street parking reserves which appeared to stay relatively steady could not be used to fund work here. Officers reported that they were aware that it would be a challenge to balance public risk and highlighted that there were a very small number of claims registered with the City and that the way this was manged was not just around what was determined to be a trip but also the process behind this and the adequate inspection of highways. This dictated whether the City's insurance premiums changed, and the insurance provision was based on the City adhering to a process that was reasonable, professionally run and maintained. At present it was recognised by the City's peers across London and by its insurers that the organisation was out of step with everyone else and that, by taking these steps, they were unlikely to be in a position where they were adversely affected because they were inconsistent with practice elsewhere. This was not, however, to say that Officers would lose their care and attention with how the City's streets were maintained and Members were assured that Officers would work as hard as possible to ensure that the funds available to them could be used as efficiently and effectively as possible to provide the service.

Another Member spoke to remind Members that, on City's Fund, there was a statutory duty under a five year purview to balance the books and that the ongoing pandemic had added further to what had already been quite a difficult situation. He thanked Officers for all of their efforts in trying to manage services within the financial envelope available this year. He went on to caution Members against trying to utilise anything in City's Cash to support anything in City's Fund as this could be perceived by central government as a suggestion that the City Corporation did not require their funding in order to fulfil its statutory services. He added that City's Fund needed to support itself going forward.

A Member spoke again to question why off-street parking reserves were not being drawn upon to the extent required and to maintain the City's streets/pavements and ensure that they were safe. She added that she also had concerns around toilet closures. The Chamberlain confirmed that the funds could be used for a host of different purposes with the main priority being around the provision of off-street parking. A report further detailing the use of the funds would be submitted to the next meeting of this Committee.

**RESOLVED –** That Members:

i) Approve the overall approach to identifying savings and additional income opportunities at this time as they relate to the Highways, Parking & Traffic Management functions, including:

- Those items identified as Amber and Green at paragraph 52 of the report
- Those items identified as Red at paragraph 82 of the report, subject to the subsequent approval of the Policy & Resources Committee in relation to DBE's local risk funding for the Lord Mayor's Show.

9. **DRAFT HIGH-LEVEL BUSINESS PLANS 2021/22**

The Committee considered a report of the Director of the Built presenting the 2021/22 high-level Business Plan for the Department of the Built Environment.

Officers reported that the Plan had been produced based on the current organisational structure and that this would be reviewed further towards the end of 2021-22 in line with the Target Operating Model. Members were informed that there was a new corporate template that clearly linked to and defined how the department supported the Corporate Plan and the adopted strategies.

In response to a question, Officers highlighted that the draft City Plan 2036 placed significant emphasis on the delivery of healthy and inclusive streets.

A Member questioned why the Sports Strategy had been included within the equivalent document for PHES but not here. Officers stated that the report submitted to PHES had been a combined report with three separate business plans for the Department of Built Environment (DBE), Open Spaces and Markets and Consumer Protection appended. It was reported that the Sports Strategy was very high on the agenda for Open Spaces but that, due to limited time and workstreams, those aspects captured within this business plan were only the very high-level strategies with DBE's principal strategic commitments set out on page 621 of the agenda pack. Members were assured that this did not, however, mean that the Department would not seek to implement the Sports Strategy and others in so far as possible.

Another Member commented that it would be good to include reference to the monitoring and enforcement of planning conditions within the Plan. She went on to note that, under the Transport Strategy, the Plan referred to the need to prioritise and provide more space for people walking but did not make reference to cycling. Under the Climate Action Strategy, one of the key priorities was around reducing embodied carbon and the Member questioned whether something regarding refurbishment and reuse of buildings could be added here. Finally, the Member noted that, under the KPIs, there was mention of increasing office space and stated that she would be interested to know whether increased provision of residential accommodation should also be referenced here.

Officers reiterated that this was a high-level business plan supported by a number of divisional plans and that details such as compliance figures and development management would be included within these. Members were also informed that Officers were working at pace across the organisation to capture KPIs that have a direct link to the corporate performance framework and

corporate strategies. Officers undertook to respond further to the Member on the specifics of the questions raised in writing.

**RESOLVED –** That Members approve the 2021/22 high-level Business Plan for the Department of the Built Environment.

10. **GATEWAY 5 - BAYNARD HOUSE CAR PARK - VENTILATION & SMOKE CLEARANCE SYSTEM**

The Committee considered a joint Gateway 5 report of the Director of the Built Environment and the City Surveyor relative to Barnyard House Car Park - Ventilation and Smoke Clearance system.

**RESOLVED -** That, the Committee:

- Approve the total project sum of £640,777 including fees, surveys, staff costs, and preconstruction activities already expended
- Note that funding for this scheme from the On-Street Parking Reserve was approved in principle as part of the 2020/21 annual capital bid round and that draw-down is subject to the further approval of the Resource Allocation Sub and Policy and Resources Committees
- Agree that the tender received from the SW Bruce Ltd in the sum of £598,777 is approved and they are appointed to undertake the work
- Authorise the Comptroller and City Solicitor enter into a contract with SW Bruce Ltd.
- Approve the risk budget of £65,000 to cover design developments and asbestos, (to be drawn down via delegation to Chief Officer).

11. **STOPPING UP APPLICATION - SITE BOUNDED BY FENCHURCH STREET, MARK LANE, DUNSTER COURT AND MINCING LANE, LONDON, EC3M 3JY**

The Committee considered a report of the Director of the Built Environment regarding a stopping up application for areas of Fenchurch Street, Mark Lane, Mincing Lane and Star Alley, relating to the development of the site bound by these streets for which this Committee resolved to grant planning permission on 14 May 2020.

Officers presented the application relating to planning permission granted for 50 Fenchurch Street where, as part of the permission granted, the Committee agreed in principle to the stopping up of the public highway that would be built upon if the development were to be implemented. Officers reported that the associated Section 106 agreement was still under negotiation and that, as such, the planning permission was yet to be issued.

Members were shown plans depicting the extent of highway that would be stopped up as part of the application. It was reported that, when assessing applications for the stopping up of public highway, Officers must be satisfied that it is both necessary to do so and that the advantages in doing so outweigh any disadvantages.

Members were shown plans of the proposed development at ground floor and Officers commented that they considered that the physical interference in the

highway including the extensive works to change levels in the basement and layout of the public realm satisfy the test of necessity for the stopping up of all of the proposed areas. It was also considered that the merits test is satisfied due to the exceptionally significant public realm provided by the development over which the public would have 24/7 rights of access, the public benefit of which is considered to outweigh the disbenefits of stopping up the remainder of Star Alley. To reinforce this point, Members were shown images of the existing and proposed views of the development from Fenchurch Street and from Mark Lane, both of which depicting much improved public realm and access.

Officers concluded by highlighting that the Committee's approval to commit to the process of stopping up was now sought and that this would begin with a consultation process and that, should any unresolved objections remain at the conclusion of the process, the matter would be brought back to this Committee for determination. Should there be no unresolved objections the stopping up order would be made under delegated authority.

**RESOLVED -** That, the Committee:

- Authorise the commencement of the process for stopping up of highway as shown indicatively on the Stopping Up plan at Appendix 1
- Agree that if, after giving notice of the proposed stopping up, there are no unresolved objections the Director of the Built Environment is authorised to make the Stopping Up Order as per the plans, subject to the additional S106 covenant detailed in paragraph 16 being secured, and noting that the plans may be updated following minor mapping adjustments
- Agree that if there are unresolved objections the stopping up application will be reported back to the Committee.

12. **OUTSTANDING ACTIONS**

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

A Member questioned whether an item on idling vehicles could be added to the list reporting that she had recently seen a Freedom of Information application that had been submitted in early January 2021 and that the response to this had highlighted that, since September 2011 when the regulations came into force the City of London had not issued any fines to motorists for idling vehicles. She recognised that there was still much work for central government to do on this in terms of giving local authorities adequate powers but questioned whether it should be added to this list so that it was not lost sight of in the meantime. The Chair suggested that this matter be discussed further offline.

**RECEIVED.**

13. **PUBLIC LIFT REPORT**

The Committee received a public lift report of the City Surveyor for the period 12/12/2020 – 08/01/2021.

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

14. **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 the report be noted.

15. **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.

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

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

**Signage to Elevated Public Spaces**

A Member stated that he felt that signage to elevated public spaces in the City should be improved. He suggested that some buildings with public roof terraces often had inadequate signage directing people to these and added that the City's own website directed users wanting to access Beech Gardens to Barbican Station when the gardens were not signposted from here. He questioned whether this could be incorporated into the City Plan 2036 in terms of encouraging developers to adequately signpost such offerings.

Officers commented that this could be regarded as a non-material change to the draft City Plan and would seek to incorporate this. He thanked the Member for his thoughts. The Interim Chief Planning Officer and Development Director stated that Officers were now more proactively encouraging developers to do just this and had held recent discussions around it with both 50 and 20 Fenchurch Street where the need to highlight the public realm offerings had also been conditioned.

**Lifecycle Assessment**

A Member questioned whether, as a matter of course, developers/applicants could be asked to provide comparable lifecycle assessments across the two options and details as to which was worse in terms of whole life carbon. She added that having this data set out clearly would help the Committee to reach a view as to whether what was being offered was a genuine public benefit or something that was an inevitable harm but was nevertheless outweighed by public benefit. She added that she understood that there was a programme that enabled this data to be collated relatively easily.

Officers undertook to respond to this matter outside of the meeting.

**Emissions Training**
A Member stated that she had asked whether a condition could be put in place for 1-12 Long Lane requiring zero emission machinery and that Officers had responded to say that there would be zero emissions in accordance with the London Plan. When the Member had followed up further on this, it transpired that the London Plan NRMM requirement was around low rather than zero emissions. In light of this, she suggested that some training to help the Committee better understand these nuances would be welcome. Officers had also reported that work was being done to ascertain whether there were zero emissions options that could be considered for construction and the Member asked that further updates be provided on this in due course.

The Chair commented that there was clearly much interest in these matters based on the debate today and asked Officers to report back to the Member with further details.

**Bishopsgate Judgement**
In response to a request for further information on the Bishopsgate judgement, Officers reported that the case, which was brought by two taxi trade organisations, concerned TfL's May 2020 Streetspace Plan and Guidance and the subsequent A10 Order restricting parts of the Bishopsgate corridor to just buses and cycles.

It was reported that there were five grounds of claim, four of which were successful, broadly these related to:

- disregarding a material consideration in formulating the Streetspace Plan and Guidance - namely the status and role of taxis being considered as distinct from other motor vehicles. It was found that the status and roles of taxis had been considered differently in relation to the A10 Order.
- failure to comply with the Public Sector Equality Duty in considering the impacts of restricting taxis on people with protected characteristics.
- a breach of taxi driver's legitimate expectations about the use of roads and bus lanes, particularly as a result of TfL's bus lane policy to permit taxis to use bus lanes except in exceptional circumstances
- irrationality – the justification for the Plan, Guidance and A10 Order being conjecture rather than evidence based

Officers undertook to share a copy of the judgement with members of the Committee and reported that the findings were fact-specific, including issues around how the Plan and Guidance had been formulated, and the nature of the A10 and its use by taxis. TfL have indicated that they intend to appeal, and the effect of the judgment has been stayed to allow them time to do so. It was added that TfL had stated that they have no immediate plans to remove any of their existing schemes pending an appeal.

Whilst the judgment concerned the specifics of the TfL guidance, plans and measures, Members were informed that Officers were monitoring the issue,

including any potential considerations for the City but it was not felt that there was any imminent response required.

The Member questioned what the fifth ground of claim had been. Officers reported that this concerned taxi driver licences and whether these counted as possession and it was found that there was not sufficient evidence that there was any loss of income incurred.

**Busking Noise Nuisance**
A Member commented that residents within his Ward had raised concerns as to noise nuisance being created by buskers from across the river Thames who had been told by Southwark Council to direct their amplifiers north. Residents had contacted the City's Noise Abatement Team who had attempted to request that the volume be lowered but their efforts had been unsuccessful to date. The Member therefore asked Officers to redouble their efforts on this. Officers undertook to respond to the Member separately on this matter.

**Departure of the Director of the Built Environment**
A Member noted that the Director was soon to leave the City Corporation and requested an update on the structure of the department and staffing levels, particularly given the large number of often complex applicants that were currently progressing. The Interim Chief Planning Officer and Development Director assured Members that he was currently satisfied that his team were adequately resourced and had staff of adequate experience to deal with major, complex schemes.

The Chair reported that the Director would be departing due to changes under the Target Operating Model and highlighted that Jon Averns was now temporarily acting as Chief Officer until such time as an Executive Director to oversee the work of this and other Committees was appointed.

The Member went on to suggest, as she had done previously, that consideration should be given to holding separate, stand-alone meetings to determine large planning applications. The Chair highlighted that the number of meetings scheduled for the Committee this year had already been added to for this reason.

17. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There were no additional, urgent items of business for consideration.

18. **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.

| **Item No(s)** | **Paragraph No(s)** |
|---|---|
| 19 | 3 |
| 20 | 3 & 5 |
| 21 – 22 | - |

19. **NON-PUBLIC MINUTES**
The Committee considered the non-public minutes of the meeting held virtually on 5 January 2021 and approved them as a correct record.

20. **BRIDGE HOUSE ESTATES STRATEGIC GOVERNANCE REVIEW - UPDATE FIVE**
The Committee received a report of the Chief Grants Officer & Director of City Bridge Trust which provided an update of the work undertaken as part of the Bridge House Estates (BHE) Strategic Governance Review since the last report to Members in June and July 2020.

21. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions raised in the non-public session.

22. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were no additional, urgent items of business for consideration in the non-public session.

**The meeting closed at 2.02 pm**

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Chairman

**Contact Officer: Gemma Stokley**
**tel. no.: 020 7332 3414**
**gemma.stokley@cityoflondon.gov.uk**

| **Committee:** | **Date:** |
|---|---|
| Planning and Transportation | 16 February 2021 |
| **Subject:**<br>70 Gracechurch Street London EC3V 0HR<br>Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. | **Public** |
| **Ward:** Langbourn | **For Decision** |
| **Registered No:** 20/00816/FULEIA | **Registered on:**<br>13 October 2020 |
| **Conservation Area:** | **Listed Building:** NO |

**Summary**

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

An Environmental Statement accompanies the scheme.

The scheme is of a high-quality design and features a number of attractive features including greening and vehicle lifts which integrate into the landscaping. It provides a significant increase in office floorspace meeting one of the primary objectives of the City's Local plan and London plan policies. It results in some loss of retail within a Principal Shopping Centre, but this is considered acceptable when taking into account the nature of the development and the other benefits of the scheme, such as new pedestrian routes linking Fenchurch Street to Leadenhall Market.

The building would be designed to high sustainability standards, incorporating a significant element of climate resilience, energy efficiency, targeting BREEAM 'Outstanding' and adopting Circular Economy Principles and

integrated urban greening.

The scheme delivers an increased and significant enhancement of public realm through the introduction of a new north-south public route through the building connecting Fenchurch Street to the network of passageways and lanes connecting Leadenhall Market and the introduction of a large permeable accessible space within the site, fronting Fenchurch Street and Lime Street, open to the public 24 hours a day.

The scheme provides a varied range of retail spaces at ground floor and lower ground mezzanine, including the retail forum hall fronting Gracechurch Street and a retail pop up area within the new permeable accessible space.

The scheme provides a free public viewing gallery at Levels 29 and 30, totalling around 1,125sq.m of floorspace. The public viewing gallery will offer views across London to the north, south and west. The space would be managed by the Applicant and will be made available for the benefit of City workers, residents and visitors.

Over 72,000sq.m of flexible and sustainable Grade A office floorspace suitable for circa 4,300 City workers would be provided as part of the scheme. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers, from incubator spaces, SMEs to multinational companies.

1002 long term bicycle spaces would be provided with associated shower and locker facilities. The number of short term spaces at 28 would not be compliant with requirements but need to be balanced against the other public realm benefits. Save for this shortfall, the scheme is in compliance with Local Plan Policy 16.3 and London Plan policy 6.9. The scheme includes an innovative solution of two service vehicle lifts within the building, the lids of which during the daytime would form part of the publicly accessible area fronting Fenchurch Street and Lime Street.

Representations objecting to the proposals have been received from Historic England on the ground of harm to significance arising as result of impact on views from within the Inner Ward and increasing the amount of modern development competing with the historic buildings visible within the Tower of London's setting. Further concerns relate to: The impact of the proposals when viewed upstream at Waterloo Bridge and the effect of daylighting of Leadenhall Market and any loss of light as a result of this scheme could harm the special interest of the listed building and have a negative and consequent effect on its future sustainability. Historic England further raise concerns over the quality of the design as part of the Cluster, with particular reference to Leadenhall Market.

A letter of objection has been received from the owner of nearby 60 Gracechurch Street covering a number of grounds of objection including: harmful impact on heritage assets and the townscape, daylight, sunlight, impact on the development opportunities.

3 further letters of objection have been received from 3 residents of 2-4 Bulls Head Passage, objecting on the grounds of loss of daylight and sunlight to these properties.

The proposal would preserve pan-London LVMF and local strategic views in accordance with London Plan Policy CS13(1), London Plan Policies 7.11 and 7.12, City Plan 2036 Policy S13 and the draft Publication London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. Following rigorous assessment, it is concluded that the proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and Significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.

The proposal would preserve the special interest and setting of The Monument, Tower Bridge, Leadenhall Market, The Ship Tavern PH, 81-82 Gracechurch Street, 7-9 Gracechurch Street, 39-40 Lombard Street and 7-8 Philpot Lane. The significance of the Bank, Leadenhall Market and Eastcheap Conservation Area would be unharmed preserving and enhancing the character and appearance of the area.

The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.

Planning of the City Cluster has sought to safeguard the immediate setting of the Tower of London in accordance with guidance and to step the height of development away from the Tower so that it rises to a peak some way from the Tower. This scheme is located on the western side of the eastern cluster and it is considered that it sits comfortably within the Eastern Cluster policy area as well as the City Cluster policy area of the replacement Local Plan and its Renewal Opportunity Area.

In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City the heritage, design, tall buildings and public realm policies, but fail to accord with the retail policies. It is the view of officers that, as a matter of planning judgement, that as, in particular, the proposals make will make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, heritage, tall buildings and public realm policies, they accord with the development plan when considered as a whole.

Paragraph 11 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up to date development plan without delay.

Paragraph 131 of the NPPF sets out that great weight should be given to outstanding and innovative designs which help raise the standard of design more generally in the area.

As set out in paragraph 193 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). The world heritage site status and its Grade I listing places the Tower of London at the very highest level and as a result great weight should be given to the asset's conservation.

Taking all material matters into consideration, it is recommended that planning permission be granted subject to all the relevant conditions being applied and Section 106 obligations being entered into in order to secure public benefits and minimise the impact of the proposal.

**Recommendation**

(1) That the Chief Planning Officer be authorised to grant planning permission for the above proposal in accordance with the details set out in the attached schedule, subject to:

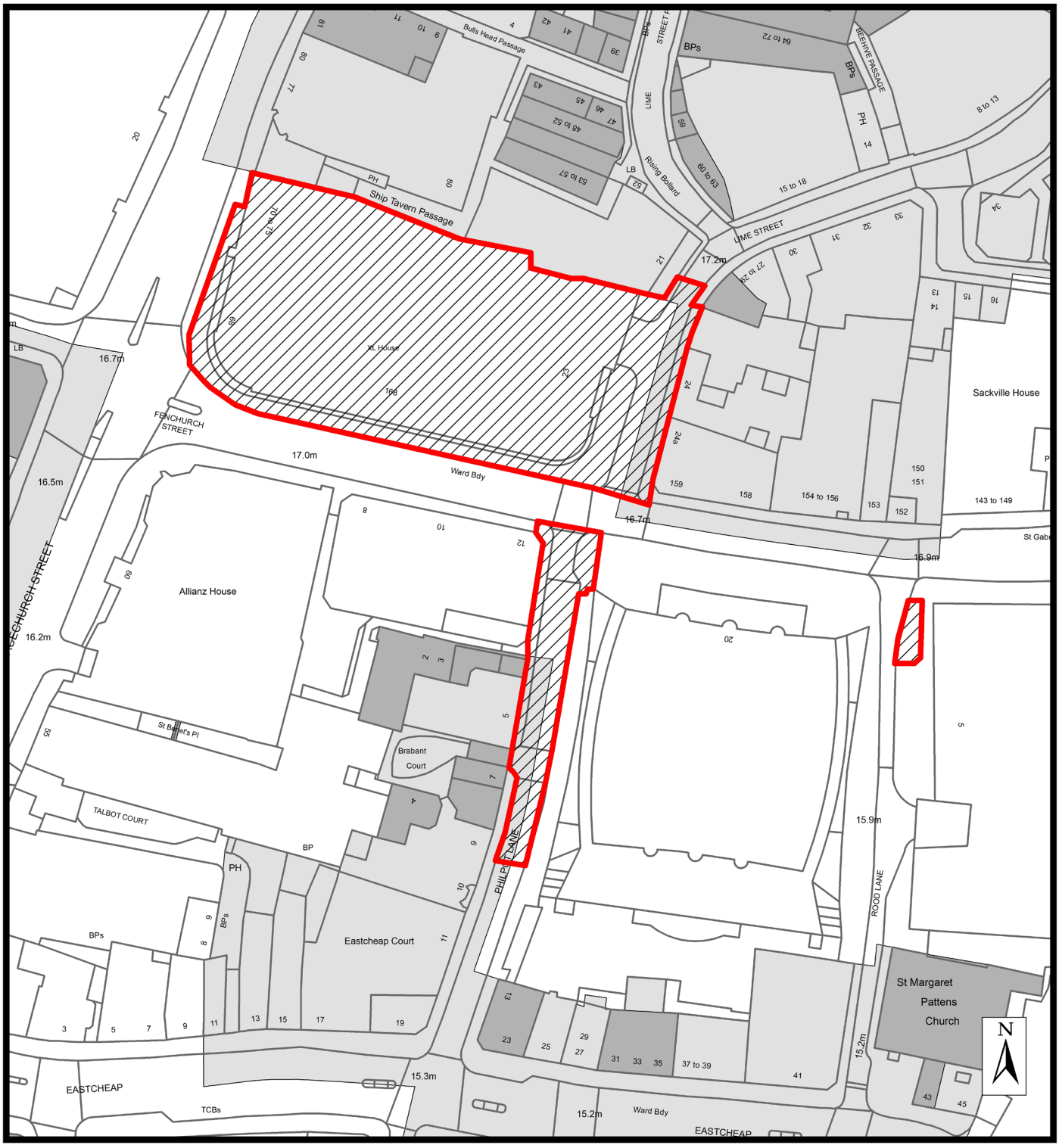
a) The Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);

b) 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 be issued until the Section 106 obligations have been executed;

(2) 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 Highway Act 1980.

(3) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

# Site Location Plan

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ADDRESS:
70 Gracechurch Street, London EC3V 0HR

CASE No.
20/00816/FULEIA

**SITE LOCATION**

**LISTED BUILDINGS**

**CONSERVATION AREA BOUNDARY**

**CITY OF LONDON BOUNDARY**

CITY OF LONDON

DEPARTMENT OF THE BUILT ENVIRONMENT



Image 1: View of existing building looking east, at the junction of Gracechurch Street, Lombard Street and Fenchurch Street

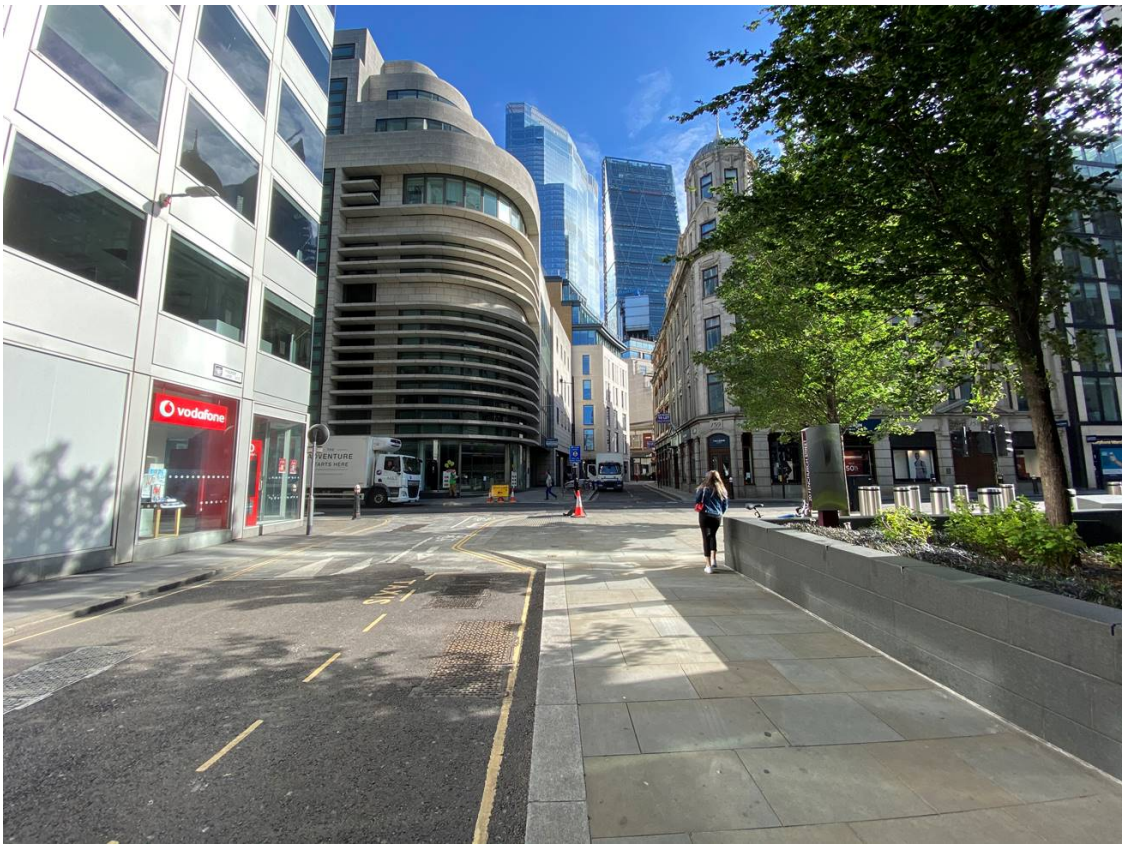
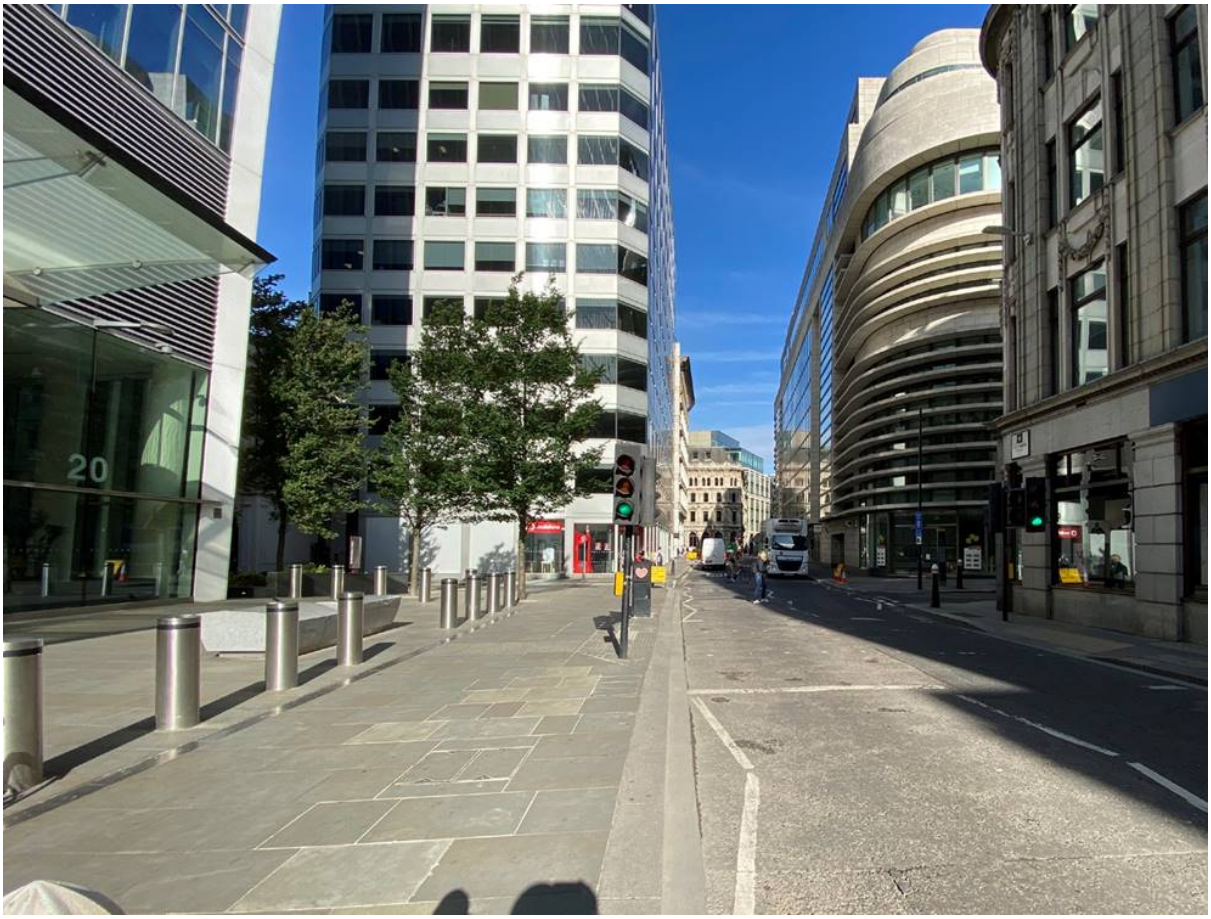


Image 2: View of existing building, looking north from Philpot Lane



View 3: View of existing building, looking west from Fenchurch Street



Image 4: View of existing building at Ship Taverns Passage

## Main Report

**Environmental Statement**

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a mean of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.

2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:

    a) To examine the environmental information
    b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
    c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
    d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.

4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.

5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.

6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.

7. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.

**Site and surroundings**

8. The site occupies a prominent corner plot and is located towards the middle of Gracechurch Street, on the eastern side. It is bound by Gracechurch Street to the west, Ship Tavern Passage to the north, Lime Street to the east and Fenchurch Street to the south.

9. The red line boundary of the proposed development includes integrated public realm proposals at the interface with the public highway which adjoins the main site, where public realm improvements are proposed. The red line includes:

    1. Land in Lime Street where highway improvements and tree planting works are proposed;
    2. Land in Philpot Lane where highway improvement works are proposed; and
    3. Land off Rood Lane where tree planting is proposed.

10. The existing building was completed in 2001. It is 8 storeys high with 3 basements and comprises 17,467 sq.m (gia) offices, 9,274 sq.m (gia) retail and 1,315 sq.m ancillary floorspace. (Total 28,056 sq.m).

11. Residential properties at 4 Bulls Head Passage lie to the north and at 14 Lime Street to the north east of the site.

12. The site is immediately abutted to the north and east by the Leadenhall Market Conservation Area. Land to the east side of Lime Street, where highways and public realm improvement works are proposed, is in the Leadenhall Market Conservation Area and land to the west side of Philpot Lane, where further highways and public realm works are proposed, is in the Eastcheap Conservation Area.

13. There are a number of listed buildings within the immediate vicinity of the site. These include:

    - Leadenhall Market (Grade II*)
    - 81-82 Gracechurch Street (Grade II)
    - The Ship Tavern, 27 Lime Street (Grade II)
    - 39-40 Lombard Street (Grade II)
    - 38 Lombard Street (Grade II)
    - 7-9 Gracechurch Street (Grade II)
    - Custom House (Grade I)
    - Billingsgate Market (Grade II)
    - Adelaide House (Grade II)
    - Cannon Street Station Towers (Grade II)

Other listed buildings in close proximity include: The Tower of London (World Heritage Site, Scheduled Monument and listed buildings), Tower Bridge (Grade I), The Monument (Scheduled Monument and Grade I), Lloyd's Building (Grade I), 24-28 Lombard Street (Grade II), 60 Lombard Street (Grade II), St Edmund's Church (Grade I), 27-28 Clement's Lane (Grade II) and St Clement's Church (Grade I) all in the Bank Conservation Area; 37-39 Lime Street (Grade II) in the Leadenhall Market Conservation Area and 2-3 (Grade II) & 7-8 (Grade II*) Philpot Lane and 4 Brabant Court (Grade II) in the Eastcheap Conservation Area.

14. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the highway authority.

**Proposals**

15. Planning permission is sought for:

    - The demolition of all existing buildings and erection of a new building to provide a Class E office-led tower of ground plus 33 storeys with flexible retail use (mix of shops and restaurants) (Class E), drinking establishments (Sui Generis) and hot food take-away (Sui Generis)) at ground level and a public viewing gallery (Sui Generis) at 29th and 30th level.

16. The scheme provides 76,380 sq.m gea floorspace comprising:

    - 72,992 sq.m of office floorspace;
    - 1,823 sq.m of flexible retail; and
    - 1,566 sq.m of public access space including public viewing gallery.

17. The maximum height of the proposed development would be 154.73m AOD. The proposed development includes a base podium building and tower split into three vertical forms. The base is stepped in height, the eastern part would be ground plus three storeys, the central part would be ground plus four storeys and the western part would be ground plus five storeys. The podium would be solid form, expressed in masonry with curved facades and punctuated with glazing and terraces accommodating plating between the podium forms. The base includes a passageway set between the west and central forms, providing a new public route through connecting Fenchurch Street to Ship Tavern Passage. The tower that sits above the podium presents itself as three distinct forms with terraces between each form. The western tower block reaches a height of 139.52m AOD (30 storeys above ground), the central tower block reaches a height of 147.12m AOD (32 storeys above ground) and the eastern tower block reaches a height of 154.73m AOD (33 storeys above ground). The form is designed to be sculpted, with the artist Brancusi providing inspiration for the curved forms. The tower elements have metal fins and shelves with terracotta spandrel inserts.

18. The scheme provides a significant increase in office floorspace and a reduction in retail floorspace on the site, with the aim of creating an open and permeable publicly accessible ground floor with a variety of retail uses, with flexible Grade A office floorspace above.

19. The main entrances would be from Gracechurch Street and Fenchurch Street with escalators ascending to the 2nd and 3rd floor office lobby. The south east corner of the proposed building is open-sided, providing a large area of outdoor publicly accessible space in daytime hours when flatbed servicing lifts are not in use. This enables pop-up retail uses in this area, fronting Lime Street and providing further activation of this space.

20. Access to the public viewing gallery at levels 29 and 30 would be provided from ground floor level off Ships Tavern Passage, with dedicated lifts, supported by a security check area. The viewing gallery is located to offer views across London to the north, south and west. The public viewing gallery would be managed by the applicant and made available to City workers, residents and visitors.

21. When exiting the lifts from the public viewing gallery you would exit via the new north to south pedestrian public route proposed in the building, connecting Fenchurch Street to Ship Tavern Passage. The north to south passageway would connect to the network of passageways providing access to Leadenhall Market.

22. The scheme would provide a range of retail spaces at ground floor and lower ground mezzanine, including the retail forum hall fronting Gracechurch Street. There would be further space for a retail pop up area at ground floor level.

23. The proposed scheme would incorporate extensive urban greening, including large planted terraces at podium and roof levels, balcony planters located on alternate floors between tower forms to the north and south elevations, the planting of trees on Lime Street and Rood Lane and a green wall to Ship Tavern Passage northern elevation.

24. A tenant roof garden is proposed at the rooftop on two of the three tower roofs. The space will be landscaped and be demised to the office occupiers as amenity space. The space would offer amenity space, supporting a healthy, varied and engaging workplace. The perimeter of the terrace would have 2m high upstand balustrades and a landscaped area.

25. Off street servicing would take place from the basement, accessed via Lime Street out of hours by two flatbed vehicle lifts which during the daytime would form part of the publicly accessible space within the site. This innovative solution removes any dead frontage and ground floor space often experienced with service yard entrances.

26. The development would have two basement levels and the existing basement would be reused insofar as possible. Basement 1 accommodates the vehicle loading and unloading facilities, with a turntable allowing vehicles to enter the lifts in a forward gear via Lima Street and would accommodate some plant space, ancillary spaces for waste storage, mail, security offices and retail and offices storage space. Basement 2 accommodates space for plant and storage.

**Consultations**

27. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders including a traditional public exhibition held between 9th and 10th December 2019 and a second online public consultation held between 17th and 31st August 2020.

28. The initial public exhibition was held in the Gallery of the Brand Exchange (3 Birchin Lane, London EC3V 9BW) and in total 61 people attend the public exhibition across the 2 days, with 16 feedback forms completed. In summary 100% of respondents supported the proposals for redevelopment. Positive comments were received in respect of the buildings design, the form of the building sitting into the cluster and the publicly accessible space.

29. The second online public consultation website received circa 858-page views and 19 feedback forms were completed. In summary 84% of respondents supported the proposals, 11% were neutral and 5% were opposed. Positive comments were received in respect of the sympathetic design and proportions, the buildings environmental credentials, the ground floor plane and the public viewing gallery. More negative comments related to the façade treatment and the preference for a bar with a view rather than a public viewing gallery.

30. Following receipt of the applications they have been advertised on site and in the press and have been consulted upon twice, including under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letter and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.

31. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

| **Consultation responses** | |
|---|---|
| Historic England | Historic England has no objection to the principle of replacing the existing building on the site but are concerned about the proposed tall building's wider impact on the significance of London's historic environment, these include: the Tower of London, St Paul's Cathedral and Leadenhall Market. In outline, these concerns are as follows:<br><br>• The Tower of London: Historic England identifies a modest degree of additional (less than substantial) harm to significance arising as a result of impact in views from within the Inner Ward and increasing the amount of modern development competing with the |

| | |
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| | historic buildings visible within the Tower's setting. They advise that given the status of the Tower as a World Heritage Site, preserving its significance must be given the greatest possible weight.<br><br>• St Paul's Cathedral: Historic England express concern about the impact of the proposals when viewed upstream at Waterloo Bridge and state that development should not dominate the Cathedral or compromise its relationship with the clear sky around it.<br><br>• Leadenhall Market: Concerns are raised that appropriate natural light needs to continue to be provided to the historic Leadenhall Market, and that loss of light as a result of this scheme could harm the special interest of the listed building and have a negative and consequent effect on its future sustainability. Historic England further raise concerns over the quality of the design as part of the Cluster, with particular reference to Leadenhall Market.<br><br>Having regard to national, strategic and local policies, while Historic England recognise the opportunities for public benefits, which include the creation of a permeable connection to the market and improved public realm, they state that permission should not be granted unless persuaded that the harm caused by the proposals has been minimised, that there is clear and convincing justification for the proposals and that the harm they would cause would be outweighed by public benefits.<br><br>**Response to comments:** consideration of the impacts identified in Historic England's response are contained in the following sections of this report: Heritage – Tower of London World Heritage Site and Designated Heritage Assets. |
| Historic Royal Palaces | HRP state that the impact of this development on the Outstanding Universal Value of the Tower has been judged as not causing substantial harm and do not object to the application. |
| The Greater London Authority | The GLA are broadly supportive of the scheme and the principle of a proposed office-led redevelopment within the CAZ and CAZ retail cluster.<br><br>**Urban Design:** The development layout is strongly |

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| | supported and the height and massing is acceptable in strategic planning terms, noting associated strategic views and heritage considerations.<br><br>**Heritage:** The GLA raise a number of concerns surrounding the development resulting in a degree of harm to: the Tower of London World Heritage Site, Leadenhall Market and Bank Conservation Areas; the Grade I listed churches of St Edmund, St Mary-le-Bow and St Mary Woolnorth; the Grade I listed Custom House and Billingsgate Market; the Grade II* listed Former Port of London Authority Building; the Grade II listed 81-82 Gracechurch Street, 39-40 Lombard Street, Adelaide House; 1 Cornhill, Cannon Street Station and the Grade I listed St Peter and Vincula Chapel and St Thomas's Tower.<br><br>GLA officers have requested further assessment of potential impact in relation to Tower Bridge, Billingsgate Market, Custom House, Cannon Street Station and 1 Cornhill to fully assess the impact to heritage assets.<br><br>**Climate Change:** GLA have requested further information in relation to maximising onsite renewable energy and demonstrating potential for connection to a future heat network.<br><br>**Flood Risk and Green Infrastructure:** The GLA have stated that the approach to flood risk management and surface water drainage complies with London Plan and Publication London Plan policy. They have requested additional information in relation to water efficiency measures.<br><br>**Response to comments:**<br>The applicant has responded to the GLA's request for clarifications and additional material in an email addressing points on sustainability and by the submission of a technical note on transport issues and a clarifications report in relation to heritage assets. Officers have considered whether these documents are 'any other information' as defined in Regulation 2(1) of the EIA Regulations, such that there would be a need to advertise it and reconsult on it. 'Any other information' is defined as any other substantive information relating to the environmental statement provided by the applicant. Officers have considered whether the information provided to the GLA is substantive and concluded that it is not.<br><br>The information provided is considered to clarify and pull together information already included in the Environmental |

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| | Statement (ES) (including images from the HTVIA). Whilst in some cases the information expands on the ES providing slightly more detail, the information was not considered substantive such that it made any material difference to the assessment on the merits of the scheme or its impacts. In particular the impact of the scheme on the significance and setting of Custom House, Billingsgate Market and Cannon Street Station were assessed thoroughly utilizing view and heritage assessments submitted in the EIA as well as utilizing 3D digital modelling assessments. The City had a thorough understanding of the significance and setting of these heritage assets in carrying out the assessment of the proposal. The information already provided in the ES was considered sufficient by officers given the location and context of these assets, such that officers were able to reach a view as to whether the development would have an adverse impact on the significance and setting of these heritage assets. In this respect the additional information did not make a material difference to the assessment of impact. It is the view of officers that the environmental statement as submitted with the planning application contained all the information required by the EIA Regulations in particular that required by regulation 18 and Schedule 4, including information relating to transport, heritage, townscape and visual impact.<br><br>The technical note on highway matters sets out minor changes agreed during the assessment process and provides clarifications on the transport assessment. The note further addresses the ability for highway works associated with the development to contribute to making the highway safer and provides clarification on the cycling access routes and how these can be explored as part of the local improvements schemes to be carried out pursuant to the s278 agreements. Clarification is also provided on the methodology that was used in calculating the pedestrian comfort levels. The document further outlines where conditions have been agreed to secure management details in relation to the accessible carparking and pop up retail space. None of this information is considered substantive.<br><br>In respect of climate change the applicant confirmed to TfL the target non-hazardous demolition and construction waste diversion from landfill for the scheme and compliance with the draft Publication London Plan target for reduction of carbon emissions, along with their commitment to explore the potential for further reductions, which is to be secured by condition. They have also confirmed previously agreed improvements to reducing carbon during the construction process and whole life carbon. This response is considered |

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| | to provide clarifications to the GLA and is not considered substantive.<br><br>It is the view of officers that the environmental statement as submitted with the planning application contained all the information required by the EIA Regulations in particular that required by regulation 18 and Schedule 4, including information relating to transport, climate change, heritage, townscape and visual impact.<br><br>An officer assessment of the points raised and consideration of the impacts identified in The Greater London Authority's response are contained in the following sections of this report: Heritage – Tower of London World Heritage Site and Designated Heritage Assets, Designated Heritage Assets – Impacts on the setting and significance of listed buildings and conservation areas and Sustainability & Energy. |
| Transport for London | Transport for London confirms that the proposed cycle and car parking is acceptable and broadly complies with Publication London Plan policy.<br><br>Transport for London have secured contribution towards a Cycle Route Quality Criteria study specified for the cycling link from the site to Cycle Superhighway 3 (CS3). The financial contribution towards this will be J150k.<br><br>They are supportive of the public realm improvement works to Fenchurch Street and Philpot Lane and of the servicing strategy and loading bay area. |
| Transport for London Crossrail safeguarding | No comments |
| Environment Agency | No comments |
| Lead Local Floor Authority | Conditions are recommended requiring details to ensure that sustainability, flood risk reduction and water runoff rates are improved. |
| London City Airport | The proposals do not conflict with current safeguarding criteria and so there is no objection. |
| National Air Traffic Services (NATS) | The proposals do not conflict with current safeguarding criteria and so there is no objection. |
| London Borough of | The London Borough of Tower Hamlets state that the proposed development raises some concerns about the |

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| Tower Hamlets | degree of visual separation between the eastern cluster and the Tower of London and that the Tower of London World Heritage Site has already reached its limit in terms of visual intrusion and expresses concern about the continuing process of diminishing the expanse of clear sky in backdrop views of the WHS:<br>• View 10A – Tower of London: Inner Wall, East of Wakefield Tower: The harm to this view would be minimal.<br>• View 10B – Tower of London: Inner Ward, West of The White Tower 2: The proposed development visually fills the gap between 20 Fenchurch Street and the Chapel bell tower, while its height at the same level as the solid base of the bell tower. The change to this view is considered to cause some harm, as the proposed development would infill the remaining section of sky between 20 Fenchurch Street and the Chapel.<br>• View 10D – Tower of London: Inner Wall, West of Bowyer Tower: When considering 50 Fenchurch Street as part of the cumulative effect on the Tower of London WHS, the proposed development in question appears problematic as it contributes towards an extended wall of tall buildings, some of which appear within an uncomfortable proximity to the Tower of London WHS. As such, the proposal would cause some harm in this view.<br><br>They conclude that the proposal would begin to fill the visual gap between 20 Fenchurch Street and the recognised expanse of the City Cluster. They state that the relevant views have been assessed and the impacts identified would cause some, less than substantial harm to the setting and thereby significance of the Tower of London World Heritage Site.<br><br>**Response to comments:** consideration of the impacts identified in The London Borough of Tower Hamlets response are contained in the following sections of this report: Heritage – Tower of London World Heritage Site and Designated Heritage Assets. |
| City of Westminster | No comments |
| London Borough of Hackney | No objection |

| **Letters of representation – 3 letters of objection received from the owners/occupiers of 2 surrounding sites** | |
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| Owner of Flat A, 4 Bulls Head Passage | A resident and owner of Flat A, 4 Bulls Head Passage has submitted an objection on behalf of residents of A-C, 4 Bulls Head Passage and objects on the following grounds:<br><br>• Concerned that the proposed development will impact light into the apartments and significantly reduce light later in the day and that it would impact on their quality of life.<br><br>**Response to Comment:** Consideration of these impacts are contained in the following sections later in the report: The Building's Form and relationship to Eastern Cluster; Design Approach; Designated Heritage Assets; Environmental Impact of proposals on surrounding area. |
| Owner of Flat B, 4 Bulls Head Passage | Objection on the following grounds:<br><br>• Concerned that the proposed development will impact light into the apartment and significantly reduce light later in the day and that it would impact on the quality of life.<br><br>**Response to Comment:** Consideration of these impacts are contained in the following sections later in the report: Environmental Impacts of proposals in surrounding areas. |
| Owner of Flat C, 4 Bulls Head Passage | Objection on the following grounds:<br><br>• Concerned that the proposed development will impact light into the apartment and significantly reduce light later in the day and that it would impact on the quality of life.<br><br>**Response to Comment:** Consideration of these impacts are contained in the following sections later in the report: Environmental Impacts of proposals in surrounding areas. |
| Owner of 60 Gracechurch Street | The owner of 60 Gracechurch Street has submitted a detailed objection and while they do not object to the principle of the redevelopment they have requested the application be deferred on the ground that insufficient information has been submitted to enable the application to be determined at this time. In summary the ground of |

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| | objection contained in the letter cover the following matters:<br><br>• States that the redevelopment of 70 Gracechurch Street must be considered in context and any redevelopment must clearly demonstrate that there would be no adverse impact on the future development potential of 60 Gracechurch Street.<br>• Seek further information to demonstrate that the proposed development of this site will not hinder the future development potential of 60 Gracechurch Street.<br>• The scale of the proposed building does not accord with that of the surrounding area and the cumulative impacts of 55 and 70 Gracechurch Street would be significant.<br>• The proposed development has potential to have an adverse impact on the amenities of existing occupiers on ground of potential loss of daylight and sunlight.<br>• Concerns raised regarding Historic England's comment and the impact of the development and its effect on daylighting to Leadenhall Market and any consideration in advance of satisfactory resolution would be premature.<br><br>**Response to comments:** Consideration of these impacts are contained in the following sections of the report: The Building's Form and relationship to the Eastern Cluster; Design Approach; Designated Heritage Assets; Environmental Impact of proposals on surrounding area. It is not considered that approving this application would have an adverse impact on future re-development on nearby sites, including 60, Gracechurch Street. Any proposals for such re-development would have to be considered on their own merits. |

**Policy Context**

32. 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 the applications.

33. 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 satisfactorily addressing a number of national policies in respect of housing ambition, small sites, industrial land and aviation. Following an exchange of correspondence and further directions issued by the Secretary of State on 10th December 2020, the Mayor approved the 'Publication London Plan' which is intended to address the Secretary of State's directions on 13th March 2020 and 10th December 2020. On 21st December 2020 the Mayor sent the draft Publication London Plan to the Secretary of State for his consideration. The Secretary of State responded on the 29th of January 2021 formally confirming that the version of the London Plan provided on the 21st December 2020 contained the modifications necessary to conform with the previous directions. As it has passed through the Examination in Public, and there are no longer any barriers to the adoption of the plan it is expected to that the new London Plan will be published shortly. As such it can be afforded significant weight as a material consideration. Given there is likely to be a period of time between any resolution to grant planning permission and the permission being issued, to allow for the negotiation of the S106 agreement, it is possible that the new London Plan will be adopted before the permission is issued, should members resolve to grant planning permission.

34. In relation to this scheme the Draft London Plan continues to support a mixed-use office scheme in the Central Activities Zone (CAZ). The changes that are most relevant to this scheme are those that encourage good growth, enhance climate change, good design and sustainability requirements and further support requirements for public access and routes through sites.

35. The draft City Plan 2036 was agreed by the Court of Common Council in May 2020 for pre-submission, Regulation 19, consultation. Amendments to the Plan, taking into account the 2020 revisions to the Use Class Order, were approved by the Court of Common Council in January 2021. The Plan is therefore a material consideration in the determination of planning applications. Regulation 19 consultation is due to commence in February 2021. As the plan has not yet reached the regulation 19 stage, it can only be afforded some weight.

36. 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 B to this report.

37. Government Guidance is contained in the National Planning Policy Framework (NPPF) 2019 and the Planning Practice Guidance (PPG) which is amended from time to time.

38. In respect of sustainable development, the NPPF states that paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' At Paragraph 11(c) the NPPF states that for decision making this means 'approving development proposals that accord with an up-to-date development plan without delay'.

39. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:

    a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);

    b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and

    c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

40. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

41. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 103 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”.

42. Paragraph 111 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

43. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 124 advises that “The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.

44. 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.

45. Paragraph 131 sets out that great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

46. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 151 states that new developments should increase the use and supply of renewable and low carbon energy and heat

through measures including renewable and low carbon energy sources and identifying opportunities to draw energy supply from decentralised supply systems.

47. 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.

48. Paragraph 192 of the NPPF advises, "In determining applications, local planning authorities should take account of:

    a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

    b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

    c) the desirability of new development making a positive contribution to local character and distinctiveness."

49. Paragraph 193 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance,

50. Paragraph 194 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

    a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

    b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."

51. Paragraph 196 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable

importance and weight should be given to the desirability of preserving or enhancing the character or appearance of the conservation area.

52. Paragraph 197 states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

**Considerations**

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

    - To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
    - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

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

55. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990); (the tree planting and street improvement works are located in the Leadenhall Market and Eastcheap Conservation Area, engaging this duty in relation to the conservation areas).

56. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.

57. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.

58. The principal issues in considering this application are:

    - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
    - The economic benefits of the proposal.
    - The appropriateness of the proposed uses.

- The appropriateness of the bulk, massing and design of the proposals.
- The impact of the proposal on the Tower of London World Heritage Site.
- The impact on strategic views in the Local Views Management Framework and on local townscape views.
- The impacts of the proposal on other designated heritage assets, including Leadenhall Market, The Monument, Tower Bridge, The Ship Tavern PH, 81-82 Gracechurch Street, 7-9 Gracechurch Street, 39-40 Lombard Street and 7-8 Philpot Lane.
- The impacts of the proposal on the Leadenhall, Bank and Eastcheap Conservation Areas.
- The proposed public realm benefits and cultural offer
- Transport, servicing, cycle parking provision and impact on highways.
- The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise, overlooking, daylight, sunlight and light pollution.
- The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability.

**Economic Issues and the need for Development**

59. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating J69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.

60. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.

61. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs).

62. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

63. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will create the demand for more employment and for the space required to accommodate it.

64. The London Plan 2016 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy 2.10). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and policies 2.11 and 4.3 provide for exemptions from mixed use development in the City in order to achieve this aim.

65. The London Plan projects future employment growth across London, projecting an increase in City employment of 116,000 between 2016 and 2036, a growth of 22%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

66. Emerging London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

67. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

68. The draft City Plan (2036) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

69. The application site is located within an area identified as the Eastern Cluster in the Local Plan 2015 (Figure G) and within the City Cluster area (Figure 33) identified in the draft City Plan 2036.

70. The Cluster Policy area is defined by an illustrative diagram in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. As outlined at paragraph 2.7 of the Local Plan and paragraphs 3.55 and 7.13 of the draft City Plan 2036 the boundary as shown in the diagram is indicative and not prescriptive.

71. Paragraph 3.4.4 of the emerging City Plan (2036) identifies the City Cluster as a key area of change where office and employment growth will be accommodated by a cluster of tall buildings, complemented by retail, leisure, cultural and educational facilities, ground floor animation, additional greening, high quality public realm and improved pedestrian movement and permeability.

72. Objection has been raised by the owner of 60 Gracechurch Street to the south of the site, that the proposal would prejudice development opportunities for that site. There is no evidence to indicate that permitting the current application would prejudice future development of nearby sites such as 60 Gracechurch Street. Office development is encouraged across the City and each case is decided on its own merits.

73. Despite the short term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations and as outlined in the City of London document: London Recharged: Our Vision for London 2025.

Proposed uses

74. The proposed building has been designed to provide a flexible workplace-led mix of uses. The 33 storeys above ground predominantly provide office use (Class E) with flexible retail use (Class E plus Sui Generis drinking establishment and hot food takeaway) at lower ground mezzanine and ground floor levels. A public viewing gallery (Sui Generis) is located at levels 29 and 30, accessed directly from the ground floor which provides amenity for City workers, residents and visitors. At the south east corner of the ground floor, permeability is enhanced to Fenchurch Street and Lime Street and there is increased permeability through the site from north to south with the introduction of a new publicly accessible route through the proposed development.

Provision of Office Accommodation

75. Strategic Policy CS1 of the City of London Local Plan 2015 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the Draft Publication London Plan.

76. The proposed development would provide 72,992 sq.m GEA of office floorspace (an increase of 55,525 sq.m over existing) comprising well designed, flexible office accommodation in a sustainable building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan policy S4.

77. The shape of the proposed development would provide flexible floorplates which can be arranged and subdivided in a number of ways to accommodate a range of office occupiers. The shape of the floorplates allows for a prioritisation of natural lighting throughout the façade design and seeks to prevent overheating from sunlight. This range of options is well suited to providing for incubation spaces for start-ups, Small and Medium Enterprises (SMEs), with opportunities for subdivision and co-working spaces, which comprise the majority of the City businesses.

78. The proposed development seeks to provide roof terrace spaces for the use of office occupiers at podium and roof levels, these spaces would provide high quality amenity space to City workers and would contribute to the urban greening of the building. The proposed office provision addresses the needs of international business in accordance with Local Plan policy DM 1.2 and emerging City Plan strategic policy S4 and policy OF1.

79. The central part of the ground floor hosts the office entrance lobby, from which escalators and lifts provide access to the main sky lobby at the second floor. The lobby has frontages and access to both the proposed passageway and Fenchurch Street. Levels 2-32 provide office floorspace with associated facilities.

80. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. The S106 agreement would include an obligation to make specific and identified provision within the development for such occupiers.

Proposed Retail

81. The existing retail floorspace on the site is 9,274sq.m (GIA), it is occupied for retail use at lower ground, ground and first floors.

82. The proposed retail floorspace comprises 1,715sq.m (GIA) of flexible uses for a flexible mix of shops, cafes and restaurants (Class E), drinking establishments and take away (Sui Generis) to ensure the building can respond to market demand.

83. There is a significant loss of retail floorspace, 7,559sq.m, contrary to policy. Under policy DM20.1 and emerging policy RE1, the amount of active retail frontage remains largely the same due to the new pedestrian route through the building. There is existing 75m of active ground floor retail frontage and it is proposed that there would be 78m of active retail frontage at ground floor level. The policy is to resist the loss of retail frontage and floorspace.

84. The application proposes the ground floor and lower ground floor mezzanine would prioritise a mixture of publicly accessible space and retail space as well as entrances for the areas on upper floors. At the western part of the ground floor, a large retail space is provided to the south fronting Gracechurch Street, Fenchurch Street and the proposed passageway. This space has frontages to the west, south and east including a large curved frontage at the intersection of Gracechurch Street and Fenchurch Street. The eastern part of the ground floor is multifunctional. The space is entirely open to Fenchurch Street and Lime Street at ground floor to the east which accommodates a large piece of public realm in the daytime, suitable in part for retail pop up uses to provide further dynamic enhancement and activation to this space. A further large retail area is proposed towards the centre of the floorplate at lower ground floor mezzanine level. The lower ground floor provides publicly accessible toilets, including a changing places facility.

85. The site is located in the Leadenhall Market Principal Shopping Centre (PSC) as identified in the Local Plan. Policy DM20.1 states that within Principal Shopping Centres the loss of retail frontage and floorspace will be resisted and that development should maintain a clear predominance of shopping frontage within Principal Shopping Centres.

86. In weighing the planning balance, it is necessary to take into account the fact that the current Local Plan and the emerging City Plan places emphasis on the primary business function of the City and on strengthening the cluster of activities that contribute to London's role as the world's leading international financial and professional services centre. The scheme would provide significant additional office floorspace, close to the Eastern Cluster contributing to meeting the City's targets for increasing office floorspace. Other Local Plan objectives met include provision of a new publicly accessible viewing platform providing higher level views and public areas, in line with emerging City Plan policy.

87. Although there is a loss of retail floor space, the amount of active retail frontage at ground floor level increases slightly. The proposed retail component of the scheme and creation of active frontages would enhance the public interest and vitality of the street frontages on Gracechurch Street and Fenchurch Street, and increase the permeability into the building through the creation of two permeable routes. One of these spaces can be used to provide pop up retail and contributing a further 580sq.m of retail space. The proposed development would provide flexible retail floorspace at ground floor across key frontages and at lower ground mezzanine level. The proposed retail would be fit for purpose in the context of a changing retail market, being flexible and adaptable in layout, in support of long-term vitality and viability of the Principal Shopping Centre. It is considered that the proposed use would complement retail uses at the neighbouring Leadenhall Market, particularly with the introduction of the proposed passageway providing increased access. During the day, there is potential for a pop-up retail space within the new permeable, accessible open space. This offer would provide a flexible and adaptable space which has the potential to address rapidly changing retail patterns and demand from the largely office-based employment in the Cluster. This space is flexible and would utilise the same space as the service entrance and so is considered on a flexible basis and is not permanent retail. On balance it is considered that the loss of retail floorspace is acceptable, the mix of uses would provide a complementary use to the offices on the upper floors in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with Emerging City Plan Policy OF1. However, the development proposed, would be contrary to adopted Local Plan Policy CS10, DM20.1 and Emerging City Plan policy RE1. A condition is recommended to secure retail uses falling within Class E and Sui Generis as proposed, and to prevent the change to any other use within Class E.

Proposed Public Viewing Gallery

88. Local Plan policy DM10.3 and draft City Plan 2036 policies S8, S14 and DE5 seeks the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City.

89. A new public viewing gallery is proposed at levels 29 and 30 located in the western tower. The space would be mostly double height, with an ancillary area at level 30, mezzanine and visitor facilities. The space would provide views to the south, west and north and is suitable for a range of free public activities. The indoor space would include seating and planting and there would be a space for a small retail kiosk which would not restrict access to the area and would enhance the place for people to sit and dwell.

90. A glazed winter garden is located on the 29th floor on the southern side of the floor, providing a comfortable environment to enjoy the low winter sun. Given its south facing aspect it will be sunlit, bright double height space planted with evergreen vegetation.

91. The combination of the public viewing gallery and enclosed winter garden would result in an elevated public space of the highest quality, providing dynamic views across this part of London, providing a valuable space for culture as well as expansive views over London for all to enjoy.

92. The space would contribute to the network of free to enter viewing galleries across the City and internally would incorporate culture in the form of sculpture, art, pop up cultural performance and educational events.

93. The public viewing gallery would be free to access and would involve successful management of the space. The public viewing gallery and winter garden would be open all year round (except Christmas Day, Boxing Day, New Year's Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later and there is no need for a booking system for users and would not be closed for private events during those hours. The Cultural Implementation Strategy would cover potential use for events outside the public hours which would be secured via a Section 106 agreement. It would be accessed from the ground floor with dedicated lifts and security checks.

94. A Visitor Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.

95. A Visitor Management Plan and the use of the public viewing gallery and winter garden would be discussed and secured under the Section 106 negotiations and agreement.

Urban Greening

96. The proposed development would incorporate a variety of urban greening measures, which provides the following benefits: mitigating air and noise pollution, capturing CO2 while releasing O2, combating the heat island effect, improving biodiversity, rainwater run-off management as well as making a place healthier and more attractive, improving the wellbeing of people. Across the entire application site, the development achieves an Urban Greening Factor (UGF) 0.31 which exceeds the draft London Plan policy G5(B) UGF target of 0.3. When taking only the actual site ownership area into consideration, excluding public highway on Lime Street, Philpot Lane and Rood Lane, the UGF score is 0.37 using the GLA calculation methodology and 0.42 using the City of London calculation methodology.

97. The substantial increase in greening is integrated into the architectural approach on the building, delivering intensive living green roofs at levels 31 and 32, a green wall in Ship Tavern Passage, and mixed perennial, shrubs and tree planting to terraces at level 5 and 6, plus planting to balconies at all levels providing greening to the vertical recesses.

98. Mature trees are proposed on public highway land, including five in Lime Street and two in Rood Lane. These trees would be part of the public realm and highway enhancements proposed as part of the scheme. The trees would provide visual amenity as well as environmental benefits in terms of air quality, wind mitigation and habitat for the promotion of biodiversity.

99. The siting, size and planting palette would ensure year-round seasonal diversity and richness whilst optimising the holistic benefits of greater biodiversity, cooling, noise attenuation, SuDs and general amenity, with well documented health and wellbeing benefits. The details would be secured by condition and would include maintenance and irrigation details.

**The Buildings Form and Relationship to the Eastern Cluster**

Principle of a Tall Building

100. The proposal is defined as a tall building under the adopted Local Plan (CS 14, para 3.14.1 – those which significantly exceed the height of their general surroundings) and emerging City Plan (S12(1), buildings over 75m AOD>).

101. The proposal is located within the south west area of the 'Eastern Cluster' Policy Area in the adopted Local Plan (Policy CS7, Figure G) and within the 'City Cluster' Policy Area in the Draft emerging Local Plan (emerging Policy S21, Figure 33), which extends the Cluster to the south incorporating 20 Fenchurch Street and the area to its west. The emerging City Cluster identifies two Renewal Opportunity Sites, one of which, applies to the application site, and seeks tall buildings on appropriate sites.

102. The Cluster Policy area is defined by an illustrative diagram in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites.

103. The proposed tall building is not in an area identified as 'inappropriate for a tall buildings' in either Plan. Local Plan Policy CS14 and emerging City Plan Policy S12 indicate that planning permission should be refused for tall buildings in conservation areas.

104. The tall building therefore is to be assessed against the criteria set out in CS 14(3) and S12(2-6), and the wider provisions of the Development Plan.

Skyline Impact and Relationship with the Cluster

105. The proposal would be read as part of the emerging City Custer, defining the south western edge. The height, form and massing of the proposal has been amended considerably following extensive pre-application discussions to ensure a sensitive relationship with the Cluster, wider London skyline, historic skyline features, local views and the significance

of strategic heritage assets, in particular the Tower of London, St Paul's Cathedral and its processional route and the Monument, all of which are addressed in detail in this report.

106. The proposal has been designed with the future evolution and consolidation of the Cluster in mind. In strategic London-wide and riverside views the new tall building would counterbalance and subdue the assertive bulk of 20 Fenchurch Street as an outlier from the Cluster. The building would step up in three sections towards 20 Fenchurch and would be subtly inclined and tapered to enhance its silhouette. The proposal successfully moderates between the height and bulk of 20 Fenchurch and the rest of the Cluster to create a more cohesive City Cluster. The Sky Garden would remain visible as an elevated public space in important views.

107. The proposed three staggered, slender and tapered interconnected tower elements, together with the dramatic vertical green recesses, would break down the massing of the building into a tripartite arrangement. This would create a dynamic silhouette and architectural composition that would positively contribute to the variety of buildings in the City Cluster without dominating the skyline.

108. The proposal would be a maximum of 154.8m high. By way of comparison, the proposal is of a more modest height compared with most other existing and consented tall buildings in the Cluster (in descending AOD height order):

- 1 Undershaft: 304.9m
- 22 Bishopsgate: 294.94m
- 122 Leadenhall Street: 239.40m
- 110 Bishopsgate (former Heron Tower): 217.80m
- 52-54 Lime Street 206.50m
- Tower 42: 199.60m
- 'The Gherkin' (30 St Mary Axe): 195m
- 20 Fenchurch Street: 160m
- 70 Gracechurch Street: 154.8m (the current proposal)
- 50 Fenchurch Street 149.6m (Committee resolution to grant planning permission but the permission has not yet been issued)
- 55 Gracechurch Street 146 m (Committee resolution to grant planning permission but the permission not yet been issued)

Design Approach: Architecture, Urban Design and Public Realm

109. The proposal would comprise a distinctive and carefully articulated building which is considered to be architecture of the highest quality. It would have outstanding sustainability credentials, is attractive and contextual at numerous scales and would enhance existing and create new high-quality public realm appropriate to the character of this part of the City.

110. The proposed building responds positively to the scale of its townscape context through a podium base with stepped back tapered tower elements above. The proposed solid podium and lighter treatment to the towers create a complimentary yet distinctive ensemble. Its visual impact would enhance the skyline and local views of the City Cluster as well as the setting of nearby conservation areas and listed buildings.

111. The massing is broken down successfully through three interconnected tower elements which taper inwards towards the top and bottom, creating a pleasing sculptural composition. The recesses in between would feature cascading greening, providing texture, depth and contrast.

112. Each of the three vertical tower elements are staggered in plan and elevation, creating a rhythm and breaking down the bulk. The height rises in three steps from 139.5m on the western edge up to 154.8m towards the east.

113. Greened, recesses in between the three tower elements on the north and south facades would cascade over and grow up from the terracotta balconies on alternate floors. The vertical greening would provide an attractive and architecturally distinctive contrast of soft and hard materiality, colour, depth and texture on the facades as well as environmental benefits. The contrast would visually soften and break up the mass of the building in close up as well as in wider City views. The vertical greening and darker terracotta to the recessed balconies would enable the tapered tower elements to appear distinct and coherent.

114. The proposed façade treatment is of high quality in terms of architecture and sustainability. The tower elements would comprise a curtain wall framework of expressed slim metal horizontal projecting bands at each floor, offset vertical, shaped mullions and fluted terracotta spandrel inserts in between, resulting in a textural approach with modulation, articulation and depth. The offset vertical mullions help turn the curved corners that vary in radius up the height of the building. The dramatic curved corners would ensure an attractive architectural appearance from all angles and a softer form on the skyline.

115. The design incorporates vents for natural ventilation through slots in the mullions, supports solar shading and the slowing of downdrafts towards the podium and street level. The curved corners of the tower elements assist with wind mitigation.

116. The proposed podium base is divided into three corresponding bays below the three tower elements on Fenchurch Street to break up the scale of the frontage. The podium reduces in height in from six storeys on Gracechurch Street down to four storeys on Lime Street to respect the established height of the immediate context and the adjacent Leadenhall Conservation Area.

117. The podium would feature dramatic, tapered terracotta columns at 4.5m centres. These would create the appearance of solidity, depth and rhythm to the podium when viewed obliquely and relate to the materiality and character of the immediate townscape, tying the building

comfortably into its setting. Terracotta spandrels would express the floorplates.

118. The podium is topped by a pronounced cornice, giving clear architectural definition to the height of the podium which would respect the established scale of development in the surrounding streetscape.

119. Greening to the podium recesses on Fenchurch Street would soften and enhance the street frontage. A green wall would be incorporated into Ship Tavern Passage to positively address the blank inactive frontage and enhance the visual amenity of the space.

120. The corner at Gracechurch Street and Fenchurch Street would be expressed with a dynamic curved corner treatment, to both podium and tower elements to mark its townscape prominence.

121. The podium block responds to the scale and character of the immediate context. It presents well-proportioned, well-detailed facades to Gracechurch Street, Fenchurch Street, Lime Street and Ship Tavern Passage and respond to their distinctive architectural and spatial characters.

122. The detailed design and architecture of the proposed development is of an excellent standard. Both the towers and podium would make a positive contribution to the local area and the emerging City Cluster of tall buildings. The proposed high-quality materials and detailed design provide a richness to the building, appropriate to the character of the City as well as the setting of surrounding buildings and spaces. The elevations would have a depth and quality of modelling, of a high standard of design and architectural detail.

123. Arranged around the base of the podium would be a series of high quality and active frontages with multiple entrances. The south east corner would be open-sided, providing a vast area of outdoor publicly accessible space in daytime hours when flatbed servicing lifts are not in use. This will allow pop-up retail and cultural uses in this area, enriching the variety of activity in Lime Street.

124. A new, spacious 9m wide pedestrian route is proposed directly through the site from Fenchurch Street to Ship Tavern Passage. This is a key public benefit of the scheme, improving north-south routes in the City Cluster and linkages to Leadenhall Market and its retail uses.

125. The proposed ground floor would be attractive, permeable, legible and provide good levels of passive surveillance. Appropriate signage and lighting would be incorporated.

126. York Stone and the specified City natural pallet of high-quality public realm materials would be used throughout to create seamless integration with the wider public realm, in accordance with the City Public Realm SPD and associated Technical Guidance.

127. Further public realm enhancements are proposed to the public highway in Rood Lane, Philpot Lane and Lime Street including the provision of five street trees to the east of Lime Street and two street trees at the top

end of Rood Lane. The trees would perform as wind mitigation features as well as provide visual and environmental amenity.

128. The proposals deal successfully with a change in level across the site. It would be step-free and inclusive for use by all without undue separation or hinderance. The management approach is to allow unrestricted and inclusive access for all which would be secured via legal agreement. It is important that the elevations, external and part internal, in particular at ground and first floor level, need to be well detailed to achieve this positive interface and active frontage, and this is reserved for condition. Security features have been, where possible, designed integral to the architecture, avoiding visual clutter and obstacles, whilst creating a safe place.

129. Lighting, in accordance with the adopted City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass. It would be contextual, building on the components of spatial character design guidance for the City Cluster in the adopted Strategy. The full details would be ensured via condition.

**Heritage**

**Tower of London World Heritage Site – Impact on Outstanding Universal Value (OUV)**

Outstanding Universal Value and Relationship

130. The seven overarching attributes of Outstanding Universal Value which are contained in the Statement of Outstanding Universal Value, itself set out in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: i.) an internationally famous monument ii.) landmark siting and iii.) physical dominance of the White Tower.

131. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. The proposal is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations.

132. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre, stating (at paragraph 2.4.25), *its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of* London. It is also acknowledged that the Cluster had an emerging identity and that the relationship between the ToL and the Cluster is long-established, having existed for over half a century. It

acknowledges the Cluster forms a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. The Management Plan, at paragraph 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider i.) their effect on the established Cluster ii.) the space between it and the ToL and iii.) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

133. Whilst being proportionate, the assessment uses the assessment framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.

Impact on OUV/Significance

134. The proposal would have an in-direct impact, via change in the wider setting of the WHS. Change is not necessarily harmful. That change will be apparent in a number of views including those from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London.

*LVMF View 10A.1, River Prospect, Tower Bridge (Upstream, North Bastion)*

135. This viewpoint is identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge).

136. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT Tower, Centre Point and the Tate Modern.

137. The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (paragraph 187). The guidance states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (paragraph 185). The visual management guidance states that the background should be managed sensitively, and that development

should not compromise a viewer's ability to appreciate OUV (paragraph 186).

138. The proposal would be located at a considerable distance to the west of the ToL, on the western periphery of the Cluster. A small triangular slither of the eastern facade would be visible adjacent to the north west of 20 Fenchurch Street. The main bulk of the building, however, would be concealed behind 20 Fenchurch Street in this view. The impact on the wider setting of the ToL would be negligible.

139. Appearing at a considerable distance to the west from the focus of the ToL in the foreground, the WHS would not be obscured, distracted from or dominated. Given the intervening distance, siting, scale, form and appearance, the proposal would not harm those relevant attributes of OUV. It would leave unaffected those relevant components which also form part of the LVMF visual management guidance – the physical form and visual dominance of the White Tower, the iconic sky-etched silhouette, the close relationship to the River Thames and City beyond in the background, in accordance with the visual management guidance in the LVMF SPG (paragraphs 183-186). The effect of the proposal (when considered alone) on this view and on OUV and the setting and significance of the designated heritage assets is minor and neutral and the cumulative effect as a result of the proposed development and other proposed developments is negligible and is not considered to harm the setting of the WHS or it OUV.

140. In terms of wider compliance, given the siting, scale, form and orientation, which consolidates the Cluster, the proposal would have minimal visual impact and would not detract from the composition of the view, preserving an appreciation of identified landmarks, including the observers ability to recognise and appreciate the relevant Strategically Important Landmarks, the ToL and St Paul's Cathedral, in accordance with London Plan Policies 7.11 and 7.12 and Local Plan Policy CS 13. It would not obscure an appreciation of the scale and geography of London, including the Monument, in accordance with the visual management guidance in the LVMF SPG.

*LVMF View 25.A. 1-3, Townscape View, Queen's Walk*

141. This Protected Vista is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the ToL and the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413).

142. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the proposal, which would be largely obscured from view, behind 20 Fenchurch Street, on the western periphery of a consolidating Cluster, it would not undermine the composition and characteristics of the view or those landmark

elements. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it. As only a thin slither of the proposed development is visible in the context of the other emerging and consented schemes in the Cluster, the contribution of the proposal to the cumulative effect is negligible and would be neutral in effect, not resulting in any harm to the setting of the WHS and its OUV.

143. The siting, height, scale, stepped massing and attractive, sleek and slender profile would comprise a high quality design, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 418-422) and guidance contained in the Local Setting Study. The cumulative impact of the proposal would result in a slight change but would not result in any harm to the setting of WHS and OUV.

*LVMF View 11B. 1-2, River Prospect, London Bridge (Downstream)*

144. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified amongst other landmarks.

145. Given the pre-eminence of the River Thames in the foreground and the significant intervening distance between the Tower of London and the proposal, which would be on the western periphery of a consolidating Cluster, it would not undermine the composition and characteristics of the view or those landmark elements. It would allow the observer a recognition and appreciation of the ToL as the Strategically Important Landmark.

146. The proposal would not affect the clear sky backdrop of the White Tower and would not impose itself on it, given the intervening distance and separation in the field of view, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, 'dominance' and silhouette of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS and its OUV.

147. When considering cumulative impact, the proposal would be largely obscured in the views by 55 Gracechurch apart from a small slither. The cumulative impact would be negligible and not harmful to the view, setting or significance of ToL WHS and its OUV.

Other World Heritage Site Views

148. The Local Setting Study (Section 7) identifies Representative Views which are deemed to exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. In particular the proposal would impact on views across Tower Green, Inner Ward, Inner Curtain Wall, North and Inner Curtain Wall, South, and the representative impact is contained in submitted THVIA views 10A-10D (from the Inner Ward and Inner Curtain Wall), in addition to views 7-9 from Tower Bridge Approach and Tower Wharf.

*Inner Ward, Tower Green and the Scaffold Site*

149. Historic Royal Palaces, in making a representation, acknowledge the proposal would appear part of the Cluster, and that it *"would not be significant"*. Historic Royal Palaces have raised no objection to the proposal. Historic England, whilst considering that the proposal would be *"appear as a sliver of development mostly concealed by, and lower than, the existing building at 20 Fenchurch Street"*, consider the proposal would be a slight increase the amount of modern development encroaching into the Inner Ward, resulting in overall cumulative modest degree of harm. Historic England considers that the proposal will result in less than substantial harm to the significance of the Tower. It is the view of your Officers that the proposal would not cause harm.

150. In most of these views, the proposed building appears as a sliver. In View 7 from Tower Bridge Approach North much of the east façade is visible but appears as a comparatively smaller scale and recessive than the neighbouring 20 Fenchurch Street and 50 Fenchurch Street for which there is a committee resolution to grant permission (subject to the prior completion of the s106 agreement). These views are deemed by the Local Setting Study to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place apart from the modern city outside the walls, where the relationship between the scale of the individual buildings can be appreciated. Under 'key issues' it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings – qualified in the associated 'Objectives and Guidance' development should i.) respect that sense of place and ii.) ensure the buildings surrounding the Inner Ward remain the focus of the view.

151. The Local Setting Study acknowledges that there is a range of views in the Inner Ward. The proposal would, in most views, be hidden behind the western range of enclosing buildings, having no visual impact. From views nearer the White Tower looking towards the Chapel of St Peter ad Vincula, the proposal would be a sliver, non-prominent feature which

would adjoin 20 Fenchurch Street at some intervening distance appearing as part of the emerging long-established Cluster backdrop which to a degree breaches the silhouette of the Chapel. Moving toward the Chapel, in its immediate setting from the green, the proposal followed by the rest of the Cluster moves out of view and it is unchallenged and pre-eminent.

152. In accordance with the guidance in the Local Setting Study the proposal would i.) respect the distinct sense of place and the pre-eminent stage in which those rich traditions would continue to take place and ii.) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is considered the iconic, strategic landmark siting and dominance of the White Tower would be unchanged in terms of the overarching attributes of OUV and their components while the relationship between the ToL set away from the City beyond would be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct long-established backdrop entity.

*Inner Curtain Wall (South)*

153. Views from the Inner Curtain Wall were assessed where the guidance in the Local Setting Study recognises it is a 360 degree viewing experience where the aim is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River, whilst under the associated guidance seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.

154. The proposal would again appear as a sliver of development adjoining 20 Fenchurch Street and when viewed alongside the proposed 50 Fenchurch Street and 1 Leadenhall (consented), would assist in consolidating the Cluster's distinct urban form and separate long-established identity. The White Tower, accentuated by its fortified massive masonry crenelated walls, would remain the focus of the view from the Inner Curtain Wall. It would continue to dominate the scene while that relationship with the River and an appreciation of it as a historic gateway would be undiluted. Historic England consider the proposal would result in slight harm which would reduce the prominence generally of historic buildings in what is a varied scene acknowledged in the Local Setting Study as one where *''modern buildings provide a clear contrast between the historic tower and the contemporary city outside its walls''* - an acknowledgment at ease with the concept of contrast between old and new reinforcing one another and contributing to the attribute 'landmark siting' and the component of this which is an established relationship between the ToL and the City beyond. It is considered that those identified relevant attributes and components of OUV would be preserved and the visual management guidance in the Local Setting Study would be complied with.

*Inner Curtain Wall (North)*

155. 'The Local Setting Study, in assessing views from the north Curtain Wall acknowledges that this is a 360-degree experience and demonstrates a *clear contrast between the historic Tower and the modern city outside its walls*. The identified aim is to i.) maintain views that reveal the relationship between the Tower and the City and ii.) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' it recognises that future tall buildings *could* reduce the perceived prominence of the Tower in its setting stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the Tower of London and the City to the north and that clear views of the concentric curtain walls should be preserved.

156. The proposal, sited a considerable distance to the west of these views, adjoining and subduing the isolated eye-catching form of 20 Fenchurch Street would, appear on the western side of the established Cluster, consolidating its distinct form, whilst preserving that relationship with the Tower of London. The concentric defences would remain pre-eminent and an appreciation undiluted in these views under the baseline and cumulative scenarios, also in accordance with the guidance.

*Chapel Royal of St Peter ad Vincula, Tower of London (Grade I)*

157. Dating from the early 16th century, the grade I listed stone chapel in the grounds of the Tower of London is of very high architectural and historic significance and forms part of the World Heritage Site. The City Cluster rises above the Chapel Royal of St. Peter ad Vincula whilst 20 Fenchurch Street appears in the background to the left of the Chapel bell tower. The tall buildings are part of the setting of the Chapel.

158. The proposed development visually fills the small gap between 20 Fenchurch Street and the Chapel bell tower, while its height is at the same level as the solid base of the bell tower and would not extend to the distinctive lantern.

159. The change to this view is considered to be minor due to the marginal visibility of the proposed development. The distance away and high-quality architecture of the visible part would avoid any harm to the setting and its contribution to the significance of the listed building. The lantern bell-cote of the Chapel would be unaffected and remain seen against the sky backdrop. As such the proposal would not result in harm to the setting of the Chapel Royal of St Peter ad Vincula. The contribution the setting makes to the significance of the listed Chapel within the inner ward of the Tower of London would not be adversely affected.

160. The GLA have commented that the proposed tall building would cause less than substantial, cumulative harm to the significance of the Grade I

listed St Peter ad Vincula Chapel through the introduction of additional development in the backdrop of the listed church and the resultant loss of clear sky space.

161. The cumulative effect of the proposed development is a very small addition in relation to the other cumulative tall buildings in the Cluster. Its marginal visibility behind the bell tower makes a minor and balanced contribution to the cumulative effect and is not considered harmful to the setting of the Chapel or its contribution to the setting and significance of the other listed buildings within the Tower of London World Heritage Site.

*St Thomas's Tower, Tower of London (Grade I)*

162. St Thomas Tower was built by Edward I in the late 1270's and is part of the medieval palace at the Tower of London. It houses Traitor's Gate and faces the riverside. In views along the riverside walkway, 20 Fenchurch Street forms a prominent feature in the background of St Thomas's Tower. The City Cluster appears mainly to the right of the Tower. It is of outstanding historic, architectural and archaeological significance as well as being of outstanding universal value as part of the Tower of London World Heritage Site.

163. In the view looking north west along the riverside, the proposed development would appear to the right of 20 Fenchurch Street, with the bulk of the building hidden behind out of view. The degree of change to the setting is small and the effect would be neutral on the setting of St Thomas's Tower and the Tower of London as a whole. The setting would not be harmed and its contribution to the significance of St Thomas's Tower would not be affected.

164. In the HTVIA view 9 the development would appear above the concentric defences, including the Grade I listed St Thomas's Tower where it rises above the historic structure. The GLA have stated that "the existing harm caused by 20 Fenchurch Street is exacerbated by the proposal extending development to right in the view, extending the loss of clear sky space to the left of the outer tower, and diminishing the existing clear definition of the crenellations of the historic defences. Noting the harm in these views are seen in the context of existing tall buildings, GLA officers judge the level of harm to be less than substantial." The proposal would appear as a thin slice of development abutting 20 Fenchurch Street at some distance and would not detract from the appreciation of the crenellations and concentric defences of St Thomas's Tower.

165. The cumulative impact would be that the proposed development would be a very minor element in the view and would help to connect 20 Fenchurch Street to the rest of the City Cluster. The cumulative impact

is not considered to represent harm to the setting of the Tower of London.

*Other Views*

166. Other views have been provided which are not LMVF or identified Representative Views in the Local Setting Study, but which still demonstrate well the attributes and components of OUV where there is a relationship with the proposal. The view from the riverside walkway of Tower Wharf, looking west, demonstrates the relationship between the emerging City Cluster in the background and the ToL which, towers over the immediate foreground. In this view, the proposal would reinforce the relationship between the two distinct urban forms – the Cluster and the ToL ensemble, which would dominate in the immediate foreground, causing no harm.

Conclusion – Impact on Tower of London World Heritage Site

167. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates to OUV. The GLA consider that given harm has been identified to key listed buildings and the local setting, within the wider area based heritage asset of the Tower of London WHS, then the WHS and its Outstanding Universal Value is also judged to be harmed, but concludes that it is harm that is less than substantial. Historic England and the London Borough of Tower Hamlets also state that the cumulative impact of the proposal would result in less than substantial harm. The officers of the City of London do not concur with this opinion. In all views, including the relevant approach and representative views, it is considered in line with the WHS SPG that the scale of change in all instances is deemed to be between negligible and minor and where the magnitude of impact is considered small on those relevant attributes of OUV. It is considered in all instances that the overall impact would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG the height, form and detailed design of the proposal has been amended to mitigate the impact, ensuring the proposal would read as part of the emerging coherent Cluster form, which it is established is intensifying and forms a long-term backdrop to the ToL ensemble. It is the view of your officers that the proposed development would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, the conservation area, or the Scheduled Monument.

**Wider London View Management Framework Impact**

168. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the Capital's character and identity at a strategic level.

169. The site falls outside of Protected Vistas in the LVMF but impacts on a number of the identified Assessment Points. Designated London Panoramas at View 1 (Alexandra Palace), 2 (Parliament Hill), 3 (Kenwood), 4 (Primrose Hill), 5 (Greenwich Park) and 6 (Blackheath Point) are all assessed in the submission, as the proposal would be seen. The magnitude of change in these broad panoramas is considered negligible, and in all it would accord with the visual management guidance by consolidating the City Cluster, which is identified as a landmark in these compositions, preserving that composition and the viewers ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral. From the designated Townscape View LVMF 26A (St James Park) the proposal would not have an impact.

170. Particular attention is given to the River Prospects where the magnitude of potential impact is greater, here addressed in turn.

View 15 (15.B.1 and 15B.2), River Prospect, Waterloo Bridge (Downstream)

171. This is an iconic London view. St Paul's Cathedral is identified as the Strategically Important Landmark. It is considered that the proposal would complement the development of the emerging City Cluster as a singular coherent entity in the skyline composition, assisting in subduing and taking the tension out of the isolated 'eye-catching' visual influence of 20 Fenchurch Street. The height is appropriate to the site and would step down from the apex of the Cluster around 22 Bishopsgate, towards the scale of the River and would be of a high-quality design. This is in accordance with paragraph 263 of the SPG visual management guidance.

172. The proposal would not draw tall buildings closer to St Paul's, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paragraphs 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified. The proposal would not harm the wider setting or view of St Paul's Cathedral.

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

173. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, drawing in 20 Fenchurch Street, preserving and enhancing the townscape setting of St Paul's whilst not detracting from wider

landmarks in the view in accordance with the visual management guidance at paragraphs 280-283 of the LVMF SPG.

Summary of LVMF Impacts

174. The proposal would not harm and would make some positive contributions to the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS 13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and Draft Publication London Plan Policy HC4 and guidance contained in the LMVF SPG.

**Other Strategic Views (Local)**

The Monument to the Great Fire

175. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City.

*View from the Monument*

176. The Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument. The principal axial views are identified as being provided by King William Street and Gracechurch Street/Bishopsgate as leading the eye into the Bank Conservation Area and the fringe of the City Cluster.

177. The building would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall. The building would read as part of the Cluster, still allowing for an appreciation of the contrast between the Bank Conservation Area and the Cluster. It is considered that the proposal would not harm the view. The cumulative impact would be that the proposed building would be obscured by the proposed 55 Gracechurch Street development.

178. No other identified view from the Monument would be affected.

*View of and approaches to the Monument*

179. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD, but it would be in its near setting.

180. From Tower Bridge the proposal would be mostly obscured in the view by 20 Fenchurch Street, causing no harm to the view towards the Monument.

181. The Queens Walk view of the Monument from directly opposite on the South Bank would remain unaffected. The proposal would not have a direct interface in the backdrop of the Monument. The building would be seen some way to the left of the Monument and would not detract from its setting or views of it. It is considered that the proposal would accord with the guidance in the Protected Views SPD.

182. The SPD identified approach to the Monument view from the Gracechurch Street/Lombard Street junction, would be unaffected as the site does not fall within this view.

Fleet Street / Ludgate Hill: The Processional Approach to St Paul's Cathedral

183. The proposal would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street or Ludgate Hill. It would leave this kinetic townscape experience unaffected, in accordance with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

St Paul's Cathedral – Views From

184. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. In these views, the tower would sit to the left of 20 Fenchurch Street, consolidating the Cluster. It would not obscure or detract from a City skyline landmark and would be an attractive addition to the skyline. It is considered it would preserve the composition and character of these views.

Views from other publicly accessible elevated viewing areas, in particular the 'Sky Garden' at 20 Fenchurch Street

185. The Sky Garden public viewing gallery at 20 Fenchurch Street was an integral ingredient taken into account in the planning balance in the 20 Fenchurch Street decision letter. The impact on it as a public attraction and sensitive receptor is a material consideration. The scheme was amended at pre application stage to minimize its impact here.

186. The viewing experience offers a unique 360-degree experience over different levels along a perimeter walk, with a large south-facing external terrace. Due to its siting and height the proposal would not impact the open experience of the south terrace or the quality of the microclimate. The impact would be limited to a small section of the north western aspect and would be transitory as part of the overall experience. The cumulative impact together with 55 Gracechurch Street (committee resolution to grant planning permission) would be to impact on the views looking west and north west from the Sky Garden. At no point would it obscure an appreciation or understanding of important cultural and heritage assets, notably the River Thames and

its bridges, Westminster, St Paul's Cathedral or Bank Junction. The design of the roof has been architecturally integrated and considered to create an attractive feature with greening to the roofs and facades to enhance the view. Overall, it is considered that the viewing experience from the Sky Garden would not be harmed by the proposal.

187. By virtue of the orientation and height of the proposal it would not harm the viewing experience at consented public terraces at 1 Leadenhall, 120 Fenchurch Street, 1 Undershaft, 22 Bishopsgate, 100 Leadenhall or 50 Fenchurch Street (Clothworkers) for which the committee have resolved to grant planning permission.

188. Outside the City, from the Tate Modern Viewing Gallery on Bankside, the proposal would further consolidate the Cluster as a distinguishable urban form and would not harm the viewing experience.

Other Views

189. The proposal has been assessed in terms of its impact on 44 views as set out in the Heritage, Townscape and Visual Impact Assessment. The proposal has been appropriately designed in relation to its surroundings. Although the building would be visible in many views, its high-quality design and appropriate massing would not detract from the visual amenity of the townscape views. The proposed development protects significant views of important buildings, townscape, riverscape and skylines and would not result in any harm to any of the views identified in the Heritage, Townscape and Visual Impact Assessment. The settings and significance of the listed buildings and landmark buildings featured within these views would not be harmed by the proposals.

190. In terms of the townscape, the HTVIA concludes that the impact the development has on the townscape is beneficial with no negative impact. Officers concur with this assessment and consider the impacts of the proposed development on townscape views is neutral to minor beneficial.

**Designated Heritage Assets (Direct and In-direct Impact)**

Leadenhall Market Conservation Area

191. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance of the Conservation Area as deriving from the vibrancy of the historic market, the characterful Medieval street grid, small scale of buildings, streets and spaces in dramatic contrast to the immediate setting.

192. The site is on the boundary of the Leadenhall Market Conservation Area on Ship Tavern Passage and Lime Street. A small part of the application site on Lime Street itself is public highway that partly falls

within the Leadenhall Market Conservation Area. The proposals include public realm enhancements to this public highway and planting of five street trees in Lime Street. This would specifically benefit and enhance the Leadenhall Conservation Area, and views into and out of the conservation area along Lime Street and from Fenchurch Street.

193. The GLA consider that there would be a less than substantial level of harm to the Leadenhall Market Conservation area “owing to the scale of the development and its position on the conservation area’s southern boundary, the proposal would have a significant visual impact on the contribution made by the setting to the ability to appreciate the significance Leadenhall Market Conservation Area”. The GLA, however, concur with the City of London’s assessment that large-scale modern development, visible over the roofs of lower scale buildings is characteristic feature of the conservation area given its proximity to the eastern cluster. Furthermore, the GLA acknowledge that the public realm works to Lime Street and improved pedestrian connectivity between Fenchurch Street and Leadenhall Market are modest enhancements.

194. The proposed tall building would be sited outside of the Leadenhall Market Conservation Area but would have an impact on its immediate setting and some views into and out of it. Given the enclosed nature of the Conservation Area, in particular, the roof of the market, the proposal will be generally concealed from view. Where visible it will be appreciated alongside 20 Fenchurch Street in the backdrop. This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market with the historic buildings dominating the foreground of the views. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market Conservation Area.

195. The proposed podium relates to the general scale of building frontages in the Leadenhall Conservation Area and steps down in height from Gracechurch Street to Lime Street to respect the predominant scale and height of frontages within the Conservation Area. The solidity of the proposed podium is characteristic of the materiality of the area.

196. The vertical greening on the tall building, would provide visual amenity and environmental benefits to the setting of the conservation area, including mitigating wind and heat impacts.

197. The public benefits include a free public viewing gallery at levels 29 and 30, which would enable the public to enjoy elevated views from which to appreciate and better reveal the conservation area and the distinctive roof structures of the listed II * Leadenhall Market.

198. At ground level a new publicly accessible route would be provided through the building from Fenchurch Street linking into the Conservation Area at Ship Tavern Passage. This new route builds on the traditions of courts, alleys and quieter routes which characterise the Conservation Area. It would enhance the pedestrian experience of routes into the Conservation Area, provide active frontages and improve linkages to Leadenhall Market to the north of the site.

199. The public realm proposals and trees in Lime Street would enhance the character and appearance of the Leadenhall Market Conservation Area. The new podium and tower building would not result in harm to the setting, significance, and views into and out of the Leadenhall Conservation Area.

Eastcheap Conservation Area

200. The Eastcheap Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance as an area with strong historical associations with the Thames, with post-Fire landmarks and good commercial architecture occupying an ancient street pattern and urban grain. The setting is defined by an established relationship with modern tall buildings in the backdrop, such as 20 Fenchurch Street. The majority of Conservation Area views would be unchanged, given the particular dimensions and character of a unique historic urban grain.

201. Public realm improvements are proposed to the highway at the north end of Philpot Lane as part of the overall development. This small part of the site is located in the Eastcheap Conservation Area. The proposed landscaping of the public highway would enhance the character and appearance of the Eastcheap Conservation Area and would incorporate appropriate traditional materials such as York stone and granite. The proposed enhancements would be in accordance with the City Public Realm enhancement strategy:
• Rationalise street furniture
• Improve the pedestrian experience
• Enhance paving and surfaces
• Introduce more trees and planting
• Preserve historic character
• Create an inclusive environment
• Maximise the sustainability of each project.

202. The proposed tall building is not located in a conservation area and is situated on the north side of Fenchurch Street some way from the boundary but would impact on the setting of the Eastcheap Conservation Area in views looking north along Philpot Lane. The height, massing and architecture of the proposed building is typical of what characterises the existing setting and would not harm the setting

or significance of the Eastcheap Conservation Area or views into or out of the Conservation Area along Philpot Lane.

**Designated Heritage Assets – Impacts on the setting and significance of listed buildings and conservation areas**

The Monument (Grade I and Scheduled Ancient Monument)

203. The Monument to the Great Fire (''the Monument''), by Sir Christopher Wren and Robert Hooke, built 1671-77, symbolised the restoration and renaissance of London following the Great Fire of 1666. It comprises an elegant fluted Roman Doric column of Portland Stone with a crowning gilded flaming urn sat atop a large pedestal. It is of exceptional architectural, artistic, historic and archaeological significance as a City/London-wide landmark.

204. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance.

205. The Proposal would appear to the left in the backdrop and setting of the Monument on approach from London Bridge, on axis from the South Bank (Queen's Walk, western end). On approach from Lower Thames Street/Fish Street Hill the proposal would appear to the right, some distance away and would not impinge on the silhouette of the Monument. The proposed development would not harm the setting or significance of the Monument as a grade I listed building and Scheduled Ancient Monument.

Tower Bridge (Grade I)

206. Tower Bridge, completed in 1894, was designed by Sir John Wolfe Barry and Sir Horace Jones for the City of London Corporation. It represents a triumph of Victorian engineering as a low hybrid suspension and bascule bridge and features gothic towers and turrets in a dramatic composition that frames the river.

207. The proposal would largely leave the visual experience of Tower Bridge unaffected, including in views from the north, south and west. From Butler's Wharf and other views to the east, 20 Fenchurch Street would almost entirely screen the proposed building from view.

208. The GLA acknowledge that the proposed development would have a negligible impact on the contribution made by the setting to the ability to appreciate the significance of Tower Bridge. However, the GLA officers consider that further analysis is required specifically in views from the river and in views looking west from Shad Thames further east. As noted above the applicant has provided this information to the GLA and it forms part of the background papers to this report.

209. The HTVIA includes Views from the River Thames on Millennium Bridge (View 37) and views from further east from Butlers Wharf (View 12) and Kings Stairs Gardens (View 11). Furthermore, 3D digital modelling techniques have been used to enhance the assessment of the scheme and ensure a thorough analysis of the impacts on the setting and significance of Tower Bridge. The officers of the City of London consider that the impact on views and setting of Tower Bridge has been fully and properly assessed and the proposal would not result in harm to the setting and the significance of the grade I listed Tower Bridge.

Leadenhall Market (Grade II*)

210. The site is in close proximity to the Grade II* listed Leadenhall Market, which is a large and decorative top-lit Victorian market building in wrought iron and glass designed by Horace Jones in 1881. It has a complex of roofed footways with detached portions to the south, lined with open fronted shops. It has a well preserved interior, but on the exterior it is surrounded by tall buildings of the modern City of London. Its significance lies in its high architectural and historic interest.

211. Where visible the proposal will be appreciated alongside 20 Fenchurch Street in the backdrop, such as looking south from Gracechurch Street, or Leadenhall Street, along Whittington Avenue. This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market with the historic buildings dominating the foreground of the views and is part of the significance of the setting. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market.

212. Historic England have raised concern regarding the impact on daylight to Leadenhall Market. The market's covered spaces are artificially lit to ensure adequate lighting. The day light levels are not considered to be a contributor to the significance and special architectural or historic interest of the listed building. A change in daylight levels would not harm the setting and significance of the listed building. Impact on sun and day light is dealt with in another section of this report.

213. There are proposed improvements to Lime Street which include the extension of the existing shared surface down to Fenchurch Street, with York stone paving and new trees along a widened pavement. All of these aspects will lead to an improvement in the listed building's setting and the new publicly accessible connection from the south, through the site, will serve to better reveal its significance in a minor way. Historic England "recognise the opportunity here to provide public benefits, which include the creation of a permeable connection to the market and

improved public realm in general". The proposed elevated public viewing gallery would result in better revealing its significance by affording views and appreciation of the historic and characteristic roof structures of the market.

214. There is the opportunity for Leadenhall Market's current use to be supported by complementary uses in the proposed development, supporting the sustainability of the listed building.

215. The proposal would change and to some degree enhance the setting of the listed building. There would not be harm to the setting or significance of the listed Leadenhall Market buildings.

The Ship Tavern Pub, Lime Street (Grade II)

216. The Classical mid-19th Century public house is located diagonally opposite the application site in Lime Street and is of architectural and historic interest. The setting is characterised by dramatic change in scale with the backdrop of tall buildings which forms part of the settings significance. The proposed high-quality architecture of the replacement building would be an enhancement to the setting of the Ship Tavern. The carefully designed podium that steps down towards Lime Street would respond to the lower height and smaller scale and would contribute positively to the setting of the Grade II listed Ship Tavern on Lime Street. The proposals and the public benefits it would provide to the public realm in Lime Street, including the planting of five street trees would enhance its immediate setting.

81-82 Gracechurch Street (Grade II)

217. 81-82 Gracechurch Street is a 19th century classical building of Portland stone. Its significance lies in its architectural design and façade details. The development would be prominent in southward views of 81-82 Gracechurch Street with the massing of the development highly visible above the roofline of the building. GLA consider "the harm to the contribution made by the setting to the ability to appreciate the significance of this building to be less than substantial."

218. The immediate setting is characterised by a mix of stone fronted buildings of various styles, heights and periods juxtaposed with a backdrop of tall modern buildings. The proposal will change the immediate setting due to the increase in height compared to the existing. The masonry clearly expressed podium would relate to the established scale on Gracechurch Street and the tall building would be typical of the existing backdrop setting, which features dramatic change of scale. The setting would not be adversely affected by the proposals

and the contribution of the setting to the significance of the listed building would be unchanged and unharmed.

7-9 Gracechurch Street (Grade II)

219. Built in 1919 by W Campbell-Jones as a bank, 7-9 Gracechurch Street is a steel framed building clad in Portland Stone in a French/ Beaux Arts style. It is located on the west side of Gracechurch Street to the north of the application site. Its significance lies in its architecture and historic interest. Its wider setting features a mix of buildings in age, materials, style and height. The juxtaposition of heights and architecture, including the City Cluster of tall buildings is part of the character of the setting. The proposal would be a high-quality addition to the south eastern wider setting and there would be no adverse impact on the setting of the listed building.

39-40 Lombard Street (Grade II)

220. Built 1868, by Francis, of Portland Stone in an ornate Italianate palazzo manner. Comprising a tall ground floor (potentially a former banking hall) and rich carved classical detail to the upper floors. It is of architectural, artistic and to a slightly lesser extent historical interest. Its immediate setting, defining the corner of Gracechurch Street and Lombard Street, seen alongside other classical Portland Stone commercial edifices, makes a modest contribution to significance overall.

221. The GLA consider the introduction of new development of significantly greater scale opposite the listed building in Gracechurch Street to result in less than substantial harm to the significance of this building. The GLA state that “The proposals would alter the contribution made by the setting to the ability to appreciate the significance of the Grade II listed 39-40 Lombard Street, opposite the site”. The scale of the new development would be appreciated in open northward views along Gracechurch Street however this would be viewed in the context of the existing office developments in the immediate setting and tall buildings of the eastern cluster in the background.

222. On approach from the west along Lombard Street the backdrop is commanded by the bulk of 20 Fenchurch, which would be subdued by the proposal. The full significance of the building is better appreciated in close view, in particular where the sumptuous detail can be appreciated, where given the scale of 39-40, and the height-to-width ratio of the street, it would command the foreground, while the proposal would only be visible at a high level in the oblique. It is considered that the impact would be of low magnitude and no harm would be caused to the special interest, significance or setting of 39-40 Lombard Street.

7-8 Philpot Lane (Grade II*)

223. Much altered terrace, dating from the late 17th century, substantially redeveloped in c.1984 and again refurbished in 2018 leaving little authentic fabric. Italianate style, stucco-fronted brick terraces, with clay tile clad hipped roofs. The principal significance lies in the basement interior, a rare and unique late Medieval vaulted undercroft. It is of high architectural, historic and archaeological significance, less so artistic. It draws a moderate degree of significance from setting, in particular, as a group around Brabant Court and in association with 4 Brabant Court, 2-3 and 5 Philpot Lane. Together these form a rare and unique ensemble of the form and urban grain of the pre-industrialised, pre and immediately post-Fire City of London – comprising smart brick-faced terraced commercial fronts and quieter, intimate off-street domestic/cottage industry courtyards.

224. The proposal would be seen and appreciated in the context of the emerging Cluster in the immediate and wider setting from Philpot Lane and located close to 20 Fenchurch Street. These dramatic contrasts in scale between the old and new are an established character trait of this setting which otherwise in terms of physical form, layout and appearance would be undiluted – that relationship between the ensemble remaining appreciable. In closer views, the listed building will continue to dominate.

225. It is considered the proposal would preserve the special interest/significance, and the contribution made by setting to the significance of 7-8 Philpot Lane.

Custom House, Lower Thames Street (Grade I)

226. Custom House is a very large and imposing neo classical riverfront building of Portland stone. It was built 1813-1817 by David Laing and rebuilt by Robert Smirke in 1825. It is of high architectural and historic significance, connected to its function as an office for the collection of customs and excise taxes. Its open foreground setting on the river contributes to its significance and enables the appreciation of the architectural qualities in long views from the southbank and bridges over the River Thames. The wider backdrop setting to the north features the tall buildings of the City Cluster, creating a dramatic contrast in scale and form.

227. 20 Fenchurch Street is a prominent feature in the background setting of the listed building. In a position from the south bank where the Custom House would lie in axis, the listed building would be fully obscured by the HMS Belfast. Moving further to the west, where the façade of Custom House comes into view, the proposed development would be

partially visible in a gap between existing and consented tall buildings. This is a minor addition in the background of the view, and the high quality of the proposed design will add richness to the overall composition. This will cause no harm to the setting or significance of the listed building or the ability to appreciate it.

228. The view assessed at View 36 of the HTVIA, from Southwark Bridge, looks towards Cannon Street station with its listed towers prominent in the middle-ground, and the City's Eastern Cluster towers in the background. Nos.52-54 Lime Street (the Scalpel) appears between the two listed towers. The proposed development would appear in the foreground of the Scalpel, the three distinct vertical forms of the proposal, each tapering to the top and with curved corners, adding an element of interest in the background of the view. Its addition would not detract from the significance of the listed towers which will remain recognisable and prominent elements in the view, maintaining their relationship with the river and the railway line. There is considered to be no harm to their significance or the ability to appreciate it.

229. Officers have used 3D modelling digital techniques to assess the impact of the scheme on significant designated heritage assets including the two Cannon Street Station Towers and the proposals have been subjected to a robust and thorough assessment.

230. Officers have used 3D modelling digital techniques to assess the impact of the scheme on significant designated heritage assets including Custom House and the proposals have been subjected to a robust and thorough assessment.

231. The proposal would be visible in the backdrop of Custom House and form part of its existing characteristic City Cluster wider setting but would not appear in close proximity. The significance of the setting of the listed building and the setting's contribution to the significance of Custom House would not be harmed by the proposals due to the distance and high architectural quality of the building.

Former Billingsgate Market, Lower Thames Street (Grade II)

232. Billingsgate Market, by Horace Jones, was built in 1872 as the City's fish market. Its significance lies in its French 17th century classical style architecture, in brick with attractive Portland Stone dressings as well as its historical uses. Its riverfront setting contributes to its significance. Its backdrop is characterised by considerably taller buildings in the wider setting. The change in scale is part of the existing setting. The proposed tall building would form part of the typical change in scale and would not harm the setting of the listed building or the contribution that setting makes to the significance of the listed building.

233. The background setting of the listed building is dominated by the form of no.20 Fenchurch Street. View 16 of the HTVIA shows a view looking straight at the listed building from the south. The proposal would form a minor addition to the already established and evolving Cluster of tall buildings in the background of Billingsgate Market and Custom House in northerly views.

234. The proposed development would replace Tower 42 in the view, slightly closing the sky gap between no.20 Fenchurch Street and no.20 Gracechurch Street further to the left. The addition of the proposed development to the view, by virtue of its high-quality architecture adds interest to the composition. In the context of the existing background setting of this listed building, the partial visibility of the proposed development is not considered to harm the setting and significance of the listed building or the ability to appreciate it. Officers have used 3D modelling digital techniques to assess the impact of the scheme on significant designated heritage assets including former Billingsgate Market and the proposals have been subjected to a robust and thorough assessment.

Adelaide House, King William Street (Grade II)

235. Adelaide House, built by Sir John Burnet and Tail in 1924-5 is a large, steel framed office building of 11 storeys, faced in Portland Stone and granite, with archaic Greek and Egyptian style decorative motifs. Its significance lies in its high architectural quality, historic interest as an art deco office building and its setting on the north east side of London Bridge and the River Thames.

236. The GLA have stated that the proposed building would affect the silhouette of Adelaide House and consider that the level of harm would be less than substantial.

237. Views 18, 19 and 20 of the HTVIA illustrate the visual impact of the proposal on the listed building. Within these views the eastern cluster provides a backdrop to and above the Grade II listed Adelaide House, with 20 Fenchurch Street dominating the foreground views and The Leadenhall Building, 22 Bishopsgate and Tower 42 appearing prominently behind. In the cumulative views, 55 Gracechurch Street, with a recent resolution to grant consent would block the view of the proposed building almost entirely.

238. The tall buildings of the Eastern Cluster do not detract from the ability to appreciate its significance. The proposal would not adversely affect the silhouette of the listed building.

239. The proposed development would add a high-quality element to the wider northern setting which features a variety of old and new buildings

of varying scale. The stepped form of the tripartite tower would be partially visible. The proposal would enhance the northern setting in terms of the collection of tall buildings which make up the City Cluster. The addition of the proposal would maintain the character of the backdrop and would not harm the setting or significance of the listed building. The proposal would not affect the contribution the setting makes to the significance of Adelaide House.

Cannon Street Station Towers (Grade II)

240. The pair of towers at Cannon Street Station, at Cousin Lane and Allhallow's Lane, were built 1865-6 possibly by E M Barry and used to mark the junction of the train shed with the bridge. The brick towers feature open arched upper parts, square domed roofs with squat lanterns and spire. Their significance lies in their townscape landmark presence in river views, their architectural quality and functional association.

241. The setting of the towers is characterised by a mix of building styles, heights and periods as well as the tall buildings of the City Cluster in the wider backdrop. The change in scale as a result of the proposal would not change the character of the backdrop setting. The high-quality architectural appearance of the proposed development would not detract from the setting of the listed towers. The significance of the listed towers would not be affected by the proposals.

Former Port of London Authority Building, 10 Trinity Square (Grade II*)

242. Built 1912 – 22 by Sir Edwin Cooper, this monumental Portland stone landmark building in the Greek classical style features a richly embellished tower. Its setting includes a broad range of buildings in terms of period, style, height and materiality. It forms part of the setting of the Tower of London and is a clearly identifiable landmark feature in river prospect views. Its significance lies in its architecture and historic Port of London civic function, and to a lesser degree its setting including the Tower of London.

243. The GLA consider the proposal to result in less than substantial harm to the setting and significance of the listed building by encroaching on the open sky above the former Port of London Authority Building.

244. In Views 7, 10D and 13 of the HTVIA, the proposed development does not appear above the listed building, but above Minster Court which currently forms a backdrop to the listed building on the left side. The proposed development would not impinge on the skyline of the tower of this listed building. Its robust architectural form and contrasting materiality when compared to the Cluster buildings would remain a prominent element in these views. There would be no harm to the

significance of this listed building, or the ability to appreciate its significance, as result of the proposed development.

245. The proposed development would appear in the north western backdrop of the listed building and would nestle close to 20 Fenchurch Street. The City Cluster and contrast in the scale and form is part of the setting. The change presented by the addition of the building would not detract from the quality of the setting or its contribution to the significance of the former Port of London Building. The distinctive landmark tower of the listed former Port of London building would remain easily identifiable and appreciable on the skyline. As such the proposals would not result in harm to its setting or significance.

Church of St Mary Le Bow, Cheapside (Grade I)

246. The large red brick and Portland stone church was built by Wren in 1670-83. Its square tower and steeple are one of Wren's best and an important landmark feature seen from some distance away. Its significance lies in its outstanding architectural quality and historic interest as one of Wren's finest City Churches, its historic 12th century crypt and its ecclesiastical use.

247. In the view looking east along Cheapside from the junction of Wood Street, towards the proposed development, the square tower and spire of St Mary Le Bow appears as a very prominent feature, rising above the prevailing context and seen against a backdrop of sky. The foreground and the distant backdrop feature large modern buildings. The proposed development would sit behind 20 Gracechurch Street and 20 Fenchurch Street in this view. It would appear below the level of the street clock on the church tower and would not intrude into the silhouette of the tower seen against the sky. The tapering form stepped three elements and rounded corners of the proposal would result in an elegant and softer form in the far distance backdrop. The small change to the setting would not result in harm to the setting of the listed building or the significance of the listed building.

Church of St Mary Woolnoth, Junction of Lombard Street and King William Street (Grade I)

248. The distinctive English Baroque Church of St Mary Woolnoth, built 1716-1727 by Nicholas Hawksmoor, is the parish church of the Lord Mayor of London. The Portland stone principal west front comprises an original composition of double height rustication with Tuscan columns and a tower of twin turrets, crowned by coupled lanterns. It is of very high architectural, historic, artistic and archaeological significance. The unique work of English Baroque architecture is an arresting landmark at the centre of the City of London.

249. Its prominent siting at the junction between King William Street and Lombard Street from the heart of the City at Bank Junction, set amongst a panorama of fine classical commercial, civic and in this case, religious, monuments from all eras. This makes a medium contribution to the significance of the Church.

250. GLA officers are of the view that the cumulative visual impact of the proposed building would cause less than substantial harm to the setting of Grade I listed church of St Mary Woolnoth.

251. The proposal will appear in the backdrop of the Church in views from the west, in particular in views along Lombard Street. The foreground of Portland Stone classical buildings backdropped by the baseline and cumulative Cluster of tall buildings behind creating a theatrical contrast in scale and character between the old and new City. The Church in part is backdropped by 20 Fenchurch Street and the proposal would form part of that backdrop, adding visual balance and softening the impact through its curved corners, tapering form and materiality. It is a kinetic and transient relationship and from the junction of Lombard Street and King William Street the Church is the pre-eminent foreground monument with a skyline presence. Given the transient nature of the impact, at a point when the view is most complex and varied with an established backdrop of the Cluster, it is considered that the magnitude of impact would be minor and that no harm to the significance or setting of the church would arise, especially given the significant distance of the proposal to the east. The Church would still have a sky-backed skyline presence in important local views, and it would remain a prominent City landmark and skyline feature.

Church of St Edmund the King, Lombard Street (Grade I)

252. The Built in 1670 by Wren, it features a distinctive tower with an octagonal lead covered lantern and concave spire. It is of very high architectural, historic, artistic and archaeological significance. Its setting features the classical Portland stone and brick historic buildings to the west and the rising new towers of the City Cluster as its backdrop to the east, providing a dynamic and dramatic contrast in scale to the setting that is characteristic of the City.

253. The church is the focus of the view along Lombard Street and is seen against the backdrop of 20 Fenchurch Street. GLA officers are of the view that the cumulative visual impact of the proposed building would cause less than substantial harm to the setting of Grade I listed church of St Edmund. As part of the kinetic experience of moving eastwards down Lombard Street, the proposed development moves into its background. As the viewer moves further forward, the existing no.20 Gracechurch Street would move into the listed building's background.

This overlaying of historic and contemporary buildings and changing backdrops within the dense townscape of the City, add richness while emphasising the historic qualities of the townscape through counterpoint. This would not detract from the significance of the Church or its neighbouring listed buildings, and the distinction between the historic and contemporary buildings would remain clearly discernible.

254. The proposed building would balance the backdrop setting of the Church of St Edmund the King, by framing the spire and reducing the lopsided impact of 20 Fenchurch Street in this view. The solidity of the materiality and softness of the curved corners would form an appropriate backdrop and the impact of the change would be minor and not harmful to setting or significance.

1 Cornhill (Grade II)

255. A grand Classical building of rusticated Portland stone with an iconic rounded corner supporting dome, built in 1905. Its significance lies in its high architectural quality and landmark presence in views looking east from Bank Junction and Cheapside. It is situated at the junction of Cornhill and Lombard Street and the surrounding heritage buildings of distinction make up its immediate setting and contribute to its significance. The wider setting is characterised by the visibility of tall, modern buildings which is part of its character and does not detract from the significance of the listed building.

256. GLA officers consider further analysis of the development's contribution to the setting of 1 Cornhill in views from Poultry (looking east) should be undertaken to establish how the development impacts on the ability to appreciate the asset's significance. The City have carried out a thorough analysis of the impact of the proposals on views, including from Poultry, via the use of 3D modelling and digital technology to enhance the assessment of the scheme. In the view from Poultry, looking towards the curved corner formed by no.1 Cornhill the proposed development would appear in the background to the right and away from its dome. The significance of the listed building and the ability to appreciate it are unaffected. As noted above the applicant has provided this information to the GLA and it forms part of the background papers to this report.

257. The introduction of the proposed development in the wider setting would not affect the significance of the listed building. The proposed development would largely hidden in views from Bank Junction. In views from Cheapside the proposed building would sit behind 20 Gracechurch Street and to the right of 1 Cornhill. There would be no effect on the significance of the listed building and no harm to the setting.

Other Listed Buildings

258. The impact of the proposals on the settings of the other listed buildings and their significance, identified in the THVIA have been fully assessed and taken into consideration. These include the City Churches of St Peter, St Magnus the Martyr, St Margaret Pattens and St Michael Cornhill. The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to the relative distance of the proposal where it would not appear unduly prominent, would not impact on the roofscape silhouette of the listed buildings, the presence of other tall buildings that characterise the existing settings and existing built fabric blocking the view of the proposed development in the backdrop. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings.

259. The proposals would not harm the settings of any listed buildings or adversely impact on the contribution that the setting makes to the significance of the listed building.

**Conservation Areas**

Bank Conservation Area

260. The boundary of the Bank Conservation Area lies on the west side of Gracechurch Street, diagonally to the south west and the north west of the application site, but not directly opposite. The proposal will be visible from a number of vantage points within the Bank Conservation Area including along Lombard Street.

261. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. It's most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate/Gracechurch Streets, mitigated, in their own way, through the modelling and detail of the lower storeys of the existing and consented towers. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east and strong juxtapositions between old and new.

262. The majority of the Bank Conservation Area comprises a dense, tight-knit urban grain with strong streets enclosures, an essential character trait, which would remain undiluted. It is only in a few more open vistas would the proposal be appreciated.

263. The GLA state that the development would introduce a notably taller building which would have a significant visual impact on the immediate setting of the conservation area at the eastern boundary, particularly in View 31 of the HTVIA along Lombard Street.

264. The proposal will be visible in some views as part of the distant backdrop as a fleeting, transient element alongside 20 Fenchurch Street. The impact is not considered harmful and is not an unusual relationship in the Conservation Area, with fleeting views of the City cluster with the dynamic contrast of the historical City in the foreground and new City exemplified as the cluster of towers as a distant backdrop.

265. In those views north and south along Bishopsgate/Gracechurch Street, the proposal would read part of the cumulative Cluster of tall buildings. By reason of its complementary materials, and solid, robust and modelled masonry base there would be a positive dialogue with the scale and proportions of the Conservation Area opposite. The proposal would form part of that prevailing contrast in scale on the eastern border of the Conservation Area.

266. View no 29 identified in the Bank Conservation Area Character Summary and Management Strategy SPD looks north along the boundary of the Bank Conservation Area on Gracechurch Street. The existing view features tall buildings in the backdrop setting to the north on Bishopsgate. The proposed development would appear on the right in this view, with the vertical greening to the recesses evident and forming a striking feature. The proposals would not harm the setting of the Bank Conservation Area in this view.

267. Overall, the proposal would result in some minor change to the setting of the Conservation Area, but not in a manner which would undermine that significance, which would be preserved.

Tower Conservation Area

268. The Tower Conservation Area lies within the defined Local Setting of the Tower of London, within the London Borough of Tower Hamlets. The Tower Conservation Area is tightly drawn around the Tower, its Liberties, the Royal Mint Site and eastwards to include the area around St Katherine's Dock.

269. The Conservation Area was first designated in March 1977 and the Character Appraisal published in March 2008 describes it as "one of the largest and most significant Conservation Areas in the Borough". It comprises of a complex pattern of overlapping developments over two thousand years. The Tower of London itself is by far the most significant site in the conservation area, due to its symbolic, historic and architectural value and is designated as a World Heritage Site of Outstanding Universal Value. The White Tower remains the focal point of the western part of the Conservation Area. The eastern part of the Conservation Area around St. Katharine's Dock has undergone

significant changes since the closure of the docks and the character of buildings and spaces are more varied.

270. The history of this Conservation Area dates back to the foundation of the Roman city in around 50AD. The alignment of the Roman Walls fixed the position of the Tower a thousand years later. William the Conqueror began construction of the Tower of London after his invasion in 1066 and used surviving parts of the south-eastern corner of the City Wall to form the southern and eastern defences to a new fortress at the corner of the city.

271. The Character Appraisal describes the Tower of London on page 8: The architectural and urban character of the Tower today was shaped by its original purpose as a fortress. The White Tower is the most significant and memorable element of the fortress, visible from behind the lower defensive stone walls. It is significant as one of the oldest pieces of architecture in the City and as an innovative example of Norman design. It also has immense symbolic value as an internationally recognized icon of London.

272. Although it is no longer the largest building on the London skyline, from most angles it retains a sense of detachment from the city. This is due to its location within the low defensive walls, the large open spaces surrounding the tower and most importantly the clear silhouette of the White Tower against the sky. Views of the Tower are protected in the London Plan and the detailed guidance on how the policies are to be managed is to be found in The London View Management Framework.

273. The White Tower's sense of detachment from the rest of the city, its aloofness and its inaccessibility are essential aspects of its visual character and evidence of its historic purpose. They make a critical contribution to its architectural and historic value, but they are also vulnerable to damage from development elsewhere in London, including tall buildings well outside the Conservation Area.

274. The Tower Conservation Area is surrounded by a mix of modern developments of varying size, form and period. The western backdrop setting of the Tower Conservation Area is characterised by the tall buildings of the Eastern Cluster and the dramatic contrast in scale, form and period of buildings.

275. The development would result in a minor change to the setting of the Tower Conservation Area as the development would be visible in westward views from within the conservation area over the outer curtain walls and moat area of the Tower of London (View 7 of the HTVIA). The GLA consider the proposal to cause additional cumulative harm to the setting and significance of the Conservation Area in this

view by encroaching on the open sky above the grade II listed former Port of London Authority building.

276. The proposal would be seen at some distance in the context of the other existing and consented tall buildings, including 55 Gracechurch Street, and nestled behind 20 Fenchurch Street. The proposal would not impinge on the silhouette of the tower of the former PLA listed building. In other views across the Conservation Area it would appear as a thin sliver and would have a negligible impact. The existing setting is characterised by the juxtaposition of historic buildings and the tall City cluster. The proposal is therefore considered to not result in cumulative harm to the setting and significance of the Tower Conservation Area. The setting and its significance and the significance of the Tower Conservation Area would not be harmed by the proposals.

277. The Conservation Area Management Guidance advises on page 22 that "Any new development in this area should respect the importance of the Tower and should follow the guidelines in the World Heritage Site Management Plan." The WHS Local Setting Study is key in this respect and these views have been assessed in detail and no harm was found. The proposal would not detract from the quality of the views and the ability to appreciate the Tower Conservation Area and the WHS and landmark listed buildings in the view. As such, the setting and significance of the Tower Conservation Area would be unharmed by the proposal.

Other Conservation Areas

278. Overall, the proposal would result in some minor change to the wider backdrop setting of other Conservation Areas, but not in a manner which would undermine that significance, which would be preserved. The tall buildings of the City Cluster and the dramatic change in scale is part of the characteristic backdrop to many conservation areas, which would be preserved and unharmed.

**Conclusion on Heritage**

279. The proposal would preserve the special architectural and historic interest/significance and setting of strategic, landmark designated heritage assets, including St Paul's Cathedral, Tower of London, Tower Bridge and Monument.

280. The proposal would not result in any harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the significance or setting of the listed buildings, Scheduled Monument and conservation area. The significance of the Tower of London and the

ability to appreciate its OUV would be unharmed by the slight change to its setting and the cumulative impact of the scheme.

281. It is considered that the high quality architecture of the new building, public realm enhancements, greening, tree planting, new pedestrian route and elevated public viewing gallery would result in a minor enhancement to the setting of listed Leadenhall Market and its contribution to the significance of the listed building.

282. The immediate setting to the listed Ship Tavern on Lime Street and 7-8 Philpot Lane would both be enhanced by the public realm enhancements. The proposals would not harm the setting or significance of other listed buildings in the vicinity identified in the HTVIA.

283. The character and appearance of the Leadenhall Conservation Area and Eastcheap Conservation Area would be preserved and enhanced by virtue of the tree planting and public realm enhancements to Lime Street and Philpot Lane. The setting of these conservation areas and the settings contribution to the significance of the Leadenhall, Eastcheap and Bank Conservation Areas would not be adversely affected by the proposals. The dramatic contrast in height and scale of building is a feature of the setting of these conservation areas on the boundary of the City Cluster and is considered acceptable and not harmful to significance.

284. It would not harm the setting of any designated and non-designated heritage assets and would not detract from LVMF, townscape, riverscape, skyline, protected views and views into and out of the surrounding conservation areas.

285. The proposal includes a number of public benefits which in turn would benefit the settings of designated heritage assets, including new pedestrian routes, public realm enhancements, greening and elevated public viewing gallery, affording new views of the City's heritage.

286. 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, and the development would provide a visually positive contribution to the character of this part of the City.

**Archaeology**

287. The site is in an area of important archaeological potential at the centre of the Roman City and overlying remains of the first Roman Forum, the second Forum which replaced it, and the adjacent street network which are of high significance. There is also potential for pre-historic and

medieval remains to survive. An Historic Environment Assessment has been submitted with the application.

288. Archaeological excavation has been carried out on the site prior to construction of the existing and earlier buildings on the site. There are areas of important Roman remains of the early development of the Roman City and Fora surviving on the west, south and east perimeters, outside the basement area. The existing building was designed to minimise archaeological disturbance and protect remains around the perimeter of the site.

289. The proposed development includes four basement levels within the existing basement footprint, reuse of some of the existing piles, new pile capping beams, additional foundations on the west and south-east sides of the site and a small extension to the south east area of the basement. The additional foundations and extended basement would have an archaeological impact.

290. One new pile is proposed on the western perimeter of the site. It would partly be located over an existing low-level tunnel, which was constructed in the 1960's, to minimise archaeological disturbance. Remains of the first and second Fora and pre-Forum deposits would be affected where they survive outside the area of tunnel construction. Pile capping beams are proposed, and these would not have an archaeological impact.

291. In the south east corner, the basement would be extended, a new piled wall installed and slab for the lower ground mezzanine floor. This area has been partially excavated and would have an impact on remains of the Roman Fora and foundations of St Dionis Backchurch which may survive here. There are remains of the Roman Forum conserved in this area and these would not be affected by the new piling.

292. The scheme includes new landscaping and tree planting. Excavation for the tree pits may have an impact on post medieval and late medieval remains and structures surviving in this area.

293. The proposals are acceptable subject to conditions to cover details of a programme of archaeological work and foundation design.

**Public Access and Inclusivity**

294. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy 7.2 of the London Plan and policy D5 of the draft Publication London Plan.

295. The principles of inclusive design have been incorporated into the proposals. The ground floor of the development is highly permeable, with a number of entrances and new routes through the site which would be open 24 hours a day. As part of the proposed Section 278 works the stepped entrance to Leadenhall Market from Ship Tavern Passage would be made an accessible route, and therefore enhancing this route and the entrance to Leadenhall Market. All accommodation and facilities are served by accessible lifts; two public lifts from ground floor serve the public viewing terrace. Accessible WCs are provided throughout the building, including on levels 29 and 30 of the public viewing gallery. A Changing Places facility has been provided on the lower ground floor mezzanine. Accessible cycle parking facilities are included. While the development is car free, there is one accessible blue badge space located in the under-croft area to the east of the side, accessed via Lima Street.

296. The development is considered to comply with the relevant policies of the Development Plan and draft plans outlined above.

**Cultural Strategy**

297. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Vision has been submitted in accordance with draft City Plan 2036 Strategic Policy S6.

298. The Cultural Vision outlines its strategy for the development based on utilising different parts of the proposed development and highlights the following objectives:

- To provide multifunctional space in the undercroft at ground floor, suitable for a range of pop up uses such as exhibitions, performances, experiential retail events and markets;
- To provide a new high quality and generously proportioned passageway through the site from Fenchurch Street to Ship Tavern Passage, improving access to Leadenhall Market and generally contributing to the network of exciting and engaging pedestrianised routes in the City. There are opportunities to consider the implementation of art installation within the passageway (e.g. poster displays) subject to agreement with the City of London and maintaining a clear footway width;
- To provide a public viewing gallery at the top of the building, contributing to the network of free to access elevated public spaces across the City for the use of the City residents, workers and visitors; and
- To provide opportunities for enrichment within the public viewing gallery, including supporting exhibitions and public events.

299. A Cultural Implementation Strategy would be secured in the S106 agreement to secure a year round Cultural Programme which would establish monitorable deliverables in curation of the spaces for education outreach, sharing of knowledge, cultural activities and events which would respond to the needs of the local area and be informed by a continuing dialogue with stakeholders, the local community and building users.

300. The policies referred to above are complied with.

**Transport, Servicing & Parking and Impact on Public Highways**

Cycling

301. The Draft Publication London Plan policy T5 requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

302. The Draft Publication London Plan requires 985 long stay cycle parking spaces. The applicant is proposing 1002 long stay cycle parking spaces; this exceeds the London Plan standards.

303. The long stay cycle parking, which is proposed to be located at Lower Ground Level, would be accessed via 2 cycle lifts accessed from Lime Street. There are also 2 goods lifts and a gullied stairwell to add capacity at peak times adjacent to the lifts proposed.

304. The London Plan requires 102 short stay cycle parking spaces. The applicant is proposing 28 short stay cycle parking spaces (which includes 3 cargo cycle spaces), which is below the London Plan standards.

305. The applicant is providing 17 additional long stay cycle parking spaces in lieu of short stay cycle parking spaces. Given the provision of 28 short stay cycle parking spaces (25% of the provision), and over provision of long stay cycle parking, the proposal is considered acceptable due to the constraints of the site. The shortfall in short stay cycle parking spaces would not give rise to any unacceptable impact on highway safety would not give rise to a severe residual cumulative impact on the road network.

306. 5% of the cycle parking spaces are accessible for adapted cycles and this will be secured by planning condition. the remainder of the long stay cycle parking will be made up of two-tier racks and folding cycle

lockers. The overall design and layout of the cycle parking will be secured by condition.

307. The proposals include 100 showers and 700 lockers to complement the cycle parking provision. The shower and locker provision is in line with the Publication London Plan and is acceptable.

308. A Cycling Promotion Plan will be secured by planning condition. This will include information and evidence of the built facilities, and all measures taken to increase the modal share of cycling to the development.

Vehicular Access

309. The development is car free (in that there is no private vehicle parking provision at the development), except for one blue badge parking space, which is in line with Local Plan 2015 Policy DM16.5 -1 and Draft City Plan 2036 policy VT3-1 and the Draft Publication London Plan.

310. TfL have requested a Parking Design and Management Plan (PDMP) should be secured by condition. This will include details on the proposed operation of the blue badge space.

Servicing and Deliveries

311. Policy DM16.5 of the Local Plan and draft City Plan 2036 Policy VT2 – 1 require developments to be designed to allow for on-site servicing. Policy VT2 – 2 requires major commercial development to provide for freight consolidation. Policy VT2 – 4 requires delivery to and servicing of new developments to take place outside peak hours (7am – 10am, 12pm – 2pm and 4pm – 7pm on weekdays) and requires justification where deliveries within peak hours are considered necessary. Publication London Plan policy T7 G requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

312. The servicing of the building would take place off-street via 2 innovative vehicle lifts accessed from Lime Street, that will form part of the public realm during the day. The access on Lime Street will be slightly realigned. The design will be agreed with City of London as part of the Section 278 process.

313. The vehicle lifts are a relatively new concept to the City of London, but the lifts have been successfully used elsewhere in the world. When not in use, the lids of the vehicle lifts would form part of the public realm blending in with the rest of the area and people will be able to walk over the lifts and use the public space. When the lifts are in use, the lid of

the lifts would raise up, to allow a vehicle to drive into the lift, the lift would then lower the vehicle into the basement.

314. The applicant has given evidence relating to the risk of vehicle lift failure, which is rare with their preferred manufacturer. Nevertheless, to reduce the risk of lift failure, the applicant has agreed to sign up to a lift maintenance strategy, and service level agreement to ensure failures are fixed in a timely fashion and do not impact negatively on the public highway.

315. Vehicles would be able to enter and exit the servicing lifts in forward gear.

316. The servicing area is at Level Basement 1, where 4 loading bays and storage spaces would accommodate vehicles up to 10m in size. It is proposed to have electric vehicle charging facilities within the basement servicing area.

317. If a vehicle arrives and the ingress lift is already in use, there is space for the vehicle to wait off street, until the lift is ready to use.

318. It is proposed the number of deliveries to the development per day is capped to 60 and this will be secured in the Section 106 agreement. This is a significant improvement on the current situation, currently there are approximately 113 daily delivery and servicing trips and 17 delivery and servicing trips in the peak hour. The proposed maximum number of deliveries per hour for the new development is 8.

319. Waste collection will take place in the same way as all other servicing vehicles and will be included in the daily cap of 60 vehicles.

320. The applicant has agreed to no servicing between 0700 and 2300. In the day, the area where the servicing lifts are located can be used as a public realm space, and this is considered a benefit of the scheme. When the lifts are in use the opening from Lime Street will be closed off, this will be between 2300 and 0700 and is considered acceptable.

321. The development will be required to produce a delivery and servicing plan (DSP), and this will be secured in the S106 agreement.

322. The applicant is proposing to use an off-site consolidation centre in order to reduce the number of deliveries to the development per day.

323. The applicant is also proposing to use cycle couriers as part of their servicing strategy, and this will form part of their submitted DSP.

Public Realm and HVM (hostile vehicle mitigation)

324. People will be able to walk north/south through the building from Fenchurch Street, providing relief to the footways surrounding the development and offering a new route.

325. The new pedestrian through route will be open to the public 24 hours per day and is step free, it will be permissive path land.

326. In respect of the service lifts area, there is a 1cm gap between the lift and the surrounding surface when the lifts are not in use; this gap is not considered a safety concern as it is a similar width to slot drains.

327. There may be market stalls or public furniture placed on the lids of the vehicle lifts when the lifts are not in use, to allow people to dwell.

328. The canopies around the building are at a height of 6m which is considered acceptable. The canopies will require Technical Approval and projection licences.

329. HVM may be required at the entrances to the public space on Lime Street, and at the ends of the pedestrian through route; the HVM will not be placed on public highway and a requirement to provide further details of this for approval have been secured by condition.

Public Transport

330. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B.

331. The site is located close to Cannon Street, Fenchurch Street and London Bridge National Rail Stations. The site is located close to Bank/Monument and Cannon Street underground stations. The site is close to several bus routes on Gracechurch Street and Fenchurch Street.

332. The submitted Transport Assessment indicates that the overall increase in trips across all modes would have a negligible impact on the surrounding highway and public transport network capacities.

Pedestrian Comfort

333. Transport for London's Pedestrian Comfort Guidance recommends a minimum comfort level of B+, and the aim in the City of London Transport Strategy is that all pavements will have a minimum Pedestrian Comfort Level of B+.

334. A thorough PCL assessment has been conducted for the development. As a result of the proposed development, which provides a new

pedestrian route through the development, the majority of locations will perform at a minimum PCL score level of B.

335. The table below shows the PCLs currently and as proposed.

| Location | Base | | Base 2027 (no diversion) | | Base 2027 (with diversion*) | |
|---|---|---|---|---|---|---|
| | AM | PM | AM | PM | AM | PM |
| Fenchurch Street north | B- | B | B | B- | B | B |
| Philpot Lane east | B+ | B+ | B | B | B | B |
| Philpot Lane west | F | F | B | C+ | B | C+ |
| Gracechurch Street east | C+ | C+ | B | B | B+ | B+ |
| Lime Street east | F | F | B+ | B+ | B+ | B+ |
| Lime Street west** | B+ | B | C+ | C+ | B- | C+ |
| Rood Lane east | A+ | A+ | A+ | A+ | A+ | A+ |

**Assumes a conservatively predicted 10% of people may divert through the new pedestrian route*

***Assumes no diversion of pedestrians flows through the site corner*

336. From the table above you can see that the proposed PM PCLs on Lime Street west drops from a B to a C+ and the AM PCLs on Lime Street west drops from B+ to B-. The reconfiguration of the Lime Street footways will narrow the western footway slightly (to allow the eastern footway to widen to an accessible width). This means the PCLs on Lime Street (west) will worsen. This worsening on the west side of Lime Street is considered acceptable because it allows the eastern footway on Lime Street to increase from a PCL score of F to B+.

337. The applicant was asked to investigate amending the footway at the corner of Gracechurch Street and Fenchurch Street to improve the PCL in this location, which is affected by the existence of a cluster of post,

signal box and traffic lights. However, this was not deemed possible due to the radius needed for large vehicles to turn left from Gracechurch Street to Fenchurch Street. Nevertheless, the PCL table above shows the PCL scores are acceptable on Gracechurch Street.

338. Should footway widening be proposed on the north side of Fenchurch Street as part of the Section 278 agreement, the PCL scores will improve on Fenchurch Street.

339. The development proposes a new pedestrian route through, realignment of Lime Street and Philpot Lane to enhance the footways and setting the building lines back in a number of locations to widen the footways.

340. Overall the PCL scores are predicted to generally improve from the existing levels to be in line with our Transport Strategy.

341. The existing trips to the development in the AM and PM peaks are 351 and 340 respectively. The proposed trips to the development in the AM and PM peaks are 1107 and 1080 respectively. These figures are considered acceptable due to the improvements in PCLs, the provision of a new through route for people walking, and the Section 278 Agreement scope.

Construction

342. TfL have objected to the location of a pit lane on Gracechurch Street. This would mean that all construction activities would have to take place on Fenchurch Street, and this could add up to 30% additional time to the programme. However, TfL have agreed that they will engage collaboratively and positively when a contractor is appointed. Therefore, it is recommended a Construction Logistics Plan is secured by condition, for approval by the City in consultation with TfL.

Section 278 Agreements

343. A Section 278 agreement will be secured by the City of London and by Transport for London (TfL) or appropriate legal agreement.

344. TfL have requested a J15k contribution towards a Cycle Route Quality Criteria study specified for the cycling link from the site to Cycle Superhighway 3 (CS3), and J135k to deliver cycling improvements identified by the study, and/or wider cycling improvements in the City of London.

345. The City of London Section 278 agreement will comprise, but is not limited to, works to the footways on Fenchurch Street, footway improvements on Philpot Lane, footway improvements and the

feasibility study of the extension of the timed closure on Lime Street, the removal of the 2no. existing steps on the public highway on Ship Tavern Passage, to create a step free route.

346. The Section 278 agreement will also include the realignment of the crossover to access the servicing lifts. This realignment will mean the current public cycle parking stands will need to be relocated, they are proposed to be relocated onto the widened eastern footway on Lime Street – the locations will be agreed in the detailed design with the City of London.

347. The Section 278 works will be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision, including the potential for footway widening and greening. This would be secured through the Section 106 agreement.

Stopping Up

348. There is no stopping up of highway required.

**Environmental Impact of Proposals on Surrounding Area**

349. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

**Wind Microclimate**

350. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

351. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being

5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

352. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.

353. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, of if there is negligible or beneficial effect, wind mitigation is not required.

354. Assessments have been carried out for both the windiest season and the summer season.

355. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

Wind conditions at street level

356. In the existing baseline conditions the wind tunnel tests and CFD show that conditions around the site are suitable for their intended use, primarily occasional sitting or standing. Further to the east around 20 Fenchurch Street where the conditions are windier, there is one location on the southeast corner of 20 Fenchurch Street which is categorised as uncomfortable in the windiest season.

357. Early testing of the effects of the development on wind microclimate led to the incorporation of a number of features into the design of the building and landscaping. These include:

- Architecturally: An opening and undercut at ground floor to the south-eastern corner of the proposed development and the installation of a porous screen at the southern end of the passageway.
- Landscaping: rooftop landscaping including 3m high deciduous and evergreen trees, shrubs, planting of 3m high trees at podium level and shrubs.
- Wider public realm enhancement works: two 5m high deciduous trees along the eastern side of Rood Lane and five 5m high

evergreen trees located to the east on Lime Street with shrub planting.

358. In considering the completed development, in most locations the wind conditions would remain either in the same categories as existing or become windier but would continue to fall within a category suitable for the intended use.

359. A study has been undertaken to show the percentage change and degree level of change from one category to another. Tall buildings will generally increase the windiness of conditions around them, the existing site is quite calm as would be expected for a low-rise building, however 20 Fenchurch Street creates considerable windiness around it in the existing scenario. As the existing site contains a low-rise building, some locations see a considerable increase in wind conditions, but maintain acceptable conditions for the intended pedestrian activities. However, the entrance of 20 Fenchurch Street sees improved conditions.

360. With the proposed mitigation measures in place, all locations at street level would experience wind conditions appropriate to the intended use and there would not be any safety exceedances resulting in unsafe conditions.

361. In testing the proposed development and cumulative schemes within 400m of the site, with proposed mitigation measures in place, there would be no material change in wind conditions from the scenario of the proposed development with existing buildings. In addition, the redevelopment of 55 Gracechurch Street, which the committee recently resolved to grant permission for (Application number 20/00641/FULEIA) has been included as an additional separate cumulative scheme for assessment; as above the results show there is no material change from the scenario of the proposed development with existing buildings.

362. As part of the wind mitigation proposals, the installation of a porous screen would be installed within the new route through the site. The screen is required in order to satisfy the conditions in and around the area, without this the wind levels would be unacceptable. A condition is proposed to secure the design of this screen and its integration with the legible London wayfinding signs.

363. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level, and so no additional mitigation above that proposed is required.

364. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the ES.

365. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with Local Plan Policy 7.6, draft Publication London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

**Daylight, Sunlight, Overshadowing**

366. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces is included in the environmental statement, supplemented by an Addendum dated 13th January 2021. Chapter 11 of the environmental statement identifies the methodology employed. When referring to the degree of adverse impact in this report (negligible, minor, moderate etc..) in this report, officers have adopted the terminology used in the environmental statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2011) are used as guidance to inform the assessment in the environmental statement. Policies 7.6 and 7.7 of the London Plan, policy DM10.7 of the Local Plan and policy DE8 of the draft City Plan set out the policy approach. Policy D6(D) of the draft Publication London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space. The policy set out in Policy DM10.7 of the Local Plan is to resist development which would reduce noticeably the daylight and sunlight available to nearby residential dwellings and open spaces to unacceptable levels. The Local plan states that the City Corporation will apply the methods in the BRE guidelines consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. The approach indicated by planning policy, in particular London Plan policy 7.6B is that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. In applying London Plan policy 7.6B the BRE Guidelines can be used when assessing whether harm is

likely to occur, and further judgement made as to whether any such harm is unacceptable. Both the London Plan and Local Plan policies require a judgement to be made as to whether any harm is unacceptable and whether any reduction results in unacceptable levels of daylight and/or sunlight. The draft City Plan policy DE8 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context. The residential buildings and open spaces to be considered include those at 2-4 Bulls Head Passage, 4 Brabant Court, 9B Eastcheap, Jamaica Buildings, ancillary residential at The Ship Public House and The Grapes Public House. Impact on eight public amenity spaces is also to be considered.

367. The impact on four nearby churches were also assessed in the environmental statement, 3 experiencing no impact and one, St Edmund the King Church, experiencing minor adverse impact (as a result of failing to meet the No sky line criterion in one of seven rooms).

368. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. The dense urban environment of the City, in particular in and around the cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, the proposed development provides a degree of separation such that it would not have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of

their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

Daylight

369. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC of the NSL guidelines are not met.

370. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

371. Of the buildings with residential accommodation assessed, The Ship PH, The Grapes PH and Jamaica Buildings were assessed as experiencing a negligible effect within the BRE Guidelines. The impact on the remaining three buildings is outlined below.

2-4 Bulls Head Passage

372. A total of 16 windows serving 9 rooms were assessed for daylight. For VSC, 8 would meet BRE criteria and 8 would see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more.

373. Of the 8 affected windows, 7 would experience alterations between 20-29.9% which is considered Minor Adverse and 1 would experience an alteration of 33.7% which is considered Moderate Adverse. All 8 windows have low baseline values, ranging from approximately 5-10% VSC and therefore the percentage alteration is disproportionate to what the occupant would experience. 3 of these windows serve bedrooms which are less sensitive to daylight alterations as outlined in the BRE Guidelines.

374. For NSL, 2 of the 9 rooms would experience alterations between 20-29.9% which is considered Minor Adverse. One room is a bedroom and both rooms have very low baseline values of approximately 10-15% NSL and therefore the losses are unlikely to be noticeable to the occupants.

375. Overall, owing to the low VSL and NSL baseline values of this property, it is considered that the daylight overall effect is Minor Adverse.

4 Brabant Court

376. A total of 15 windows serving eight rooms were assessed for daylight. For VSC all 15 windows see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more.

377. Of the 15 affected windows, 4 would experience an alteration in VSC between 20-29.9% which is considered Minor Adverse effect.

378. The remaining 11 windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect.

379. All the affected windows have existing levels well below the 27% VSC recommended by in BRE Guidelines, ranging from 4.2-10.5% VSC, whereby any alteration could result in a disproportionate percentage change.

380. For NSL, seven of the eight rooms assessed would meet the criteria set out in BRE Guidelines. The one affected room would experience an alteration in NSL of 27.1% which is considered Minor Adverse effect. The room is on the ground floor, facing into a narrow alleyway with an existing NSL value of 27.5%, which is below the 80% recommended in BRE Guidelines and therefore a loss of sky visibility is unlikely to be noticeable to the occupant.

381. Overall, owing to the low existing VSC levels and high level of NSL compliance, the daylight effect to this property is considered Minor Adverse.

9B Eastcheap

382. 9B Eastcheap, located to the south of the site has planning permission to be used as residential and or short term lets. (Planning permission dated 04.02.2000 application number: 4280Y). It appears that at the present time the building is in use as short-term lets although the use can revert to permanent residential without the need to apply for planning permission. Short-term lets can be less sensitive to daylight and pollution effects owing to the temporary and transient occupancy.

383. The submitted assessment concludes that overall the residential units at 9B Eastcheap would experience Minor Adverse effect.

384. A total of 23 windows serving 19 rooms were assessed for daylight within this building.

385. For VSC, 11 of the 23 windows assessed would meet BRE's criteria and are therefore considered to experience Negligible effect.

386. Of the 12 remaining windows, two would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect whilst 10 would experience an alteration between 20-29.9% which is considered a Minor Adverse effect.

387. 3 of the impacted windows serve bedrooms which BRE Guidelines note are less sensitive to daylight alteration as their primary purpose is for sleeping. 6 windows serve living-room diners which are more reliant on good daylight.

388. Of these 6 windows, 5 have existing low levels of VSC (between 2-9%) and therefore any reduction in absolute VSC values has a disproportionality high percentage reduction and is disproportionate to what the occupant is likely to experience. The remaining window has a higher baseline value of approximately 14% and would experience a minor adverse alteration.

389. For NSL, 12 of the 19 rooms assessed would meet BRE's criteria and are therefore considered to experience Negligible effect.

390. Of the 7 remaining rooms, one would experience an alteration in NSL between 40-49.9% which is considered a Major Adverse effect and one would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect.

391. All 7 of these rooms are bedrooms which BRE Guidelines note are less sensitive to alterations in daylight.

392. The assessment considers that given the existing low level of daylighting to rooms, together with affected rooms being bedrooms, the impact on the property as a whole would be Minor Adverse.

Sunlight

393. The sunlight assessment shows three of the sensitive residential receptors would experience a change in Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (Winter PSH). The impact on the three properties is outlined below.

2-4 Bulls Head Passage

394. A total of 9 rooms were assessed for sunlight within this building, of which 5 would meet the BRE Criteria for APSH and Winter PSH.

395. 4 rooms would see reductions in APSH from 20-29.9% which is considered Minor Adverse. Each of the rooms would retain between 16-18% APSH, which is considered good within a city centre location.

396. No reductions in Winter PSH would occur. The overall effect to sunlight at this property is considered Negligible.

The Grapes PH

397. A total of 4 rooms were assessed for impact on sunlight within this building, of which 1 would meet the BRE Guidelines. The residential unit is ancillary accommodation to the PH.

398. For APSH, three of the four rooms assessed would meet the BRE Guidelines and are considered to experience a Negligible effect. The remaining room sees a loss of 24% which is considered a Minor Adverse effect. However, this room would retain 19% APSH and is not affected in relation to sunlight during winter.

399. For Winter PSH, two of the four rooms assessed would meet the BRE Guidelines. Of the two rooms affected in the winder, one would experience an alteration in Winter PSH between 20-29.9% which is considered a Minor Adverse effect whilst one would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. Both rooms affected during winter have existing values below the 5% recommended in BRE Guidelines and therefore the percentage alteration is disproportionate to what the occupant is likely to experience. Additionally, both of these rooms would retain APSH levels in excess of 30% which is very good within an urban location.

400. Overall, the majority of windows comply with BRE Guidelines for APSH, with the one affected window retaining very good levels of APSH. The two windows affected for Winer PSH have low existing values whereby a percentage change is disproportionate. Therefore, the sunlight effect to this property is considered Minor Adverse.

The Swan PH

401. A total of 5 rooms were assessed within this building, of which 4 would meet the BRE Guidelines for both Annual and Winter PSH. The residential unit is ancillary accommodation to the PH.

402. For Annual PSH, all five rooms assessed would meet the BRE Guidelines and it is therefore considered to experience Negligible effect.

403. The room which is adversely affected is served by one window has a very low existing APSH level of 5%, well below the 25% recommended

in BRE Guidelines and therefore, despite the high percentage alteration, given the low existing APSH level, the loss is disproportionate to what would be perceptible to the occupant.

404. For Winter PSH, all rooms assessed would meet the BRE Guidelines and are considered to experience a Negligible effect.

405. Overall, given the very low existing APSH where a loss would be experienced, the effect to this property is considered Negligible.

Cumulative Impact

406. For daylight in the cumulative scenario, the following 10 properties were assessed: 4 Brabant Court, 9B Eastcheap, The Ship PH, The Grapes PH, Jamaica Buildings, St Michael Cornhill Church, St Edmund The King Church, St Clements Church, St Margaret Pattens Church and the Swan Tavern. Only 9B Eastcheap is considered to experience a Moderate Adverse cumulative effect. It should be noted that only bedrooms to the rear of the property are affected, which are considered less important in relation to alterations in daylight.

407. For sunlight, of the 8 properties assessed, The Grapes PH and Jamaica Buildings are considered to experience Moderate Adverse cumulative effects.

408. Overall the impact on sunlight and daylight to surrounding residential at 2-4 Bulls Head Passage, 4 Brabant Court and 9B Eastcheap would be Minor Adverse. It is not considered that the proposal would result in unacceptable harm to the amenity of surrounding land and buildings and will not reduce noticeably the daylight and sunlight available to nearby dwellings to unacceptable levels. The daylight and sunlight available will be sufficient and appropriate to context and provide acceptable living conditions. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with London Plan policy 7.6B, draft Publication London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

Overshadowing of amenity areas

409. BRE Guidelines recommend that for an external space to appear well lit, at least 50% of the area should receive at least 2 hours of sunlight on March 21st. If as a result of development an amenity area does not meet the above and the area which receives two hours of direct sunlight is reduced to less than 0.8 times its former value (i.e. more than 20% reduction) then the loss of sunlight is likely to be noticeable.

Public Open spaces:

410. The potential overshadowing impacts of the proposed development has been assessed on 8 surrounding public amenity areas:

- St Michaels Cornhill Gardens;
- St Peter-upon-Cornhill Church Garden;
- Leadenhall Market;
- St Helen's Bishopsgate Churchyard;
- Bevis St Marks Synagogue Courtyard;
- Sir John Cass's Foundation Primary School Playground;
- Aldgate Square; and
- Jubilee Gardens.

411. In assessing transient overshadowing, on 21st March, shadow is cast from the proposed development from 08:00GMT, which moves in a clockwise direction throughout the day. Between 13:00GMT and 16:00GMT the roof of Leadenhall Market is partially overshadowed by shadow cast from the proposed development. The remaining amenity areas are unaffected by shadow cast from the proposed development.

412. In assessing sun hours on the ground, all the amenity areas assessed would see no alteration from the percentage of total area which sees at least two hours of direct sunlight on March 21st, when comparing the baseline scenario with the proposed development scenario. Therefore, in accordance with the BRE Guidelines, each amenity is considered to experience no effect as a result of shadow cast from the proposed development.

413. When considering overshadowing arising as a result of cumulative impact the effect on 21st March is negligible. Except for shadow cast on the roof of Leadenhall Market, the amenity areas are unaffected on 21st June. None of the amenity areas will be affected on 21st December.

414. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area and therefore the impact would not cause unacceptable harm to the open amenity areas and complies with policies 7.6 and 7.7 of the London Plan, policy D6 of the draft Publication London Plan, DM10.7 of the Local Plan and DE8 of the emerging City Plan.

Solar Glare

415. 66 locations have been identified in the ES as sensitive to solar glare within 1 km of the site. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions, pedestrian crossings and railway lines at these locations.

416. The assessment concludes that the development would have no effect or a negligible effect on 44 of the locations. Of the remaining 22 locations there is a negligible effect on 5 locations. At the remaining 17 locations, based on a combination of criteria including angle of the solar reflection in relation to the road users' line of sight, the ability to deploy a visor in all cases other than the lowest angle reflections, the duration of the solar glare and the existence of alternative traffic signals at junctions enabling the road user to use different options, the effects of solar glare are assessed be being 'minor adverse'. The assessment in the environmental assessment concludes that no additional measures are required to mitigate the impact of solar glare. Officers consider that further consideration should be given to the issue of mitigation should planning permission be granted.

417. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of any mitigation measures (if considered necessary). The development would comply with the London Plan, policy D9 of the draft Publication London Plan, Local Plan policy DM10.1 and draft City Plan 2036 policy DE8 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Pollution

418. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

419. Potential light pollution impacts arising from the proposed development have been assessed in relation to 10 buildings which have been identified as sensitive to the impacts of light pollution in accordance with Institute of Lighting Practitioners (ILP) Guidance.

420. The assessment shows that pre-curfew (before 11pm), the levels of light pollution would be limited and well within the 25-lux threshold set out within the ILP Guidance for all ten surrounding buildings assessed.

421. The post-curfew (after 11pm) assessment shows that the levels of light trespass would be below the 5-lux threshold set out within ILP Guidance at each of the sensitive surrounding receptors assessed. Light intrusion ranging from 0-0.35 lux, can be observed at The Swan PH, 39 Leadenhall Market, 4 Brabant Court and 9B Eastcheap, however these are considered Negligible. 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. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

422. The remaining surrounding buildings would see no impact in relation to light intrusion and are considered to experience a Negligible effect.

423. The development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 and has been designed as to avoid light spill.

Air quality

424. 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 development to be at least Air Quality Neutral, developers will be 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 draft Publication London Plan.

425. The Environmental Statement includes an assessment of the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.

426. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.

427. For the completed development the building would utilise a heat pump solution for zero emissions heating. The development would be car-free and the assessment states that the transport emissions associated with the servicing vehicles would have negligible impact. The assessment concludes that the development would have no significant impacts on air quality.

428. The development meets the Air Quality Neutral benchmarks for both building and transport emissions assessment.

429. The City's Air Quality Officer has no objections and recommends that a condition is applied requiring the submission and approval of an Air Quality Report to detail how the finished development will minimise emissions and exposure to air polluting during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and the submitted Air Quality Assessment.

430. Subject to compliance with conditions, 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 SLI of draft Publication London Plan which all seek to improve air quality.

Noise and Vibration

431. Local Plan 2015 policy DM15.7, London Plan policy 7.15 and draft Publication London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.

432. The Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.

433. In most City redevelopment schemes the main noise and vibration issues occur during demolition and early construction phases. The Assessment identifies a Major Adverse (significant) impact on one sensitive receptor close to the site, The Ship PH. All other receptors are predicted to result in a Minor Adverse or Negligible effect (not significant).

434. Noise and vibration mitigation, including control over working hours and types of equipment to be used would be included in a Construction Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.

435. During the operational phase of the development, the Assessment concludes that there would be a negligible impact on noise levels from road traffic compared with the existing.

436. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.

437. The submitted noise assessment indicated that the requirements of these conditions can be satisfactorily met and consequently the proposals would comply with London Plan policy 7.15, draft London Plan policy D13, Local Plan policy Dm15.7 and draft City Plan 2036 policy HL3.

Health Impact Assessment

438. The applicants have submitted a Health Impact Assessment which has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health, identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
- Provision of high-quality, publicly accessible open space in the public viewing gallery encouraging physical activity and creating healthy working environments;
- Provision of high-quality public realm at the ground floor improving the physical environment and contributing to social cohesion;
- New north to south pedestrian route incorporating the site into its wider area, facilitating pedestrian access and alleviating demand on existing pedestrian routes;
- A car-free development minimising vehicles travelling to the site;
- Building design considering the context of the site and maximising benefits including employing system to reduce energy usage; and
- Consideration to sustainability and inclusive design.

439. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:

- Implementation of a Construction Environmental Management Plan to minimise any environmental effects including dust (via Dust Management), noise and vibration;
- Implementation of a Construction Logistics Plan to minimise the environmental and road traffic related impacts of the demolition and construction works;
- Implementation of a Delivery and Servicing Management Plan setting out access, delivery times (overnight only) and booking system; and

- Implementation of a Framework Travel Plan to minimise vehicle trips – as the site has good access to public transport and active travel modes, the target focus is to maximise uptake of active travel options (walking and cycling).

440. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy 3.2 and draft London Plan policy GG3 and draft City Plan 2036 policy S1.

**Sustainability & Energy**

Energy and CO2 emissions

441. The Energy Statement accompanying the planning application demonstrates that the building has been designed to achieve a 47.2% improvement in carbon emissions compared with a Building Regulations compliant building. This would be achieved through a number of energy demand reduction measures. The applicant has since identified further improvements to improve the overall target to 58.5% targeted through adding PV on spandrels, a condition is proposed to require an updated Energy Statement to be submitted for assessment.

442. These include the use of passive design features such as achieving an enhanced thermal envelope performance and envelope airtightness by using a “closed cavity frame” façade system with high performance specifications relating to reducing solar gain and thermal bridging. Natural, operable ventilation slots have been incorporated to reduce the need for mechanical cooling. The passive design measures overall would achieve 30.2% carbon emissions savings.

443. The applicants consider that the proposed building cannot be connected to a district heating system, neither to an existing network due to its location, nor to a private heating network on site, due to the size of the development. However, heating and hot water can be provided by water source heat pumps that would contribute carbon emissions savings of 17%.

444. This energy strategy demonstrates compliance with the London Plan carbon targets. (London Plan Policy 5.2 and draft Publication London Plan S12). A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan

targets for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the draft Publication London Plan.

BREEAM

445. A BREEAM pre-assessment (New Construction 2018) has been carried out for the proposed development. This demonstrates that the development can achieve a score of 89.41% which is within the "Outstanding" category.

446. The development's scores are high in the categories Energy, Materials and Pollution, three of the City's four priority categories, and would perform particularly well in the Transport and Waste sections.

447. Additionally, there are a number of credits that should be targeted to maintain the highest level of rating, relating to Management, Health & Wellbeing, Energy and Pollution. These include assessing options to ensure the energy efficiency is optimised as part of the passive design analysis and, to further address the pollution criteria considering the use of a compliant refrigerant leak detection system.

448. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. A condition has been included requiring the submission of a post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating).

Whole Life Carbon

449. The draft Publication London Plan requires applications referable to the Mayor to include a Whole Life-Cycle Carbon assessment against each lifecycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is

therefore an important tool to achieve the Mayor's net zero-carbon city target.

450. The submitted assessment has been carried out using a nationally recognised methodology. Following a refinement of the proposed building's materials and service life performance, the modelled embodied carbon emissions would remain below the GLA's benchmark emissions target. However, they would not meet the GLA's aspirational target of the more ambitious targets of the RIBA 2030 Climate Challenge for Net Zero Buildings and of the Leti (London Energy Transformation Initiative) roadmap to zero carbon buildings by 2030.

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

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

452. A strategy to achieve further reductions of Whole Life Cycle carbon emissions of the proposed development towards meeting more ambitious targets will be required by condition.

Circular Economy and Waste

453. Emerging New London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Draft City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.

454. The Sustainability Statement describes how the building design can incorporate circularity principles and actions according to the 9 circularity principles in the GLA Circular Economy Guidance. These include designing to eliminate waste, including designing for longevity, flexibility of space, designing out construction, demolition, excavation and municipal waste arising, conserving resources, increasing efficiency and sustainable sourcing.

455. The Applicant reviewed opportunities to refurbish and extend the existing building to contribute to this growth, but the opportunities were limited by its existing structure. The close grid and existing

configuration preclude the opening up of the base of the building and the massing is bulbous, and a new podium can be more finely tuned to the scale and cornice lines of adjacent buildings. The configuration of floorplates is not suitable for flexible office space and creating additional floorspace above the existing building would further restrict the layout at ground floor level due to the need to introduce additional structure to support the new floors above. Additionally, a refurbishment scheme would not have provided key public benefits such as the passageway from Fenchurch Street to Ship Tavern Passage.

456. The applicants commit to undertaking a pre-demolition audit to determine the feasibility of refurbishment or reuse, and to identify the opportunities to re-use and recycle existing materials. They also commit to generating a Resource Management Plan to reduce the amount of construction waste.

457. The project commits to the targets of 95% diversion of demolition waste and 98% diversion of non-demolition waste from landfill.

458. A comprehensive package of further opportunities to incorporate circularity principles and actions has been submitted that includes:

- Retaining the majority of the basement
- Using recycled steel, concrete and other aggregates, including site-won material
- Sourcing materials responsibly, minimising transport distances
- Using highly efficient and durable mechanical, electrical and plumbing systems with easy access
- Maximising natural ventilation and daylight ingress
- Using high water efficiency systems
- Using water collected through a sustainable drainage system for irrigation in the public realm
- Incorporating building elements that are demountable and reusable
- Designing flexible internal spaces.

459. A pre-commencement condition has been included requiring the submission of a detailed Circular Economy Statement, that provides 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. The detailed Statement will be expected to meet the relevant targets set out in the GLA Circular Economy Guidance.

Flood Risk, Drainage and Climate Resilience

460. 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.

461. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk). The proposed development will utilise SuDS techniques to attenuate rainfall and minimise run-off from the site. The following techniques are proposed: Rainwater harvesting, green/brown root systems, blue roof systems, permeable paving, attenuation tank and flow controls.

462. 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 draft Publication London Plan.

463. The Lead Local Flood Authority and Thames Water have raised no objections to the proposals and have recommended conditions to be attached.

464. The Sustainability Statement sets out measures proposed to provide the development's resilience to climate change. These have to address:

- Avoiding overheating and solar gain in the building
- Maximising the quality and quantity of urban greening to provide cooling and shading
- Avoiding flooding and managing surface water run-off.

465. The proposed closed cavity facade system with high performance glazing, high thermal mass and external solar shading will prevent the proposed building from suffering from overheating.

466. The proposed development includes a range of green infrastructure measures such as green walls, podium and roof gardens and street trees that would contribute to cooling the building, resulting in an Urban Greening Factor of 0.35 that exceeds the GLA and the City of London's requirements.

467. To effectively manage the water run off without the opportunity for integrating soakaways, the existing combined connection to the public sewer in Fenchurch is being used in combination with above ground and below ground attenuation tanks. Other Sustainable Drainage Systems, such as green or blue roofs and permeable paving are being considered to reduce pollution and the volume required within the attenuation structures.

468. Floor-by-floor plantrooms are able to introduce 25 percent greater BCO outside air, which allows for partial free cooling via an overhead VAV system. VAV systems are designed to use 10-degree Celsius supply of air to enable maximum free cooling. Cooling towers would generate 14dgree Celsius water overnight and this water would be stored in concrete tanks in the basement, the evaporatively cooled water used 10 percent of the energy of an equivalent mechanical refrigeration system. Small chillers are provided for back-up and global warming in the event of extreme temperatures. This system provides 98 percent carbon emissions improvement over Part L notional building cooling system.

**Security**

469. Security proposals to protect the building and the new areas of public realm have been developed in consultation with the Designing out crime and the counter terrorism security officers within the City of London Police.

470. The site will be protected by a combination of façade resilience at the ground floor level of the building and HVM resistant bollards located at the building entrances. These would be on private land within the site.

471. Security checks and screening facilities for visitors prior to accessing the viewing galleries and public amenity areas will take place at ground level within a space prior to entry to the lifts.

472. Further details of the overall security strategy will be required by condition and a Visitor Management Plan will be required by S106 which will detail more specifically the measures to protect the viewing gallery.

473. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

**Fire Statement**

474. A Fire statement has been submitted outlining the fire safety strategy for the building which has been developed in consultation with the City District Surveyor's office and the London Fire Brigade. The statement adequately covers the relevant fire aspects of the design and is adequate for the planning stage.

**Planning Obligations**

475. 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.

476. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

477. From 1 April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. The change removes the Mayor's 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).

478. CIL contributions and City of London Planning obligations are set out below:

**MCIL2 Calculation**

| Liability in accordance with the Mayor of London's policies | Contribution | Forwarded to the Mayor | Retained for administration and monitoring |
|---|---|---|---|
| **MCIL2** | £8,183,262 | £7,855,932 | £327,330 |

| Liability in accordance with the City of London's policies | Contribution | Available for allocation | Retained for administration and monitoring |
|---|---|---|---|
| **City CIL** | £3,365,250 | £3,196,987 | £168,263 |
| <u>City Planning Obligations</u> | | | |
| Affordable Housing | £897,400 | £888,426 | £8,974 |
| Local, Training, Skills and Job Brokerage | £134,610 | £133,264 | £1,346 |
| Carbon Reduction | £0 | £0 | £0 |

| | | | |
|---|---|---|---|
| Shortfall (as designed) | | | |
| Section 278 (Evaluation and Design) | £100,000 | £100,000 | £0 |
| Security Measures (Eastern City Cluster) | £448,700 | £448,700 | £0 |
| S106 Monitoring Charge | £4,750 | £0 | £4,750 |
| Total liability in accordance with the City of London's policies | **£4,950,710** | **£4,767,377** | **£183,333** |

City Planning Obligations

479. 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 test in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction)*
- Delivery and Servicing Management Plan (*Including Consolidation)*
- Service Vehicle Lift Maintenance Strategy
- Cycling Promotion Plan
- Legible London Contribution
- Cycling Improvements Contribution (J150,000) *(J15k Cycle Route Quality Criteria Study and J135k Improvement Works)*
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement (*CoL)*
- Section 278 Agreement *(Transport for London – Gracechurch Street)*
- Public Route *(Specification & Access)*
- Public Viewing Gallery & Winter Garden – Levels 29/30 *(Access & Management Plan. To be open all year round (except Christmas Day, Boxing Day, New Year's Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later)*
- Public Realm / Market Space *(Specification & Management Plan)*
- Cultural Implementation Strategy

- Television Interference Survey
- Wind Audit
- Solar Glare Audit

480. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary and enter into the S106 and S278 agreements.

481. The scope of S278 agreement may include, but is not limited to, highway/footway improvements to Fenchurch Street, Philpot Lane, Rood Lane, Ship Tavern Passage and Lime Street junction and tree planting.

Monitoring and Administrative Costs

482. 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.

483. 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

484. The City will apply CIL towards infrastructure to support the development of the City.

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

485. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
    a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
    b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
    c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

486. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case would remove or minimise disadvantages suffered by persons who suffer from a disability and in

particular mobility impairment by providing enhanced and accessible public realm. It is also the view of officers that the provision of accessible floorspace and publicly accessible viewing gallery and winter garden would advance equality of opportunity.

**Human Rights Act 1998**

487. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).

488. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of the properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the Minor Adverse impact and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

489. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising though impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

**Conclusions**

490. 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 Publication London Plan and the draft Local Plan and considering all other material considerations.

491. The Proposed Development comprises the demolition of an unremarkable and outmoded retail and office development and the replacement proposed delivers a high quality, office-led development in the emerging City Cluster, which will meet growing business needs,

supporting and strengthening opportunities for continued collaboration and clustering of businesses.

492. The scheme makes optimal use of the site, providing an attractive City tower, the Brancusi-influenced design comprised of three forms set above a robust podium would provide a significant increase in office floorspace in accordance with the City's objective to support a thriving economy and remain the world's leading international financial and professionals service centre.

493. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. The office space would be complemented by publicly accessible commercial, cultural and permeable spaces adding vibrancy to the City's streets and benefitting the City's diverse communities.

494. The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles.

495. The scheme delivers significant public realm enhancement, including a generously proportioned north-south passageway through the site, connecting Fenchurch Street to the network of passageways and lanes connecting to Leadenhall Market. Further public realm enhancements to the south east fronting Fenchurch Street and Lime Street, creating a large permeable publicly accessible space within the site and delivering highways and public realm improvements to Lime Street including the planting of five trees. Further highways enhancements are proposed to Philpot Lane and two street trees are proposed on Rood Lane which would improve the appearance and pedestrian environment of the local area.

496. The increase in floorspace and occupation places extra pressure on the comfort and safety of the City's streets. The development achieves PCLS of B- and above other than on Lime Street, where the eastern footway will narrow to allow the western footway to widen so is considered acceptable.

497. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel

498. Objections have been received from statutory consultees and third parties, relating to the design of the development, its impact on designated and non-designated heritage assets and the impact on the

environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

499. The proposal would deliver a tall building on a suitable site in the Eastern Cluster and in the emerging City Cluster and on an identified Renewal Opportunity Site in accordance with Local Plan Policy CS14 and CS7, City Plan Policies S12 and S21, London Plan Policy 7.7 and draft Publication London Plan D9. The proposal would not harm and would protect pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and draft Publication London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. Following rigorous assessment, it is concluded that the proposal would preserve the OUV/Significance, authenticity and integrity of the Town or London World Heritage Site, according with associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.

500. The proposal would preserve the special interest/significance and setting of the Tower of London, Tower Bridge, Leadenhall Market, The Monument, The Ship Tavern PH, 81-82 Gracechurch Street, 7-9 Gracechurch Street, 39-40 Lombard Street, 7-8 Philpot Lane, Custom House, Billingsgate Market, Cannon Street Station Towers, St Mary-le-bow, Former Port of London Authority Building, Adelaide House, 1 Cornhill, Vincula Chapel and St Thomas' Tower. It is considered that the significance of the Tower of London, Bank, Eastcheap and Leadenhall Market Conservation Areas would be unharmed.

501. The proposals would not cause harm to the significance and setting of the Monument or Tower Bridge, the application proposals accord with London Plan policy 7.8, Local Plan policies CS12, DM12.1, DM12.3 and DM12.4, draft Publication London Plan policy HC1 and with the emerging City Plan policy HE1.

502. The proposals comply with the policies relating to strategic views, and the policies which seek to protect the Tower of London WHS.

503. The proposals comply with strategic objective 1 in the Local Plan and with the policies relating to offices and to economic growth.

504. The proposals conflict with policies which seek to prevent the loss of retail floorspace in Principal Shopping Centres.

505. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as the policies relating to tall buildings, heritage, design, and public realm are also complied with, that notwithstanding the conflict with the retail policies, the proposals comply with the development plan when considered as a whole.

506. The environmental impact of the development on the neighbouring buildings and spaces has been assessed. Adverse impacts have been identified on noise and vibration in the surrounding area and to nearby buildings, primarily during the construction phase.

507. The impact on daylight to surrounding residential at 2-4 Bulls Head Passage, 4 Brabant Court and 9B Eastcheap would be Minor Adverse. Despite failures against the BRE guidelines, it is not considered that the proposal would result in an unacceptable impact on the existing use of the properties in the context of the location of the site in a dense urban area which is in the emerging City Cluster and on an identified Renewal Opportunity Site. As such, the extent of harm is not considered to be such as to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. In any event, it is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the Minor Adverse impact.

508. Negative impacts during construction would be controlled as far as possible by implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.

509. Objections have been received from a nearby occupier of a commercial building, regarding the impact caused by the development on amenity and conditions to daylight and sunlight. This report assesses the proposals against Strategic Policy CS10 which seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. The dense urban environment of the City, in particular in and around the cluster is such that the juxtaposition of commercial buildings is a

characteristic that often results in limited daylight and sunlight levels to those premises. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. It is considered that the proposal does not conflict with Local Plan Policy CS10.

510. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.

511. It is the view of officers that the proposal complies with the development plan when considered as a whole and that other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached.

**Background Papers**

Internal

09.11.2020 Memo, Air Quality Officer
11.11.2020 Memo, Contract and Drainage Service
12.11.2020 Memo, Local Transport Planning
24.11.2020 Memo, Lead Local Flood Authority
30.11.2020 Memo, Environmental Health Officer
17.12.2020 Memo, Access Team
18.12.2020 Memo, Planning Obligations
20.01.2021 Email, District Surveyors
29.01.2021 Email, Access Team

External

03.06.2020 Letter, Thames Water
03.11.2020 Email, Environment Agency
05.11.2020 Email, TfL (Crossrail Safeguarding)
10.11.2020 Letter, London City Airport
13.11.2020 Email, NATS Safeguarding
16.11.2020 Email, Environment Agency
18.11.2020 Email, Westminster Council
19.11.2020 Letter, Historic England
23.11.2020 Letter, Thames Water
09.12.2020 Comment, Mrs Meghan Allen
15.12.2020 Email, Thames Water
18.12.2020 Letter, London Borough of Tower Hamlets
19.12.2020 Email, Mann Vergan on behalf of residents of Flat A, B and C of 4 Bulls Head Passage
07.01.2021 Comment, Mann Vergan
08.01.2021 Letter, NTR Planning Ltd
08.01.2021 Comment, Emma Baylis
13.01.2021 Letter, London Borough of Hackney
13.01.2021 Email, Historic Royal Palaces
13.01.2021 Letter, TRIUM
15.01.2021 Letter, DP9
20.01.2021 Letter, Environment Agency
21.01.2021 Letter, Trium
26.01.2021 Comment, Will Ryan
26.01.2021 Letter, London Borough of Hackney
29.01.2021 Email, Alasdair Buckle, DP9
01.02.2021 Letter, Greater London Authority
01.02.2021 Email, Civil Aviation Authority
02.02.2021 Email, Alasdair Buckle, DP9
03.02.2021 Email, Deborah Ewenla, TfL

Documents

BREEAM Pre-assessment, eb7, 11th January
Contamination Assessment Report, RMA
Covering Letter, DP9
Design and Access Statement, KPF, January 2021

Environmental Statement Volume 1, Trium
Environmental Statement Volume 2, Citidesigner
Environmental Statement Volume 3, Trium
Environmental Statement Non-Technical Summary, Trium
Energy Statement, DSA
Fire Statement, ARUP Fire
Flood Risk Assessment and Drainage Strategy, RGB
Health Impact Assessment, Quod
Landscape & Public Realm Strategy, Spacehub
Outline Demolition and Construction Environmental Management Plan, AIA
Planning Statement Rev 1, DP9
Preliminary Ecological Appraisal, TEC
Schedule of Drawings, Kohn Pedersen Fox
Smart Infrastructure & Utilities Statement, DSA
Statement of Community Involvement, Field Consulting
Sustainability Statement, TFT
Healthy Streets Transport Assessment, Momentum
Wind Microclimate – Supplementary Information, RWDI
Daylight and Sunlight Addendum, GIA, 13th January 2021
Additional information Project Forum, Spacehub, Momentum and RWDI, 11th November 2020
Technical Note, Momentum Transport Consultancy, 15th and 21st January 2021
Design Queries – Retail, KPF, January 2021
Design and Accessibility Queries, KPF, January 2021
Design Queries: Way finding porous screen, KPF, January 2021
Urban Greening Factor, Spacehub, 12th January 2021
Embodied Carbon Technical Briefing Note, TFT, 18th December 2020
Applicants Response to Planning Application Representations, DP9, 15th January 2021
Clarifications Report in Response to GLA Stage 1 Report, Citydesigner, 2nd February 2021
Technical Note response to TfL, Momentum Transport Consultancy, 1st February 2021

Drawing Numbers
PA-019 1:250@A1, Existing Basement Levels 03, 02, 01 and Lower Ground Plans
PA-020 1:250@A1, Existing Ground Floor Plan
PA-021 Rev 01 1:250@A1, Existing Level 01, 01 Mezz., 02 and 03 Plan
PA-024 1:250@A1, Existing Levels 04, 05, 06 and 07 Plan
PA-028 1:250@A1, Existing Level 08 and Roof Plan
PA-030 1:250@A1, Existing North and South Elevation
PA-031 1:250@A1, Existing East and West Elevation

**Appendix A**

**REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS**

**Reasoned Conclusions**

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

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted. An objection received states that the Environmental Statement refers to uses defined under the categories of the Town and Country Planning (Use Classes) Order 1987. The description of development refers to the same types of uses but as defined under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which would potentially allow for a significantly different range of uses. Therefore, it is stated that the City of London need to determine that the Environmental Statement and all other documents adequately assess the proposed development.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the proposed amendments contained within the submission and sets out additional assessment of daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space and public terrace uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide:
- 72,992 sq.m. gea of office floorspace (Class E);
- 1,823 sq.m. gea flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis.))
- 1,566 sq.m sui generis public viewing gallery and winter garden with ancillary space
REASON: To ensure the development is carried out in accordance with the approved plans

2. The areas within the development marked as retail on the floorplans hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and sui generis (pub and drinking establishment, and take-away) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.

3. The areas shown on the approved drawings as offices, flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis)) and public viewing gallery and garden with ancillary space, and as set out in Condition 62 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020).
REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

**Monitoring Measures**

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Vehicle Lift Maintenance Strategy, a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures to the Public Garden terrace. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The

duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

**Appendix B**
**London Plan Policies**
The following policies from the London Plan (2016) are considered relevant:

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

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

Policy 2.18 Protect, promote, expand and manage the extent and quality of and access to London's network of green infrastructure.

Policy 3.1 Protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

Policy 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;
Support the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity;
Promote London as a suitable location for European and other international agencies and businesses.

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

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

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

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

Policy 4.8 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 5.5 (Decentralised Energy Networks) Development proposals should prioritise connections to existing or planned decentralised energy networks where feasible.

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

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

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

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

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

Policy 5.12 Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 and address flood resilient design and emergency planning; development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible be set back from those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

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

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

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

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

Policy 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:
ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
provide parking for disabled people in line with Table 6.2
meet the minimum cycle parking standards set out in Table 6.3
provide for the needs of businesses for delivery and servicing.

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

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

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

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

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

Policy 7.6 Buildings and structures should:
a be of the highest architectural quality
b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
c comprise details and materials that complement, not necessarily replicate, the local architectural character
d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
e incorporate best practice in resource management and climate change mitigation and adaptation
f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

g be adaptable to different activities and land uses, particularly at ground level
h meet the principles of inclusive design
i optimise the potential of sites.

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

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

Policy 7.10 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 7.14 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 draft Publication London Plan Policies.**

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)

- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

**Relevant GLA Supplementary Planning Guidance (SPG):**

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);

- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

**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
HL6 Public toilets
Policy HL9 Health Impact Assessments
S2 Safe and Secure City
SA1 Crowded Places
SA3 Designing in security
HS3 Residential environment
S4 Offices
OF1 Office development
S5 Retailing
RE2 Retail links
S6 Culture, Visitors and the Night -time Economy
CV2 Provision of Visitor Facilities
CV5 Public Art
S7 Smart Infrastructure and Utilities
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
Policy VT3 Vehicle Parking
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
HE3 Setting of the Tower of London World Heritage Site
S12 Tall Buildings
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Spaces

OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR3 Sustainable drainage systems (SuDS)
S16 Circular economy and waste
CE1 Zero Waste City
S21 City Cluster
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);
- Cultural Strategy 2018 – 2022 (2018).
- Eastcheap Conservation Area Character Summary and Management Strategy SPD 2013
- Leadenhall Market Conservation Area Character Summary and Management Strategy SPD 2017
- Bank Conservation Area Character Summary and Management Strategy SPD2012

Relevant Local Plan Policies

***CS1 Provide additional offices***

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

***CS2 Facilitate utilities infrastructure***

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

***CS3 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.

***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.

***CS11 Encourage art, heritage and culture***

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

***CS12 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.

***CS14 Tall buildings in suitable places***

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

***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.

***CS16 Improving transport and travel***

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

***CS17 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.

***CS19 Improve open space and biodiversity***

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

***CS20 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.

***CS22 Maximise community facilities***

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

***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

a) new accommodation suitable for small and medium sized businesses or occupiers;
b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
c) continued use of existing small and medium sized units which meet occupier needs.

***DM1.5 Mixed uses in commercial areas***

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

***DM2.1 Infrastructure provision***

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe

subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

***DM3.2 Security measures***

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

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
b) measures to be integrated with those of adjacent buildings and the public realm;
c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

***DM3.3 Crowded places***

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

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

***DM3.4 Traffic management***

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

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

***DM3.5 Night-time entertainment***

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

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

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

***DM10.1 New development***

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

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

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

***DM10.2 Design of green roofs and walls***

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

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

***DM10.3 Roof gardens and terraces***

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.

2) Public access will be sought where feasible in new development.

***DM10.4 Environmental enhancement***

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

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

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

***DM10.7 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.

***DM11.2 Public Art***

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

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

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

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

***DM12.2 Development in conservation areas***

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.

3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

***DM12.3 Listed buildings***

1. To resist the demolition of listed buildings.

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

***DM12.4 Archaeology***

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

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

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

***DM15.1 Sustainability requirements***

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

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

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

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

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

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

***DM15.2 Energy and CO2 emissions***

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

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

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

***DM15.3 Low and zero carbon technologies***

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

***DM15.4 Offsetting carbon emissions***

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

***DM15.7 Noise and light pollution***

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

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

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

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

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

***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 recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

***DM17.2 Designing out construction waste***

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

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

***CS18 Minimise flood risk***

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

***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
b) the benefits of the development outweigh the flood risk to future occupants;
c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and
b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood

Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;
b) provide a high quality environment;
c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
d) have regard to biodiversity and the creation of green corridors;
e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

### *DM19.2 Biodiversity and urban greening*

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

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

### *DM20.1 Principal Shopping Centres*

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:

- maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
- the contribution the unit makes to the function and character of the PSC;
- the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

### *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.

***DM22.1 Social and community facilities***

1. To resist the loss of social and community facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility;  or
b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
b) in locations which are convenient to the communities they serve;
c) in or near identified residential areas, providing their amenity is safeguarded;
d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Relevant Local Plan Policies

***CS1 Provide additional offices***

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

***CS2 Facilitate utilities infrastructure***

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

***CS3 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.

***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.

***CS11 Encourage art, heritage and culture***

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

***CS12 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.

***CS14 Tall buildings in suitable places***

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

***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.

***CS16 Improving transport and travel***

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

***CS17 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.

***CS19 Improve open space and biodiversity***

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

***CS20 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.

***CS22 Maximise community facilities***

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

***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

a) new accommodation suitable for small and medium sized businesses or occupiers;
b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
c) continued use of existing small and medium sized units which meet occupier needs.

***DM1.5 Mixed uses in commercial areas***

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

***DM2.1 Infrastructure provision***

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

***DM3.2 Security measures***

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

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
b) measures to be integrated with those of adjacent buildings and the public realm;

c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
f)an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

***DM3.3 Crowded places***

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

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

***DM3.4 Traffic management***

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

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

***DM3.5 Night-time entertainment***

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

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

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

***DM10.1 New development***

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

a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
c) appropriate, high quality and durable materials are used;
d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
f)the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
i)there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
j)the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
k) there is provision of amenity space, where appropriate;
l)there is the highest standard of accessible and inclusive design.

***DM10.2 Design of green roofs and walls***

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

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

***DM10.3 Roof gardens and terraces***

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.

2) Public access will be sought where feasible in new development.

***DM10.4 Environmental enhancement***

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

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

i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
j) the use of high quality street furniture to enhance and delineate the public realm;
k) lighting which should be sensitively co-ordinated with the design of the scheme.

***DM10.7 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.

***DM12.2 Development in conservation areas***

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.

3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

***DM12.3 Listed buildings***

1. To resist the demolition of listed buildings.

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

***DM12.4 Archaeology***

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

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

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

***DM15.1 Sustainability requirements***

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

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

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

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

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

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

***DM15.2 Energy and CO2 emissions***

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

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

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

***DM15.3 Low and zero carbon technologies***

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes

should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

***DM15.4 Offsetting carbon emissions***

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

***DM15.7 Noise and light pollution***

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

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

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

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

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

### *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 recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

***DM17.2 Designing out construction waste***

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

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

***CS18 Minimise flood risk***

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

***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

b) the benefits of the development outweigh the flood risk to future occupants;
c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and
b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;
b) provide a high quality environment;
c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
d) have regard to biodiversity and the creation of green corridors;
e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

***DM19.2 Biodiversity and urban greening***

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

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

***DM20.1 Principal shopping centres***

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:

a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
b) the contribution the unit makes to the function and character of the PSC;
c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking

establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

***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.

***DM22.1 Social and community facilities***

1. To resist the loss of social and community facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
b) in locations which are convenient to the communities they serve;
c) in or near identified residential areas, providing their amenity is safeguarded;
d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

**SCHEDULE**

APPLICATION: **20/00816/FULEIA**

**70 Gracechurch Street London EC3V 0HR**

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

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 Prior to any stripping-out or demolition of the existing building, a material audit of the building should be submitted to and approved in writing by the Local Planning Authority to understand the value of it as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, with the presumption that as little waste as possible is generated and the development shall be carried out in accordance with the approved details.
REASON : To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plans: Draft London Plan ; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, 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 start.

3 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that confirms that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance, and that provides the final details on how the building would adhere to 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. 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; CS17, 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.

4 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, confirming that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and providing calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: Draft London Plan: D3, SI 2, SI 7 - Local Plan: CS17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

5 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.

6 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.

7 Prior to the commencement of development, an updated Energy Assessment demonstrating the improvements in carbon emissions from the building is required to be submitted to and approved by the Local Planning Authority.
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.

8 No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.
REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace

9 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.

10 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction

11 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.

12 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.

13 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.

14 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

15 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.

16 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.

17 The development shall incorporate such measures as are necessary within the site to resist structural damage and to protect the approved new public realm within the site, arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. 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.

18 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.7 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 100m3;

(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; and

(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
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 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

19 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 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

20 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.

21 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in

order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

22 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 and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;
(b) details of the proposed new facades including details of a typical bay of the development for each facade and fenestration;
(c) details of canopies;
(d) typical masonry details, including jointing and any necessary expansion/movement joints;
(e) details of ground and first floor elevations including all entrances, integrated seating, vitrines and information boards;
(f) details of semi-internal elevations fronting the ground floor public routes;
(g) full details of the Public viewing gallery and winter garden, including all elevations, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
(h) details of soffits, hand rails and balustrades, including those soffits in the semi-external areas of the podium between ground and garden level
(i) details all party wall treatments;
(j) details of junctions with adjoining premises;
(k) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
(l) details of all drainage and irrigation;
(m) details of the integration of M&E in all external and semi-external public elevations in the podium from ground to garden level;
(n) details of the legible London wayfinding sign and porous wind mitigation screen within the new north/south route; and
(o) details of the improvement works at the junction of Lime Street and Fenchurch Street.
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.

23 Before the works thereby affected are begun, sample panels of agreed sections of the masonry facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.

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

24 All unbuilt surfaces, including the podium, terraces, balconies, roof terrace, tenant garden, undercroft, new public route and trees approved for wind mitigation, shall be treated in accordance with a landscaping scheme, including details of:
a) Irrigation;
b) Provision for harvesting rainwater run-off from road to supplement irrigation;
c) Spot heights for ground levels around planting pit;
d) Soil;
e) Planting pit size and construction;
f) Tree guards; and
g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.
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 and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

25 Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue 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.

26 Details of the position and size of the green walls(s), the type of planting and the contribution of the green wall(s) to biodiversity 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.

27 Details of the construction, including detailed drawings, growing media, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

28 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.

29 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036

30 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 retail uses (Class E and sui generis) and any Class E (office) kitchens. 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 said use takes place and retained for the life of the building.
REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

31 No cooking shall take place within any Class E or sui generis use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

32 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.
REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

33 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

34 Prior to first occupation confirmation shall be provided that either: all water network upgrades required to accommodate the additional flows to serve the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water to allow occupation. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.
REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

35 Once the building construction is completed and prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development shall submit the post-completion report in line with the criteria set out in the GLA's Circular Economy Statement Guidance that shall be approved in writing by the Local Planning Authority, and that confirms the targets and actual outcomes achieved, clearly indicates where and why any variation has occurred and provides a summary of important lessons learned.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

36 Before any retail units are occupied 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) A signage strategy for the retail units within the development shall be submitted;
(b) The signage relating to the public viewing gallery and winter garden shall also be included within the overall strategy.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

37 (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.

38 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.

39 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.
REASONS: 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.

40 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

41 A post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or a minimum rating of 'Excellent' as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

42 A post construction Whole Life Cycle Carbon assessment to demonstrate actual whole life cycle carbon emissions savings in accordance with the Mayor of London's guidance on Whole Life Cycle

Carbon Assessments shall be submitted to the Local Planning Authority and the Greater London Authority 3 months after practical completion.
REASON: To demonstrate that Whole Life Cycle carbon emissions have been minimised and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: Draft London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1.

43 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 1,002 long stay pedal cycle spaces, and a minimum of 28 short stay pedal cycle spaces, including for a minimum of 3 cargo bikes. 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.

44 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.

45 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.
REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and Intend to Publish London Plan policy: T5

46 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 100 showers and 700 lockers shall be provided adjacent to the bicycle parking areas and changing facilities 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 cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

47 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.

48 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.

49 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

50 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.

51 No servicing of the premises shall be carried out between the hours of 07:00 and 23:00 on Monday to Sunday. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.

52 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

53 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety

54 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.

55 The one car parking space suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors.
REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, Draft Local Plan: VT3, London Plan: 6.13D and 6A.2 and Intend to Publish London Plan: T6.5.

56 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plan or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

57 The pass doors shown adjacent to or near the 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 disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.

58 The roof terraces on level 31 and 33 hereby permitted shall not be used or accessed between the hours of 00.00 hrs (Midnight) on one day and 08.00 hrs on the following day, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

59 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.

60 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.

61 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.

62 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

63 The areas within the development marked as retail on the floorplans at ground and basement level hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and sui generis (pub and drinking establishment, and take-away) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.

64 Unless otherwise approved in writing by the Local Planning Authority, no more than 50% of the areas marked as retail on the floorplans hereby approved shall be occupied as Food and Beverage uses.
REASON: To ensure that a varied mix of retail types is provided within the development in accordance with the following policies of the Local Plan: CS20 and of the emerging policies of the City Local Plan: S5, RE2.

65 The areas shown on the approved drawings above ground floor as offices, flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis)) and public viewing gallery and winter garden with ancillary space, and as set out in Condition 63 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).
REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those

assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

66 The development shall provide:
- 72,992 sq.m. gea of office floorspace (Class E);
- 1,823 sq.m. gea flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis.)); and
- 1,566 sq.m gea sui generis public viewing gallery and winter garden with ancillary space.
REASON: To ensure the development is carried out in accordance with the approved plans.

67 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:
PA-006 1:1250@A1, Site Location Plan
PA-007 1:1250@A1, Land Ownership Plan
PA-008 1:500@A1, Ground Floor Block Plan
PA-039 1:250@A1 Basement Level 03, 02, 01 and Lower Ground Demolition Plans
PA-040 1:250@A1 Ground Floor Demolition Plan
PA-041 REV 01 1:250@A1, Level 01, 01 Mezz., 02 and 03 Demolition Plan
PA-044 1:250@A1, Levels 04, 05, 06 and 07
Demolition Plan, PA-048 1:250@A1, Level 08 and Roof Demolition Plan
PA-050 1:250@A1, North and South Demolition Elevations
PA-051 1:250@A1, East and West Demolition Elevations
PA-096 1:250@A1, Proposed Basement 2, B1, LG and LGM Plans
PA-100 REV 01 1:250@A1, Proposed Ground Floor Plan
PA-101 REV 01 1:250@A1, Proposed Level 01, 02, 03 and 04 Plan
PA-105 REV 01 1:250@A1, Proposed Level 05, 06, 07 and 08 Plan
PA-109 1:250@A1, Proposed Level 09-10, 11, 12 and 13-14 Plan
PA-115 1:250@A1, Proposed Level 15-24, 25, 26 & 27 Plan
PA-128 1:250@A1, Proposed Level 28, 29, 30 and 31 Plan
PA-132 1:250@A1, Proposed Level 32, 33 and High Level Plant
PA-135 1:250@A1, Proposed Roof Plan
PA-200 1:250@A1, Proposed North and South Context Elevations
PA-201 1:250@A1, Proposed East and West Context Elevations
PA-220 1:250@A1, Proposed North Elevation
PA-221 1:250@A1, Proposed South Elevation
PA-222 1:250@A1, Proposed East Elevation
PA-223 1:250@A1, Proposed West Elevation
PA-250 1:250@A1, Proposed Section AA
PA-251 1:250@A1, Proposed Section BB
PA-252 1:250@A1, Proposed Section CC
PA-253 1:250@A1, Proposed Section DD
PA-254 1:250@A1, Proposed Section EE
PA-255 1:250@A1, Proposed Section FF
PA-310 1:1250@A1, Proposed Podium Levels East

PA-311 1:50@A1, Proposed Podium Levels Façade South
PA-312 1:50@A1, Proposed Podium Levels East Wall
PA-313 1:50@A1, Proposed Podium Levels Arcade
PA-320 1:50@A1, Proposed High Levels Façade West East
PA-321 1:50@A1, Proposed High Levels Façade North South
PA-322 1:50@A1, Proposed High Levels Façade Plant
8305-PL-GA-103 1:125@A1, General Arrangement Landscaped and Public Realm - Roof Plan
8305-SE-GA-201 1:50@A1, Section - Lime Street
8305-DE-SD-501 1:25@A1, Typical Soft Details - Southern Façade
8305-DE-SD-502 1:25@A1, Typical Soft Details - Northern Façade
8305-PL-GA-101 1:250@A1, General Arrangement Landscape and Public Realm - Ground Floor
8305-PL-GA-102 1:125@A1, General Arrangement Landscape and Public Realm - Levels 04, 05 and 06
8305-SE-GA-202 1:50@A1, Section - Rood Lane and PA-002 1:250@A1, Section Cut and
Elevation Marker Key Plan.

INFORMATIVES

1 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.

- to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;

- aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;

- or where the procurement of goods and services is contracted out

- ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our `Guidance note for developers').

For additional details please refer to the City of London's `Local Procurement Charter' and `Local Procurement - Guidance Note for City Developers'. These documents can be found at

http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning

Further guidance can be obtained by contacting the `City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

To access free support in procuring locally please call 020 7332 1532 or email city.procurement@cityoflondon.gov.uk

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).

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 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 Local 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.

4 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.

5 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.

6 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.

7 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.

8 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.

9 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) Connections to the local sewerage and surface water system.

(g) Carriageway crossovers.

(h) 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".

10 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.

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

Noise and Dust

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

(b)
Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise,

dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)
Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act l974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act l990 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 NOx 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 NOX 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.

Cooling Towers

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

Ventilation of Sewer Gases

(o)
The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer

vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety

(p)
Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)
If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

12 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.

13 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.

14 The investigation and risk assessment referred to in condition **** must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and

approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to:
- human health,
- property (existing or proposed) including buildings, open spaces, service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archaeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

15 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification:
London Fire Brigade, Fire Prevention Branch
5-6 City Forum
City Road
London EC1N 2NY

(b) Public houses, wine bars, etc.
City of London Corporation
Trading Standards and Veterinary Service
PO Box 270
Guildhall
London EC2P 2EJ

(c) Inflammable materials (e.g., petroleum)
London Fire Brigade, Petroleum Department
5-6 City Forum
City Road
London EC1N 2NY

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

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

(e) Works affecting a GLA road:
Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

16 The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.

17 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.

18 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

19 All reasonable endeavours are to be used to achieve a BREEAM 'Outstanding' rating and The City of London Corporation as Planning Authority requests early discussion with the Applicant should it appear that the rating is likely to fall below outstanding.

**Background Papers**

External

16.11.2020 Email, Environment Agency

19.11.2020 Letter, Historic England

18.12.2020 Letter, London Borough of Tower Hamlets

19.12.2020 Email, Mann Vergan on behalf of residents of Flat A, B and C of 4 Bulls Head Passage

07.01.2021 Comment, Mann Vergan

08.01.2021 Letter, NTR Planning Ltd

08.01.2021 Comment, Emma Baylis

13.01.2021 26.01.2021 Letter, London Borough of Hackney

13.01.2021 Email, Historic Royal Palaces

15.01.2021 Letter, DP9 response to representations and technical note

20.01.2021 Email, Environment Agency

21.01.2021 email, City of Westminster

26.01.2021 Comment, Will Ryan

01.02.2021 Letter, Greater London Authority

| | |
|---|---|
| **From:** | Gagen, Kurt |
| **To:** | DBE - PLN Support |
| **Subject:** | FW: Planning Application Consultation: 20/00816/FULEIA |
| **Date:** | 19 November 2020 17:30:19 |
| **Attachments:** | image001.png |

---

**From:** HNL Sustainable Places <HNLSustainablePlaces@environment-agency.gov.uk>
**Sent:** 16 November 2020 17:39
**To:** Gagen, Kurt <Kurt.Gagen@cityoflondon.gov.uk>
**Subject:** RE: Planning Application Consultation: 20/00816/FULEIA

Hi Kurt,

Apologies for my mistake. Thanks for getting back to us to check but we still have no comments.

Thanks

George

---

**From:** Gagen, Kurt [mailto:Kurt.Gagen@cityoflondon.gov.uk]
**Sent:** 16 November 2020 17:08
**To:** HNL Sustainable Places <HNLSustainablePlaces@environment-agency.gov.uk>
**Subject:** RE: Planning Application Consultation: 20/00816/FULEIA

Dear George,

It is not a scoping opinion you have been consulted on. It is a planning application. Do you wish to make any comments?

Kind regards,
Kurt

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

**T: 020 7332 1549**
**M: 07710 761826**
www.cityoflondon.gov.uk

Dear Kurt Gagen
Thank you for consulting us on the EIA scoping opinion for the proposed redevelopment of 70 Gracechurch Street. Given the location and the lack of environmental constraints within our current remit, we have no comments to make on this application.
If you have any queries about this response, please do not hesitate to contact me.
Best wishes,
George Lloyd
Sustainable Places Planning Advisor
Environment Agency - Hertfordshire & North London
2 Marsham Street, 3rd floor, London, SW1P 4DF
Email: HNLSustainablePlaces@environment-agency.gov.uk

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Historic England

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

Direct Dial: 020 7973 3774

Our ref: P01297730

19 November 2020

Dear Mr Gagen

**T&CP (Development Management Procedure) (England) Order 2015**
**& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**70 GRACECHURCH STREET, LONDON, EC3V 0HR**
**Application No. 20/00816/FULEIA**

Thank you for your letter of 13 October 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**
Historic England has no objection to the principle of replacing the existing building on the site, but we are concerned about the proposed tall building's wider impacts on the significance of London's historic environment, in particular the Tower of London WHS, St Paul's Cathedral and Leadenhall Market.

Our principal concern is about the harm that the replacement building would cause to the Tower of London by appearing in views from within the Inner Ward and increasing the amount of modern development competing with the historic buildings visible within the Tower's setting. We are also concerned that appropriate natural light needs to continue to be provided to the historic Leadenhall Market, and that loss of light as a result of this scheme could have a negative effect on the market's future sustainability.

Given the exceptional significance of the Tower, evident in its designation as a World Heritage Site, and the great weight that must be given to its conservation by the National Planning Framework and in strongly-worded policies in the London Plans, we recommend that permission should not be granted unless you are persuaded that the harm caused by the proposals has been minimised, that there is clear and convincing justification for the proposals and that the harm they would cause would be outweighed by public benefits.

In weighing harm against public benefits in the manner required by paragraph 196 of the NPPF, you would also need to ensure that the potential for achieving heritage



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

benefits through this scheme has been maximised and is capable of being fully realised, in particular through enhancements to the adjacent Grade II* listed Leadenhall Market.

**Historic England Advice**

*Significance*

The development site is not within a conservation area, and the existing building on the site from the early 2000s is of no architectural or historic interest. It is a solid and impenetrable building which has its principal frontage onto Gracechurch Street and so turns its back to the adjacent Grade II* listed Leadenhall Market.

However, because of its height and scale, the proposed tall building at No. 70 Gracechurch Street would have impacts on designated heritage assets well beyond the development site, in particular on the Tower of London (World Heritage Site; various listings and a scheduled monument).

The Tower is a monument of exceptional historic and architectural importance, and has dominated London since the 11th century. It is a fortress and palace, prison and execution site, barracks and tourist attraction which, at its centre, includes the finest and most intact example of a Norman keep in Europe (the White Tower).

The Tower has a historic relationship with the City of London, visually set apart from it. Maintaining this relationship is integral to safeguarding its landmark setting and sense of physical dominance, attributes of the Tower's Outstanding Universal Value.

From some views upstream at Waterloo Bridge, the proposals could have an impact on St. Paul's Cathedral, Wren's masterpiece and one of the most significant baroque buildings in England. The Cathedral appears prominently in the view from Waterloo Bridge, with its monumental dome the main focus of this part of the City as Wren intended. The City Cluster appears in the background to the right, but is currently distinct enough from the cathedral to enable some visual separation.

The site is adjacent to the Grade II* listed Leadenhall Market, which is a large and decorative top-lit Victorian market building in wrought iron and glass designed by Horace Jones in 1881. It has a well preserved interior, but on the exterior it is surrounded by tall buildings of the modern City of London.

*The Proposals and their Impact*

The proposals are for the demolition of the existing building and its replacement with a new office building comprised of three linked forms of 140m, 147m and 155m AOD

above a podium that would provide a new permeable route to Leadenhall Market. The building would be framed in terracotta with variable glazed openings, and terrace levels are planted. A public viewing gallery would be provided at the top of the lowest of the three towers.

Due to the height of the proposed building, it would have an impact on the settings of designated heritage assets further afield. The impact is assessed in detail below in those views which are particularly sensitive to potential heritage impacts. This assessment has been informed by the London Advisory Committee following the presentation by applicants on 30 June 2020 and the subsequent meeting on 2 July.

The impact of the proposed development on the Tower of London would harm its significance and outstanding universal value. The degree of harm would be modest.

**View 10A Tower of London: Inner Wall/East of Wakefield Tower** is a view from within the Inner Ward of the Tower of London towards the historic group of buildings that make up the Queen's House. The City Cluster noticeably intrudes into the enclosed space. In particular, the tall building at No. 20 Fenchurch Street rises above the historic group, dominating it and creating an incongruous visual relationship between the two.

The proposed new building would appear as a sliver of development mostly concealed by, and lower than, the existing building at 20 Fenchurch Street. In this case, the harm to the significance of the Tower of London through an increase of modern development in its backdrop would be slight, but the status of the Tower as a World Heritage Site means that preserving its significance must be given the greatest possible weight.

**View 10C Tower of London: Inner Ward - North-west corner of the White Tower** is a view towards the Chapel of St. Peter ad Vincula and the Victorian barracks block. The tall building at No. 20 Fenchurch Street rises above the roofline of the chapel.

As in View 10A, the proposed new building will appear as a sliver of new development alongside the 20 Fenchurch Street. The proposal would slightly increase the amount of modern development appearing in the backdrop of the chapel. The overall form and extent of the cluster, and its visual relationship with the Tower, would not change substantially. The proposals would  cause a modest degree of additional harm to its significance.

The proposals woud also have an impact on the form and scale of the City Cluster, particularly in **View 42 LVMF 15B.2 Waterloo Bridge Downstream at the centre of the bridge**. St. Paul's is the Strategically Important Landmark in the view, and the LVMF management guidance advises that new development should not dominate the cathedral or compromise its relationship with the clear sky around it. New development

in the City Cluster should be of an appropriate height and of high architectural design quality.

A visual relationship between the Cathedral and the tall buildings of the City Cluster as two distinct forms with space between them was established as the cluster took shape in the early 2000s, and is best understood from the LVMF views from centre (15B.2) and Westminster bank (15B.1) of Waterloo Bridge. The Cathedral is set apart in the foreground and middle ground of the view, with the City Cluster forming the background to the right.

The pinnacle of the cluster is closer to the Cathedral than the tall building at No. 20 Fenchurch Street which appears as an 'outlier' further to the right. The visual tension created by the cluster in this view of St Paul's Cathedral and on the wider character of the City is likely to increase as the mass of the cluster grows larger and it takes on greater prominence on the skyline relative to the Cathedral. This will be an important consideration for the City for this and any future applications affecting the scale and mass of the cluster.

The site is not within a conservation area, but it is close to the Grade II* listed Leadenhall Market. The market is dominated on all sides by existing and consented tall buildings, and the proposal at No. 70 Gracechurch Street would not fundamentally change the visual appearance of the setting of the listed building in its townscape. We are, however, concerned that appropriate natural light needs to continue to be provided to the historic market, as a loss of natural light could harm the special interest of the listed building and have consequent effects on its future sustainability.

*Relevant Law and Policy*

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 make it a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving listed buildings or their settings.

Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at paragraph 190 that local authorities, when considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal.

Paragraph 193 states that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance, and the more important the asset, the greater the weight should be. Any harm or loss should require clear and convincing justification and substantial harm or total loss should be exceptional.

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. The phrase "less than substantial harm" describes all harm that is not "substantial". This encompasses a wide range of possible harm. A finding of any harm is a consideration to which the decision-maker must give "considerable importance and weight" and "less than substantial harm" in NPPF terms does not imply "a less than substantial objection"

If the harm is deemed to be less than substantial, paragraph 196 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

Both the 2016 London Plan and draft New London Plan (2019) have a robust policy position to protect London's World Heritage Sites. The draft New London Plan has been through its Examination in Public, with the policies referenced here supported by the Panel, meaning significant weight should be afforded to them.

Draft policy HC2 of the New London Plan reinforces the protection provided to them in the current London Plan, stating that "development proposals in WHSs and their settings … should conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes."

The City of London's Policy CS12: Historic Environment, seeks the "safeguarding [of] the City's listed buildings and their settings" and "Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value…of the Tower of London World Heritage Site." Policy CS13: Protected Views, aims "to protect and enhance significant City and London views of important buildings, townscape and skylines…by…securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV."

From its introduction onwards the World Heritage Site Management Plan is clear that "the greatest challenge to the World Heritage Site… remains the impact on its setting of development and tall buildings." It describes the Tower's setting in detail in section 2.4. Key elements of the Tower's setting that are sensitive for the management of its OUV are highlighted in paragraphs 7.3.17-18 and 7.3.27, namely the potential of new development to change the relative scale of the Tower in views, and the degree to which the Tower's relationship with the cluster can be understood by the sky space around the White Tower.

*Position*

The proposed new building at No. 70 Gracechurch Street would, along with consented but as yet unbuilt developments, fill the visual gap between the tall building at No. 20 Fenchurch Street and the main part of the City Cluster with built form and increase the Cluster's overall density. The prominence of the proposal at No. 70 Gracechurch Street and its consequent high potential to affect a high concentration of important heritage assets and the wider historic character of the City, demands a very high quality design response to its context.

We question whether the proposed design is of such quality. Its massing, the relationship between podium and upper levels, and the relationship between the proposed building and its surroundings, and particularly Leadenhall Market all give grounds for thinking otherwise.

The impacts identified above would, in the language of the NPPF, cause less than substantial harm to a designated heritage asset of the highest possible significance. The Tower's status as a World Heritage Site means that it is a heritage asset of the highest significance and that the greatest possible weight should be given to its conservation. It also means that you should ensure that the applicants have submitted a Heritage Impact Statement that is in line with ICOMOS guidance.

You will know that local authorities are required to seek to avoid or minimise harm (paragraph 190), and be confident that any remaining harm has been clearly and convincingly justified (paragraph 193, NPPF).

We advise you to treat very seriously both this individual harm, and the incremental cumulative impact of successive City Cluster proposals, on the significance of the Tower when weighing the harm against public benefits in the manner required by the NPPF.

Therefore, permission should not be granted unless you are persuaded that the harm caused by the proposals has been minimised, that there is clear and convincing justification for the proposals and that the harm they would cause would be outweighed by public benefits
(paragraph 196, NPPF).

We recognise the opportunity here to provide public benefits, which include the creation of a permeable connection to the market and improved public realm in general. We acknowledge that better accessibility to the adjacent Grade II* listed Leadenhall Market also has the potential to improve its setting.

There may also be the opportunity for its current use to be supported by

complementary uses, which would be a public benefit, but we advise you to ensure that you are satisfied that the proposals would not inadvertently undermine the market's sustainability.

**Recommendation**
Historic England has concerns regarding the application on heritage grounds.
We are particularly concerned about the quality of the design as a part of the Cluster, which impacts on the heritage context, and the effect of this design specifically in the setting of the Tower, and the effect on the daylighting of of Leadenhall Market.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 190, 193 and 196 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

**Michael Dunn**
Principal Inspector of Historic Buildings and Areas
[redacted]

**Director of the Built Environment**
Development Division
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

PLACE

Tel 020 7364 5009

www.towerhamlets.gov.uk

18 December 2020

Dear Kurt Gagen,

**CITY OF LONDON REF:** 20/00816/FULEIA

**TOWER HAMLETS REF:** PA/20/02319

**ADDRESS:** 70 Gracechurch Street London EC3V 0HR

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

**INTRODUCTION**

Thank you for your letter of 02 November 2020 notifying the London Borough of Tower Hamlets of the City of London's receipt of the above-mentioned planning application.

The advice contained within this letter sets out the Council's assessment and conclusions which will inform the response to the request for observations.



Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

## PROPOSED DEVELOPMENT

The demolition of the existing buildings on the site does not cause concern for the London Borough of Tower Hamlets and as such comments are provided on the basis of the proposed building.

## HERITAGE

### Location

The application site is located to the north-west of the Tower of London, which is a World Heritage Site (WHS) containing a number of listed buildings as well as being located within Tower Hill Conservation Area. The Outstanding Universal Value (OUV) of the WHS is based on, amongst other things, a demonstration and symbol of Norman power, reflecting the last military conquest of England. The strategic location of the site in its prominence is the townscape is a key component of this value.

The proposed development raises some concerns about the degree of visual separation between the eastern cluster and the Tower of London. The proposed development is a tall building in terms of the City of London's planning policy (in excess of 70m AOD).

### The Tower of London World Heritage Site

With respect to heritage assets, Policy 7.8 of the London Plan (2016) and Policy HC1 of the Intend to Publish London Plan require that developments affecting the setting of heritage assets, including conservation areas, listed buildings, scheduled monuments and World Heritage Sites, should conserve their significance. Additionally, Policy 7.10 of the London Plan (2016) and Policy HC2 of the Intend to Publish London Plan state that development should not cause adverse impacts on WHS or their settings, and, in particular, should not compromise the ability to appreciate OUV, integrity, authenticity or significance.

The International Council on Monuments and Sites (ICOMOS) advised in their consultation response to the refused application for a 305.3m AOD tall building (serving as a visitor attraction) at land adjacent to 20 Bury Street in the City of London (GLA/4868/02 and City of London ref: 18/01213/FULEIA) (dated March 2019), the following:

> *"That the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional challenges to it. Neither is it an acceptable approach to allow further negative visual impact on the property's integrity when it is already threatened".*



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The London Borough of Tower Hamlets concurs with the assertion that the Tower of London WHS has already reached its limit in terms of visual intrusion and expresses concern about the continuing and seemingly iterative process of diminishing the expanse of clear sky in backdrop views of the WHS

View 10A – Tower of London: Inner Wall, East of Wakefield Tower

Within this view, The City Cluster intrudes into the enclosed space. In this view, the tall building at No. 20 Fenchurch Street (The 'Walkie Talkie') rises above the historic group. The proposed development would appear partially on its right-hand side at a lower height than 20 Fenchurch Street. The harm to this view would be minimal.

View 10B – Tower of London: Inner Ward, West of The White Tower 2

Within this view, The City Cluster rises above the Chapel Royal of St. Peter ad Vincula whilst 20 Fenchurch Street appears in the background to the left of the Chapel bell tower. The proposed development visually fills the gap between 20 Fenchurch Street and the Chapel bell tower, while its height at the same level as the solid base of the bell tower. The change to this view is considered to cause some harm, as the proposed development would infill the remaining section of sky between 20 Fenchurch Street and the Chapel.

View 10C – Tower of London: Inner Ward, North-west corner of the White Tower

The proposed development would not be visible within this view.

View 10D – Tower of London: Inner Wall, West of Bowyer Tower

Within this view, The City Cluster is seen rising above the Grade II* Listed One Trinity Square. The submitted Heritage, Townscape and Visual Impact Assessment by Trium states that the proposals '*effectively reduces the singularity of No.20 Fenchurch Street and contributes to the process of closing the gap between it and the principal Cluster*'.

The process of 'closing the gap' is not supported by ICOMOS who, as set out above, have previously stated, in the context of new tall buildings within the City of London, that *'The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact'.*

It should be noted The London Borough of Tower Hamlets objected to the now consented development at 50 Fenchurch Street (City of London ref: 19/01307/FULEIA). This development is for a 35-storey building outside of the City Cluster. When considering 50 Fenchurch Street as part of the cumulative effect on the Tower of London WHS, the proposed development in question appears problematic as it contributes towards an extended wall of tall buildings, some of which appear within an uncomfortable proximity to the Tower of London



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WHS. This would also run contrary to the plan-led approach to modelling the cluster and its impacts on the WHS set out in the City's Local Plan and emerging Local Plan. As such, the proposal would cause some harm in this view.

**Strategic views**

Relevant strategic views are set out in the London View Management Framework SPG (2012). The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. Policies 7.11, 7.12 of the London Plan (2016) and the LVMF SPG outline the views of strategic importance to London, and detail how these views should be managed.

The relevant LVMF views have been provided which would affect the Tower of London WHS. LVMF view 10A.1 would be affected very minorly, with only a sliver of the proposed development seen to the right-hand side of 20 Fenchurch Street. LVMF view 25A.1 would also be very minorly affected, with only a sliver of the proposed development seen to the left-hand side of 20 Fenchurch Street.

**CONCLUSIONS**

The proposed development would begin to fill the visual gap between 20 Fenchurch Street and the recognised expanse of the City Cluster. The relevant views have been assessed and the impacts identified would cause some, less than substantial harm to the setting and thereby significance of the Tower of London WHS.

Yours sincerely,

**Adam Garcia**
Principal Planning Officer (West Area Team)

For and on behalf of the Divisional Director for Planning and Building Control, London Borough of Tower Hamlets



Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

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[redacted]
**Cc:** [redacted]
**Subject:** 70 Gracechurch Street - 20/00816/FULEIA
**Date:** 19 December 2020 11:34:30

Dear Madam, Dear Sir,

I am writing in regards to the planning application 20/00816/FULEIA for a development at 70 Gracechurch Street.

I represent a residential building at 4 Bulls Head Passage, EC3V 1LU, and am representing the three respective owners in the block:

Flat A: Mann Vergan (on my behalf)
Flat B: Emma Baylis
Flat C: William Ryan

We are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.

I would like to make a representation that the residents are against this new development, as it will impact our quality of life.

Can you inform us what steps we need to take in order to further this complaint.

If you have any queries please do not hesitate contacting me.

Thanking you in advance.

Best wishes,

Mann Vergan
Lawyer*

[redacted]

[redacted] & Wales, BVI, New York and Massachusetts

# Comments for Planning Application 20/00816/FULEIA

**Application Summary**
Application Number: 20/00816/FULEIA
Address: 70 Gracechurch Street London EC3V 0HR
Proposal: Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.|cr|REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects). |cr|(The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,125sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).|cr|The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Kurt Gagen

**Customer Details**
Name: Mr Mann Vergan
Address: 4 Bulls Head Passage Flat A London

**Comment Details**
Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity
Comment:Dear Madam, Dear Sir,

I am writing in regards to the planning application 20/00816/FULEIA for a development at 70 Gracechurch Street.

I represent a residential building at 4 Bulls Head Passage, EC3V 1LU, and am representing the three respective owners in the block:

Flat A: Mann Vergan (on my behalf)
Flat B: Emma Baylis
Flat C: William Ryan

We are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.

I would like to make a representation that the residents are against this new development, as it will impact our quality of life.

Can you inform us what steps we need to take in order to further this complaint.

If you have any queries please do not hesitate contacting me.

Thanking you in advance.

Best wishes,

Mann Vergan
Lawyer*

[redacted]

*admitted in England & Wales, BVI, New York and Massachusetts

NTR Planning Ltd
Property • Planning • Consulting

Clareville House
26-27 Oxendon Street, London
SW1Y 4EL
[redacted]

3798/NTR/MEG

8th January 2021

Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ
For the attention of Kurt Gagen

Dear Kurt

**Re: Representations in relation to Planning Application ref. 20/00816/FULEIA**
**At: 70 Gracechurch Street, London EC3V 0HR**

I am writing on behalf of our clients, Property Class England 3 GmbH & Co. KG (owners of Allianz House, no. 60 Gracechurch Street) to make representations in relation to the above application. Our clients object to this application on grounds that that insufficient information has been submitted to enable the application to be determined at this time.

Growth/Renewal and Impact on Future Development Potential

The redevelopment of no. 70 Gracechurch Street must be considered in context. Any redevelopment must have regard to form, function and structure of an area and the scale, mass and orientation of surrounding buildings (London Plan policy 7.4). The building currently proposed at no. 70 is of a vastly different scale and character to the local context - in particular in relation to our client's premises at no. 60 Gracechurch Street, which are directly opposite and linked in function, use and townscape character. It is acknowledged that no. 70 Gracechurch Street is within an allocation growth area, however emerging plan policy confirms the need to consider the impact on the wider area by extending the 'Cluster' allocation to the south so that it includes no. 60 Gracechurch Street (emerging plan policy S21). In addition, the emerging plan identifies both no. 70 and no. 60 Gracechurch Street as a Renewal Opportunity sites, where growth, including tall buildings is focused. The development of no. 70 cannot be considered in isolation, when it sits directly opposite a site which has also been specifically identified as a renewal site ear marked for the delivery of large scale development and appropriate for 'tall buildings'. Any redevelopment proposal must clearly demonstrate that there would be no

adverse impact on the future development potential of no. 60 Gracechurch Street, so that emerging policy ambitions may be fulfilled. The emerging plan recognises the importance of the site, further emphasising the importance of considering the two sites together, or as part of a masterplan.

The Principle of Development

Our clients do not object to the principle of the redevelopment of this site but seek further information to demonstrate that this development will not hinder the future development potential of no. 60 Gracechurch Street. Our client's property is an important corner plot directly opposite the application site, with clear linkages in terms of use (designated 'Principle Shopping Centre' frontage along both sides of Gracechurch and Fenchurch Street) and built form and the renewal and regeneration of both sites must be considered together.

Design

The potential for tall buildings in this City Cluster/Renewal Opportunity Area is acknowledged, however the scale of development, as currently proposed, does not accord with that of the surrounding area. Local Plan design policy CS10 confirms that the bulk, height, scale and massing and detailed design of buildings must be appropriate to character, amenity and setting and the proposal must therefore relate to the existing built form. If a tall building is to be considered it must have due regard to opportunities for redevelopment of a similar scale at no. 60. Good design principles would focus height and mass towards corner locations (such as this) and the applicants must demonstrate that future opportunities as envisaged in the emerging plan, are not hindered.

You will be aware that the adjoining neighbour (no. 55 Gracechurch Street) to the immediate south of no. 60 Gracechurch Street, is also subject to a live planning application for a tall building (planning application ref. 20/00671/FULEIA). The cumulative impact of the two development's, which are 29 and 33 storey's respectively, either side of a modest building, would clearly be significant. The applicants have not sufficiently considered this cumulative impact to confirm no adverse impact.

Amenity of existing occupiers

No. 60 Gracechurch Street is currently occupied with retail uses at ground floor and offices above. The existing tenants have an ongoing lease agreement and have no plans to vacate. London plan (policy 7.6) and local plan policy (CS14), as well as emerging London plan policy D9 and Local Plan policy S12 confirm that tall buildings will only be acceptable where there is no adverse impact on the amenity of their surroundings. The redevelopment of no. 70 Gracechurch Street has the potential to have an adverse impact on the amenities of existing occupiers on

grounds of potential loss of daylight/sunlight. The applicants have not explored these impacts fully, such that we can be satisfied that there would be no adverse impact.

Heritage

The application site is in close proximity to two conservation areas (Eastcheap and Leadenhall conservation areas) and a number of listed buildings, including the Grade 1* listed Monument and the Tower of London World Heritage Site. London plan policy 7.8 and Local Plan policy CS7 seek to protect Heritage assets and are clear that proposals for tall buildings must conserve heritage assets and their settings. The impact of the development in this unique heritage context and its effect on daylighting to Leadenhall Market has been identified as a cause for concern by Historic England, who have requested that these matters should be fully addressed. We are concerned that any consideration in advance of satisfactory resolution of these issues would be premature.

In the light of the above, we respectfully request that this application is deferred, to allow the applicants to fully consider the implications of the redevelopment in the wider context, in particular, the impact on the future development potential of number 60 Gracechurch Street, the impact on the amenities of existing occupiers of the building and the unique heritage context within which it sits.

We would be grateful to receive confirmation of receipt of this correspondence and to be informed of progress with this application hereafter.

Yours sincerely

[redacted]

**Meghan Allen**
Associate
**NTR Planning**
[redacted]

# Comments for Planning Application 20/00816/FULEIA

**Application Summary**
Application Number: 20/00816/FULEIA
Address: 70 Gracechurch Street London EC3V 0HR
Proposal: Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.|cr|REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects). |cr|(The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,125sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).|cr|The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Kurt Gagen

**Customer Details**
Name: Miss Emma Baylis
Address: 17 Vinegar Street London

**Comment Details**
Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:I am the owner of Flat B, 4 Bull's Head Passage, EC3V 1LU and alongside my fellow flat owners at Flats A and C we are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.

I would like to make a representation that the residents are against this new development, as it will impact our quality of life.

Hackney Council
Planning Services
2 Hillman Street
London E8 1FB
**www.hackney.gov.uk**
Hackney Reference:2020/3341

13-01-2021

Mr Bhakti Depala
Po Box 270, Guildhall, London Ec2p 2ej

EC2P 2EJ
EC2P 2EJ

**Dear Sir/Madam**

**Town and Country Planning Act 1990 (as amended)**
**Town and Country Planning (Development Management Procedure) (England) Order 2015**

**Application Number:** 2020/3341

**Site Address:** 70 Gracechurch Street London Ec3v 0hr , London, EC3V 0HR

**Development Description:** Notification from the City of London of application 20/00816/FULEIA for the demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 2 Hillman Street, London, E8 1FB, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours sincerely

[redacted]

**Natalie Broughton**

**Head of Planning and Building Control**
**Neighbourhoods and Housing**

**PLANNING DECISION NOTICE**

**Town and Country Planning (Development Management Procedure) (England) Order 2015**

| | | | |
|---|---|---|---|
| **Agent:** | Bhakti Depala<br>Po Box 270, Guildhall, London Ec2p 2ej<br>Ec2p 2ej<br>EC2P 2EJ | **Applicant:** | Bhakti Depala<br>Po Box 270, Guildhall, London Ec2p 2ej<br>Ec2p 2ej<br>EC2P 2EJ |

Part 1- Particulars of the Application

**Application No:** 2020/3341

**Date of Application:** 02-11-2020

**Date Validated:**

**Application Type:** Adjoining Borough Observations

**Proposal:** Notification from the City of London of application 20/00816/FULEIA for the demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

**Location:** 70 Gracechurch Street, London, EC3V 0HR

Part 2 – Particulars of Decision: **No Objection**

**Date of Decision:** 13-01-2021

Yours sincerely

[redacted]

**Natalie Broughton**

**Head of Planning and Building Control**
**Neighbourhoods and Housing**

Hackney Council
Planning Services
2 Hillman Street
London E8 1FB
**www.hackney.gov.uk**
Hackney Reference:2021/0176

Kurt Gagen

26-01-2021

**Dear Sir/Madam**

**Town and Country Planning Act 1990 (as amended)**
**Town and Country Planning (Development Management Procedure) (England) Order 2015**

**Application Number:** 2021/0176

**Site Address:** 70 Gracechurch Street London EC3V 0HR

**Development Description:** Notification from the City of London of revised application ref: 20/00816/FULEIA for the demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 2 Hillman Street, London, E8 1FB, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours sincerely

[redacted]

**Natalie Broughton**

**Head of Planning and Building Control**
**Neighbourhoods and Housing**

**PLANNING DECISION NOTICE**

7**Town and Country Planning (Development Management Procedure) (England) Order 2015**

**Agent:** Kurt Gagen

**Applicant:** C/O Agent

Part 1- Particulars of the Application

**Application No:** 2021/0176

**Date of Application:** 13-01-2021

**Date Validated:**

**Application Type:** Adjoining Borough Observations

**Proposal:** Notification from the City of London of revised application ref: 20/00816/FULEIA for the demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

**Location:** 70 Gracechurch Street London EC3V 0HR

**Plan Numbers:**

Part 2 – Particulars of Decision: **No Objection**

**Date of Decision:** 26-01-2021

Yours sincerely

[redacted]

**Natalie Broughton**

**Head of Planning and Building Control**
**Neighbourhoods and Housing**

**From:** Adrian Phillips <[redacted]
**Sent:** 13 January 2021 09:24
**To:** Gagen, Kurt [redacted]
**Subject:** RE: 70 Gracechurch Street Consultation 20/00816/FULEIA

Dear Kurt

Thank you for contacting me. The impact of this development on the OUV of the Tower we have judged as not causing substantial harm, so are not objecting to the application in this instance.

Kind Regards

Adrian Phillips

**Director of Palaces & Collections**
[redacted]
[redacted]
Historic Royal Palaces

---

**From:** Gagen, Kurt <K[redacted]>
**Sent:** 12 January 2021 18:47
**To:** Adrian Phillips <[redacted]
**Cc:** Joyce, Maureen [redacted]>
**Subject:** 70 Gracechurch Street Consultation 20/00816/FULEIA

Dear Mr Phillips

I am the Case Officer dealing with the abovementioned site.

Historic Royal Palaces was consulted on the abovementioned application on 02.11.2020 and to date we have not received a response, which is unusual so I wanted to make contact with you.

Can you confirm if you are planning on making representations? The application is being

reported to 16th February Planning and Transportation Committee.

Kind regards,
Kurt

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

[redacted]
www.cityoflondon.gov.uk




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Historic Royal Palaces is a registered charity (No 1068852), correspondence details, Hampton Court Palace, Surrey KT8 9AU Historic Royal Palaces Enterprises Ltd, a company registered in England (No 3418583) registered office Hampton Court Palace, Surrey KT8 9AU.

70 Gracechurch Street

**Applicant's Response to Planning Application Representations**

Application ref: 20/00816/FULEIA

Advanced Idea Holdings Limited

**DP9 Limited**



DP9 Ltd
100 Pall Mall

London

SW1Y 5NQ
Tel: 020 7004 1700
Fax: 020 7004 1790

## 1. INTRODUCTION

1.1 This Report is prepared by DP9 in response to representations submitted to the City of London's public consultation on current planning application ref: 20/00816/FULEIA.

1.2 The purpose of this Report is to identify and address all individual comments contained within the representations, with a view to demonstrating the acceptability of the planning application proposals and alleviating any concerns contained within representations. It is worth noting that this response is issued further to a set of additional planning application documentation including amended proposed drawings, some of which is subject to a re-consultation exercise. Additional and amended documentation is referred to where of relevance.



1.3 This Report has been prepared with input of the following professional consultants who form part of the applicant's consultant team:

- **Kohn Pederson Fox**;
- **Spacehub** (landscape architects);
- **Trium Environmental** (EIA coordinators);

- **Citydesigner** (heritage and townscape consultants);
- **Momentum** (transport consultants);
- **RWDI and Wirth** (wind consultants);
- **GIA** (daylight, sunlight, overshadowing and solar glare consultants).

1.4 For each representation, the Report extracts all substantive comments (shown in italics) and queries and provides an answer to each.

## 2. OVERVIEW OF REPRESENTATIONS

2.1. All representations received to date are set out in Table 1. Parties that have submitted representations have been set into the following categories, which correspond to the sections of this Report:

a) **Public bodies**;

b) **Other bodies**; and

c) **Neighbouring and nearby landowners**.



*Table 1 – overview of consultation responses*

| Date | Submitted by | Type |
|---|---|---|
| 05/11/2020 | TfL Crossrail Safeguarding | Public body |
| 10/11/2020 | London City Airport | Other body |
| 13/11/2020 | NATS Safeguarding | Other body |
| 16/11/2020 | Environment Agency | Public body |
| 18/11/2020 | Westminster City Council | Public body |
| 19/11/2020 | Historic England | Public body |

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| 18/12/2020 | London Borough of Tower Hamlets | Public body |
| 07/01/2021 | Mr Mann Vergan on behalf of 4 Bulls Head Passage | Neighbouring landowner |
| 08/01/2021 | Ms Emma Baylis on behalf of 4B Bulls Head Passage | Neighbouring landowner |
| 08/01/2021 | Allianz House, 60 Gracechurch Street | Neighbouring landowner |

## 3. PUBLIC BODY REPRESENTATIONS

TfL Crossrail Safeguarding

| Comment ref | Comment | Response |
|---|---|---|
| **TFLCS1** | *No Comment – land outside of TfL's Crossrail Safeguarding area.* | No response |

Environment Agency

| Comment ref | Comment | Response |
|---|---|---|
| **EA1** | *No Comments on the proposal following review.* | No response |

Westminster City Council

| Comment ref | Comment | Response |
|---|---|---|
| **WCC1** | *No Comments on the proposal following review.* | No response |

Historic England

| Comment ref | Comment | Response |
|---|---|---|
| **HE1** | **Summary:**<br><br>*Historic England has no objection to the principle of replacing the existing building on the site, but we are concerned about the proposed tall building's wider impacts on the significance of London's historic environment, in particular the Tower of London WHS, St Paul's Cathedral and Leadenhall Market.*<br>*Our principal concern is about the harm that the replacement building would cause to the Tower of London by appearing in views from within the Inner Ward and increasing the amount of modern development competing with the historic buildings visible within the Tower's setting. We are also concerned that appropriate natural light needs to continue to be provided to the historic Leadenhall Market, and that loss of light as a result of this scheme could have a negative effect on the market's future sustainability.* | Responses to specific matters raised here are set out in more detail in HE2 to HE11 below. |

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| | *Given the exceptional significance of the Tower, evident in its designation as a World Heritage Site, and the great weight that must be given to its conservation by the National Planning Framework and in strongly-worded policies in the London Plans, we recommend that permission should not be granted unless you are persuaded that the harm caused by the proposals has been minimised, that there is clear and convincing justification for the proposals and that the harm they would cause would be outweighed by public benefits.*<br>*In weighing harm against public benefits in the manner required by paragraph 196 of the NPPF, you would also need to ensure that the potential for achieving heritage benefits through this scheme has been maximised and is capable of being fully realised, in particular through enhancements to the adjacent Grade II* listed Leadenhall Market.* | |
| **HE2** | *The impact of the proposed development on the Tower of London would harm its significance and outstanding universal value. The degree of harm would be modest.* | The proposed scheme is within the defined policy area of the Eastern Cluster, which is accepted as a contrasting, but high quality group of buildings in the wider setting of the Tower of London WHS. The proposals would be a minor addition to the existing and emerging Cluster, its high architectural quality making it a worthy addition. In a number of views, it ameliorates |

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| | | the singular powerful form of 20 Fenchurch Street. Its addition to the Cluster is therefore not considered to cause any harm to the significance or OUV of the WHS.<br><br>As part of pre-application consultations, Historic Royal Palaces stated that they had no objections to the proposed design.<br><br>Further analysis is provided in: Chapter 8 (section A, pages 36 to 43) and Chapter 10 (Views 7 to 9 and 10A to 10D) of the HTVIA. |
| **HE3** | ***View 10A Tower of London: Inner Wall/East of Wakefield Tower*** *is a view from within the Inner Ward of the Tower of London towards the historic group of buildings that make up the Queen's House. The City Cluster noticeably intrudes into the enclosed space. In particular, the tall building at No. 20 Fenchurch Street rises above the historic group, dominating it and creating an incongruous visual relationship between the two.*<br>*The proposed new building would appear as a sliver of development mostly concealed by, and lower than, the existing building at 20 Fenchurch Street. In this case, the harm to the significance of the Tower of London through an increase of modern* | The minor visibility of the proposed scheme in this specific view, with only a "sliver" of the proposed building visible next to 20 Fenchurch Street makes it a comparatively small addition in the wider setting and backdrop of the WHS. This minor addition in the view, of a building of high architectural quality, is not considered to harm the significance of the WHS or the ability to appreciate it. The OUV of the WHS is unaffected.<br><br>Further analysis is provided in: Chapter 8 (section A, pages 36 to 43) and Chapter 10 (Views 7 to 9 and 10A to 10D) of the HTVIA. |

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| | *development in its backdrop would be slight, but the status of the Tower as a World Heritage Site means that preserving its significance must be given the greatest possible weight.* | |
| **HE4** | ***View 10C Tower of London: Inner Ward - North-west corner of the White Tower*** *is a view towards the Chapel of St. Peter ad Vincula and the Victorian barracks block. The tall building at No. 20 Fenchurch Street rises above the roofline of the chapel.*<br>*As in View 10A, the proposed new building will appear as a sliver of new development alongside the 20 Fenchurch Street. The proposal would slightly increase the amount of modern development appearing in the backdrop of the chapel. The overall form and extent of the cluster, and its visual relationship with the Tower, would not change substantially. The proposals would cause a modest degree of additional harm to its significance.* | In View 10C, the proposed scheme is not visible.<br><br>In View 10B, which we believe is the view HE is actually referring to, only a very small part of the proposed scheme will be visible in the backdrop of the base of the bell tower of the Grade I listed Chapel of St Peter ad Vincula, leaving the lantern bell-cote unaffected. The very limited visibility of the proposed scheme, in the context of the existing setting of contemporary, high quality tall buildings, would not affect the prominence of the listed Chapel in this view. There is therefore no harm to the significance of the listed building or the OUV of the WHS as a whole.<br><br>Further analysis is provided in: Chapter 8 (section A, pages 36 to 43) and Chapter 10 (Views 7 to 9 and 10A to 10D) of the HTVIA. |
| **HE5** | *The proposals would also have an impact on the form and scale of the City Cluster, particularly in* ***View 42 LVMF 15B.2 Waterloo Bridge Downstream at the centre of the bridge****. St. Paul's is the* | In LVMF 15B.2 (View 42 of the HTVIA), the proposals add a new, high quality building to the southern part of the Eastern Cluster. It complies with the requirements of the management guidance listed in HE's comment i.e., it |

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| | *Strategically Important Landmark in the view, and the LVMF management guidance advises that new development should not dominate the cathedral or compromise its relationship with the clear sky around it. New development in the City Cluster should be of an appropriate height and of high architectural design quality.* | does not dominate the Cathedral or compromise its relationship with the clear sky around. The building is of an appropriate height in relation to the other buildings of the Eastern Cluster and is considered to be of high architectural design quality.<br><br>Further analysis is provided in: Chapter 6, Chapter 8 (section B, pages 46 to 47) and Chapter 10 (Views 42 and 43) of the HTVIA. |
| **HE6** | *A visual relationship between the Cathedral and the tall buildings of the City Cluster as two distinct forms with space between them was established as the cluster took shape in the early 2000s, and is best understood from the LVMF views from centre (15B.2) and Westminster bank (15B.1) of Waterloo Bridge. The Cathedral is set apart in the foreground and middle ground of the view, with the City Cluster forming the background to the right.*<br><br>*The pinnacle of the cluster is closer to the Cathedral than the tall building at No. 20 Fenchurch Street which appears as an 'outlier' further to the right. The visual tension created by the cluster in this view of St Paul's Cathedral and on the wider character of the City is likely to increase as the mass of the* | The proposed scheme does not reduce the distinction between the Cathedral and the Eastern Cluster. In fact, it improves the visual relationship between them.<br><br>In these views, where the interplay between St Paul's Cathedral and the Eastern Cluster is traditionally enjoyed, the historic duality of the two has been disrupted by No.20 Fenchurch Street, effectively introducing a third element, which is exacerbated by its form with a figurative front and back so that it appears to 'lean away' from the Cluster, towards the south. This perception of 'three elements' is made more disruptive by No.20 Fenchurch Street appearing to be the same height as St Paul's from this angle. This means that a symmetrical composition occurs, with its axis being the Cluster with its three central and largest buildings, both |

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| | *cluster grows larger and it takes on greater prominence on the skyline relative to the Cathedral. This will be an important consideration for the City for this and any future applications affecting the scale and mass of the cluster.* | under construction and consented, flanked by two singular objects, St Paul's to the left and No.20 Fenchurch Street to the right, effectively paired as 'outliers' from the group. This is not an acceptable form for the skyline, as the dominance of St Paul's Cathedral as a standalone object of great importance is diminished by its regrettable visual pairing with No.20 Fenchurch Street. The proposed development rectifies this damaging condition by closing the gap between the Eastern Cluster and No.20 Fenchurch Street which enhances the Cathedral's relationship with the Cluster as a whole.<br><br>Further analysis is provided in: Chapter 8 (section B, pages 46 to 47) and Chapter 10 (Views 42 and 43) of the HTVIA. |
| **HE7** | *The site is not within a conservation area, but it is close to the Grade II* listed Leadenhall Market. The market is dominated on all sides by existing and consented tall buildings, and the proposal at No. 70 Gracechurch Street would not fundamentally change the visual appearance of the setting of the listed building in its townscape. We are, however, concerned that appropriate natural light needs to continue to be provided to the historic market, as a* | It is noted that HE acknowledges that the proposed scheme *"would not fundamentally change the visual appearance of the setting"* of the Grade II* listed Leadenhall Market.<br><br>Leadenhall Market is highly enclosed (with both a roof/truss and brise soliel blocking sunlight where partially glazed) and therefore there is limited opportunity for overshadowing impact. |

| | | |
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| | *loss of natural light could harm the special interest of the listed building and have consequent effects on its future sustainability.* | |
| **HE8** | *The proposed new building at No. 70 Gracechurch Street would, along with consented but as yet unbuilt developments, fill the visual gap between the tall building at No. 20 Fenchurch Street and the main part of the City Cluster with built form and increase the Cluster's overall density. The prominence of the proposal at No. 70 Gracechurch Street and its consequent high potential to affect a high concentration of important heritage assets and the wider historic character of the City, demands a very high quality design response to its context.* | The design of the proposed scheme has been carefully developed in order to respond to its prominent location at the corner of Gracechurch Street and Fenchurch Street, in relation to surrounding heritage assets, and in relation to existing and consented Cluster buildings. In response to the fine grain of the adjacent conservation areas, and as part of the setting of highly graded listed buildings, the proposed design has a richly detailed podium level of varying heights which relates better to the street wall than the existing building. The tripartite sculptural form of the tower rising from the podium adds a high quality element to the setting of heritage assets and adds richness to medium and long distance views of the Cluster. A new publicly accessible north-south route at ground level, which incorporates compatible uses, connects to the historic Ship Tavern Passage and improves the pedestrian connectivity to the Grade II* listed Leadenhall Market from Fenchurch Street. There are proposed improvements to the public realm on Lime Street that include extending the existing shared surface down to Fenchurch Street, with new yorkstone paving extending into the 'Forum Halls', |

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| | | widened pavements and the planting of street trees along Lime Street. All of these attributes of the proposed scheme, in particular its exemplary architectural quality, improved connectivity and public realm, make a positive contribution to the settings of nearby heritage assets, the local townscape character and the City's skyline.<br><br>Further analysis is provided in: Chapter 6 of the HTVIA. |
| **HE9** | *We question whether the proposed design is of such quality. Its massing, the relationship between podium and upper levels, and the relationship between the proposed building and its surroundings, and particularly Leadenhall Market all give grounds for thinking otherwise.* | This comment doesn't make clear or give further details on why the aspects of the proposed scheme listed in this paragraph do not meet the high quality criteria referred to in HE8. The architects' DAS and Chapter 6 of the HTVIA set out in detail the rationale and evolution of the tripartite form of the proposed design, the relationship of the upper levels to the base, and how the base relates in height, expression and materiality to its context, including the nearby conservation areas. With regard to the Grade II* listed Leadenhall Market, HE consider that there is no harm to its setting (HE 7 above) and that the new connection from the south, improvements to the public realm and complementary uses at ground level have the potential to improve its setting (HE11 below). |
| **HE10** | *The impacts identified above would, in the language of the NPPF, cause less than substantial* | The HTVIA assessment on the Tower of London (chapter 8, section A) follows the stepped 'assessment |

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| | *harm to a designated heritage asset of the highest possible significance. The Tower's status as a World Heritage Site means that it is a heritage asset of the highest significance and that the greatest possible weight should be given to its conservation. It also means that you should ensure that the applicants have submitted a Heritage Impact Statement that is in line with ICOMOS guidance.* | framework' set out in the Mayor of London's World Heritage Sites Guidance on Settings SPG 2012, which is in line with ICOMOS guidance. This is confirmed in paragraph 5.2 of the SPG, *"This framework is based on ICOMOS guidance on undertaking Heritage Impact Assessments for World Heritage Sites and has been adapted for use in the UK context."*<br>The detailed assessments in Chapter 8, section A of the HTVIA conclude that there is no harm to the significance or the OUV of the WHS. |
| **HE11** | *We recognise the opportunity here to provide public benefits, which include the creation of a permeable connection to the market and improved public realm in general. We acknowledge that better accessibility to the adjacent Grade II* listed Leadenhall Market also has the potential to improve its setting.*<br><br>*There may also be the opportunity for its current use to be supported by complementary uses, which would be a public benefit, but we advise you to ensure that you are satisfied that the proposals would not inadvertently undermine the market's sustainability.* | The acknowledgement of public benefits in this comment is welcomed. The proposals are conceived to complement and improve footfall to Leadenhall Market, enhancing its sustainability. |

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| **HE12** | ***Recommendation***<br>*Historic England has concerns regarding the application on heritage grounds.*<br>*We are particularly concerned about the quality of the design as a part of the Cluster, which impacts on the heritage context, and the effect of this design specifically in the setting of the Tower, and the effect on the daylighting of of Leadenhall Market.* | The responses to HE2 to HE11 apply to this comment. |



London Borough of Tower Hamlets

| Comment ref | Comment | Response |
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| **LBTH1** | *The proposed development raises some concerns about the degree of visual separation between the eastern cluster and the Tower of London. The proposed development is a tall building in terms of the City of London's planning policy (in excess of 70m AOD).* | The responses to HE2, HE3 and HE4 apply to this comment. |
| **LBTH2** | *With respect to heritage assets, Policy 7.8 of the London Plan (2016) and Policy HC1 of the Intend to Publish London Plan require that developments affecting the setting of heritage assets, including* | The responses to HE2 to HE8 apply to this comment. |

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| | *conservation areas, listed buildings, scheduled monuments and World Heritage Sites, should conserve their significance. Additionally, Policy 7.10 of the London Plan (2016) and Policy HC2 of the Intend to Publish London Plan state that development should not cause adverse impacts on WHS or their settings, and, in particular, should not compromise the ability to appreciate OUV, integrity, authenticity or significance.* | |
| **LBTH3** | *View 10A – Tower of London: Inner Wall, East of Wakefield Tower*<br>*Within this view, The City Cluster intrudes into the enclosed space. In this view, the tall building at No. 20 Fenchurch Street (The 'Walkie Talkie') rises above the historic group. The proposed development would appear partially on its right-hand side at a lower height than 20 Fenchurch Street. The harm to this view would be minimal.* | The response to HE 3 applies to this comment. |
| **LBTH4** | *View 10B – Tower of London: Inner Ward, West of The White Tower 2*<br>*Within this view, The City Cluster rises above the Chapel Royal of St. Peter ad Vincula whilst 20 Fenchurch Street appears in the background to the left of the Chapel bell tower. The proposed development visually fills the gap between 20* | The response to HE 4 applies to this comment. |

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| | *Fenchurch Street and the Chapel bell tower, while its height at the same level as the solid base of the bell tower. The change to this view is considered to cause some harm, as the proposed development would infill the remaining section of sky between 20 Fenchurch Street and the Chapel.* | |
| **LBTH5** | *View 10D – Tower of London: Inner Wall, West of Bowyer Tower*<br>*Within this view, The City Cluster is seen rising above the Grade II* Listed One Trinity Square. The submitted Heritage, Townscape and Visual Impact Assessment by Trium states that the proposals 'effectively reduces the singularity of No.20 Fenchurch Street and contributes to the process of closing the gap between it and the principal Cluster'.* | In this view, No.20 Fenchurch Street disrupts the envisaged compositional quality of the existing and emerging Eastern Cluster (seen in the cumulative view on page 141 of the HTVIA), as a singular outlier building with a powerful expression. The addition of the proposed scheme to this view softens this dichotomy between the Cluster and 20 Fenchurch Street, contributing to its connection with the emerging Cluster and be part of a single composition of tall buildings. |
| **LBTH6** | *It should be noted The London Borough of Tower Hamlets objected to the now consented development at 50 Fenchurch Street (City of London ref: 19/01307/FULEIA). This development is for a 35-storey building outside of the City Cluster. When considering 50 Fenchurch Street as part of the cumulative effect on the Tower of London WHS, the proposed development in question appears problematic as it contributes towards an extended* | The proposed scheme does lie within the Eastern Cluster policy area as in the adopted 2015 Local Plan and draft City Plan 2036.<br>There is considered to be no harm to View 10D as explained in the response to LBTH5 above. |

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| | *wall of tall buildings, some of which appear within an uncomfortable proximity to the Tower of London WHS. This would also run contrary to the plan-led approach to modelling the cluster and its impacts on the WHS set out in the City's Local Plan and emerging Local Plan. As such, the proposal would cause some harm in this view.* | |
| **LBTH7** | *Relevant strategic views are set out in the London View Management Framework SPG (2012). The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. Policies 7.11, 7.12 of the London Plan (2016) and the LVMF SPG outline the views of strategic importance to London, and detail how these views should be managed. The relevant LVMF views have been provided which would affect the Tower of London WHS. LVMF view 10A.1 would be affected very minorly, with only a sliver of the proposed development seen to the right-hand side of 20 Fenchurch Street. LVMF view 25A.1 would also be very minorly affected, with only a sliver of the proposed development seen to the left-hand side of 20 Fenchurch Street.* | Noted, no response. |

## 4. OTHER BODY REPRESENTATIONS

London City Airport

| Comment ref | Comment | Response |
|---|---|---|
| **LCY1** | *London City Airport suggests the following conditions are added to this application. London City Airport's response must change to an objection unless these conditions are applied to this planning permission:*<br><br>*No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.* | Noted, no objection to the proposed condition. |

NATS Safeguarding

| Comment ref | Comment | Response |
|---|---|---|
| **NATS1** | *The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.* | Noted, no response. |

## 5. NEIGHBOURING AND NEARBY LANDOWNER REPRESENTATIONS

4 Bulls Head Passage

| Comment ref | Comment | Response |
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| **4BHP1** | *We are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.* | A Daylight and Sunlight Addendum has been submitted to the City of London for further consultation, which addresses the concerns in relation to 2-4 Bulls Head Passage. |

4B Bulls Head Passage

| Comment ref | Comment | Response |
|---|---|---|
| **4BBHP1** | *I am the owner of Flat B, 4 Bull's Head Passage, EC3V 1LU and alongside my fellow flat owners at Flats A and C we are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.* | A Daylight and Sunlight Addendum has been submitted to the City of London for further consultation, which addresses the concerns in relation to 2-4 Bulls Head Passage. |

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| | *I would like to make a representation that the residents are against this new development, as it will impact our quality of life.* | |

60 Gracechurch Street

| Comment ref | Comment | Response |
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| **60GS1** | *The building currently proposed at no. 70 is of a vastly different scale and character to the local context - in particular in relation to our client's premises at no. 60 Gracechurch Street, which are directly opposite and linked in function, use and townscape character.* | Noted. The proposed development responds to the current Eastern Cluster and emerging City Cluster in which it is placed. The area includes numerous tall buildings and the townscape and visual impact of the building has been considered widely. |
| **60GS2** | *Our clients do not object to the principle of the redevelopment of this site but seek further information to demonstrate that this development will not hinder the future development potential of no. 60 Gracechurch Street. Our client's property is an important corner plot directly opposite the application site, with clear linkages in terms of use (designated 'Principle Shopping Centre' frontage along both sides of Gracechurch and Fenchurch Street) and built form and the renewal and regeneration of both sites must be considered together.* | The Applicant does not consider that the proposed redevelopment of No. 70 Gracechurch Street will inhibit the ability to redevelop No. 60 in any way. The improvement of the public realm and active uses at ground floor could complement any future proposals at No. 60. There is the potential for towers to positively relate in the emerging City Cluster.<br><br>The proposals have been robustly justified in the context of the Development Plan including the policy referred to and have been subject to a full assessment of built heritage, townscape and visual impact. |

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| **60GS3** | *The potential for tall buildings in this City Cluster/Renewal Opportunity Area is acknowledged, however the scale of development, as currently proposed, does not accord with that of the surrounding area. Local Plan design policy CS10 confirms that the bulk, height, scale and massing and detailed design of buildings must be appropriate to character, amenity and setting and the proposal must therefore relate to the existing built form. If a tall building is to be considered it must have due regard to opportunities for redevelopment of a similar scale at no. 60. Good design principles would focus height and mass towards corner locations (such as this) and the applicants must demonstrate that future opportunities as envisaged in the emerging plan, are not hindered.* | |
| **60GS4** | *No. 60 Gracechurch Street is currently occupied with retail uses at ground floor and offices above. The existing tenants have an ongoing lease agreement and have no plans to vacate. London plan (policy 7.6) and local plan policy (CS14), as well as emerging London plan policy D9 and Local Plan policy S12 confirm that tall buildings will only be acceptable where there is no* | The Development Plan does not require the assessment of daylight and sunlight impacts to office or retail buildings and the BRE guidance does not regard these uses as sensitive. Relevant properties for daylight and sunlight assessment were reviewed and confirmed as appropriate through the EIA scoping report. |

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| | *adverse impact on the amenity of their surroundings. The redevelopment of no. 70 Gracechurch Street has the potential to have an adverse impact on the amenities of existing occupiers on Page 3 grounds of potential loss of daylight/sunlight. The applicants have not explored these impacts fully, such that we can be satisfied that there would be no adverse impact.* | |
| | *The application site is in close proximity to two conservation areas (Eastcheap and Leadenhall conservation areas) and a number of listed buildings, including the Grade 1* listed Monument and the Tower of London World Heritage Site. London plan policy 7.8 and Local Plan policy CS7 seek to protect Heritage assets and are clear that proposals for tall buildings must conserve heritage assets and their settings. The impact of the development in this unique heritage context and its effect on daylighting to Leadenhall Market has been identified as a cause for concern by Historic England, who have requested that these matters should be fully addressed. We are concerned that any consideration in advance of satisfactory resolution of these issues would be premature.* | These issues have been considered in detail across the submission including in the Heritage, Townscape and Visual Impact Assessment (ES Vol.2) and it is not considered that there is a need for further assessment. Leadenhall Market is highly enclosed (with both a roof/truss and brise soliel blocking sunlight where partially glazed) and therefore there is limited opportunity for overshadowing impact. |

**ENDS**

**DP9 Limited**

**15/01/2021**

# TECHNICAL NOTE

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|---|---|
| **Project** | 70 Gracechurch Street |
| **Report Title** | Response to CoL Comments |
| **Date** | 15/01/2021 |
| **Prepared by** | Momentum Transport Consultancy |
| **Prepared for** | City of London (CoL) |

## 1. Introduction

1.1 This Note has been prepared in response to comments received from the City of London (CoL) regarding the submitted planning application for 70 Gracechurch Street.

1.2 The requested clarifications and/or the additional information sought from CoL Highways is summarised in Appendix A. This appendix provides a succinct summary of transport related comments and the respective responses. In some circumstances, further information has been requested with additional detail, and these items have been summarised in the below section of the Technical Note.

## 2. Further Information

2.1 The responses provided can be summarised into the following key discussion subjects:

- Highway Boundaries
- Pedestrian Comfort Level (PCL) Scores
- Lime Street Cycle Rack Dimensions
- Cycle Parking Calculations

2.2 All other items are responded to in note format and are attached in Appendix A.

**HIGHWAY BOUNDARIES**

**CoL Comment(s):**

*"We believe that the majority of the stopping up is proposed on TfL highway, and that some of the proposed stopping up on Fenchurch Street is already private land, so would not need to be stopped up"*

*"Figure 3.14 presents the existing highway boundaries and Figure 3.15 presents the revised highways boundaries as a result of the Proposed Development. We believe that the majority of the stopping up is proposed on permissive path so may not need to be stopped up. Please confirm if you are proposing the stopping up due to your understanding that the permissive path has become public highway due to long use?"*

2.3 A detailed review of the highway boundaries submitted as part of the submitted TA has been undertaken. Further checks have confirmed that the ownership of the proposed footprint of the new development is within private land and owned by the site. Therefore, no stopping up of public highway would be required as part of the proposed development.

2.4 A revised drawing has been prepared to show the updated land ownership plan and is attached in Appendix B.

## PEDESTRIAN COMFORT LEVELS

**CoL Comment:**

*"For ease, please can the applicant provide a table showing the PCL score at each location now and the PCL score proposed without diversion, and with diversion, eg"*

2.5 The suggested format presented in the below tabled has been requested for simplification. Whilst the recommended format and table has been populated, additional columns to account for AM and PM peak hours separately have been added as this was considered useful context. The PCL scores presented are considered the most representative of the links as a whole.

*2.1: PCL Scores*

| Location | Base 2027 | | Base 2027 no Diversion | | Base 2027 with Diversion | |
|---|---|---|---|---|---|---|
| | AM | PM | AM | PM | AM | PM |
| Fenchurch Street north | B- | B | B | B- | B | B |
| Philpot Lane east | B+ | B+ | B | B | B | B |
| Philpot Lane west | F | F | B | C+ | B | C+ |
| Gracechurch Street east | **C+** | **C+** | **B-** | **B** | **B** | **B+** |
| Lime Street east | F | F | B+ | B+ | B+ | B+ |
| Lime Street west* | B+ | B | C+ | C+ | B- | C+ |
| Rood Lane east | A+ | A+ | A+ | A+ | A+ | A+ |

**Assumes no diversion of pedestrians flows through the site corner*

2.6 It can be seen that the PCL scores of F would be removed with the proposed development. This would be achieved via rebalancing and rationalising of the space available on Lime Street. Consequently, under the 'with development' scenario all links would meet the minimum accessibility criteria (i.e. 2m minimum width) with the proposed development and so represents a significant improvement from existing conditions in this regard.

2.7 The majority of the locations will likely perform at a minimum PCL score level of B. Two links would achieve a PCL score of C+; however, one of these is improved from an existing score of F, and the other would benefit from the likely diversion of pedestrian flows through the site corner (e.g. those travelling to Lime Street from Fenchurch Street west and vice-versa as this represents a shorter distance).

**CoL Comment:**

*"How wide would the footway have to be extended by, to improve the pinch point C- score on the corner of Gracechurch Street and Fenchurch Street? Would this minor footway widening be agreed to be in the scope of the S278 if TfL and the City agree?"*

2.8 The pinch point PCL score of C- at the southern end of Gracechurch Street is caused by the existence of the cluster of post, signal box and traffic light. The radius is also tight at this location because of the left turn from Gracechurch Street on to Fenchurch Street. Widening the footway at this location would impact on the ability of larger vehicles to turn left into Fenchurch Street (under the current junction operation) and this does provide limitations to widen the footway at this location, with the information we currently have at our disposal.

2.9 Nevertheless, we have reviewed the PCL assessment at this location in order to gain an understanding of the widening that would be required to improve on the PCL score of C- as presented within the submitted TA. Upon updating the PCL assessment required to undertake this work it was observed that the future N / S baseline flows assumed along Gracechurch Street had been onerously applied.

2.10 The baseline flows have subsequently been updated to be consistent with the other external footway links (i.e. growthed to 2027). The work requested by CoL looking into the widening that would be required to improve upon the C- score presented in the TA was subsequently undertaken. It was found that a score of C+ (in the AM and PM peak hours) would be achieved at this location with the corrected baseline flows accounted for.

2.11 An increased widening of 0.01m would be required along Fenchurch Street in order to achieve a PCL score of C+ at this location.

2.12 CoL Highways has queried if the applicant would be willing to undertake minor footway widening. As outlined above, the PCL assessment has provided positive and supportive PCL results. Moreover, any change in widths to the footways in question, would likely impact the operation of the junction and corner radius, all of which we understand is under investigation by CoL and TfL. The Applicant may be willing to consider contributing an appropriate and reasonable amount towards the potential upgrade of the Gracechurch Street / Fenchurch Street junction as part of a S278 agreement with CoL / TfL however, minor widening works may become redundant or superseded by the overall junction review. In summary, it is our view that the PCL analysis undertaken is robust and demonstrates that the surrounding footways can accommodate the development flows.

## LIME STREET CYCLE RACKS

**CoL Comment:**

*"There should be a minimum 2m wide access route next to occupied cycle stands on the eastern pavement of Lime Street, as this would accommodate larger electric mobility scooters (BS8300-1:2018 8.1.2)."*

2.13 It is confirmed that a minimum of 2m wide access route would be provided next to an occupied cycle stand on the eastern pavement of Lime Street. Figure 2.1 below provides further clarity on the dimensions at this location.

*Figure 2.1 Dimensions Available at Lime Street (East)*




2.14 It can be seen that when a parked cycle is accounted for, there would be a space of 2.3m available to the east of the cycle rack. To note, the widths shown in the submitted PCL maps as part of the TA document take account of buffer space to each side of the parked cycle, as per TfL's PCL guidance.

## CYCLE PARKING CALCULATIONS

**CoL Comment:**

*"There are some discrepancies between my working for the cycle parking calculations and the applicants. Please can the numbers be clarified to confirm what the London Plan requires?*

*How has the Public gallery cycle parking been worked out?"*

2.15 The cycle parking calculations have been reviewed. The number of long stay spaces required for Retail (Non-Food) has been increased from one to four and the total number of long stay spaces required has therefore increased by three. The discrepancy in short stay spaces required for Retail (Food) has occurred due to the application of A3-A5 food retail standards within the TA for robustness. This is considered a 'worst-case' application of the standards and no changes are therefore proposed to be made in this regard.

2.16 In summary, the requirement for long stay spaces has increased by three (985 total now required) and there is no change to the short stay space requirement (102).

2.17 The public gallery cycle parking has been calculated by reference to the 'Other' D1 category within ITP London Plan. The cycle parking requirement is based on the number of staff for long stay spaces and based on sqm for short stay requirements. The number of staff has been calculated by reference to the Employment Density Guide and the use class assumed has been D2 (Visitor and Cultural Attractions) and is consistent with the recently submitted 55 Gracechurch Street application. The subsequent calculations indicate that there will likely be 8 staff members required and therefore one long stay space is required as per the ITP London Plan standards. Sixteen short stay spaces are required.

2.18 The updated totals of cycle parking spaces required are provided below for clarity:

*Figure 2.2: Updated Cycle Parking Calculations*

| Land Use | No of Spaces | |
|---|---|---|
| | Short Stay | Long Stay |
| Office B1 | 24 | 974 |
| Public Gallery (Other) | 16 | 1 |
| Retail (Food) | 46 | 6 |
| Retail (Non-Food) | 16 | 4 (+3) |
| **Total** | **102** | **985** |

2.19 The above change in the required number of cycle parking spaces is minor and can readily be incorporated at the next stage.

2.20 Responses to the remaining items raised by CoL are provided in Appendix A.

2.21 We trust all matters have been satisfactorily addressed and welcome any further discussions in relation to the technical highways matters.

# APPENDIX A

| Deliveries and Servicing | | |
|---|---|---|
| # | CoL Comment | Response |
| D1 | A condition or obligation should be included to ensure that servicing is only allowed between 2300-0700 each day | Noted. The Applicant would be willing to commit to the nominated servicing hours. |
| D2 | Deliveries in the daytime (ie when the vehicle lifts are not in use: 0700-2300) should be done by cargo cycle or foot only | Noted and acknowledged within the submitted DSP. |
| D3 | The DSP is required and should comment on the use of cargo cycles and the number of vehicles that are not on the road/accessing the development due to the use of cargo cycles to show the benefits of using cargo cycles | The use of cargo bikes during the day will contribute to the removal of all daytime vehicle deliveries as these sustainable deliveries enable an overnight vehicle delivery strategy to implemented. As such, all delivery vehicles that might otherwise have been present on the wider highway network during the day will be removed. Any existing daytime delivery servicing vehicles will also be removed as a result of the proposals. The detailed DSP which we understand will be secured by way of condition, can investigate in further detail - the corresponding cargo bike loads that could feasibly be used by the development and the comparative vehicles that would otherwise use the road network. |
| D4 | The use of an off-site consolidation centre will be mandatory | It is understood that the use of consolidation centres is pertinent to the servicing strategy and ensuring the proposed loading areas work appropriately. The use an off-site consolidation is, however, also dependent upon external factors such as the continued delivery and expansion of these schemes via logistical companies. Whilst it can be assumed that this delivery will continue, it is requested that the wording be modified to allow some flexibility for the development to refine the internal operations should it be necessary. The Applicant would be willing to agree to a condition requiring the use of consolidation centres, on the basis of the supply being available and we would request that the proposed development be permitted 6-12 months from opening to address this requirement. |
| D5 | We recommend a cap on the number of vehicles to the site per servicing period (2300-0700) of 58 vehicles, and a maximum of 3 of the deliveries do not have to travel from the consolidation centre (the remaining 55 must travel from the consolidation centre) | A cap on daily servicing vehicles is supported; however, it is proposed that a buffer of 10% is allowed to account for daily fluctuations of deliveries that may be required across the week and indeed contingency purposes. This approach is consistent with the feedback received from CoL for 55 Gracechurch Street. In this regard, we would request that the recommended daily cap be amended to 64 vehicles and a maximum of 3 deliveries not travelling from a consolidation centre. |
| D6 | All lift maintenance should be done at the weekend unless it is emergency maintenance, and this should be secured through legal agreement | Noted. The Applicant would be willing to commit to this. |
| D7 | The vehicle loading bays in the basement will provide electric vehicle charging, which is welcomed and this should be secured by condition | Noted. The Applicant would be willing to commit to this. |
| # | Additional Questions | |
| D8 | Please can the applicant confirm they will agree to a condition or planning obligation limiting servicing by vehicle to 2300-0700 each day only? | Please comment D1. |
| D9 | Please can the DSP include comment on the number and commitment to the use of cargo cycles? | Please comment D3. |

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| D10 | One of the documents states “The Proposed Development will use freight consolidation as required by policy and is therefore forecast to generate 78 delivery and servicing trips per day, and up to 8 trips within the peak hour.” However, most of the information states 58 deliveries per day – please clarify | It is confirmed that the expected daily delivery frequency is 58 vehicles with consolidation. |
| D11 | How will the public realm area (where retail is proposed) on the lids of the vehicle lifts be serviced? Will the applicant commit to servicing this market stalls on the vehicle lifts via cycle courier only? | It is our understanding that vendors associated with pop-up retail would generally arrive on site with the necessary facilities and goods. Notwithstanding, there will be the opportunity for the area to be served by cargo bikes / foot deliveries. The Applicant would be willing to consider this, noting that there could also be some synergies applied to the overnight servicing strategy given the small scale nature of the pop up retail facilities. |
| D12 | Please can the applicant confirm they will sign up to a legal agreement to maintain the lifts, which includes all routine lift maintenance to take place at weekends? | Noted. The Applicant would be willing to discuss a legal agreement regarding maintenance. |

| Public Realm and Pedestrian Comfort | | |
|---|---|---|
| **#** | **CoL Comment** | **Response** |
| P1 | The new pedestrian route through the development is welcomed and considered a key benefit of the scheme. We will want to ensure that the ‘approximately 5 metres of useable, sheltered footway’ would be maintained and not blocked by furniture etc, and as such there will be an obligation associated with the public space | Noted. The Applicant would be willing to further discuss this obligation which would be delivered under the permissive path criteria. |
| P2 | Lighting should be agreed by condition and should be in line with the City of London (CoL) Lighting Strategy. CoL street Lighting will be placed on the building | Noted. The Applicant would be willing to commit to engaging in further discussions with the CoL in this regard and the details of such would need to be agreed at the next design stage. |
| P3 | There are expected to be 1107 NET trips in the AM peak hour (0800-0900) and there are expected to be 1080 NET trips in the PM peak hour (1700-1800) | Noted. As per Pre Application discussions, there are opportunities to consider improved footway widths along the site's western frontage (Gracechurch Street) and the site's southern frontage (Fenchurch Street). It should be acknowleged that the submitted TA has provided the PCL scores for the future operations, and the delivery of the n/s route through the Site forms the primary mitigation for diverting trips through the site, in addition to the junction redesign of Lime Street / Fenchurch Street / Philpot Lane and the opening up of the south eastern corner of the site. The aforementioned mitigation measures do form the primary mitigation being provided with potential to consider the Fenchurch Street and Gracechurch Street footway works, however those components of work are directly linked and associated with TfL and CoL identified schemes. Further discussions will be required and negotiated separatley. Notwithstanding, the PCL analysis undertaken supports the proposed development impact *<u>without</u>* the requirement to deliver footway widening on Fenchurch Street and Gracehurch Street. |
| P4 | The increase in people to the development at peak hour is considered acceptable due to the mitigation being provided in the form of: | |
| P5 | · a new n/s pedestrian route through the building | |
| P6 | · potential within the CoL S278 to widen the footway on either side of Fenchurch Street (dependent on the future vision for the street) | |
| P7 | · potential within the TfL S278 to widen the footway on Gracechurch Street (subject to TfL agreement) | |
| P8 | · redesign of the Lime Street Junction with Fenchurch Street within the S278 scope | |
| P9 | · footway improvements on Philpot Lane within the S278 scope | |
| P10 | · footway improvements and the consideration of an extension of the timed closure on Lime Street within the S278 scope | |
| P11 | Overall, the geographical area of the CoL S278 should include Lime Street (up to and including the existing bollards), Fenchurch Street, Philpot Lane and Rood Lane. The TfL S287 should be negotiated separately | Noted . |
| P12 | Relocation of the taxi rank and TRO changes on Philpot Lane would be in the scope of the S278 – however it would be subject to a public consultation process and we cannot pre-judge the outcome of this | Noted. |
| P13 | The detailed design of the S278 will take place later in the process and will be informed by City of London Policy, our vision for the area and, TfL’s Healthy Streets. | Noted. |
| P14 | The PCLs have been calculated with an expected 10% of people taking the new pedestrian route through the building. This figure is considered reasonable. | Noted. |
| P15 | When you take into account the proposed new route through the development the PCL scores achieved would be generally much improved from the expected PCL scores in 2027. | Noted and agreed. |
| P16 | The provision of the new pedestrian route, the improved permeability of the south eastern corner of development, and the realignment of Lime Street and Philpot Lane have helped to improve the PCLs. | Noted. |

| | | |
|---|---|---|
| P17 | The Gracechurch Street PCLs have improved due to the setting back of the façade and also due to the removal of pinch points. Two pinch points remain on the corner of Fenchurch Street and Gracechurch Street, which are as a result of the signal box and secondly as a result of the radius of the corner of the kerb. Mitigation to remove this pinch point and improve the PCL score could come in the from of widening the footway on the corner of Gracechurch Street and Fenchurch Street. This would be in agreement with TfL, the City and the applicant, but the applicant has shown willingness to improve the footways on Fenchurch Street | Please see comment P26 below. |
| P18 | There are two trees proposed on Rood Lane, primarily for wind mitigation purposes. This form of wind mitigation is not the preferred option as it reduces the useable width of the footway. However, in this instance, the PCL score on Rood Lane remains at A+, and the clear footway width remains accessible, therefore this is considered acceptable in highway terms | Noted. |
| P19 | It was disappointing to see the Transport Assessment stated the "Applicant is not committing to carry out works as part of the Proposed Development beyond the 'Do Minimum' scheme". We consider the S278 works discussed in our continued pre-application process as necessary to offset the downsides associated with the development, including the wind conditions as a result of the development, and this wording needs to be discussed with the CoL | The improvements delivered as part of the 'Proposed Development' are seen as the minimum that can be delivered at this moment in time given the uncertainty surrounding the future of Fenchurch Street and wider improvements that may be identified and delivered. It is stated within the TA at Paragraph 5.5.47 and 5.5.48 that, *"It was confirmed with TfL that this flexible approach was the most appropriate way forward given the uncertainty involved as a consequence of the improvement scheme's prematurity and the future function of Fenchurch Street. Once the future function of Fenchurch Street can be identified, discussions surrounding the optimal crossing provision at this location can re-continued.*<br><br>*To reiterate, the Applicant would be open to discussing and investigating in liaison with TfL and CoL whether contributing towards the delivery of an alternative future scheme (to the 'Do Minimum' scheme presented within this TA) would be appropriate."*<br><br>The Applicant remains committed to engaging in these discussions regarding the Lime Street/Fenchurch Street/Philpot Lane junction as part of a S278 agreement when the time is appropriate to CoL / TfL. |
| **#** | **Additional Questions** | |
| P20 | The CoL will expect the applicant to sign up to obligations in the S106 agreement to ensure the public routes through the development are accessible at all times (as agreed) and built and insured to an appropriate level – please confirm agreement | Noted. The Applicant would be willing to further discuss this obligation which would be delivered under the permissive path criteria. |
| P21 | Where will the seating/public furniture be stored when not in use on the vehicle lifts? | The DAS notes that loose furniture shown in visualisations is indicative only. In the proposed pop-up market, the stalls/carts are intended to be provided by the vendors, and therefore stored offsite. However, in the design development stage, agreements between the building management and vendors could facilitate the use of some of the storage facilities located in the basement and be accessed via the goods lifts (outside of peak hours). Please see comment D1 for further information in this regard. |
| P22 | There is a statement which says: "The proposed pedestrian walkway that would be provided as part of the development would provide an additional pedestrian route through the Site and would be accessible to those that wish to access the Proposed Development." This statement could be misinterpreted to mean people can only use the route through, IF they are accessing the site. Please confirm this is a genuine publicly accessible route for anyone to use – this is our understanding | Noted. It is confirmed that this would genuinely be a publicly accessible route for anyone to use as permissive path. |
| P23 | Are all the existing public cycle parking stands relocated from the west to the east of Lime Street? | Yes, they are relocated in full. Nine cycle racks (and 18 spaces) are maintained. |

| | | |
|---|---|---|
| P24 | When the vehicle lifts are in use how wide will the public access route past the lifts be and how will it be managed? | To note, with the implementation of overnight servicing, the vehicle lifts would only be in operation when there are no pedestrians present in the space. In this regard, it would be likely that the area would be secured (by fencing or otherwise) to restrict interaction between vehicles and pedestrians and the closure would occur along the column line of the building and this space (akin to the HVM bollards)<br><br>In the rare event of vehicle lift malfunction, the narrowest points around the southern-most lift (worst case) would be 4.2m (x2) - to the columns to the south and to the east of the southern-most lift. The space available between the southern-most vehicle lift and cycle racks to the south would be 7.6m (including for a parked bicycle). Anti-clockwise routing would provide a pedestrian route width of no less than 3.3m to the west of the vehicle lift. |
| P25 | For ease, please can the applicant provide a table showing the PCL score at each location now and the PCL score proposed without diversion, and with diversion, eg: | Information provided in supporting Cover Note. |
| P26 | How wide would the footway have to be extended by, to improve the pinch point C- score on the corner of Gracechurch Street and Fenchurch Street? Would this minor footway widening be agreed to be in the scope of the S278 if TfL and the City agree? | Information provided in supporting Cover Note. |

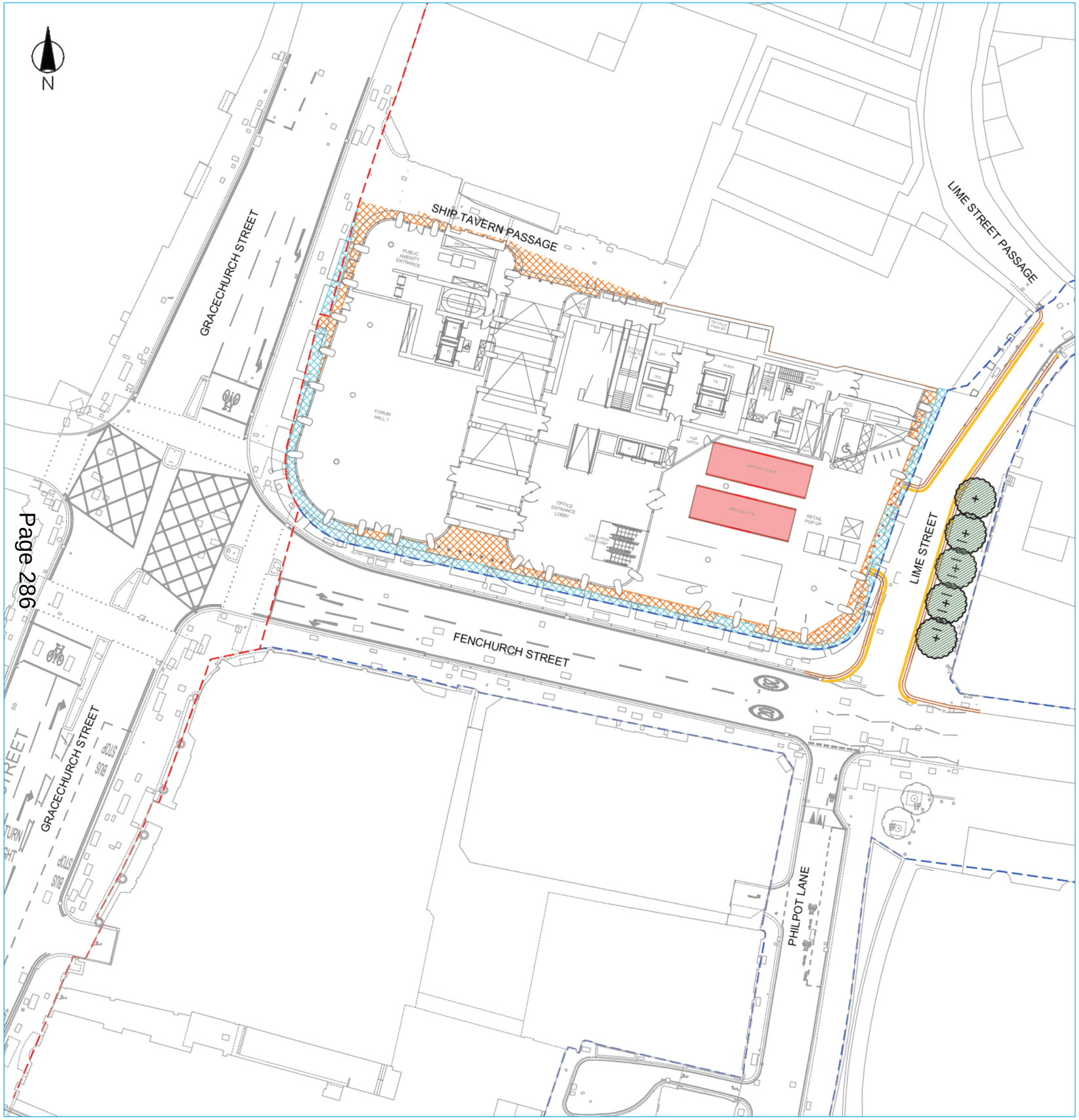
| Stopping Up | | |
|---|---|---|
| **#** | **CoL Comment** | **Response** |
| S1 | We believe that the majority of the stopping up is proposed on TfL highway, and that some of the proposed stopping up on Fenchurch Street is already private land, so would not need to be stopped up | Information provided in supporting Note. |
| **#** | **Additional Questions** | |
| S2 | Figure 3.14 presents the existing highway boundaries and Figure 3.15 presents the revised highways boundaries as a result of the Proposed Development. We believe that the majority of the stopping up is proposed on permissive path so may not need to be stopped up. Please confirm if you are proposing the stopping up due to your understanding that the permissive path has become public highway due to long use? | Information provided in supporting Note. |
| S3 | What is the area in sqm that is proposed to be stopped up? | Information provided in supporting Note. |
| S4 | Please confirm that all HVM will be within the façade of the building and on private land | The HVM bollard line is entirely within the ownership boundary / building envelope but is not entirely integrated into the façade. |

| Cycling | | |
|---|---|---|
| **#** | **CoL Comment** | **Response** |
| C1 | The proposed modal shares in the travel plan include 12.5% of people travelling by cycle, which is welcomed | Noted. |
| C2 | Three cargo bike spaces provided at ground floor level. These spaces would provide a servicing function with additional flexibility, increasing its ability to react to bespoke site requirements in the future. | Noted. |
| C3 | The long stay cycle parking can be accessed via 2 cycle lifts, 2 goods lifts, or gullied staircase and these three methods are welcomed and will give options to people at busy times | Noted. |
| **#** | **Additional Questions** | |
| C4 | There are some discrepancies between my working for the cycle parking calculations and the applicants. Please can the numbers be clarified to confirm what the London Plan requires? | Information provided in supporting Note. |
| C5 | How has the Public gallery cycle parking been worked out? | Information provided in supporting Note. |
| C6 | There are 100 showers and 668 lockers proposed. Showers are being provided at a ratio of 1 shower per 10 cycle parking spaces which is acceptable. However, the number of lockers being proposed is low – we recommend at least 1 locker is provided per long stay cycle parking space so people have somewhere to store their personal belongings. These lockers may also be used by people who want to walk or travel actively to the development. Please can the applicant increase the locker provision? | An optimisation of the layout of Basement 1 floor has been undertaken and the site can deliver an additional 32 lockers, bringing the total provision to 700 and above the minimum London Plan policy requirement. A provision of one locker per one long stay cycle parking space is unachievable with the space available and would impact other facilities in the area, such as cycle parking. |

| | | |
|---|---|---|
| C7 | 22 short stay cycle spaces are proposed at ground floor and these would be provided as Sheffield Stands. This is a decrease from the 30 (+ cargo cycles) proposed at the pre-app discussions and this is disappointing and not accepted – why has the decrease occurred? | The latest plans shown to CoL on 13th August 2020 stated 22 short stay spaces (+ three cargo bike spaces) would be provided and so it is unclear where this confusion may have originated from. However, three additional short stay spaces have been provided specifically for larger cycles and are incorporated within the building. These would be in addition to the cargo bike spaces and so the total provision of short stay cycle parking would be 25 spaces (of which 3 are larger cycle spaces) in addition to the 3 cargo bike spaces, thereby totalling 28 short stay spaces. |
| **#** | **Cycle facilities - Access** | **Response** |
| C8 | 23. Sheffield cycle stands are beneficial for people who use a two-wheeled bike as a mobility aid and do not have strength or dexterity to use wall mounted or two-tiered cycle racks, however the London Cycling Design Standards 8.2.1 recommends that "at least 5 per cent of all spaces should be capable of accommodating a larger cycle". It is noted that 5% of the long stay cycle parking will consist of Sheffield cycle stands however if these stands were to be used by larger cycles, such as tricycles, handcycles and recumbent cycles which can be up to 1.2m wide and 2.8m long, the capacity of these stands would be substantially less than the proposed 50 cycles. Three larger cycle spaces are proposed on the ground floor however it is noted that these would be reserved for cargo bikes to assist with smaller deliveries to the site (Transport Assessment 3.17.53). | Reference should be made to comment C7 above in relation to larger cycles for short stay cycle parking which addresses the concerns raised. In relation to long stay layouts for sheffield stands, it would be possible to review the proposed layout to deliver a similar proportion of larger spaces to that provided for the short stay provisions. This detailed design work could be considered at the next design stage. |
| C9 | 24. The effective clear width of the doors in the Lower Ground Floor are too narrow for cycles. 1000mm minimum door openings are required and any door to a cycle parking area should be automated with push button or pressure pad operated (London Cycling Design Standards 8.2.1). | Momentum has reviewed this comment alongside the project architects KPF and the effective clear width of all doors on the lower ground floor can be updated at the next design stage to accord with the LCDS requirement of 1m. |

| **Other** | | |
|---|---|---|
| **#** | **CoL Comment** | **Response** |
| O1 | Doors must not open outwards in line with the Highways Act 1980 | There are five egress doors that are required to open outwards. However, all five doors are set in from the building line as defined by and flanked by structural columns and open out on to private land. |
| O2 | Legible London contributions will be required | Noted. The Applicant would be willing to further discuss this requirement. |
| O3 | CLP – any street closures must maintain cycle and pedestrian access and construction deliveries should be conso | Noted. The proposed construction methodology has been submitted with the planning application and will need to further develop this work as part of the detailed CLP. |
| **#** | **Additional Questions** | |
| O4 | The canopies will require a projection licence – please can the applicant confirm the height is 7.6m above the highway below? | The ground floor canopies are currently proposed at 6m clear height above the pavements, in line with discussions with officers during pre-application consultation and CoL policy. This provision exceeds the requirement of 5.7m. |
| O5 | I can see there is space for security at the ground floor access for the public garden, what form of security checks are expected to take place? E.g security scanners, cameras, physical etc. | Application drawing PA-100 (ground floor) indicates two body scanners and one bag scanner within the Public Gallery entrance hall. Security provisions will be developed in future design stages and will be reflected in the management plan. |

# APPENDIX B






NOTES

1. Do not scale from this drawing, work to figured dimensions only.
2. This drawing is based on OS mapping provided by City of London Interactive Map and KPF plan referenced Iteration G.2, SK-426, dated 03/08/2020.
3. This highway layout is preliminary design only and has not been subject to Road Safety Audit.

- Proposed kerb
- Existing CoL highway boundary
- Existing TfL highway boundary
- Revised existing CoL permissive paths - 148m$^2$
- Proposed permissive path - 182m$^2$
- New total of permissive path - 330m$^2$ (gain of 182m$^2$ from revised existing)




OVERVIEW PLAN




LOCATION PLAN

| Rev | Date | By | Remarks | Chkd | Appd |
|---|---|---|---|---|---|
| D | 13/01/21 | PD | Minor Update | TE | DHG |
| C | 30/09/20 | OO | Minor Update | TE | DHG |
| B | 27/08/20 | OO | Updated GF Layout | TE | JM |
| A | 21/04/20 | TE | First Issue | JM | DHG |

momentum transport consultancy

Client

Advanced Idea Holdings Limited

Job Title

**70 GRACECHURCH STREET**

Drawing Title

**GENERAL ARRANGEMENT**
**PROPOSED HIGHWAY BOUNDARIES**

Drawing Status

**FOR APPROVAL**

Scale at A3

**1:500**

Drawing No

**M000349-2-E-DR-026**

Rev

**D**

**FIGURE 3.15**

COPYRIGHT
OVERVIEW PLAN: OpenStreepMap
LOCATION PLAN: Ordnance Survey

The way the world moves. By design.

**Project & Document Details**

| | |
|---|---|
| Project Name | 70 Gracechurch Street |
| Project Number | M000349 |
| Document Title | Technical Note |

**Document History**

| Issue | Status | Reason for Issue | Issued to |
|---|---|---|---|
| 1.0 | Final | For Planning | CoL |
| | | | |
| | | | |
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**Issue Control**

| Issue | Date | Author | Contributors | Authorisation | |
|---|---|---|---|---|---|
| | | | | Name | Signature |
| 1.0 | 15/01/2021 | WS | JM | JM | [redacted] |
| | | | | | |
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creating a better place

Environment Agency

Kurt Gagen
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

**Our ref:** NE/2020/132483/02-L01
**Your ref:** 20/00816/FULEIA

**Date:** 20 January 2021

Dear Kurt

**Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects). (The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,125sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).**

**70 Gracechurch Street London EC3V 0HR**

Thank you for consulting us on the revisions for this full EIA application for the proposed redevelopment of 70 Gracechurch Street. Given the location and the lack of environmental constraints within our current remit, we have no comments to make on this application.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

**George Lloyd**
**Planning Advisor**

Direct dial: +44 20302 54843
Direct e-mail: HNLSustainablePlaces@environment-agency.gov.uk



End

INVESTOR IN PEOPLE

**Westminster City Council**

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref: 20/00816/FULEIA
My ref: 21/00203/OBS

**Please reply to:** Nikki Mitchell
Tel No: 07866037846
Email: southplanningteam@westminster.gov.uk

Kurt Gagen
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

**Development Planning**
Westminster City Council
PO Box 732
Redhill, RH1 9FL

21 January 2021

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

**SCHEDULE**

**Application No.:** 21/00203/OBS **Application Date:**

**Date Received:** 13.01.2021 **Date Amended:** 13.01.2021

**Plan Nos:** Letter from City of London dated 13 January 2021.

**Address:** Development Site At 70-75 Gracechurch Street And, 168 Fenchurch Street, City Of London, London

**Proposal:** Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects). (The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,125sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).

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

Yours faithfully

[redacted]

**Deirdra Armsby**

**Director of Place Shaping and Town Planning**

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
- The terms ‘us’ and ‘we’ refer to the Council as local planning authority.

4635 Crystal Mark Clarity approved by Plain English Campaign

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
- The terms ‘us’ and ‘we’ refer to the Council as local planning authority.

4635 Crystal Mark Clarity approved by Plain English Campaign

| | |
|---|---|
| **From:** | Gagen, Kurt |
| **To:** | DBE - PLN Support |
| **Subject:** | FW: Representation Acknowledgement (20/00816/FULEIA) |
| **Date:** | 26 January 2021 16:01:30 |

**From:** Will Ryan <[redacted]
**Sent:** 26 January 2021 15:09
**To:** Gagen, Kurt <Kurt.Gagen@cityoflondon.gov.uk>
**Cc:** PLN - Comments <PLNComments@cityoflondon.gov.uk>; Emma Baylis < Mann Vergan
**Subject:** Re: Representation Acknowledgement (20/00816/FULEIA)

Hi Kurt / Rianne,

Thanks for your response.

We are all keen to receive correspondence on this matter.

I have tried to submit my own objection just now, but the website fails when I press submit:

Here is the text of my objection:
**I am the owner of Flat C, 4 Bull's Head Passage, EC3V 1LU and alongside my fellow flat owners at Flats A and B we are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.**

**I would like to make a representation that the residents are against this new development, as it will impact our quality of life.**

**Regards,**
**William Ryan**

**PS. I was advised by Rianne to make my own comment on this development (rather than just the comments made by Mann Vergan on my behalf), so that I am individually informed via email (preferable) or post of any developments here.**

Please can you submit that as a comment if this is useful, or alternatively, please add my email/postal address as a party that should be notified of any progress here.

Thanks,
Will Ryan

**planning report 2020/6712/S1**

**1 February 2020**

# 70 Gracechurch Street

**in the City of London Corporation**

**planning application no. 20/00816/FULEIA**

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**The proposal**

Office-led mixed use redevelopment of the site comprising demolition of existing buildings and construction of a new building up to 33 storeys (155m AOD) providing office use, flexible retail, a public viewing gallery, and associated public realm improvements works and other works associated with the development including access and highways works.

**The applicant**

The applicant is **Advanced Ideas Holdings**, and the architect is **Kohn Pedersen Fox Associates** (**KPF)**

**Strategic issues**

**Principle of development:** The principle of the proposed office-led mixed use redevelopment within the CAZ and CAZ retail cluster is strongly supported in principle. The proposal would provide a significant quantitative increase and qualitative enhancement to the existing office and retail offer (Paragraphs 19-29).

**Urban design:** The development layout is strongly supported and the height and massing is acceptable in strategic planning terms, subject to strategic views and heritage considerations. Overall, the scheme is of a high design and architectural quality (Paragraphs 30-51).

**Heritage:** The development would result in harm to several heritage assets many of them of high significance including The Tower of London World Heritage Site and the Grade I listed St Peter ad Vincula Chapel and Beauchamp Tower as assets in their own right. Further assessment of potential impact is required in relation to Tower Bridge, Billingsgate Market, the Custom House Canon Street Station and 1 Cornhill. Following receipt of the additional material sought, GLA officers will be in a position to assess the impact to heritage assets (Paragraphs 52-78).

**Climate Change:** Further information in relation to maximising onsite renewable energy and demonstrating potential for connection to a future heat network. The anticipated shortfall in CO2 reductions should be met through an offset contribution (Paragraphs 79-86).

**Transport:** Cycle and car parking is acceptable, subject to further clarification on cycling access/egress routes; improvements to cycling infrastructure should be assessed and a financial contribution towards a cycle hire docking station is required. Further assessment on public transport impact is required. Public realm works to Fenchurch Street and Philpot Lane are strongly supported. Servicing strategy is supported in principle. Conditions in relation to DSP, CLP and Travel Plans must secured. (Paragraphs 87-102)

**Recommendation**

That the City of London Corporation be advised that, whist the proposal is supported in principle, the application does not currently comply with the London Plan and Publication London Plan, for the reasons set out in paragraph 106 of this report.

## Context

1 On 12 November 2020 the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- 1C.1(b) "*Development which comprises or includes the erection of a building of more than 150 metres high and is in the City of London.*"

3 Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website (link here)[1].

## Site description

6 The site forms the north east corner of the junction at Gracechurch Street, Lombard Street and Fenchurch Street and is bound by Gracechurch Street to the west, Fenchurch Street to the south, Lime Street to the east and Ship Tavern Passage to the north. Leadenhall Market is situated further to the north. The site currently comprises a modern, eight storey mixed use building, constructed in 2001, occupied by a Marks and Spencer department store at ground and first floor levels and offices above. The site is located in the Central Activities Zone and is within the Eastern Cluster as defined by the City of London Local Plan. The site's frontages are also located within the Leadenhall Market Primary Shopping Centre.

7 Gracechurch Street (A1213) forms part of the transport for London Road Network (TLRN). The nearest section of the Strategic Road Network (SRN) is Eastcheap, approximately 150 metres south. The site has a very high public transport access level (PTAL) of 6b, which is considered excellent. It is within walking distance of Liverpool Street, Fenchurch Street, Aldgate, Bank, Monument and Cannon Street, serving London Underground, London Overground, National Rail, TfL Rail and Docklands Light Railway services. Liverpool Street will also be served by the

[1] https://gla.force.com/pr/s/

Elizabeth Line. Cycle Superhighway 3 runs along Lower Thames Street as two-way segregated track, approximately 300 metres from the site.

Surrounding context

8 The immediate surrounding context of the site includes a number of designated heritage assets. To the north, the Grade II* listed buildings forming the Leadenhall Market, and the Grade II listed Ship Tavern, No 7-9 and 81-82 Gracechurch Street. To the west, opposite the site is the Grade II listed Credit Lyonnaise building. To the south are the listed buildings on Philpot Lane, including the Grade II* listed No 7-8 and Grade II listed No 2-3. The site is not within a conservation area; however, the boundary of the Leadenhall Market Conservation Area adjoins the site to the north and east. Immediately to the west of the site is the boundary of the Bank Conservation Areas and the Eastcheap Conservation is located to the south of the site.

9 The wider heritage context includes a wide range of heritage structures within the City of London. A number of listed buildings, including the Grade I listed Lloyd's Building, are located the north along Leadenhall Street and Lime Street. An array of listed structures are located to the west of the site along Cornhill, Lombard Street and Clements Lane, including the Grade I listed Royal Exchange and the Churches of St Michael, St Peter, St Mary of Woolnorth, St Edmond and St Clement. To the south of the site are a number of listed buildings along Philpot Land and Eastcheap including the Grade I listed Churches of St Mary at Hill, St Dunsten in the East and St Margret Patterns. Further listed buildings are located in the wider context on the south side of the River Thames, within the Borough High Street and Tooley Street Conservation Areas, including the Grade I listed Southwark Cathedral. Significant landmarks including The Grade I listed St Paul's Cathedral, Monument and Tower Bridge are located to the west, south and east, respectively. The wider context includes the St Helen's Place Conservation Area to the north; the Lloyd's Avenue, Fenchurch Street Station and Trinity Square Conservation Areas to the east; and the Laurence Pountey Conservation Area to the south west. The Tower of London World Heritage Site (which includes various listed buildings – including the Grade I Tower itself) is to east and falls within the Tower Conservation Area. In addition a number of listed structures and buildings are located within the local setting of the World Heritage Site, including the Grade I listed Church of All Hallows by the River, Trinity House and portion of the Old London Wall and the Grade II* listed Former Port of London Authority Building.

10 A substantial amount of tall office and mixed use development has been undertaken in the immediate vicinity of the site and in the wider Eastern Cluster. This includes office-led developments at 20 Fenchurch Street (160 metres), 22 Bishopsgate (278 metres), The Leadenhall Building on Leadenhall Street (225 metres), 52 Lime Street (206 metres) and 100 Bishopsgate (172 metres).

Emerging context

11 In terms of the emerging context further office-led tall building development is proposed in the eastern cluster with schemes at 1 Leadenhall Street (183 metres), 40 Leadenhall Street (154 metres) and 6-8 Bishopsgate (217 metres) are currently under construction and consents are in place for 1 Undershaft (300m), 100 Leadenhall Street (263 metres) and 50 Fenchurch Street (150 metres). There are also a number

of live planning applications for tall buildings in the area. This includes a 30-storey (146 metres) office-led mix use development at 55 Gracechurch Street immediately opposite the site to the south (LPA ref: 20/00671/FULEIA); the office-led proposals at the Site Bounded By Fenchurch Street, Mark Lane, Dunster Court And Mincing Lane ranging in height up to 35- storeys (149 metres) (LPA ref: 19/01307/FULEIA); and the 48-storey (197 metres) office-led development proposals at Bury House (LPA ref: 20/00848/FULEIA; GLA ref: 2020/6850/S1). The draft City Plan (2036) identifies the site within the emerging City Cluster Key Area of Change which identifies the area as a tall buildings location, on appropriate sites, and which seeks accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport and public realm enhancements.

## Details of the proposal

12 The application seeks planning permission for the redevelopment of the site to include demolition of the existing office buildings and the construction of a 33 storey development with a maximum height of 155 metres (AOD) providing office use, flexible retail, a public viewing gallery, and associated public realm improvements works to adjoining streets and Philpot Lane and other works associated with the development including access and highways works. The layout of the development at ground floor level is shown below in Figure 1.




## Case history

13 An initial pre-application meeting was held with the GLA on 19 November 2019. GLA Officers advised that the principle of the office-led mixed use redevelopment of the site is strongly supported and that the design principles of the proposals were strongly supported. GLA officers welcomed further discussion on the massing and architecture of the building, response to the historic environment and LVMF views, the impacts of the development on wind microclimates, the proposed viewing platforms, urban greening and transport.

## Strategic planning issues and relevant policies and guidance

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London Local Plan (2015) and the London Plan 2016 (Consolidated with alterations since 2011).

15 The Report of the Examination in Public of the draft London Plan was published in October 2019, and the Intend to Publish London Plan version (December 2019) was subsequently submitted to the Secretary of State. On 13th March and 10th December 2020, the Secretary of State issued the Mayor with directions under Section 337 of the Greater London Authority Act 1999.

16 On 21st December 2020 the Mayor submitted to the Secretary of State his Publication London Plan with amendments designed to address these directions. This is the most up to date version of the Mayor's London Plan and should be taken into account as a material consideration on the basis described in the NPPF.

17 The following are also relevant material considerations:

- National Planning Policy Framework (2019) and National Planning Practice Guidance;
- London Plan – Publication version (December 2020)
- City of London Draft City Plan (2036)
- Tower of London World Heritage Site Management Plan

18 The relevant strategic issues and corresponding policies are as follows:

| | |
|---|---|
| • Land use principle | *London Plan; Central Activities Zone SPG; Night Time Economy SPG* |
| • Central Activities Zone | *London Plan; Central Activities Zone SPG* |
| • Retail/Office | *London Plan; Town Centres SPG; Central Activities Zone SPG* |
| • Urban design | *London Plan; Character and Context SPG* |
| • Strategic Views | *London Plan; London View Management Framework SPG* |
| • Historic Environment | *London Plan; World Heritage Sites SPG* |
| • Inclusive access | *London Plan; Accessible London SPG;* |
| • Sustainable development | *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;* |
| • Transport | *London Plan; the Mayor's Transport Strategy.* |
| • Tourism/Leisure | *London Plan; Town Centres SPG; Central Activities Zone SPG* |

## Principle of development

<u>CAZ strategic function and proposed office use</u>

19 The site lies within the Central Activities Zone as identified in the London Plan. It is also identified in the City's Local Plan as a part of a Primary Shopping Centre.

London Plan Policy 2.11 and the Publication London Plan Policy SD4 establish the strategic functions of the CAZ and support offices and retail in shopping destinations. London Plan Policy 4.2 and the Publication London Plan Policy E1 in particular, give strategic support to improvements to the quality, flexibility and adaptability of office space of different sizes as part of new office provision, refurbishment and mixed use development in the CAZ.

20 A comparison between the existing and proposed floorspace by land use is set out below:

| **Use** | **Existing** | **Proposed** | **Net change** |
|---|---|---|---|
| Office (Class B1a) | 15,045 | 69,716 | + 54,671 |
| Retail (Class A1) | 11,696 | 0 | - 11,696 |
| Flexible retail (Class E and sui generis) | 0 | 1,715 | +1,715 |
| Public access spaces and gallery | 0 | 1,495 | + 1,495 |
| **Total** | **26,741** | **72,926** | **+ 46,185** |

*Table 1: Existing and proposed land uses*

21 The existing building, whilst providing relatively modern office accommodation, was constructed primarily to provide the retail department store on the lower floors. The proposals would result in a significant uplift in the overall quantum of office floorspace as well as greater quality, flexibility and adaptability of the workspaces provided, ensuring the provision can adapt to the changing requirements of future occupiers and a range of types and sizes of office. Noting that the Publication London Plan anticipates demand for office floorspace is expected to be greatest within the CAZ and Isle of Dogs, comprising 59% of overall projected demand, the proposed development would deliver a substantial quantitative and qualitative improvement to the office stock within the CAZ and this is strongly supported in land use terms, in accordance with London Plan Policies 2.10, 2.11 and 4.2 and Policies SD4, SD5 and E1 of the Publication London Plan.

Affordable workspace

22 Policy E2 of the Publication London Plan provides that larger office proposals should consider the scope for provision of some flexible workspace suitable for micro, small and medium sized enterprises. In addition, Policy E3 of the Publication London Plan encourages the use of planning obligations to secure affordable workspace in specific circumstances and locations. Emerging City Local Plan policy S4 encourages the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City. The workspace provision has been designed with floorplates adaptable to suit a range of businesses, including SME, creative and tech companies. Given this capacity, the applicant is encouraged to consider a quantum of affordable workspaces to accommodate new and growing businesses within the City.

Flexible retail provision and loss of retail floorspace

23 Policy SD4 of the Publication London Plan supports proposals which enhance the vitality, viability, adaptation and diversification of existing retail clusters within the CAZ. Policy E9 seeks to ensure the management of retail clusters has sufficient regard to the priorities of the London Plan, specifically in terms of maintaining and enhancing town centre vitality, viability, diversity, sustainability and place-making. The site is located within the Leadenhall Principal Shopping Centre, one of 5 CAZ retail clusters identified within the local City Local Plan. Local Plan policy resists the loss of retail frontage and floorspace within the PSCs, prioritising the presence of retail at ground floor level, but where supports the presence of non-A1 class uses within the cluster where these do not adversely impact on its functioning and amenity.

24 As set out in Table 1 above, the proposals would result in the loss of the existing Class A1 retail from the site. The proposals introduce 1,715 sqm of flexible retail uses falling under Class E and Sui generis (anticipated to comprise a mix of flexible retail, market-type pop up retail, hot food takeaway and drinking establishments) at ground floor level; however, this would equate to an approximate loss of 9,981 sqm of retail floorspace from the site.

25 No objection is raised to the loss of retail from the site. Whilst Local Plan policy supports the retention of large retail units in prominent locations, the loss of the existing retail store would not adversely impact on the vitality or viability of the retail cluster which, as set out in the emerging Local City Plan, is centred on Leadenhall Market as the primary retail destination.

26 The introduction of a mix of flexible retail, market-type pop up retail, hot food takeaway and drinking establishments is supported in view of the site's location within a CAZ retail cluster, the aspiration for active frontages at ground floor, the introduction of a diverse retail offer which would enhance place-making and the vitality of the cluster and the introduction of the arcade component activating a new public route through to Leadenhall Market and complementing the market through enhanced access and supporting retail function. The proposals are considered to accord with London Plan Policies 2.15, 4.7 and 4.9 and Policies SD6 to SD8 and E9 of the Publication London Plan. A retail strategy should be secured by condition to ensure appropriate management of the diverse range of uses proposed. Public access through the arcade at ground floor level should be secured by obligation.

Housing and Affordable housing

27 London Plan Policy 4.3 promotes mixed use development, including housing, to support increases in office floorspace and states that where an increase in office floorspace is proposed and where this increase is above a justified local threshold, which is 500 sq.m. (GIA) in the City of London, as a general principal, applicants should be required to provide housing and other uses on-site or nearby to create mixed use neighbourhoods. Within the CAZ and the City of London, the London Plan approach allows for a degree of flexibility with respect to the provision of mixed uses and provision of housing and exempts the City from providing mixed uses on-site, if it compromises broader objectives such as sustaining important clusters of business activity. Under such circumstances, contributions to off-site housing provision should be sought as a planning obligation in accordance with the City Corporation's Planning Obligations SPG Tariff Calculation. The applicant proposes to provide a contribution towards affordable housing in this regard which is strongly supported. Full details of

the affordable housing contribution should be provided and suitably secured within the S106 agreement.

Publicly accessible spaces

28 Prominent tall buildings, such as that proposed here, should incorporate free to enter publicly accessible areas within their design in accordance with London Plan Policy 7.7 and Policy D8 of the Publication London Plan. Such spaces should generally be located at the top of the building to provide wider views across London. In this instance, the applicant is proposing two publicly accessible roof gardens and viewing galleries (1,125 sq.m.) on Levels 29 and 30 of the building. This would be served by dedicated lift accessed from the ground floor of the tower. The terraces would provide a glazed internal double height space and would afford elevated views north, west and south facing views over the immediate surrounding area. Subject to free of charge public access being secured by Section 106 agreement, the provision would contribute to the network of free-to-enter viewing galleries in the City of London and are considered to meet the policy requirements set out above.

Principle of development - conclusion

29 In summary, the principle of the proposed office-led mixed use redevelopment within the CAZ, comprising a significant quantitative increase and qualitative enhancement to the existing office and commercial floorspace, and including a diverse retail offer and new public routes, as well as an elevated public viewing gallery, is strongly supported.

## Urban design

30 Good design is central to all objectives of the London Plan and the Mayor's Publication London Plan. Policies contained within chapter seven of the London Plan, and chapter the of the Publication London Plan set out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

Site Layout

31 The scheme has evolved positively through pre-application advice and the design team have worked to address the key issues raised, including a clear approach to defining key pedestrian routes and demonstrating how the development will connect with the surrounding existing and future routes in line with the aspirations of the City Cluster Vision. The ground floor layout successfully integrates with Leadenhall Market and wider pedestrian desire lines in terms of sizing and alignment of proposed routes and spaces. The inclusion of a publicly accessible route through the development strengthens the site's integration with pedestrian routes to the north and enhance permeability through the site which is strongly supported.

32 The proposed open space beneath eastern portion of the building for flexible retail/public uses/loading bay lift access supports the location of basement level servicing and plant and allows the majority of public facing edges to be activated. This approach is supported in urban design terms. Further consideration of the

implications of this approach in terms of servicing and delivery are set out in the Transport section below.

33 The overall design, layout and landscaping of the proposed public spaces within the site would be of a high quality; the visualisations and landscape strategy submitted by the applicant alongside the application demonstrate that the scheme would provide a series of attractive and legible public spaces which would respond positively to the character and context of the surrounding area, whilst also providing enhanced permeability. The provision of active frontages has been maximised, with flexible retail units, capable of range of providing functions ranging from retail spaces and market-type pitches, to performances and sporting events which will add visual interest and contribute to the creation of a vibrant public realm. Further clarity is required on the level of public access through the internal passageway and how the public spaces will function at night. The applicant is encouraged to follow the principles and the best practice guidance set out in the Public London Charter.

Tall buildings, height, massing and architectural quality.

34 London Plan policy 7.7 and Policy D9 of the Publication London Plan set out the criteria against which tall and large buildings should be assessed and establish support for the development of tall buildings where they create attractive landmarks enhancing London's character, and help to provide a catalyst for regeneration, where they are acceptable in terms of design and impact on their surroundings. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate form of development in development plans and criteria against which impact should be assessed, including the requirement to take account of, and avoid harm to, the significance of London's heritage assets and their settings and the Outstanding Universal Value (OUV) of World Heritage Sites.

35 As noted above, the site is located within the Eastern Cluster as defined by the City Local Plan. Adopted and emerging policy encourages new tall buildings on suitable sites within the Eastern Cluster, having regard to the impact on the City skyline, the character and amenity of their surroundings, the significance of heritage assets, airport safeguarding and the provision of high quality public realm at street level. The proposed tall building would form part of an established and evolving cluster of tall buildings which form part of London's iconic skyline. In view of this context and the above mentioned strategic and local policy designations, the principle of the development of a tall building within this part of the CAZ is acceptable in principle. Notwithstanding the in-principle suitability of the site to accommodate a tall building, the development must also have particular regard to the protection of the OUV of the Tower of London World Heritage Site.

36 The architectural quality of the building would be of a high standard and the massing and design has evolved following a detailed pre-application process of engagement and design review involving the City of London Corporation, the GLA, and Historic England. The materiality of the tower has been well-considered in relation to its immediate and wider context. The articulation of the base, podium and tower elements is successful and results in a well-proportioned building that responds positively to the immediate and wider townscape. The tripartite sculptural form of the tower element is successful and mediates between the faceted form of the Eastern Cluster and the more organic form of 20 Fenchurch Street in longer range views. The

integration of greened terraces adds dynamism to the architecture, details of the irrigation system and plant species (having regard to species suitable for the harsher environments towards the upper levels of the tower) should be secured to ensure long term maintenance of planting is safeguarded. Subject to clarity on the proposed greening, GLA officers are of the view that the design and architectural quality of the building is of high quality.

Microclimate impacts

37 The supporting ES comprises an assessment of the impact of the building on wind and pedestrian comfort levels, in line with City of London's Wind Guidelines (comprising wind tunnel testing and CFD). The assessment identifies that the proposed development is not expected to result in significant adverse wind microclimate effects impacts to neighbouring buildings or open areas within and surrounding the development, across the year subject to recommended mitigation measures.

38 Further to this, detailed modelling has been undertaken to assess the potential for daylight, sunlight, overshadowing and solar glare impact on the surrounding area more generally. The findings of this modelling should be assessed by the City of London Corporation, and should planning permission be granted, conditions should be secured to ensure microclimate impacts, including wind and solar glare, are appropriately mitigated.

Fire Safety

39 A fire statement prepared by suitably qualified personnel at Arup has been submitted with the application in accordance with Policy D12 of the Intend to Publish London Plan. The measures contained within the statement and the additional measures to be considered at the detailed design stage should be robustly secured as part of any planning permission.

Inclusive design

40 London Plan Policy 7.2 and Policy D3 of the Publication London Plan require that all new development achieves the highest standard of accessible and inclusive design. These policies seek to ensure that all new development can be used easily and with dignity by all.

41 Level access would be provided to all of the proposed office, retail and visitor floorspaces and facilities with lift access provided to all floors. Measures are proposed to mediate level changes across the site, suitably addressed by providing gentle slopes at acceptable gradients to ensure wheelchair access and to enable those with mobility issues to move through the site in a safe and convenient manner. As such, the application complies with the London Plan and Publication London Plan in respect of inclusive design.

## Strategic Views

42 London Plan policies 7.11 and 7.12 and policies HC3 and HC4 of the Publication London Plan identify the strategic views within London and set out the

assessment framework for development that will impact upon strategic views, protected vistas and their landmark elements. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks. The policies also seek to protect views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's authenticity, integrity, significance and Outstanding Universal Value. Guidance on the management of designated views is set out in the London View Management Framework SPG.

Protected Vistas

43 The supporting Heritage, Townscape and Visual Impact Assessment (HTVIA) demonstrates that the proposed building would be visible in two Protected Vistas orientated towards St Paul's Cathedral from Parliament Hill (LVMF 2A.1) and Kenwood (LVMF 3A.1).

44 Whilst falling within the St Paul's Cathedral from Parliament Hill (LVMF 2A.1) and Kenwood (LVMF 3A.1) protected vistas, the proposal is located to the east of the St Paul's within the established cluster of tall buildings which is identified in the LVMF SPG as complementary to the silhouette of the City. The HTVIA demonstrates that the development would be largely obscured from both views by towers at the Barbican Estate and as such would have a negligible impact on the silhouette of the cluster. Having considered this alongside officer's independent assessment of the impact, GLA officers consider the proposals would not harm the characteristics and composition of the view or the ability to appreciate St Paul's Cathedral from Parliament Hill.

London Panoramas

45 The development would be visible within the following London Panoramas

LVMF 1A.1 – Alexandra Palace: The Viewing Terrace
LVMF 4A.1 – Primrose Hill: The Summit
LVMF 5A.2 – Greenwich Park: The General Wolfe Statue
LVMF 6A.1 – Blackheath Point: The Point

46 Having reviewed the impact of the scheme, and the assessment made in the supporting HTVIA, GLA officers consider the proposed tall building would have a neutral to positive impact on the prevailing pattern of tall buildings and existing clusters in these panoramas, particularly in 4A.1 – Primrose Hill, where the development serves to consolidate the Cluster's profile and composition. As such, GLA officers consider the proposed tall building fits within the prevailing pattern of buildings and spaces, and would not detract from the panorama as a whole nor harm the setting of St Paul's Cathedral, in accordance with London Plan Policy 7.12 and Policy HC4 of the Publication London Plan.

River Prospects

47 The development would impact on the following LVMF River Prospects:

LVMF 10A.1 – Tower Bridge: The North Bastion
LVMF 11B.1&2 – London Bridge: Downstream
LVMF 15B.1&2 – Waterloo Bridge: Downstream
LVMF 16B.1 – The South Bank: Gabriel's Wharf

48 The HTVIA demonstrates that the development would be highly prominent in LVMF 15B and 16B with the building sited to the left of 20 Fenchurch Street. In these views, the tripartite stepped form successfully mediates between the heart of the cluster and the outlying 20 Fenchurch Street, improving the legibility of the cluster as a more consolidated group. St Pauls Cathedral stands separate from the cluster in this view and GLA officers consider the improvement to the cluster's legibility enhances the setting of the Cathedral in this view. The HTVIA shows that the development is highly visible in River Prospect views from London Bridge (LVMF 11B.1 & 2). Whilst highly visible, it would appear as a component part of the established cluster of tall buildings. If approved, the forthcoming development at 55 Gracechurch Street would be largely obscure the proposal from this view. In LVMF views 10A.1 and 25A 1&2, the HTVIA demonstrates that the development would be almost entirely obscured by existing development at 20 Fenchurch Street and thus the proposal has negligible impact on the ability to appreciate the key landmarks, or the silhouette of the Tower of London World Heritage Site, from this view.

49 Overall, GLA officers consider that the proposal would enhance the overall juxtaposition of buildings and landmarks from the river prospect views, in accordance with London Plan Policy 7.12 and Policy HC4 of the Publication London Plan.

Townscape View - LVMF 25A.1-3 – The Queen's Walk at City Hall

50 The site is visible from within the townscape view from the Queen's Walk to the Tower of London World Heritage Site. A Protected Vista is included from Assessment Point 25A.1 and a Protected Silhouette is applied to the White Tower between Assessment Points 25A.2 and 25A.3. The development is located to the left of the World Heritage Site and is almost entirely obscured by 20 Fenchurch Street. The Protected Silhouette of the White Tower is therefore not affected by the proposed development.

Strategic Views Conclusion

51 The proposed development protects significant views of important buildings, townscape, riverscape and skylines and does not compromise the ability of viewers to recognise and appreciate identified landmarks. As such, the proposed development is in compliance with London Plan Policies 7.11 and 7.12, Publication London Plan Policy HC3 and HC4 and the requirements of the LVMF SPG.

## Heritage

52 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

53 The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Any harm to a heritage asset should be given substantial importance and weight in any planning balance. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

54 London Plan Policy 7.8, states that development affecting heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Policy HC1 of the Publication London Plan further specifies that the cumulative impacts from incremental change from development on heritage assets and their setting should be actively managed and that development proposals should avoid harm.

55 Paragraph 184 of the NPPF recognizes that World Heritage Sites are internationally recognised to be of Outstanding Universal Value and, as such, are afforded the highest significance of all designated heritage assets. London Plan Policy 7.10 states that development should not cause adverse impacts on World Heritage Sites or to their settings (including any buffer zones). In particular, it should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. Policy HC2 of the Publication London Plan further states that development, in WHS and their settings, including buffer zones, should conserve, promote and enhance their Outstanding Universal Value, or the authenticity and integrity of their attributes and provide that when considering planning applications, appropriate weight should be given to the provisions of World Heritage Site Management Plans.

<u>Tower of London World Heritage Site and listed buildings therein and the Tower of London Conservation Area</u>

56 The HTVIA demonstrates that the proposed tall building would impact the Tower of London World Heritage Site. As noted in the strategic views section above, the development would be visible in LVMF views from Tower Bridge and the Queen's Walk assessment points. In both instances, given the positioning of the site away from the WHS and the position of the development relative to 20 Fenchurch Street, the Protected Silhouette of the White Tower and the wider setting of the WHS is not affected by the proposed development in these strategic views. The proposed development would be visible from within the Inner Ward above the roofline of the Grade I listed Beauchamp Tower. In this view the building would appear as a small projecting component, lower and behind the significantly more prominent 20 Fenchurch Street. Consented proposals at 1 Leadenhall and 50 Fenchurch Street would also appear prominently above the roof line of in this view.

57 The building would appear in the backdrop to the base of the bell tower of the Grade I listed St Peter ad Vincula in a view north-west from the Inner Ward. In this view the building would fill the clear sky in the narrow space between the bell tower column and 20 Fenchurch Street. As with the above view, this visibility is in addition to the dominant massing of 20 Fenchurch Street. The supporting HTVIA demonstrates that any perception of the development would be been seen in the context of existing and emerging cumulative development, specifically 20 Fenchurch Street and the tall buildings within the eastern cluster including The Leadenhall Building, 22 Bishopsgate, 52 Lime Street and 30 St Mary's Axe, which are visually prominent above the roof lines of the listed buildings from these views. Notwithstanding this, the proposed tall building would cause additional cumulative harm to the significance of the Grade I listed St Peter ad Vincula Chapel through the introduction of additional development in the backdrop of the listed church and the resultant loss of clear sky space. The development would also appear above the concentric defences, including the Grade I listed St Thomas's Tower where it rises above the historic structure. In this view the existing harm caused by 20 Fenchurch Street is exacerbated by the proposal extending development to right in the view, extending the loss of clear sky space to the left of the outer tower, and diminishing the existing clear definition of the crenellations of the historic defences. Noting the harm in these views are seen in the context of existing tall buildings, GLA officers judge the level of harm to be less than substantial.

58 Elements of the proposed development are not sufficiently sympathetic to the significance of heritage assets within the WHS, specifically the Grade I listed St Peter ad Vincula and St Thomas's Tower and as such fail to conserve their significance. As a result, the development would compromise the ability to appreciate the authenticity and integrity of these attributes within the WHS contrary to the aims of London Plan Policy 7.8 and 7.10 and Policies HC1 and HC2 of the Publication London Plan. Given harm has been identified to key buildings and the local setting, within the wider area based heritage asset of the Tower of London WHS, then the WHS and its Outstanding Universal Value is also judged to be harmed. As with the assessment of the impact on the individual buildings above, GLA officers judge the level of harm to be less than substantial.

59 In addition to the above, the development would also impact on the Tower of London Conservation area which falls within the local setting of the WHS as set out in the Tower of London HRP Management Plan. View 7 of the HTVIA demonstrates the development would be visible in westward views from within the conservation area over the outer curtain walls and moat area of the Tower of London and encroaching on the open sky above the Grade II* listed former Port of London Authority Building. In this view, GLA officers consider the development would cause additional cumulative harm to the setting and significance of the Conservation Area and the Grade II* listed building. This harm is considered to be less than substantial.

<u>Designated Heritage Assets</u>

*St Paul's Cathedral*

60 The Grade I listed St Pauls Cathedral's significance is derived from its architectural interest, as Sir Christopher Wren's 18th Century Masterpiece, and one of

the most significant baroque buildings in England, and its historical interest, as one of London's the most recognisable buildings dating back to its reconstruction following the Fire of London in 1666. The setting of the Cathedral as a centre piece in London is varied, identified as a Strategically Important Landmark, important long distance views of the Cathedral are protected and managed through the London Plan and the LVMF SPG. The modern tall buildings of the eastern cluster to the east of the Cathedral form part of the wider setting. The local setting is comprised of the Churchyard, Festival Garden and Carter Lane gardens and the varied mix of relatively low rise modern and historic buildings that form part of the St Paul's Cathedral Conservation Area. As set out above in the assessment of strategic views, where visible in LVMF protected views and panoramas, the development is largely obscured by existing tall buildings or forms a complimentary part of the established eastern cluster. In these long distance views, the proposal would not impact on the wider setting or significance of the Cathedral. The most prominent strategic views of the Cathedral are from London Bridge and Waterloo Bridge River Prospects, with the Waterloo Bridge views being the most significant. In this view, the eastern cluster appears to the right, but is distinct enough from the Cathedral to maintain visual separation. The development is positioned to the right of the cluster mediating between the outlying 20 Fenchurch Street and the rest of the cluster. Owing to its position to the right, away from the Cathedral and its moderating effect on the cluster's silhouette, the prominence of the Cathedral as a standalone centrepiece, from this view, is not diminished. The HTVIA further demonstrates that the development would not be visible in any views along Fleet Street in a sequence of kinetic views as one moves east along Fleet Street. In light of the above, GLA officers consider the development would have no impact on the setting or significance of the Cathedral.

*Other designated Heritage Assets*

61 The HTVIA demonstrates the visual impact of the development on The Monument from the LVMF view from Queens Walk and in northward views from London Bridge and Fish Street Hill. In the LVMF view the development would be partially visible as part of the cluster to the east of, and separate from, the projecting column and would have no impact on the significance of the landmark. In other views, whilst representing a change to the northern setting of the landmark, this would be in the context of the existing eastern cluster of which the development would form an attractive and appropriately scaled addition. As such, GLA officers consider the development would have no impact on the significance of the Grade I listed and scheduled ancient monument.

62 In views looking west toward Tower Bridge, the development would be partially visible as a smaller building projecting from, but largely obscured by, the taller and more prominent 20 Fenchurch Street. In these views the development would have a negligible impact on the contribution made by the setting to the ability to appreciate the significance of the bridge. However, GLA officers consider further analysis of the development's contribution to the setting and how this impacts on the ability to appreciate the significance of the bridge should be undertaken, specifically in views from River itself and in views looking west from Shad Thames further east. As such, GLA officers consider that insufficient information has been provided to fully assess the impact on the significance of Tower Bridge.

63 The development would alter the contribution made by the setting to the ability to appreciate the significance the Grade II* listed Leadenhall Market through the introduction of a significantly taller building on the proposal site, these alterations would not impact on the significance of the asset which is derived from the its historic fabric and the architectural interest of it entrances, internal routes and the quality of the covered market spaces, these characteristics also strongly inform the significance of the Leadenhall Market Conservation Area. Owing to the scale of the development and its position on the conservation area's southern boundary, the proposal would have a significant visual impact on the contribution made by the setting to the ability to appreciate the significance Leadenhall Market Conservation Area, however, large-scale modern development, visible over the roofs of lower scale buildings is characteristic feature of the conservation area given its proximity to the eastern cluster. Furthermore, the public realm works to Lime Street and improved pedestrian connectivity between Fenchurch Street and Leadenhall Market are modest enhancements. GLA officers consider that the level of harm to the conservation area would be less than substantial.

64 The contribution made by the setting to the ability to appreciate the significance of the Grade II listed Ship Tavern and 81-81 Gracechurch Street would be altered by the development. The setting of the pub is characterised by the narrow and enclosed street layout. At street level the relationship between the listed pub and the podium level of the development would be similar to the existing condition given the stepping down of the podium towards the conservation area. GLA officers consider the development would not impact on the significance of the listed former pub building.

65 The development would be prominent in southward views of 81-82 Gracechurch Street with the massing of the development highly visible above the roofline of the building. GLA consider the harm to the contribution made by the setting to the ability to appreciate the significance of this building to be less than substantial.

66 The Grade I listed Church of St Peter and listed properties at 7 Gracechurch Street and listed buildings along Leadenhall Street and Lime Street are at a distance or appreciated from a position whereby their significance would not be altered by the development.

67 With the exception of 1 Cornhill, owing to the height of surrounding development, the orientation of listed buildings and their distance from the proposal, the development would have a negligible impact on the contribution made by the setting to the ability to appreciate the significance of the listed buildings and churches along Cornhill and at Bank junction. GLA officers consider further analysis of the development's contribution to the setting of 1 Cornhill in views from Poultry (looking east) should be undertaken to establish how the development impacts on the ability to appreciate the asset's significance.

68 Where visible in long range views from within the wider Bank Conservation Area, the development would form part of the established wider setting which includes the towers of the eastern cluster. However, the development would introduce a notably taller building which would have a significant visual impact on the immediate setting of the conservation area at the eastern boundary. Having considered views 31 of the HTVIA, the proposal would introduce a significant new

element in easterly views along Lombard Street, this would be viewed in the context of the existing 20 Fenchurch Street. GLA officers are of the view that the cumulative visual impact of the proposed building would cause less than substantial harm to the Grade I listed churches of St Edmund and St Mary Woolnorth.

69 The proposals would alter the contribution made by the setting to the ability to appreciate the significance of the Grade II listed 39-40 Lombard Street, opposite the site, through the introduction of new development of significantly greater scale opposite, the scale of the new development would be appreciated in open northward views along Gracechurch Street however this would be viewed in the context of the existing office development in the immediate setting and tall buildings of the eastern cluster in the background. GLA officers consider the harm to the significance of this building to be less than substantial. Owing to the height of existing buildings relative to the narrow width of Lombard Street and King William Street and the orientation from which the listed buildings are appreciated, the significance of the cluster of listed buildings along Lombard Street and King William Street (with the exception of the Church of St Mary Woolnorth considered above) would not be altered by the development.

70 LVMF views 18 and 19 and view 20 of the HTVIA illustrate the visual impact on the Grade II listed properties south of Lower Thames Street. Within these views the eastern cluster provides a backdrop to above the Grade II listed Adelaide House, with 20 Fenchurch Street dominating the foreground views and The Leadenhall Building, 22 Bishopsgate and Tower 42 appearing prominently behind. The proposed building would appear closer to the identified listed buildings, affecting the silhouette of Adelaide House. GLA officers consider that the level of harm would be less than substantial.

71 The proposals would alter the setting of the collection of Grade II and II* listed buildings along Philpot Lane (2-3 and 7-8 including 4 Brabant Court), Eastcheap (23-25, 33-35 and 43) and the Grade I listed Church of St Margaret Pattens and the setting of the Eastcheap Conservation Area through the introduction of new development of significantly greater scale, and public realm improvement works to Philpot Lane and at the top of Rood Lane, the scale of the new development would, in most cases be appreciated in northward views over the roofs of buildings on Eastcheap and along Philpot Lane. This would be viewed in the context of the existing office development in the immediate and wider setting, 20 Fenchurch Street in particular has a dominating presence in the immediate setting. The HTVIA assesses that while these aspects, along with the proposed public realm improvements on the northern part of Philpot Lane, would be an enhancement in their setting, it would have no effect on their significance. GLA officer concur with this assessment.

72 The development would be visible in views from near and as part of the setting of the Grade I listed Southwark Cathedral and the Grade II* listed Olaf House on the south side of the River Thames. Owing to their distance from the proposal, the development's positioning as part of the eastern cluster and the high quality of the proposed architecture, GLA consider the development would not impact on the significance of these buildings.

<u>Heritage assets not considered</u>

73 Whilst the majority of heritage assets potentially affected have been identified, the assessment does not identify the Grade I listed Custom House and Billingsgate Market and the Grade II listed Cannon Street Station towers as assets requiring assessment in their own right. These are prominent assets that hold significant heritage value owing and would be directly impacted by the development in northward views from the south side of the River Thames. Given the appearance of the building in the backdrop of these assets it is likely the development would cause some harm.

74 However, in the absence of a sufficiently detailed description of the significance of these assets, or the contribution made by their setting, GLA officers are unable to make a full assessment of the heritage impact of the proposal. The applicant should therefore provide an assessment of the potential impact of the development on these assets.

Heritage impact conclusion

75 GLA officers have concluded that the proposal would result in less than substantial harm to the Tower of London, Leadenhall Market and Bank Conservation Areas; the Grade I listed churches of St Edmund, St Mary-le-Bow and St Mary Woolnorth; the Grade I listed Custom House and Billingsgate Market; the Grade II* listed Former Port of London Authority Building and Leadenhall Market; the Grade II listed 81-82 Gracechurch Street, 39-40 Lombard Street, Adelaide House; 1 Cornhill and Cannon Street Station; The Tower of London World Heritage Site and the Grade I listed St Peter ad Vincula Chapel and St Thomas's Tower as assets in their own right.

76 In accordance with paragraph 196 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight should be given to the asset's conservation, in a manner appropriate to their significance. Given the status of the Tower of London as a World Heritage Site, which is considered to be a heritage asset of international importance, the decision maker must give particular importance and weight to any identified harm to this asset.

77 The public benefits arising from the development include enhanced pedestrian permeability through the site, between Fenchurch Street, Ships Tavern Passage and Leadenhall Market; public realm enhancement to the south east fronting Fenchurch Street and Lime Street and Philpot Lane; a public viewing gallery at Levels 29 and 30, totalling around 1,125sqm of floorspace and the delivery of over 68,000 sq.m. of commercial floorspace as part of a high quality office-led mixed use scheme within the CAZ, which would strengthen office provision within this city cluster location and would contain, 1,700 sq.m. of flexible retail floorspace contributing to the retail offer within the Leadenhall Market Principal Shopping Centre. In total, the scheme is estimated to deliver approximately 4,300 jobs across the site.

78 As noted above, the development would cause harm to several heritage assets, many of which are of high significance. Furthermore, GLA officers have identified the requirement for further assessment of potential impact in relation to

Tower Bridge, Billingsgate Market, the Custom House Canon Street Station and 1 Cornhill. Following receipt of the additional material sought, GLA officers will be in a position to make an informed assessment of the overall heritage impact. In addition, further clarity is required in relation to the affordable housing contribution, as well as details of how the public benefits will be secured/delivered more generally as part of the planning permission. As such, all the above information is required before GLA officers would be able to make the judgement on the heritage balance.

## Climate Change

Circular Economy

79 The Mayor's Publication London Plan Policy GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy.

80 As such, and in line with Publication London Plan Policy SI7, a Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste. The pre-consultation draft of the Circular Economy Statements Guidance (March 2020) provides further information on how to prepare a Circular Economy Statement.

Energy

81 The applicant has submitted an energy assessment in accordance with London Plan Policy 5.2 and Policy SI2 of the Publication London Plan. The domestic element of the development is estimated to achieve a reduction of 30% in regulated CO2 emissions compared to a 2013 Building Regulations compliant development.

82 The GLA expects all major development proposals to maximise on-site renewable energy generation, where feasible. Further information in relation to maximising onsite renewable energy and demonstrating potential for connection to a future heat network. The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. Detailed comments in relation to the required additional information have been provided separately to the Council.

Flood Risk

83 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and Publication London Plan policy SI.12.

84 The surface water drainage strategy for the proposed development complies with London Plan policy 5.13 and Publication London Plan policy SI.13 on the provision the detailed design. Further information on how SuDS elements will be included in the development, the maintenance plan and an agreement in principle with TWUL regarding the change in discharge rates should be provided.

85 There is insufficient evidence on what Water Efficiency measures will be put in place and what level of reduction will be targeted. The proposals as such do not comply with London Plan policy 5.15 and Publication London Plan Policy SI.5

Green Infrastructure

86 The proposed development takes a very positive approach to integrating urban greening across the façade of the building, and at podium and roof levels. This is reflected in the UGF of the proposed development, which the applicant has calculated to be 0.51. This greatly exceeds the policy requirement of 0.3 for predominantly commercial development set by Policy G5 of the Publication London Plan and is strongly supported.

## Transport

Trip Generation and public transport impact

87 Further improvements are required to the trip generation analysis. The trip generation data tables should include Trains Per Hour (TPH) at the specific stations assessed rather than using a more generous TPH rate from other points along the LU line they serve. The applicant should also assess all LU stations within walking distance of the development, not just Monument. Whilst a Station Capacity Assessment has been provided for Monument, a full Line Load Impact Assessment should be undertaken using TfL eRail Plan data.

88 The proposed trip rates for new travel expected to be generated by the new development are likely to be acceptable in principle but the TA should be updated prior to determination to specify where the rates in Table 5.1 originate from and why they are being used.

Cycle Parking

89 1,002 long stay cycle parking spaces are proposed at the lower ground level in line with London Plan Policy T5 standards. 85% would be Two-Tier cycle racks, 10% folding bicycle lockers, and 5% Sheffield stands and 3 would be tricycle parking spaces. All of the long-stay cycle parking aisle widths must be at least 2.5m beyond the lowered frame to comply with the London Cycling Design Standards). In addition, access to a number of cycle racks proposed at the lower ground floor should be amended to provide wider access. At least 5% of cycle parking will be suitable for larger and adapted cycles which is in line with supporting London Plan policy T5.B.

90 The proposals provide showers and lockers within the Lower Ground Mezzanine and Lower Ground levels, which is welcomed. Two dedicated cycle parking lifts and a gullied cycle stair are proposed, accessible at ground floor level adjacent to a dedicated cycle entrance proposed in Ship Tavern Passage. Cycle lift capacity should be increased to at least 2 cycles per lift, in order to reduce potential waiting times and improve the flow of cycle parking users. LCDS specifies a maximum of two set of doors between cycle stores and the development surroundings. Further clarification is required on how cycling access/egress routes along Lime Street can be shared with service vehicles in line with Vision Zero objectives in Publication London Plan policy T7.

91 22 short stay cycle spaces are proposed whereas 102 spaces would be required. The location of short stay cycle spaces is nonetheless supported as it would relate well to expected pedestrian desire lines. The applicant proposes 20% more long stay cycle parking to maintain pedestrian comfort around the site. Due to space constraints and unique characteristics of this development site, offsetting short stay with long stay cycle parking is considered reasonable in this case. The detailed design and delivery of all cycle parking should be secured by condition.

Cycling infrastructure and Cycle hire

92 Development proposals should support the delivery of new and improved cycling infrastructure to help remove barriers to cycling. TfL's Cycle Route Quality Criteria Check tool should be used to assess the route between the site and CS3 prior to determination, to show whether segregation or street changes such as removal of on-street car parking are needed to support optimal cycle routes to the site in line with Publication London Plan policy T5.A1.

93 The nearest Cycle Hire docking station at Eastcheap, is the 30th busiest out of over 800 in London. This development would increase demand for Cycle Hire and increasing Cycle Hire capacity would directly benefit employees and visitors of the new development, supporting compliance with London Plan policy T5. A contribution of £220,000 to fund a new Cycle Hire docking station in the vicinity is therefore required.

Healthy Streets and Vision Zero

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

95 The proposed realignment of the junction between Philpot Lane and Lime Street and the widening proposed of the eastern pavement of Lime Street and the western pavement width of Philpot Lane would improve Pedestrian Comfort Levels (PCL) around the site. This will be enabled by the relocation of a taxi bay to the south and a removal of yellow lines along Fenchurch Street. This is strongly supported in line with Publication London Plan policy D8 and should be secured by section 278 or 106 agreement as appropriate. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The applicant should also consider the recommendations of the stage 1 safety audit for the final design. The Transport Assessment (TA) has identified two collision clusters where deaths and serious injuries have occurred in the recent highway safety record. These are at the junction of Gracechurch Street, Lombard Street and Fenchurch Street, and the junction of Fenchurch Street and Philpot Lane. The applicant should consider measures to mitigate any safety risk and deliver measures accordingly.

Pedestrian Comfort Levels (PCL)

96 The proposals are supported by a PCL assessment which is welcomed. The growth factor assumed for future baseline pedestrian movement is acceptable in principle, as is the 10% diversion assumption for the new through-route. However, clarity should be provided on the exact methodology used to calculate future PCLs. Further discussion is welcomed about this matter and potential mitigation including footway widening on Gracechurch Street.

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

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

Car Parking

99 The proposal is car-free except for one accessible parking space proposed at the ground level, accessed from Lime Street. The disabled car parking space proposed would have an electric vehicle charging point which is supported in line with Publication London Plan policy T6.3.

100 A Parking Design and Management Plan (PDMP) should be secured by condition, and discharged prior to commencement of construction. This should include details for the design and management of all parking including LCDS-compliant cycle parking.

Deliveries and Servicing

101 Deliveries, servicing and refuse collection are proposed within a basement area with four loading bays, storage spaces and a turntable large enough for 10m rigid vehicles, accessed from flatbed vehicle lifts via Lime Street. The design, number of vehicles, access and hours of operation are considered reasonable and should be secured by condition, though the applicant should clarify how access to the disabled parking space would be retained. A full Deliveries and Servicing Plan (DSP) should be secured by condition and discharged in consultation with TfL due to the close proximity of the TLRN. The multi-use of the basement area loading bay is robust in principle as deliveries and servicing is restricted. As part of the retail strategy condition, referred to earlier in this report, the applicant should confirm how the management of the pop-up retail floorspace will be maintained over the lifetime of the development in light of the dual use of this space.

Construction

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

other on Gracechurch Street. No construction access should take place directly from the TLRN at Gracechurch Street. Any proposals for construction vehicles to use the Gracechurch Street. Lombard Street and Fenchurch Street junction should be supported by an RSA to determine the safety of vehicle movements in line with the Mayor's Vision Zero agenda. A full CLP should be secured by condition. All construction proposals in the full CLP should also support the Mayor's Vision Zero Action Plan.

## Local planning authority's position

103 City of London Corporation officers are minded to recommend the application for approval.

## Legal considerations

104 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. Article 6 or 7 directions are considered against the requirements of the 2008 Order and are not made at the request of the applicant or any other party.

## Financial considerations

105 There are no financial considerations at this stage.

## Conclusion

106 London Plan and Publication London Plan policies on offices, the CAZ, town centres, urban design, tall buildings, inclusive design, strategic views, heritage assets, world heritage sites, climate change, sustainable urban drainage, urban greening and transport are relevant to this application. Whilst the proposal is strongly supported in principle, the application does not yet fully comply with the London Plan and the Publication London Plan as set out below:

- **Principle of development:** The principle of the proposed office-led mixed use redevelopment within the CAZ and CAZ retail cluster is strongly supported in principle. The proposal would provide a significant quantitative increase and qualitative enhancement to the existing office and retail offer. Further clarification is required in relation to the provision of affordable workspace, management of the diverse retail offer, the affordable housing contribution and public access. The provision of additional public space and publicly accessible viewing gallery is supported.

- **Urban design:** The development layout is strongly supported and the height and massing is acceptable in strategic planning terms, noting associated strategic views and heritage considerations. Overall, the scheme is of a high design and architectural quality.

- **Heritage:** The development would result a degree of harm to the Tower of London, Leadenhall Market and Bank Conservation Areas; the Grade I listed churches of St Edmund, St Mary-le-Bow and St Mary Woolnorth; the Grade I listed Custom House and Billingsgate Markey; the Grade II* listed Former Port of London Authority Building and Leadenhall Market; the Grade II listed 81-82 Gracechurch Street, 39-40 Lombard Street, Adelaide House; 1 Cornhill and Cannon Street Station; The Tower of London World Heritage Site and the Grade I listed St Peter ad Vincula Chapel and St Thomas's Tower as assets in their own right. Furthermore, GLA officers have identified the requirement for further assessment of potential impact in relation to Tower Bridge, Billingsgate Market, the Custom House Canon Street Station and 1 Cornhill. Following receipt of the additional material sought, GLA officers will be in a position to assess the impact to heritage assets.

- **Climate Change:** Further information in relation to maximising onsite renewable energy and demonstrating potential for connection to a future heat network. The anticipated shortfall in $CO_2$ reductions should be met through an offset contribution.

- **Flood Risk and Green Infrastructure:** The approach to flood risk management complies with London Plan and Publication London Plan policy. The surface water drainage strategy for the proposed development is in compliance with London Plan policy subject to additional information. There is insufficient evidence on what Water Efficiency measures will be put in place and what level of reduction will be targeted. The proposals as such do not comply with London Plan policy. The proposed integration of urban greening across the development supported and in line with London Plan policy.

- **Transport:** The proposed cycle and car parking is acceptable and complies with Publication London Plan policy, subject to further clarification on cycling access/egress routes; an assessment of the requirement for improvements to cycling infrastructure should be undertaken and a financial contribution towards a cycle hire docking station is required. Further work is required on trip generation analysis in relation to public transport impact. Public realm works to Fenchurch Street and Philpot Lane are strongly supported. The servicing strategy and the multi-use of the ground floor yard and basement area loading bay is supported in principle. Conditions in relation to DSP, CLP and Travel Plans for respective elements of the proposal must be secured.

for further information, contact GLA Planning Unit (Development Management Team):
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| **Committee(s)** | **Dated:** |
|---|---|
| Residents Consultation Committee<br>Barbican Residential Committee<br>Barbican Centre Board<br>Planning and Transportation Committee | 30th November 2020<br>14th December 2020<br>27th January 2021<br>16th February 2021 |
| **Subject:** Barbican Listed Building Management Guidelines – Volume IIIA – Arts Centre Supplementary Planning Document | **Public** |
| **Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?** | 7,12. |
| **Does this proposal require extra revenue and/or capital spending?** | **N** |
| **If so, how much?** | **£** |
| **What is the source of Funding?** | N/A |
| **Has this Funding Source been agreed with the Chamberlain's Department?** | N/A |
| **Report of:** Director of the Built Environment | **For Decision** |
| **Report author:** The Chief Planning Officer | |


## Summary

As part of the strategy to guide future changes, maintain and protect the historical and architectural significance of the Grade 2 listed Barbican Estate, the Barbican Arts Centre Listed Building Management Guidelines Volume III draft has been finalised and is appended to this report. The document provides a framework within which changes to significant elements of the estate should be managed.

The next stage is to publish the draft text for formal public consultation early next year, 2021. Following consultation, the text will be reviewed in response to comments received. Any proposed amendments to the document will be reported back to your Committee for approval and approval will be sought to adopt the document as an SPD.


## Recommendation(s)

Members are asked to:

Approve the draft text of the Barbican Listed Building Management Guidelines Draft SPD, Volume III and agree that the document be published for formal public consultation in March 2021

## Main Report

### Background

1. The preparation of these guidelines has been commissioned by the City of London Corporation and authored by Avanti Architects, with the assistance of internal and external stakeholders. They form part of the suite of guideline documents for the Barbican Estate (of which Volumes 1 (Barbican as a whole), 2 (Residential) and 4 (Landscape) have already been completed), and are intended to assist all those involved in the ongoing management and conservation of the Barbican Arts Centre as a Grade II listed building.

2. The three sections of this Volume (Volume 3A), covering the Non-Residential Buildings of the Barbican will complete the Listed Building Management Guidelines (LBMG) suite of documents for the Barbican Estate, all of which are available on the City of London website.

3. The LBMG should be used by the building owners (Barbican Art Centre) in conjunction with the relevant planning and conservation authorities, in balancing the need to sustain the Arts Centre as an internationally competitive cultural institution whilst at the same time protecting its essential architectural character as a statutorily designated heritage asset. Conservation and change are not necessarily incompatible, indeed sustaining a building in beneficial use is usually the best way of conserving it. However, designation – or 'listing'- imposes certain legal obligations on a building owner as prescribed in the Planning (Listed Buildings and Conservation Areas) Act 1990, specifically the duty to obtain consent for any works that would affect the character of the listed building and, in the exercise of planning functions, the requirement to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which the building possesses. The Guidelines seek to identify and describe heritage significance and so clarify where the consent procedures are likely to be applicable.

### Current Position

4. The Barbican Arts Centre Listed Building Management Guidelines Volume III draft has been prepared and is ready for public consultation

### Proposals

5. Publish the draft text for formal public consultation for a period of 6 weeks. Following consultation, the text will be reviewed in response to comments received. Any proposed amendments to the document in will be reported back to your Committee for approval and approval will be sought to adopt the document as an SPD.

### Options

6. Approve to Publish the draft text for formal public consultation
7. Do not Approve publish the draft text for formal public consultation.

**Key Data**

There is no key data associated with the proposal to publish the draft LBMG for public consultation.

**Corporate & Strategic Implications**

- Strategic implications
  This document will aid current and future building management and adaptions needed to sustain the Barbican Arts Centre as a focus for culture within the Square Mile, thus supporting Corporate objectives 7.(We are a global hub for innovation in finance and professional services, commerce and culture) and 12 (Our spaces are secure, resilient and well-maintained)

- There are no Financial implications

- There are no Resource implications

- Legal implications:
  . Public consultation is a legal requirement for the adoption of Supplementary Planning Documents. All other implications are included in the body of this report.

- There are no Risk implications.

- Equalities implications –an EQIA Test of Relevance is appended to this report, Appendix B

- Climate implications and Security implications:
  As with any alteration, this document will support the process by which alterations to adapt the building for climate and security related reasons would be considered and permitted.

**Conclusion**

Members are recommended to approve the appended draft text for formal public consultation.

**Report author**
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# THE BARBICAN

## Listed Building Management Guidelines

## Volume IIIA

## The Barbican Arts Centre



Placeholder image

Prepared on behalf of

CITY OF LONDON

## The City of London

by

Avanti Architects

4th Draft – 09th November 2020

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**(Note – Illustrations are primarily to assist interpretation of the text, not for photographic quality. Paragraphs are numbered from 1 for each page. Document references should therefore be by page and paragraph number.)**


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**The Barbican Arts Centre under construction, showing Concert Hall (centre), Frobisher Crescent (left) and the Theatre (top)**

# THE BARBICAN
## Listed Building Management Guidelines Volume IIIA

## Introduction

1. This document is Volume III A of the Barbican Listed Building Management Guidelines, (LBMG's) of which the other volumes are as follows –

| | |
|---|---|
| Volume I | Introduction to the LBMG's, background and policy; legislation; summary of special interest of the estate; roles of the City of London and Historic England, and procedures for applying for Listed Building and Planning Consent. |
| Volume II | The residential buildings of the Barbican Estate - exteriors, common parts and interiors |
| Volume III B | The Guildhall School of Music (Not yet commissioned) |
| Volume III C | The City of London School for Girls (Not yet commissioned) |
| Volume IV | The Landscape, including Management Guidelines, Good Practice Guide and Green Infrastructure |

2. The three sections of this Volume covering the Non-Residential Buildings of the Barbican will complete the LBMG suite of documents for the Barbican Estate, all of which are available on the City of London website. It should be noted that Volume I covers the estate as a whole and is already adopted as a Supplementary Planning Document and therefore applicable to the non-residential buildings. Volumes I and IIIA should accordingly be read together.

3. Specifically, Volume I contains the National Heritage List for England (NHLE) entries for all buildings on the estate (including the non-residential buildings), together with general sections on the history of the Barbican estate (Vol I, section 4) and its Special Architectural and Historic Interest (Vol I, section 5). Accordingly, this material is not repeated in Volume IIIA.

4. There is also now an extensive literature on the Barbican which provides considerable historical background on the development of the estate. References to some of these resources are contained in the Appendix, and accordingly duplication of this material is generally avoided in the current volume.

# Executive Summary

**Purpose and structure of the Guidelines**

1. These guidelines have been commissioned by the City of London Corporation and authored by Avanti Architects, with the assistance of internal and external stakeholders. They form part of the suite of guideline documents for the Barbican Estate (of which Volumes 1, 2 and 4 have already been completed), and are intended to assist all those involved in the ongoing management and conservation of the Barbican Arts Centre as a Grade II listed building.

2. They should be used by the building owner in conjunction with the relevant planning and conservation authorities, in balancing the need to sustain the Arts Centre as an internationally competitive cultural institution whilst at the same time protecting its essential architectural character as a statutorily designated heritage asset. Conservation and change are not necessarily incompatible, indeed sustaining a building in beneficial use is usually the best way of conserving it. However, designation – or 'listing'- imposes certain legal obligations on a building owner as prescribed in the Planning (Listed Buildings and Conservation Areas) Act 1990, specifically the duty to obtain consent for any works that would affect the character of the listed building. The seek to identify and describe heritage significance and so clarify where the consent procedures are likely to be applicable.

3. As well as being consulted in the planning of any major projects, the Guidelines should be applied systematically by those responsible for running the Centre to ensure that day-to-day operational requirements, including minor works of maintenance and repair, are carried out with due regard for the heritage significance and special interest of the building and its immediate setting. In this context it should be noted that the incremental effect of numerous small changes may have just as great an impact as a single large project, and that to avoid unintended detriment a consistent level of care and understanding of the architecture is required.

4. Introductory sections explain the methodology used in the Guidelines to present the issues in a consistent format – Original Design, Alterations, Heritage Significance and Guidance. A 'Traffic Light System', such as has been employed in previous Barbican LBMG volumes, provides examples of possible works and their likely status in relation to the need for Listed Building Consent.

1. To provide an overview of relative heritage significance a Star Rating Scale attributes differing levels of sensitivity to the various parts of the Arts Centre, ranging from the highest (4 stars) for the building exterior, foyers and two principal venues – Concert Hall and Theatre, to the lowest (1 star) for such areas as offices and the exhibition halls. This should help to inform the consideration due for any intended works.

Notes on Special Needs access and diagrams of the Arts Centre's floor levels are also included.

**Summary of findings and recommendations**

2. The Arts Centre and its immediate environs constitute the public focus of the Barbican estate, one of the most ambitious projects of post-war reconstruction in Europe of its time, and as such are rich in historical, social and architectural interest. The cultural, recreational and commercial facilities are a major civic attraction, with a national and international profile. This range and

diversity should be protected.

3. The Arts Centre has now been in intensive use for over 30 years and has assimilated significant change over this period, whilst retaining its essential identity. This in itself is evidence of the dynamic nature of such an institution and the need to respond to the changing demands and tastes of its wide range of users. It is also testament to the inherent resilience of the original design and demonstrates that progressive adaptation, if intelligently and sympathetically conceived, need not be detrimental to the special architectural interest for which it is listed.

4. The Arts Centre's exterior form has a character and identity that distinguishes it from its residential neighbors as a clearly defined civic institution. Recent alterations to the Silk Street entrance and on the Lakeside façade have set a benchmark in design quality and material style that should be followed in any future works but being conceived as a finite architectural composition there is limited scope for major amendment of the building exterior generally. Similarly, the roofscape has a distinctive character that is visible from many vantage points around the estate. This should be protected from ill-considered additions such as new services apparatus, terminals and equipment housings, etc. The original provision for landscape planting along the southern facade should be fully exploited.

1. The interior arrangement was closely governed by the Arts Centre's position in the overall Barbican development, which entailed extensive excavation and concentration of the facilities within a restricted footprint. This resulted in foyer spaces of exceptional spatial depth and drama. Various later interventions in the foyers have improved circulation and increased the retail provision but have impacted on that original spatial quality and indivisibility by crossing and infilling voids with new floorplates. It is important that the principal venues, the Concert Hall and the Theatre retain their visible presence within the interior, and that the spatial flow across the foyers and main staircases – a defining aspect of the Arts Centre's character and special interest - is not further diminished.

2. The free floor area within the foyers provides ample opportunities for various temporary installations, exhibitions, craft fairs, artwork, pop-up counters etc. These enrich the Barbican 'offer' but should be of a design quality worthy of the building itself. Likewise, seating furniture, fixtures, waste bins and other incidental accessories should be carefully chosen and controlled to avoid the proliferation of clutter.

3. The interior has a highly distinctive vocabulary in terms of material and detail, including exposed pick hammered concrete, woodblock flooring, brass handrails, glazed steel guardings, door ironmongery, etc. – all of which should be preserved.
Surviving original uncoated finishes – concrete (smooth or textured), brick, terrazzo - should be kept uncoated and maintained.

4. The various services terminals, grilles, fire hoses, etc. were all scrupulously coordinated and accommodated within the original design. Any new services should avoid face-fixing and be planned with equal care.

5. Lighting and signage play a major part in setting the tone of the public spaces and common parts. The range of fittings should be restricted and coordinated. Whilst coloured light arrays may suit

seasonal requirements or special events, a default setting to white best matches the sobriety of the Barbican ambiance.

1. Recent super-graphic signage has greatly improved navigation for first time visitors, but there is further scope for establishing a more fully coordinated and consistent signage strategy for the Centre as a whole. A limited number of carefully sited electronic screens would cater for constantly changing event information better than the proliferation of posters and display boards.

2. The public toilets in the Centre were originally designed to a standard consistent with the other common parts and should be maintained accordingly. The generous use of terrazzo in floor and wall finishes was a particular characteristic and this should be retained wherever possible.

3. The two principal venues within the Centre – the Concert Hall and the Theatre – retain most, if not all, of their original character and fabric. Various acoustic modifications in the Concert Hall auditorium have not substantially altered its essential ambiance, and the recent major upgrade of flying machinery and controls in the Theatre is not visible to the audience. The public spaces and original details and finishes within these facilities constitute a major element of the Arts Centre's significance and should be carefully maintained.

4. The backstage areas, however, are working zones that must serve the operational needs of their respective performance venues and accordingly are of limited fixed heritage interest.

5. The Centre also contains a range of other cultural facilities including the Pit Theatre, Library, Art Gallery, Cinemas, Conservatory, Curve and Exhibition Halls. With the exception of the Library these are all self-contained spaces of intermediate heritage significance. The need for autonomous operation of these venues, most notably the Library and Art Gallery, has led to significant alteration including removal of interconnecting staircases, and/ or closure of multiple entry points and external connections (e.g., the Sculpture Court adjacent the Art Gallery). Wherever possible however the option of future reinstatement, even on a temporary event basis, should be retained. Recommendations regarding preservation of surviving original finishes and details apply equally within these areas.

6. The Library is distinct in being an open-sided and visible element within the main foyer volume and as such an important contributor to the spatial drama of the public interior which should be retained.

1. The Exhibition Halls have, unsurprisingly, been subject to the most substantial interventions – including the recent insertion of two new cinemas and a large restaurant. Subject to quality of design, further scope remains for change within these areas without heritage detriment, most notably the potential for establishing an active relationship with Beech Street.

2. Original supporting public facilities include the three Lakeside restaurants which despite intermittent interior refits to suit changing commercial concessions still retain their exterior form. This should be preserved notwithstanding the likelihood of further interior modification in the future.

3. There are numerous offices distributed around the Centre itself, and also in Frobisher Crescent. These have all been subject to continuous internal change and apart from miscellaneous original details retain little heritage interest. Further change to these areas may be expected without detrimental impact, provided this is executed to a high standard of design and accommodated within the existing perimeter shells. The same proviso of retaining existing envelopes applies to the extensive engineering plant areas, which may otherwise be amended and upgraded as necessary to serve the Arts Centre as a whole.

**Use and review of the Guidelines**

4. The above commentary is intended to capture only the principal findings and recommendations of the Guidelines. It is not a substitute for the detailed analysis and guidance given for each individual element of the Centre which should be consulted when planning any specific works of alteration or maintenance.

5. As with previous volumes of the Barbican LBMGs, it is recommended that the Arts Centre Guidelines are reviewed periodically to check they are being correctly applied and to ensure they remain up to date with ongoing managerial practices. Likewise, the operational plans included in the Appendix should be reviewed and updated as necessary.

# Methodology

1. The general structure of this document is as indicated on the Contents page. Within each of the principal building headings the different elements are considered in turn according to the following format.

**Original design**

2. These sections summarize the background circumstances and principal features of the original design of the element or area being considered. The descriptions do not purport to be exhaustive but aim to capture the key aspects of design from which to identify subsequent alterations.

**Alterations**

3. These sections itemize the main alterations and interventions that may have taken place since completion of the building or element being considered. It should be noted that alterations that already existed at the time of listing are covered by the provisions of listing, though this does not necessarily mean they are of comparable significance in heritage terms.

**Heritage significance**

4. These sections seek to identify the essential character and attributes of the element or area being considered that contribute to the special architectural or historic interest for which the Barbican has been listed.

**Guidance**

5. These sections (printed in boxes) set out the key measures recommended in order to maintain and avoid detriment to the heritage significance of the element or area described above. Those responsible for commissioning or designing any works to the Barbican Arts Centre should have regard to this guidance in formulating their proposals. This would ensure that the works avoid impacting on the significance of the heritage asset and accordingly either avoid the need for listed building consent or facilitate it where it is necessary.

6. The need to obtain listed building consent for works that would affect the character of a listed building is a stipulation of the Planning (Listed Building and Conservation Areas) Act 1990. This does not mean that consent may not be forthcoming if the works are not detrimental.

7. However, if works are proposed that appear to contradict, or diverge from, the recommended guidance and trigger the requirement for listed building consent, it will be for the decision maker (the planning authority) to determine whether – in the terms of National Planning Policy Framework (2012) – the impact of such works would cause harm, or substantial harm, to the significance of the asset, and if so, whether that harm is justified by compensating public benefit.
1. (The relevant tests are prescribed in para's 133 and 134 of the NPPF; refer also NPPG 2014)

**Traffic Light System**

2. Discussion of each distinct area of the Arts Centre, as noted in the table of contents, is followed by a 'traffic light system' analysis. This is intended to provide a quick reference guide to the status

of various types of works according to whether they will trigger the need for Listed Building Consent.

See further explanation below.

## The Traffic Light System

1. In addition to the main descriptive text and guidance each section of the Arts Centre volume is supported by a 'Traffic Light' analysis, whereby examples of various types of work are assigned to a series of traffic light categories, indicating the likelihood of listed building consent being necessary, based on their potential impact on the character and special architectural interest of the building. However, the issue of whether or not works require listed building consent will remain subject to evaluation on a case by case basis.

2. All proposals for additions or alterations to the buildings and external landscape, as well as any maintenance, remedial, upgrade, replacement or repair work, should be assessed for their potential impact on the buildings' heritage values as described in the main text. Some exterior changes may also require Planning Permission or Advertisement Consent. The likely impact of changes on the special architectural interest of the building will determine the need to apply for Listed Building Consent (LBC). Examples of work are colour-coded by the 'Traffic Light' system as follows:

**Green** — **Works that will not require a LBC application**

These are examples of works that would not be considered to have an impact on the character and special architectural interest of the buildings and would therefore not require a LBC application.

Examples of such works address replacement on like-for-like basis due to wear and tear, expiry of natural life cycles and/or making good following accidental or wilful damage which can be repaired locally and does not require the input of a specialist consultant. Temporary and/ or reversible work may also be included.

**Amber** — **Works where advice should be sought to determine whether a LBC application is required**

These are examples of works where it is not possible to determine without further information the potential impact on the character and special architectural interest of the buildings. In such cases, advice should be sought from the conservation officer/Historic England to ascertain if a LBC application is necessary before embarking on the work.

The requirement or otherwise for a LBC application is likely to include consideration of whether the proposed change would be reversible and the extent of any manifestation on the exterior or principal spaces of the buildings.

**Red** — **Works that require a LBC application**

These are examples of alterations that would clearly have an impact on the character and special architectural interest of the buildings and would therefore require formal evaluation to establish whether or not that impact would be detrimental. In certain cases, it may also be necessary to obtain planning permission. The requirement to apply for consent need not mean it would not be granted.

**Black** — **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

These are examples of works that would almost certainly have a detrimental effect on the character and special architectural interest of the buildings and would therefore require a LBC application. Although it is considered that consent is unlikely

> to be granted, it should be noted that the Guidelines cannot take precedent over the provisions of the Act, and the question as to what requires consent can ultimately only be determined by the courts. Works which cause substantial harm or loss are unlikely to be granted consent, but each application will need to be determined on its own merits and cannot be prejudged.

1. It should be noted that although the examples are intended to capture as many scenarios as possible, it is possible that a particular proposal may not have been anticipated in the traffic light guidelines. In such circumstances reference should always be made to the conservation authorities prior to the inception of any works. In other words, the default category is Amber. In every category, additional guidance notes enclosed in boxes are provided.

## Special Needs

2. Certain interventions may be necessary from time to time due to changing statutory regulations to cater for people with special needs. Examples might include widening doorways, installation of a stair-lift, changing bathroom or kitchen configurations to allow wheelchair access, or introduction of tactile flooring for those with impaired sight. While most changes are likely to fall within one of the categories covered in the guidelines, it is recommended that in all cases advice is sought from the Planning Department at the earliest opportunity in order to clarify where works may proceed without further approval, and to identify cases where formal consent procedures are required.

## Interpretation

3. Unless specifically excluded from the official designation entry, all parts of a building are covered by the listing. Thus, all elements contributing to its character and special interest are significant and require careful consideration before implementation of any work.

4. Special architectural interest is manifested foremost in the features that define the public character, spaces, materiality and detail of the building. The guidelines encourage wherever possible the retention of original spatial character, architectural features and like-for-like replacement when renewal is necessary.

5. These guidelines do not take precedence over the statutory provisions of the Act or any related Planning Policy or Guidance. While the guidelines do not directly prohibit any works, anyone wishing to undertake works has an obligation to supply sufficiently detailed information to demonstrate whether the proposed works would be detrimental to the character and special interest.

6. Maintenance and repair work should take into account the original design intent and be carried out, as far as possible, on a like-for-like basis. Generally, where maintenance is required, it should be coordinated within the framework of a maintenance cycle or a five-yearly review.

7. In some of the examples included in the green category, ‘like-for-like’ replacement is recommended. However, in some cases, design and materials may have already been altered from the original at the time of listing.

1. Opportunities to restore them to a more authentic state or one reflecting the guidance given in this document should be taken wherever practicable, despite the possibility of this triggering the LBC procedure, as consent is most likely to be granted.

2. As noted above, the traffic light examples of potential works are not exhaustive and there may be other details and features specific to the Arts Centre and its setting which have not been included. In such cases the building managers and those commissioning works should therefore always revert to first principles – i.e. assess the heritage significance of the area/s affected by the proposals, study the relevant Guidance commentary and consider the potential impact of the work in relation to building character and special architectural interest before implementation.

3. Any works that are the subject of uncertainty should be regarded as category Amber and trigger an enquiry before action is taken.

## The Star Rating scale

1. The Star Rating referred to within the document attributes a hierarchy of heritage sensitivity to the various sections of the building. The Traffic Light System is intended to be used as a practical guide to whether works may require formal consent when commissioning projects for maintenance or modification.

2. The two systems complement each other but do not necessarily overlap in terms of individual items. For example, a relatively minor intervention could require consent in a highly sensitive location, while a major modification might be of little consequence (in heritage terms) in an area of low sensitivity. Whilst, as noted above, all areas are covered by listing, higher starred areas should therefore be approached with particular attention to heritage considerations.

**Star Rating Scale**

| | |
|---|---|
| Exterior and exterior spaces | **** |
| Entrances, Foyers and Common Parts | **** |
| Toilets Level -1.5, -2 (Cinema/ Pit) and rear of Food Hall | ** |
| Toilets elsewhere | * |
| The Concert Hall | **** |
| The Theatre | **** |
| Concert Hall and Theatre Backstage Areas | ** |
| The Pit Theatre | ** |
| The Library | *** |
| The Art Gallery | *** |
| The Curve | ** |
| The Cinemas | ** |
| Offices | * |
| Restaurants | ** |
| The Conservatory | *** |
| Exhibition Halls | * |

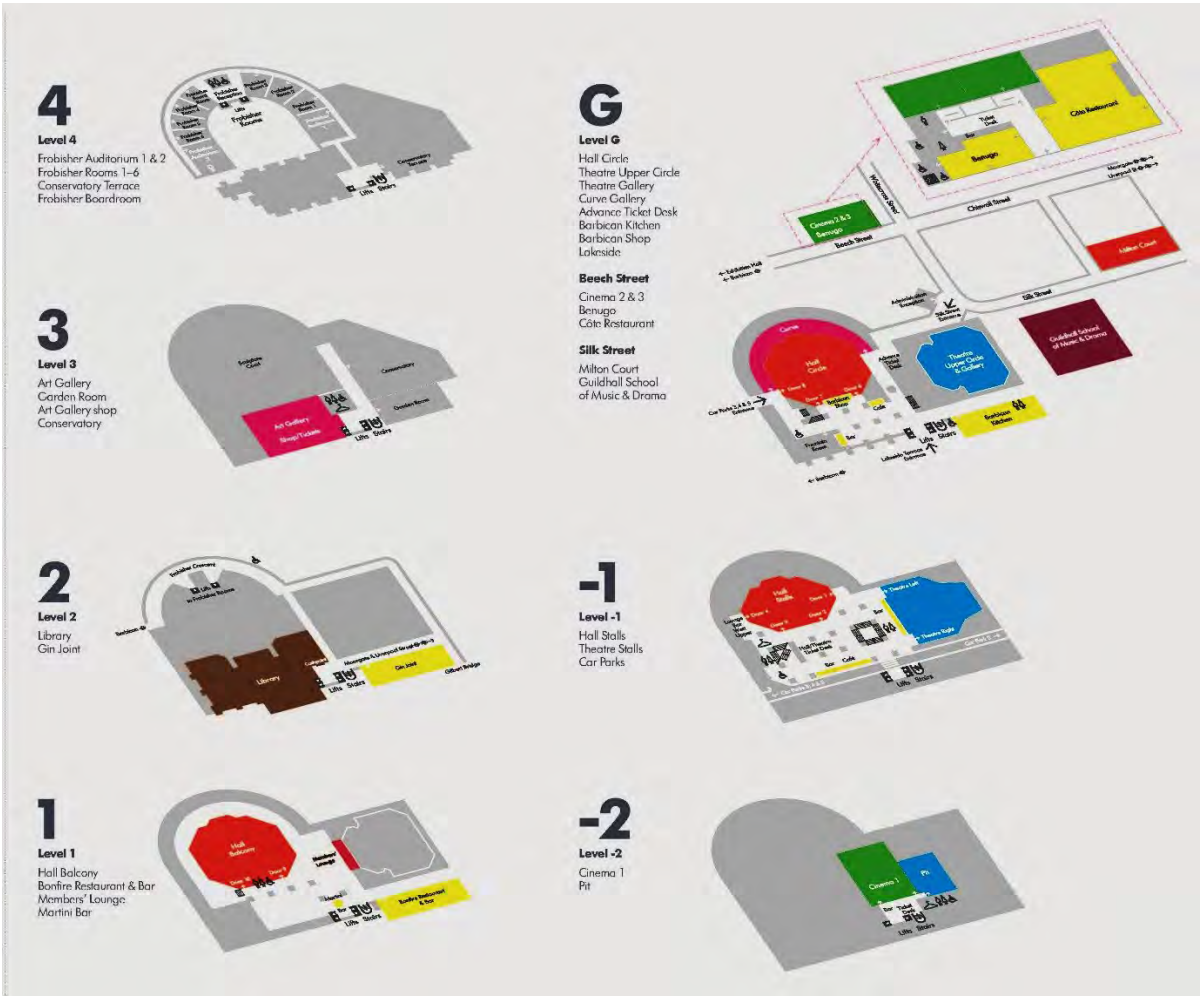
****** Extreme Sensitivity**
***** High Sensitivity**
**** Medium Sensitivity**
*** Low Sensitivity**

## Note on levels

1. There have been changing conventions for designating the floor levels in the Arts Centre over the years. The original system identified Levels 1 (the lowest, containing the basement Cinema) to Level 9 (the highest, including the upper floor of the Art Gallery and the Conservatory void).

2. More recently the public signage conventions have been simplified to provide six named floors such that Ground Level (G) relates to the Silk Street entrance and Lakeside, with Levels -1 and -2 going downwards, and Levels 1 to 4 going upwards. For the sake of clarity, the current convention, i.e. G as Ground, with two 'minus' levels and four 'plus' levels is adopted in this document. See diagrams below. For a full record of the current floor layouts and occupancy of the Centre see Operational Plans in the Appendix. Here all the Centre's levels are indicated from -3 to +9.

3. Note: a further lettering convention is used locally in the Theatre backstage areas: from A (Level -2) up to G (Level +2). This has no other application.



# The Non-Residential Buildings on the Barbican estate

**General synopsis**

**Original design**

1. Although the various non-residential buildings on the estate went through many iterations before finding their final form, the provision of a wide range of communal, educational and cultural amenities was an intrinsic ingredient of the Barbican project from the start. Early proposals included a number of amenities – a swimming pool, squash courts, a second City school, a hotel, a gallery for the Lord Mayor's coach - that would eventually be dropped. But the principal elements of social provision - the GSMD, the CLSG and the Arts Centre – remained, and in the case of the Arts Centre were significantly increased. (See Architects' Report, April 1959 for discussion of the facilities initially considered, and List Entry, Barbican LBMG Volume I for summary of facilities provided.)



**Overview of the Barbican Arts Centre in its context**

**Alterations**

1. Whilst there have been numerous detailed alterations to the several constituent parts of this non-residential provision since the estate was completed (as dealt with in the respective sections that follow) there have been few major alterations to the overall scope of amenities and, apart from the inactive Sculpture Court, none that have reduced it. The CLSG has been significantly extended, and the new cinema conversion of part of the Exhibition Halls on Beech Street including the street-facing café and restaurant, the most conspicuous recent adaptation, has added to the Barbican 'cultural offer'.

**Heritage significance**

2. The successful realization of this rich diversity of collective uses differentiates the Barbican markedly from many of the 'comprehensive' residential developments of its time where initial ambitions for communal amenities were almost invariably curtailed, or omitted entirely, due to budgetary restraints, site limitations or other pressures.

3. The reason why the Barbican vision prevailed is due partly to its sheer size and density – making such provision socially essential; partly to its central City location – unlike the typical local authority housing estate, usually less centrally located; and partly to the tenacity of the key project personnel, both client and architects, whose ambition was to address not just the City's post-war population shortage but to create an entire urban quarter in all its civic diversity.

**Guidance**

4. This collective and cultural dimension of the Barbican, as embodied in the Arts Centre, is a key contributor to the special architectural and historic significance for which it is listed. The diversity and richness of this collective provision should be protected and celebrated, and any interventions, closures or conversions should be carefully considered to avoid diminishing it.

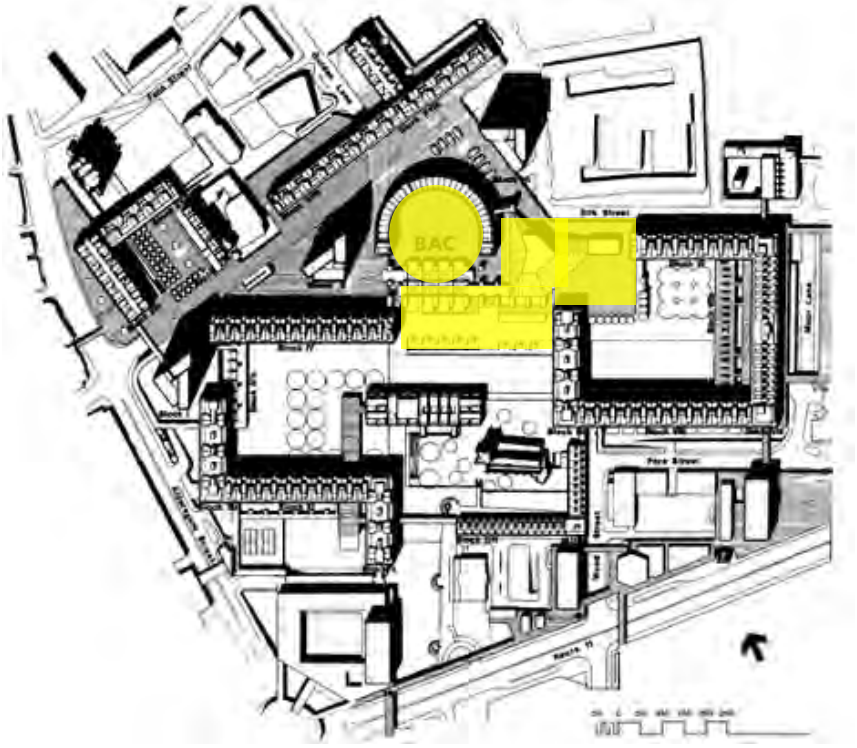
# The Barbican Arts Centre

**Introduction**

**Original design – civic impact and context**

1. Volume I of the Guidelines provides a historical summary of how the inclusion of a variety of cultural and artistic facilities within the estate was an intrinsic element of the concept from the beginning. The range of components that were to constitute the Arts Centre – theatre, concert hall, art gallery, cinemas, a lending library, and supporting bars and restaurant – would be realized at a scale that ultimately exceeded the original vision.

2. Architecturally, socially, culturally - the Arts Centre thus forms the heart of the Barbican. The estate plan, considered simply as an abstract composition, suggests how the two huge open courtyards created by the terraced blocks to east and west act as a giant frame to embed the Arts Centre in its central position, rather as the frame of a ring provides the setting for a gemstone.

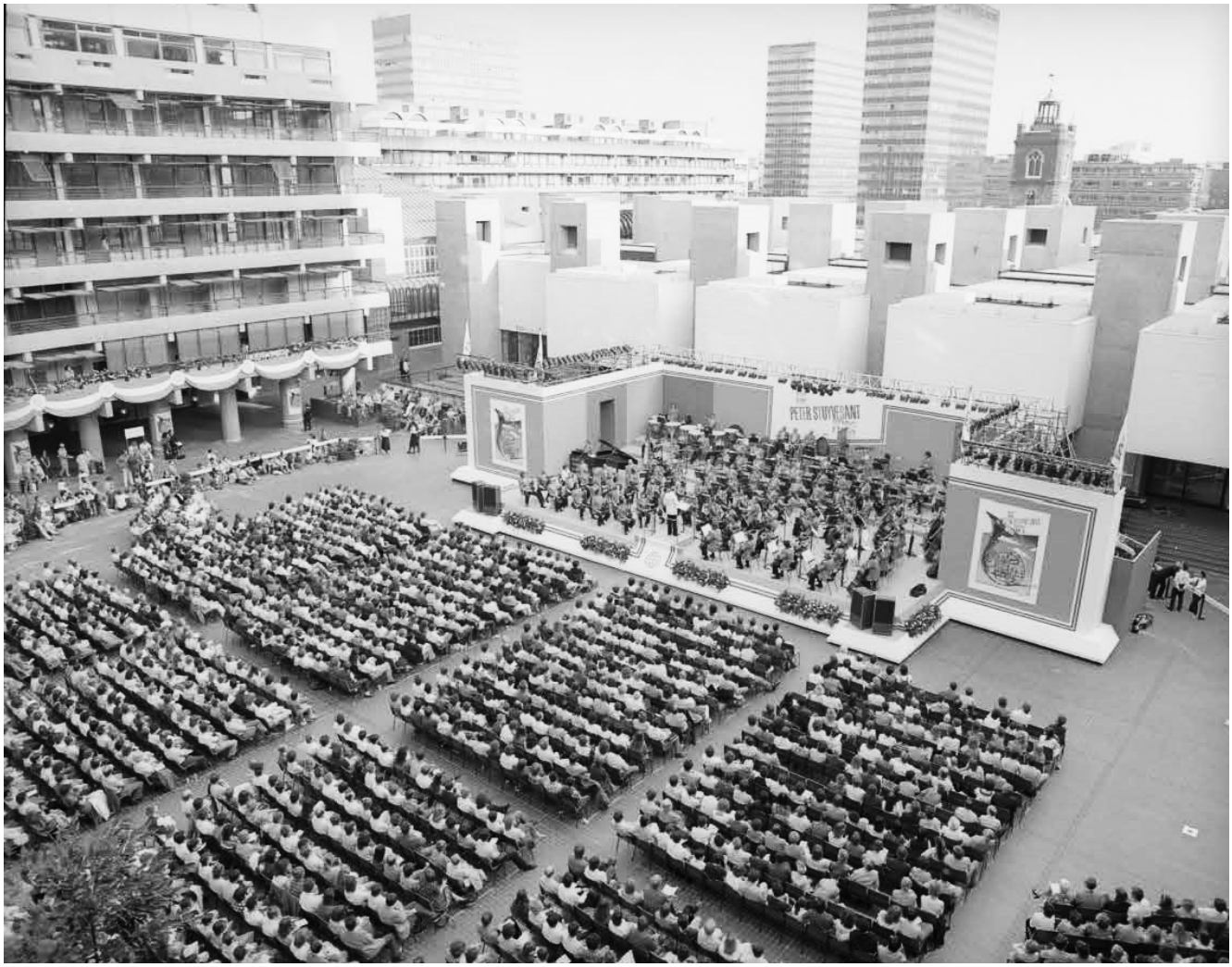



**The Barbican Arts Centre in its context**

3. The focal semi-circle of Frobisher Crescent, marking the footprint of the concert hall below, anchors the entire masterplan and provides the central orientation point of the composition as a whole. The result of this central insertion of major cultural amenities is to transform what might otherwise have been 'merely' an unusually large housing estate into a major metropolitan destination, a place of public assembly and an urban cultural quarter of international renown.

*Alterations in relation to general context (Note: detailed alterations are considered later in this volume.)*

1. The Sculpture Court, (framed by Frobisher Crescent) was intended as the Art Gallery's garden but has not been so used on a regular basis for many years, with direct access from the Gallery now largely blocked off. Lakeside Terrace has accordingly become the only open space directly associated with the Arts Centre.



**Frobisher Crescent Sculpture Court in use by the London Symphony Orchestra for an open-air concert performance, August 1982**

**Heritage Significance**

1. The enrichment of a major housing development with cultural facilities on such a scale and integrated within a single project is unique in the UK, and rare elsewhere. With its inclusion, all the types of heritage value identified in *Conservation Principles* (2008) – evidential, historical, aesthetic and communal – are abundantly represented at the Barbican.



**The Barbican Arts Centre in its context – the cultural focus of a city quarter**

**Guidance**

2. Although the Arts Centre's cultural provision also included supporting commercial facilities - bar/ restaurant/ café, etc- their primary purpose was to serve the social demands of the arts functions. Other (larger) commercial uses were located separately on the estate. The ambiance of the Arts Centre itself should accordingly remain primarily cultural. Whilst the introduction of complementary uses, such as retail provision, to broaden the 'destination offer' is part of its need to remain competitive and adapt to changing demand, this should not dilute, obscure or detract from the Centre's essential cultural ethos.

## The building exterior

(The Exhibition Halls north of Beech Street form a distinct element of the complex, and are dealt with separately in this document.)

**Original design**

1. Whilst being fully integrated into the anatomy of the overall estate, the Barbican Arts Centre as built is distinguished from the surrounding residential buildings by its overall character, form and architectural vocabulary.

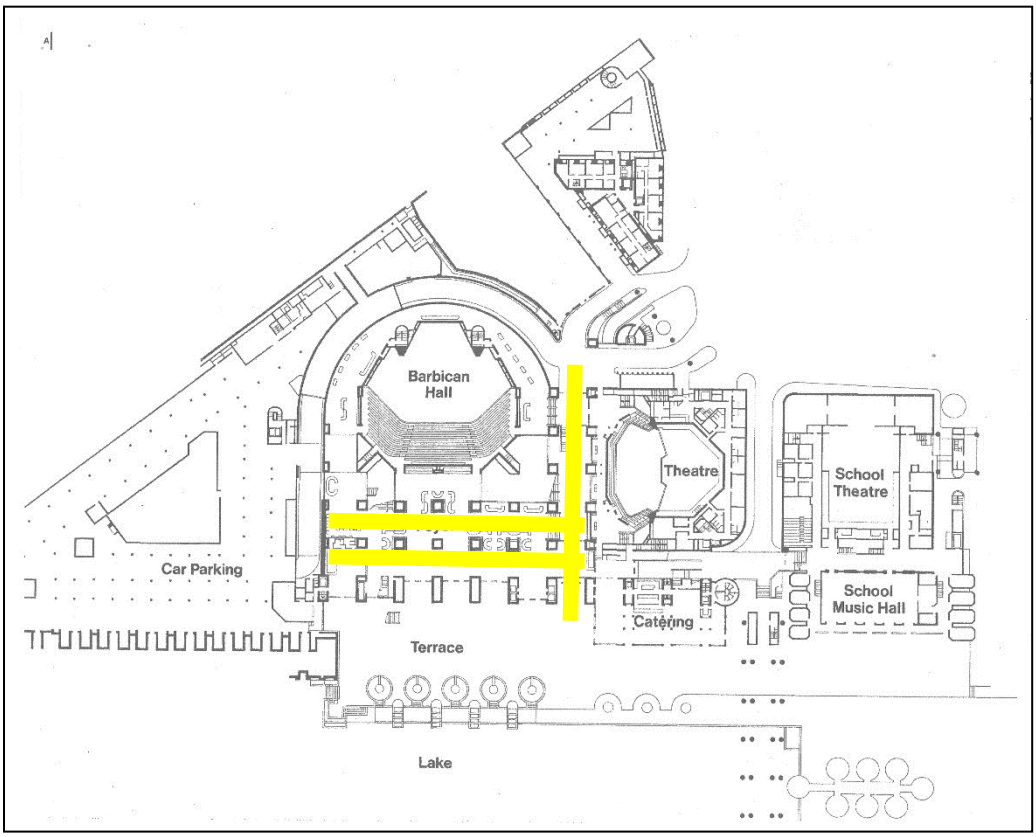


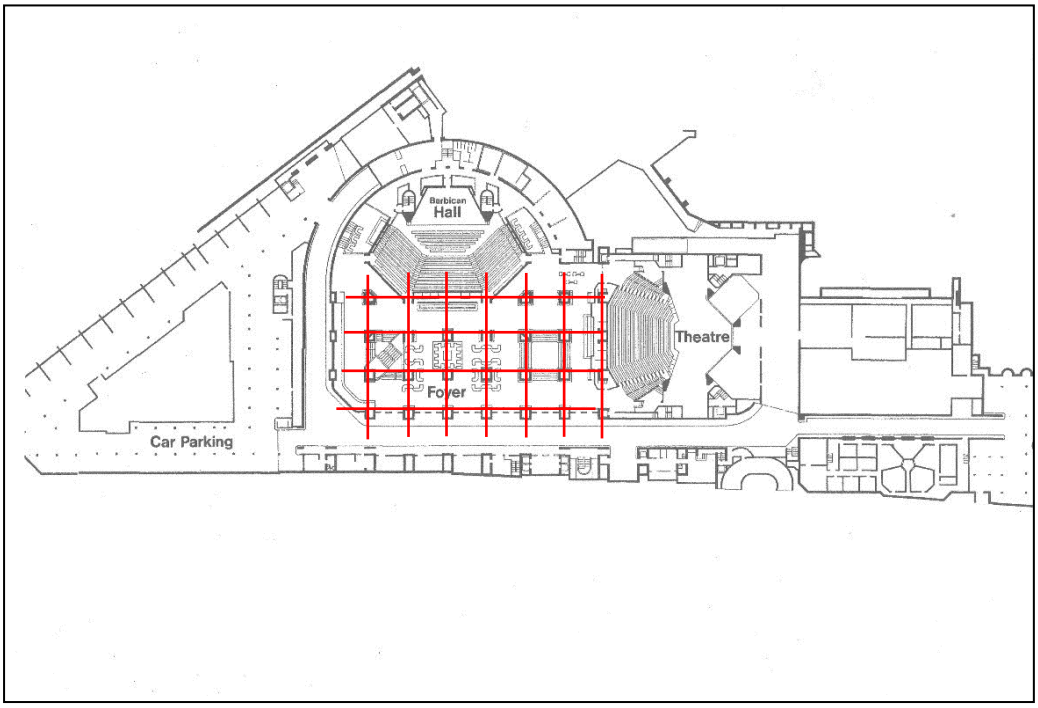
**The Barbican Arts Centre, as originally built, viewed from the south**

2. Early exploratory drawings of the arrangement of social and cultural amenities (as indicated in the Architects' Report of 1959) suggest that the key components of the theatre, concert hall, art gallery and library were at that stage still conceived as stand-alone buildings with separate ground level entrances around a landscaped courtyard. The final design (as indicated in the Architect's Report of 1968) shows how as the brief intensified these components would expand and conjoin to effectively become 'buildings within a building' the limits of which by then were already determined by the adjacent residential development.

3. The Arts Centre is accordingly an agglomeration of facilities 'under one roof' albeit that roof assumes a variety of different forms depending on the accommodation below – a paved sculpture court in the case of the concert hall; a glazed conservatory abutting the theatre fly tower, a series of flat-roofed pavilion-like boxes in the case of the art gallery, and an extensive array of rooflights that relate to the plan functions below.

4. The essential structure of the complex is clearly articulated in its architectural expression. Between the two main auditoria, a square 35 ft grid of hollow structural concrete piers supports and serves the spaces at all levels, emerging above the roofline in parallel rows of service turrets.




**The original architects' Arts Centre plans at Levels G (above, showing principal spatial foyer axes ) and -1 (below, showing foyer structural axes**

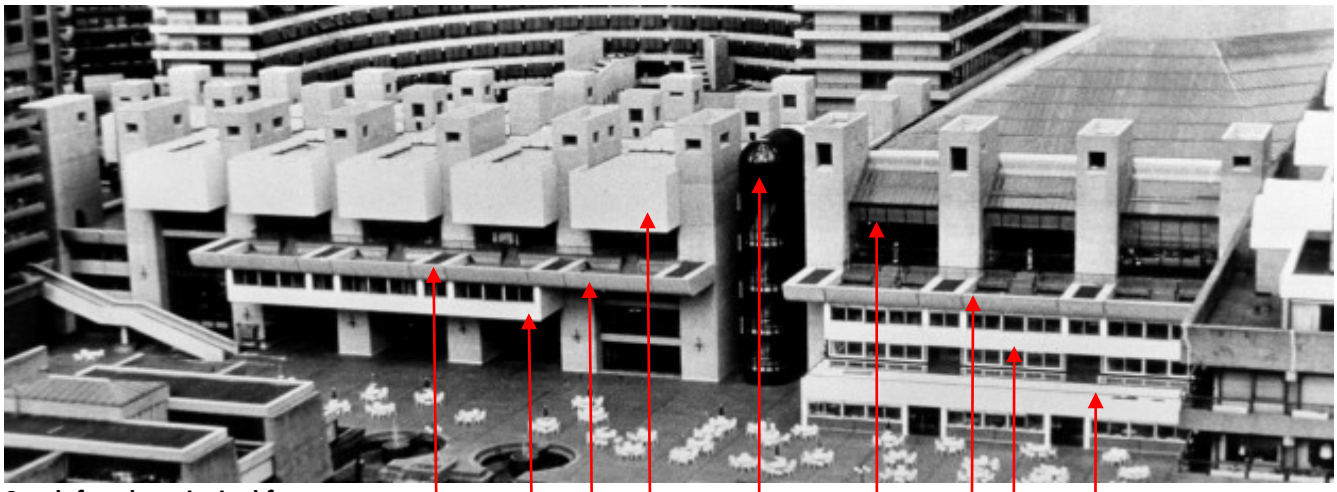
The Arts Centre complex south of Beech Street presents three distinct exterior facades – south, west and north, the east side being merged with the GSMD and not independently expressed.

1. Along the southern edge overlooking the lake the structural piers are deepened to become rectangular in plan and enclose twinned lift shafts at key locations. This southern façade (see cover photo) differs as between its east and west portions either side of a full height glazed stairtower centred on the north-south axis.

2. To the east, corresponding with the Barbican Theatre footprint behind, the lower tiers, clad in white tiling, are occupied by the lakeside Café and Restaurant. Above the oversailing balcony with its signature boat-edge profile forming the restaurant roof, the glazed envelope of the Conservatory rises between the structural piers before pitching up to the Theatre fly tower behind.

3. In the western portion, the Library - mirroring the restaurant projection and similarly tile clad – is likewise slung beneath the boat-edge balcony which, except for the interruption of the stairtower bay, thus provides a mid-height datum across the façade as a whole. Below the Library the lakeside terrace runs back between the piers to the recessed foyer line to create a sheltered undercroft.

4. Above the balcony, the Art Gallery with its prominent range of tile-clad pods, projects outwards between the piers. It may be noted how the series of circular sunken water pools along the lakeside edge are also aligned with the gallery pods above, extending the geometric discipline of the building out into the landscape.
Planter boxes on the pier axes provide points for greening both balcony edges.




**South facade: principal features**

1. The west façade is narrower in elevation, comprising only two structural bays in width, albeit here presenting the long side of the corner rectangular pier which with the 4B's Barbican Centre brand logo (now superseded) was exploited as a signage point for visitors approaching via Defoe Place from the west. Adjacent to this a grand staircase rises up between the other two piers under the dramatically projecting pod of the Art Gallery to create a giant entrance portico.






Placeholder

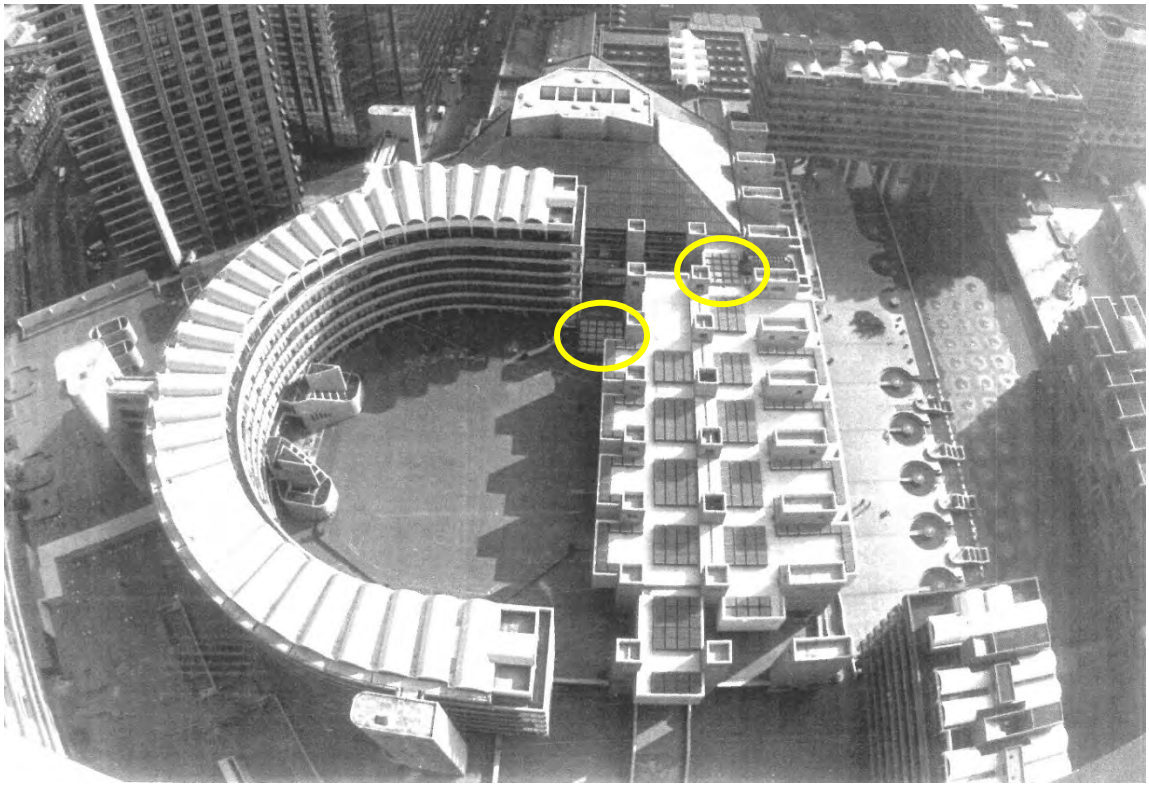
**The Arts Centre western facade with tiled projections and grand stairs up to the Gallery**

1. The north façade effectively consists of two parts – inner and outer. The inner section addresses the Frobisher Crescent podium and being visible only above the roof of the Concert Hall comprises just two stories, including the distinctive range of tile-clad gallery pods along the upper level.

2. The outer part, which for many visitors represents the Arts Centre's main entrance, addresses Silk Street at its point of inflexion from north to east between Beech Street and Moor Lane. The street façade embodies the first two stories above ground level and is contained by the oversailing cornice of the podium with its signature boat-edge profile. Within this sandwich are the vehicular entrance and exit ramps, and between them the pedestrian entrance.

3. Passing across all these ground floor elements a stratum of offices at first floor with their distinctive porthole windows follows the plan line of the podium, while behind, and rising above this, are the angled gables of the Conservatory abutting the solid bulk of the Theatre fly tower. Again, the 4B's Barbican Centre former logo on a concrete block overhead signals the main entrance from the north.

4. Any consideration of the Arts Centre exterior must also include the roofscape, given its visibility from many surrounding high level vantage points. This clearly expresses the architectural order of the several components – balconies and their planters, service turrets, tiled pods, rooflights, conservatory - and forms an integral part of the Barbican Centre's identity.



**Barbican Arts Centre roofscape – the "5th elevation"**

**Note the rooflights over the Art Gallery and those over main foyer spaces (circled beyond).**

**Alterations**

1. The Arts Centre exterior and its immediate environs have been the subject of several notable alterations over the years. Some of these may be described as cosmetic, others are more architectural in nature. In the former category are such items as new and additional signage, lighting fixtures, items of street furniture, etc – which are generally addressed in Volume IV of the LBMGs. The principal architectural interventions have occurred on the Silk Street facade, where in 1993-5 a large glazed canopy designed by Diane Radford and Lindsey Bell, echoing the podium profile, was suspended above the entrance.



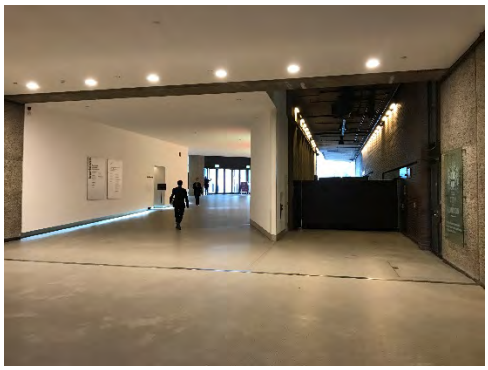

**Alterations to the Silk Street entrance. Above 1995. Below 2007 (Current)**

2. This and several other related features, including a series of gilded sculptures, 'the Barbican Muses', by Bernard Sindall and a glazed reception enclosure, were removed and the entrance re-formatted by AHMM architects in 2005-7 within a rectangular metal portal framing a new glazed door screen and bearing new illuminated Barbican signage. Between the vehicular roadways either side, a paved apron of matching width to this portal now defines the pedestrian arrival point where the new entrance and adjacent administrative reception office have been created by enclosing the previously open area between the roadways. This new arrangement provides a generous east-west

introductory lobby, leading down a gentle ramp to the main foyer entrance.




**The reconfigured Silk Street entrance, 2017**



**Entrance lobby (Theatre scene dock, right)**

1. On the south façade glazed lobbies have been added by AHMM to three of the entrance bays to provide an acoustic buffer between the foyers and the Lakeside, with a further retractable door array to the lift hall.

2. Other interventions, such as blocking out glazed openings and new rooflights in the Art Gallery, are discussed in the relevant interior section, further below.



**New lobby addition on south façade**



Placeholder

**Retractable doors to lift hall**

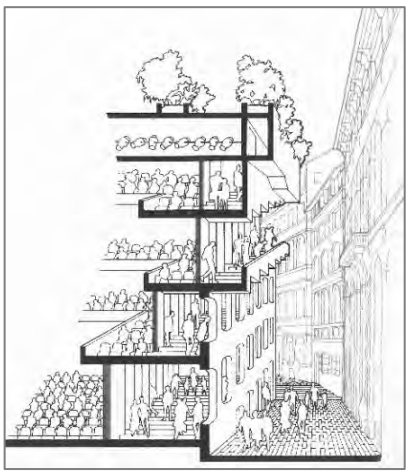
**Heritage significance**

1. In architectural terms the exterior design of the Barbican Arts Centre is highly accomplished in being both part of the estate's distinctive aesthetic language yet also differentiated from it. Continuation of the pick-hammered exposed concrete wall treatment used elsewhere is here contrasted with the use of glazed white tiling accentuating key elements of the ensemble and the widespread use of metal framed fenestration (in contrast to the timber used for apartments.)

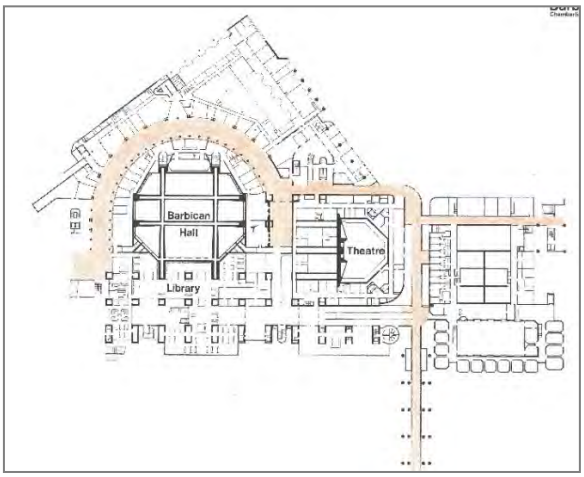
2. Together with the dramatic sculptural forms of the overall complex the Centre is clearly proclaimed as a major civic institution within its residential setting. With its context, scale, range of uses and forceful architectural identity it occupies a unique place in the canon of major public buildings of its period, both in the UK and beyond.

3. What is also unusual is that although the concentration of the various cultural facilities into a central location was a key intention of the scheme, the Arts Centre itself was not conceived with a conventional 'front door', but rather as a cluster of venues accessed from a variety of approaches and linked internally by a series of shared public spaces. In this respect the Centre might be seen as a microcosm of the Barbican estate itself, which has been compared to a small Medieval town, where routes are threaded between, under and through buildings, from multiple points of perimeter access.

4. The various entrance points to the Centre should accordingly be seen as a series of gateways leading both to and between the respective venues, and also beyond, across the wider estate and into the City. This confers a particular significance on the foyers and circulation areas – namely that they are to be understood primarily as open public realm, providing access around and between the separate 'buildings' – Concert Hall, Theatre, Art Gallery, etc – equivalent to the external public realm in a city centre, except that here they are indoors. Whilst the Silk Street entrance may dominate, the range of other access points should not be undervalued.



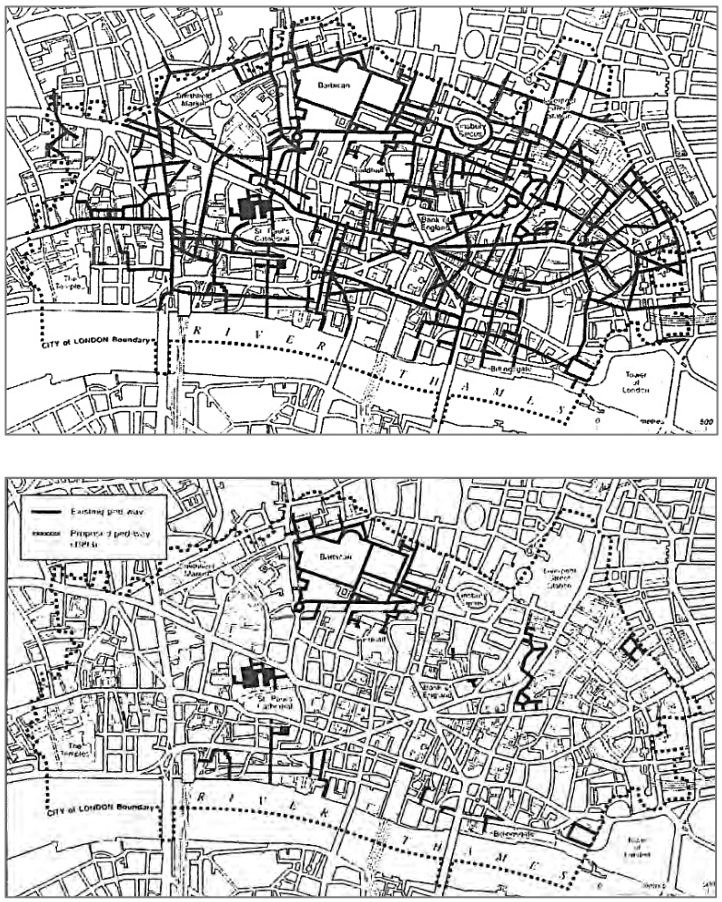
**Early CPB drawing showing foyers as 'civic realm'**




**Plan over-marked to show alternative southern eastern and western approach routes**

1. Specifically, a key original route across the site extends from the north end of Gilbert Bridge (marked by Matthew Spender's Barbican Muse sculpture) turning west at the outer corner of the Theatre to link with the 'ambulatory' below Frobisher Crescent and leading round to Defoe Place, thereby connecting many of the Centre's entrance points along this route. This difference in entrance typology from London's other major (modern) cultural venues – the Royal Festival Hall, the National Theatre - as well as the elevation of pedestrian movement to podium level, has often been cited to explain visitors' reputed difficulty in finding their way to the respective elements of the Barbican Centre.
In this regard it is important historically to note that the podium's wider accessibility was greatly reduced by curtailment of the vastly more ambitious surrounding ped-way network originally proposed in 1963 to extend across the whole City, thus leaving the Barbican's raised public realm virtually stranded.

2. As discussed in Volume IV of these Guidelines, several attempts have been made to overcome this over the years with various degrees of success and access issues, especially disabled access, continues to require review in the light of progressive best practice. The opening of Crossrail is another factor that can be expected to influence movement patterns around and across the estate. Nonetheless, after forty years of use, it seems that the public have come to appreciate, and indeed admire, the Barbican for itself and it is in such recognition that it has rightly been listed.




**The elevated City Ped-Way - above as proposed (1963), and below as realized (1992)**

**Guidance**

1. Like certain buildings in Chamberlin Powell & Bon's scheme for the University of Leeds (eg. the Roger Stevens building) the Arts Centre is a finite architectural composition which is not susceptible to significant alteration. Whilst the recent re-design of the Silk Street entrance and the Lakeside lobbies have been sensitively related to the original architecture and set a coherent stylistic idiom and quality benchmark that should be followed in any future works, the overall form and original materiality of the Centre as a whole should not be changed.

2. For example the lakeside overhangs with their dramatic chiaroscuro are a key part of its character and should not be infilled at balcony or ground level as a means of increasing interior space. Roof terraces should remain open, with any sunshades treated as a temporary seasonal installation (albeit carefully designed.) Any external measures to mitigate noise breakout would require acutely sensitive architectural consideration.



**Lakeside façade recesses should remain unenclosed, and upper level planters maintained**

**Guidance**

3. The provision for planting to the upper levels should be fully exploited as this greatly enriches the building aspect from the Lakeside and St Giles viewpoints.

1. The original material finishes should remain as originally designed, exposed concrete remaining uncoated and any defective tiling being replaced on a strictly like-for-like basis. Any maintenance works on external concrete surfaces should be approached in like manner to the protocols applicable to residential buildings. (Refer to guidance in LBMG Volume II)

2. Whilst judicious improvements in signage and lighting may assist in enhancing navigation to the Centre and across the estate, it is important that the diversity of movement patterns, variety of entry points and overall permeability of the Centre itself are not diminished.

3. The approach to wayfinding in the 2000 masterplan has focused on first-time or infrequent visitors, involving giving visual priority to certain key routes and entrances. However, this has not entailed closure of alternative approaches and entrances in an attempt to create a single 'front door'. This would inhibit useful circulation routes appreciated by those familiar with the Centre and contradict the essential nature of the complex by turning it into something that it is not. As a major cultural venue it is vital that all the arteries of the Arts Centre are available to be fully populated throughout opening hours.

4. Temporary art installations on the exterior of the Centre have required Listed Building Consent and Planning Permission, and careful attention should be paid to their potential impact on residential amenity, especially in regard to light pollution.

5. For more detailed guidance on the external precinct areas immediately adjacent to the Arts Centre, including the Lakeside terrace, its furniture, lighting and signage, please refer to Barbican LBMG Volume IV.

6. See also Arts Gallery section in reference to use of Frobisher Crescent Sculpture Court

# The Building Exterior - Traffic Light section

## Green — Works that will not require a Listed Building Consent (LBC) application

| | Example | Guidance |
|---|---|---|
| 1 | General routine maintenance items including:<br>• non-invasive surface cleaning of elements where the method is proven not to cause any detrimental material change to the surface;<br>• window cleaning;<br>• works undertaken to prepare and re-finish woodblock flooring;<br>• repointing of brickwork, provided that due consideration is given to matching of new and old pointing colour, texture and recess profile. | Methods of cleaning should be tried, tested and approved before use at The Arts Centre. However, where a new product or method is proposed a prior method statement and required performance outcome should be agreed and, local test/trial samples in inconspicuous locations should be undertaken to ensure that the proposed method achieves the desired result before embarking on main works. Woodblock flooring refurbishment should not involve changes of colour or finish.In the case of cleaning exposed concrete surfaces refer to protocols detailed in Barbican LBMG's Vol II Residential Buildings. |
| 2 | Local maintenance, repair or redecoration works to originally decorated elements, on a like-for-like basis (or to the approved specification and colour reference). | Where applicable, the correct colour must be selected. from the approved palette for Barbican exterior colours as developed by the 2000 masterplan. |
| 3 | Removal of graffiti where damage has been caused to a glazed, coated or natural material such as tiling, panel cladding, brick, stone or exposed concrete. | Appropriate specialist advice should be sought before any remedial action. Care should be taken to blend repaired area with adjacent and avoid local 'ghosting'. |
| 4 | Repairs and refurbishment, eg. recoating or local touching-up, of guardings to approaches, ceremonial stairs, ramps and escape routes. | Like-for-like repairs and refurbishment of guardings do not require a LBC application provided that like-for-like criteria are fulfilled and that no alteration to height, panelling details, section sizes, texture and colour is involved. |
| 5 | Emergency repair works or stabilisation of unsafe building fabric where the health and safety of the general public or operatives is at risk, including access arrangements needed for such works. | Temporary works to secure and make safe the external fabric will not require prior LBC provided they cause no further damage to the fabric and are also programmed for follow-on permanent repair. Care must be taken to ensure that temporary works are fully reversible. |
| 6 | Emergency changes to ironmongery to entrance doors and glazed screens and escape doors. | Undertaking emergency work to locking mechanisms, door closers, panic bars and other security measures to doors will not require LBC provided that new fittings to match the character and finish of the original or adjacent fittings are procured and programmed for permanent installation. The visual impact of any change must be kept to a minimum. |
| 7 | Emergency repair to damaged external glazed screens, panels and cladding components provided permanent replacement to match the pre-existing design is programmed for early implementation. | Introduction of a new glazing specification that would alter the appearance of the screen (eg. solar reflecting) or its frame/s (eg. thickened sections) will require prior enquiry. (ie. Category Amber.) |
| 8 | Reinstatement, refurbishment or replacement of signage. | Only the reinstatement, retention and repair or like-for-like replacement of signage existing at the time of listing is permissible in this category. One-off or piecemeal signage interventions are discouraged in favour of an overall signage strategy. **(See also Amber 7 and Red 12)** |
| 9 | Replacement/ re-lamping of individual existing light fittings following defects or breakage | Re-lamping damaged lighting with identical, or lower energy fittings is permissible in this category provided the result is consistent with the adjacent array of which they are part. |
| 10 | Planting or re-planting in designated planter positions | Maintenance of full planting on the building exterior is encouraged, provided it employs suitable species and appropriate scale. 'Suburban' effects, bedding plants and suchlike are wholly alien to the Barbican's urban context. |

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | Programmed or cyclical redecoration of an entire element or surface. | Before redecoration and where applicable, the correct colour from the approved palette for exteriors should be selected. |
| 2 | Any local maintenance/cleaning or removal of graffiti from self-finished concrete, brickwork, glass, stone or other material surfaces, where there is any risk of alteration or damage to the substrate or the visual unity of the surface. | If there is any doubt about the success of any cleaning/remedial works, contact a specialist contractor for prior advice and refer to Planning Department before proceeding. |
| 3 | Minor alterations to ironmongery to entrance doors, exterior glazed screens and escape and balcony doors. | It is likely to be permissible to change locking mechanisms, door closers, panic bars and other security measures to such doors without LBC provided that the new fittings match the character and finish of the original or adjacent fittings.<br><br>It is advised that, when carrying out works of this nature, consideration is given to the full complement of ironmongery across a whole elevation to avoid incongruous 'one-offs'. No changes to existing fire escape or fire-fighting strategies are likely to be permissible without LBC. Where the strategy is revised for the building as a whole LBC is likely. |
| 4 | Any re-covering works or patch repairs to roofing or rooflights that would be visible from residential units above. | The Arts Centre roof is overseen from many viewpoints around the estate, and deserves an equal standard of care to that needed on facades and soffits. Ideally roof repair should be undertaken on a pre-programmed basis and involve visually coherent area/s. **(See Red Category 9 & 10.)** |
| 5 | Any new services lines, including any new drainage or rwp downpipe, that would manifest externally. | Any new conduit, cable, trunking, pipework, aerial or a/c unit connections should be run in existing ductwork and not be face-fixed. Prior enquiry is advised to check whether a LBC is required. |
| 6 | Installation of bird deterrent devices along window cills, parapets or roof edges | Prior enquiry is required to assess likely visual impact. |
| 7 | Updating signage to be consistent with current brand identity | Substitution of existing external signage information to achieve design consistency with current (2017) Barbican brand identity is unlikely to require LBC, but should prompt a prior enquiry for clarity.<br>**For entirely new signage installation/s see Red 12.** |

**Exteriors:**

**Red** **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Any alterations or interventions in the existing exposed concrete structures, including walls, columns, beams, soffits, steps and slabs, or surface treatments in terms of colour and/ or texture for both self-finished and coated concrete. | Other than like-for-like repair by specialist contractors, or items in Green Category, any invasive or permanent change to the exposed concrete elements will require a LBC application, including any exploratory or survey work prior to a substantive project. |
| 2 | Any alterations or interventions in the existing tile cladding. | Other than like-for-like repair by tiling specialist, any invasive or permanent change to the tile cladding will require a LBC application. |
| 3 | Any alterations to the existing facing brickwork, including brick type, bonding pattern and pointing characteristics. | Other than like-for-like repair by specialist contractors, any other invasive or permanent change to facing brickwork will need a LBC application. |
| 4 | Any alteration or replacement or general recoating of frames, opening sashes, ironmongery, glazing or mastic to windows, entrances and escape doors and glazed screens | Any alterations to windows and/or glazed doors will require a LBC application.<br><br>In the case of repairs or replacement, the Planning Department will need to approve and verify that the intended work either fulfils like-for-like criteria before implementation of the works or reinstates the original design. |
| 5 | Any alterations to glazing/screen or curtain walling ensembles, including works to the Frobisher Crescent arcade and the Conservatory. | Any alterations to glazed screens, curtain- walling, doors etc. will require a LBC application.<br><br>In the case of repairs or replacement, the Planning Department will need to approve and verify that the intended work fulfils like-for-like criteria before implementation of the works. |
| 6 | Alteration of ventilation grilles visible on the elevations, including Frobisher Crescent arcade, the Conservatory, service turrets or within the sunken courts. | Any alterations to ventilation grille patterns, frames, opening sizes, finish and colour will require a LBC application.<br><br>In the case of repairs or replacement, the planning authority will need to verify and approve that the intended work fulfils like-for-like criteria before implementation of the works. |
| 7 | Any amendment to building plan or footprint that has an external manifestation, including any new ramps, stairs, canopies, porch/entry structures, security barriers and any other structures | Examples might include enlargement of lobbies or entrance porches. These would be highly sensitive and definitely require formal consent. |
| 8 | Changes to heights, configurations or surface finishes to roof structures. | The silhouette of the Arts Centre, especially the fly tower and Conservatory is a highly visible aspect of the identity and architectural composition of the building. Any change would require LBC. |
| 9 | Waterproofing details on all vertical and horizontal surfaces.<br>Any waterproofing detail adjoining other elevational components. These include:<br>▪ fascias;<br>▪ windows and doorframes;<br>▪ exposed aggregate in situ concrete walls;<br>▪ roof coverings generally. | Waterproofing details and re-roofing systems must be considered for their potential architectural impact and their suitability for the intended application. Discreet improvements of waterproofing and rainwater drainage details are likely to be acceptable provided no significant visual manifestation results. |

| | | |
|---|---|---|
| 10 | Rooftop plant, housings and roof lights. | The roofscape is a key element of the building character as viewed from around the estate and the residential apartments above. Alterations to roof features must be considered for their potential architectural impact. Discreet improvements of details are likely to be acceptable provided no significant visual manifestation results, but these should still trigger a prior enquiry.<br><br>Likewise, replacement of plant and housings provided they remain within the original footprint and height.<br><br>Retrospective removal of non-original installations is encouraged.<br><br>**Also see Item 5 in Black Category** |
| 11 | Addition of any new terrace extension, or roof over an existing terrace (eg. Restaurant Level +1, or Art Gallery and Conservatory Level + 2) that would be visible from beyond the building. | Applications for extensions, canopies, etc, glazed or otherwise, over or onto the exterior terraces would affect the architectural integrity of the elevations and/or the silhouette of the block and will be acutely sensitive. |
| 12 | New signage generally, or removal of original signage, eg. the 4B's logo. | The location and style of any new signage must be consistent with a buildings-wide strategy and should be located in such a way as to relate to the architectural design.<br>Direct fixing, or painting, of new signage to the external face of the building/s is generally unacceptable.<br><br>Safety and escape route signage must be consistent with a buildings-wide strategy and should be located as discreetly as possible. Current regulations with regard to style, size and location of such signs must be reconciled with heritage sensitivities of the building through discussion with the building control and conservation authorities respectively. |
| 13 | Removal, replacement or any alteration to existing entrance canopies and porches. | The original design for these elements should be considered when conceiving any alternative design. Additionally, the original locations of entrance points should be maintained. Generally, the profile, height, junction and abutment details together with materials, texture and colour should be considered when developing new proposals. |
| 14 | Repair or replacement of existing service terminals, service apparatus, eg. a/c units, satellite dishes, aerials, masts, etc , access guardings, access ladders and steps. | Any repair work or replacement other than on a like-for-like basis is subject to a LBC application.<br>**Also see Item 8 in Black Category** |
| 15 | Replacement or upgrade of existing safe access and fall-arrest systems at plant room and roof levels. | Any installation should be located as discreetly as possible, with due consideration of key sightlines and angles of visibility. |
| 16 | Replacement or upgrade of existing lightning protection system/s | Any new installation should be located as discreetly as possible, with due consideration of key sightlines and angles of visibility. Locations of any new tapes or pits must be included in proposal drawings. |
| 17 | Any change to the original windows, curtain walling, design of visible fixing details, or any alterations resulting in visible fixings in place of original invisible ones, opening sash pattern, door leaf materials, finishes, dimensions, profiles and mastic colour, and/or the addition of new ironmongery.<br><br>For remedial works or like-for-like replacements, see above. | Alteration of fenestration and curtain walling patterns, frame, sash, glazing, colours and texture are subject to a LBC application. Where any original designs have been altered, proposals for reinstatement of replacements which replicate the originals as closely as possible will be encouraged. Any changes with an external manifestation will not normally be allowed unless part of a comprehensive buildings-wide renewal/replacement programme, which will require a LBC application. Double-glazing is included in this item. |

**Exteriors:**

**Black**

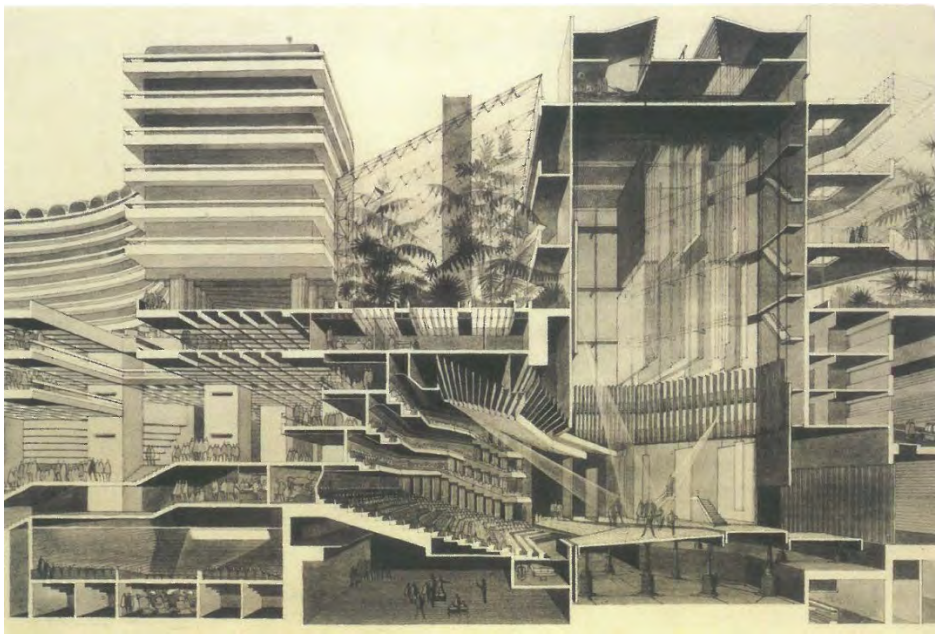
**Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Decoration of any originally self-finished materials or surfaces, eg. exposed concrete façade elements and/ or concrete soffits | The use of self-finished materials is one of the defining elements of the building's character and any work to these should be considered in terms of the potential impact on the building's special architectural interest.<br><br>Overcoating of originally undecorated concrete or other self-finished material will not normally be permitted under any circumstances. Redecoration or stripping of any non-original surface decorated at the time of listing may be permitted subject to detailed consideration and historical evidence. |
| 2 | Overcladding of any self-finished elements. | Overcladding is most unlikely to be permitted, as it is inconsistent with the character and expression of the original design. |
| 3 | Any change to original glazing lines | Applications for extensions, glazed or otherwise, beyond existing elevational planes are likely to be refused.<br>Where original glazing lines have been moved, proposals for reinstatement to their original location will be encouraged. Any proposals to alter these works will be subject to a LBC application. |
| 4 | Any permanent or temporary new ancillary enclosures at roof, intermediate or ground level. | Examples might include infilling of external undercroft areas with new vending enclosures, refuse depositories, security/entry porches or bicycle sheds.<br>**Also see item 11 in Red Category** |
| 5 | Roofscape development | Any change to the general layout of the roof or roof profile is likely to be refused, unless the proposal is for retrospective reversal to the original design and layout.<br><br>**Also see item 10 in Red Category** |
| 6 | Externally visible changes to footprint, height and profile of stair cores, lift motor rooms, ventilation shafts and other services installations. | Any such structures and installations are highly visible and likely to be refused. |
| 7 | Removal, alteration or change of height or material to terrace guardings, planters or parapet walls. | Any proposal to alter heights, change the generic design or configuration of these features, unless to return to original design, is likely to be refused. |
| 8 | Externally visible installation of new satellite dishes, aerials and associated cabling, antennae, mast or any other surface-mounted service installations, including plant housings or air-conditioning units. | Applications for such installations are most likely to be refused, as external proliferation of these elements would be highly detrimental. An application to install a communal aerial or satellite dish may be considered provided that their location and potential visual impact on the roofscape and the general character of the building is demonstrably of no adverse effect. |

## The Barbican Arts Centre Interior – Common Parts

**Principal Foyer Areas (Levels -1, G and 1.)**
(Other common parts are dealt with later in this document)

**Original design – space and volume**
1. It is widely recognized, and has been noted in LBMG Volume I, how as a result of limitations of site area, as well as progressive expansion of the brief, the Arts Centre was obliged to be developed downwards, rather than outwards. The close proximity of Shakespeare and Cromwell Towers, whose locations were already fixed, necessitated highly engineered substructure works to ensure excavations for the Arts Centre did not compromise their stability – these innovative diaphragm substructure techniques themselves being an important feature of the estate's special interest.



**Section showing the depth of the Barbican Arts Complex**

2. As a consequence of this genesis the specific, and perhaps unique, architectural character of the Barbican Arts Centre foyers lies in their internal spatial depth. Less able to rely on a conventional outlook from inside to outside – as for example in the horizontal 'layering' of external views at the National Theatre, or the transparent concourses of the Festival Hall – the primary interior drama at the Barbican derives from its predominantly introverted and vertiginous vertical space. The original section included triple height clear volumes of unequalled grandeur. Joined by the array of expansive stairways and landings the foyers have justly been described as 'Piranesian' in character. Celebrating the central, principal void (marked by a large rooflight), a suspended illuminated sculpture by Michel Santry originally provided a pivotal focal point for the whole interior.





**Foyer spaces of Piranesian grandeur**

1. In planning terms the Arts Centre foyers are essentially ordered on the 35 square structural pier grid noted earlier, with a single bay width running north-south between the theatre and the concert hall, and a double bay width running east-west across the southern side of the concert hall to form an L shaped matrix that passes through the entire height of the building. The north-south spatial axis corresponds with the Silk Street – Lakeside desire line, registered by the entrance portal and glazed stair tower respectively; the east-west axis connects the Defoe Place approach with the head of the southward link to the City via Gilbert Bridge and the Postern. Within this structural matrix selected floor plates are omitted or linked by stairways according to location to create an interior 3-dimensional landscape of extraordinary spatial richness.

**Alterations**

2. Interventions since the original opening have had significant impacts on the spatial character, circulation arrangements and interior ambiance of the Arts Centre foyers. These alterations fall into two main phases, the first being carried out by Pentagram under the direction of Theo Crosby and taking place between 1993 and 1995; the second under a masterplan by AHMM between 2000 and 2001 and implemented between 2003 and 2007. The second phase occurred in the context of the recent listing and was thereby subject to the scrutiny of the City Planning Department and consultation with English Heritage and the Twentieth Century Society.

3. The AHMM masterplan works removed the majority of alterations made by Pentagram which were considered to be at odds with the essential character of the Arts Centre, being undertaken at a time when its special architectural qualities were still under-appreciated. The principal aims of the 2000 masterplan were to strip back accumulated clutter and ad hoc signage, to better reveal the building as originally designed, improve accessibility, navigation and intuitive wayfinding. The lighting introduced by Pentagram was replaced with a more holistic lighting strategy and a new wayfinding system was introduced.

4. Taken together the principal alterations have been as follows. Stair flights have been removed in several locations including the major staircase at the north landing entrance leading down to the mezzanine between Levels G and -1; and an adjacent stair of fewer steps at right angles to the same landing leading down to the ambulatory around the rear of the Concert Hall which has now become ‘The Curve’ gallery.

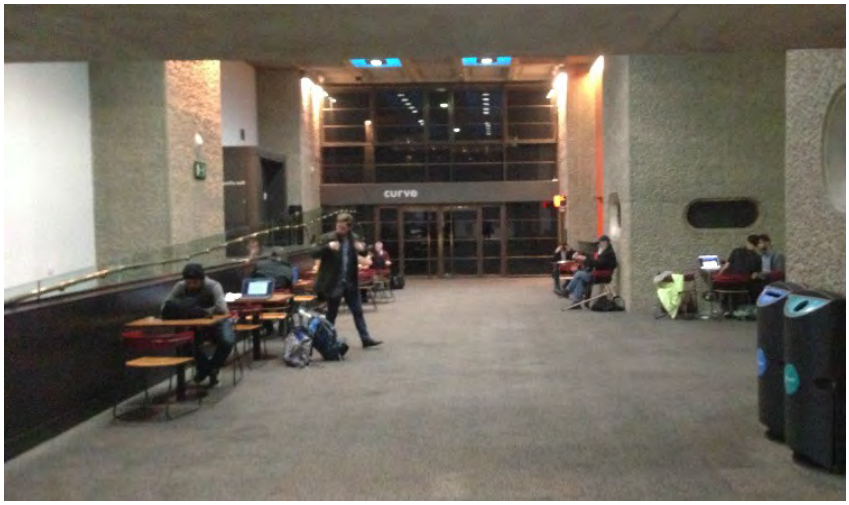
5. The previously lower level has been made up to that of the Silk Street entrance hall, necessitating the introduction of two new stair flights, one reinstating a means of escape from the east side of the Concert Hall, the other reconciling the resultant change in level within the Curve itself.

1. In addition staircase flights on the south west corner of the foyer (now the Fountain Room) which led respectively from Level G up to the Library, and from here up to the Art Gallery have also been removed. These removals have facilitated autonomous operation of the Library. (See Library section.)

2. In 1993-5 a bridge was introduced by Pentagram linking the Silk Street entrance and Lakeside terrace at Ground level, passing alongside the west edge of the Theatre. Whilst this eliminated the need to make this transition by descending and ascending one level across the interior, it also compromised a key spatial void in the north-south foyer bay and obscured the theatre's interior façade. This bridge was removed by the AHMM masterplan.

3. In its place a similar though more substantial intervention has been made by AHMM Architects, replacing Crosby's bridge with a full width ramped floor plate extending across two adjacent bays of the foyer to link the north and south landings at Ground level, the north landing being extended laterally to produce the wide entrance hall noted above. While this has restored the spatial integrity of the foyer zone occupied by Crosby's bridge, facilitated clear and intuitive access across the plan and is finely designed in itself, it has subdivided the most dramatic void of the whole Centre originally marked by Santry's 'light sculpture' and the principal overhead rooflight. The Santry sculpture, reportedly considered by a previous administration to act as a visual obstacle, hindering intuitive wayfinding, has been replaced by a lighter suspended artwork, the central focal point now being registered by an oculus within the new bridge providing a measure of visual and spatial connectivity with the level below.

4. A further smaller ramp has been introduced on the west of the ground floor foyer to provide direct access from the accessible parking spaces introduced within the adjacent car park into the ground floor foyer, level G,

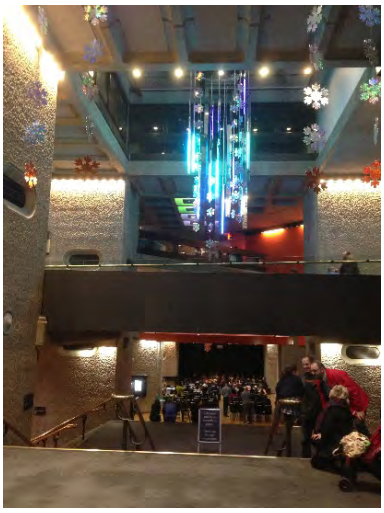


(placeholder)

**New ramp (left) connecting accessible parking with ground floor foyer. West doorway to Curve beyond**



**Original view across mezzanine looking north towards Silk Street entrance showing staircase now removed. Santry sculpture is visible, left. (Note alternating colour of carpet on stairs.)**



(placeholder)

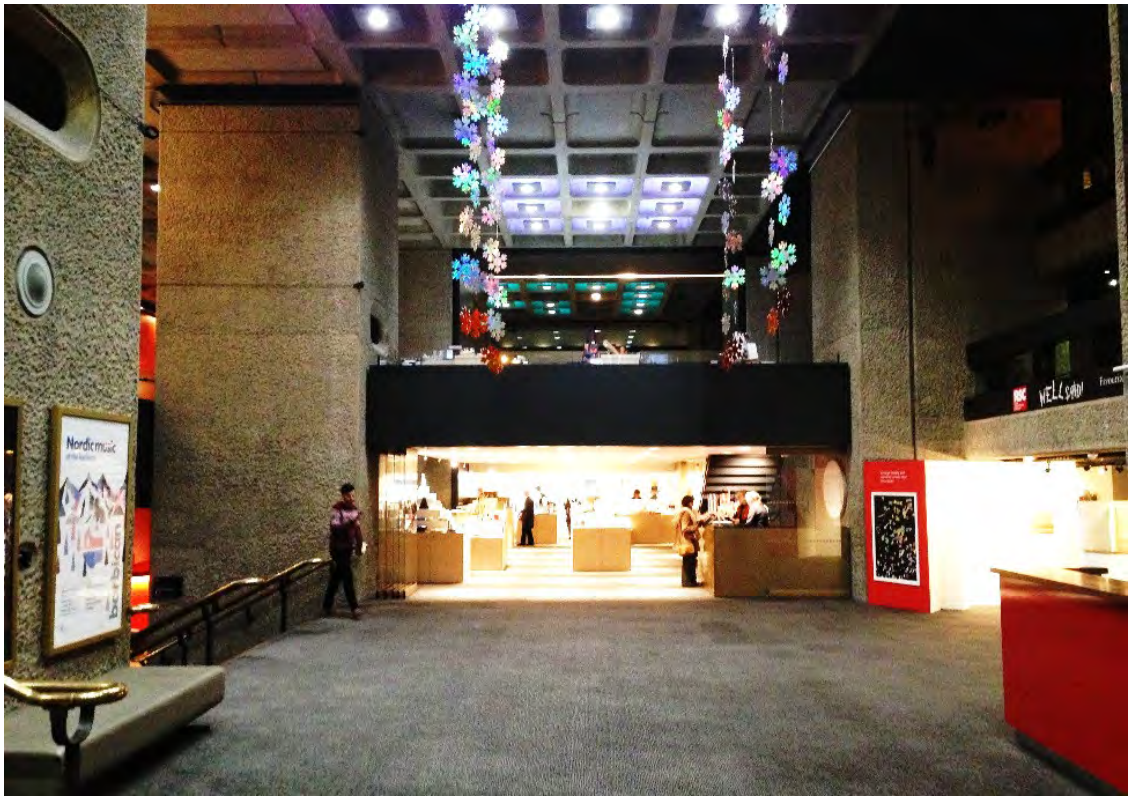
**View of new bridge on north-south axis linking Silk Street and Lakeside, dividing what was originally the largest void in the foyers. Oculus marks original position of Santry sculpture and rooflight above.**

1. In 2016 a further significant alteration was made to the main ground level foyer. The retail facility, hitherto located as part of the 2000 masterplan alterations at Ground Level behind the Concert Hall, has been moved to a location where it is accessible to visitors throughout the day, including when foyers are in use for commercial events. This has been achieved by introducing a new floor plate in the open bay opposite the Silk Street entrance in place of the shallow advance ticket desk.

2. Combined with the area directly below (previously the Hammerson Room) which it is connected by a new metal staircase and platform lift, this new floorspace provides a large open retail area extending southwards up to the centre axis of the theatre, where a sales till is located beneath the ceremonial royal plaque on the central concrete pier. Retractable glass doors are installed at the top (north) and bottom (south) edges of this space to close it off when not in use. The previous retail space has accordingly been vacated and is now re-purposed as a young families' area – Barbican Blocks.




**Previous retail enclosure, now the Barbican Blocks**




**View of new retail floor inserted into foyer space. (Compare with original view above, p.41 top picture)**



**Placeholder**

**View across new retail floor from bridge, with theatre façade behind. (Compare with picture on p.50)**

**Heritage significance – space and volume**

1. The extraordinary drama of the interior public spaces and foyers at the Barbican Arts Centre is an intrinsic consequence of the circumstances of the site and is a unique characteristic of the special architectural interest for which the Centre is listed. It is notable how voids were deliberately located adjacent to the edges of the two principal venues (Concert Hall and Theatre), manifesting their interior facades and enhancing their legibility as 'buildings within the building'. Subsequent interventions, most notably the insertion of the 2007 ramped bridge and the 2016 new retail floor at Ground level, and the removal of the pivotal Santry light sculpture, have substantially reduced – though not altogether eliminated - this significance.

**Guidance**

2. It is crucial therefore that this significance should be protected and that any new elements, whether walls, fittings, enclosures or floors, should respect the building aesthetic and should not sub-divide the remaining space, obscure the main venue facades or further reduce the volumetric drama of the interior. It should be recognized that 'space' is not the same as 'room' and that the special interest of the Barbican foyers depends on maintaining their rare spatial quality.

**Foyers**

**Original design – structure, surface and detail**

3. As already indicated, an underlying concept of the Arts Centre was that its respective components – Theatre, Concert Hall, etc. - should be perceived as distinct 'buildings within the building', with the free-standing structure of the common parts being treated in like manner to that of the external structural elements across the estate. Thus, the same pick-hammered concrete vocabulary that is the architectural signature of the Barbican generally is redeployed within the foyers to provide material continuity throughout the interior.

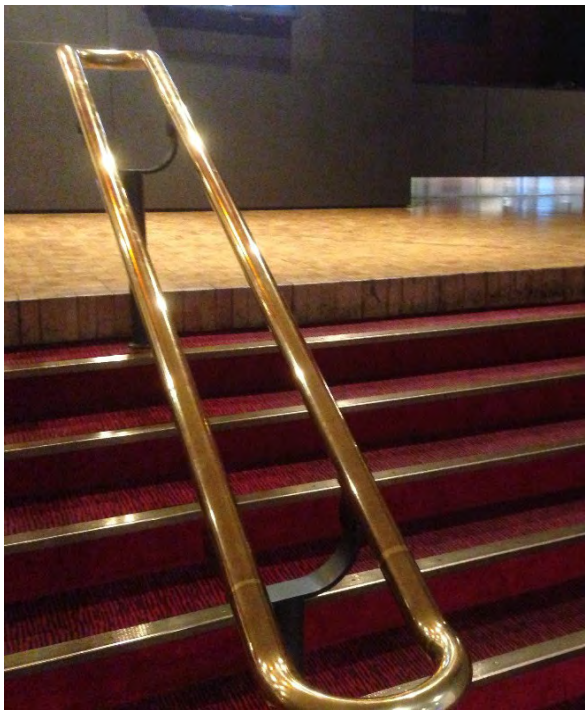
4. The interior concrete surfaces were thus designed with the same care as the exterior elevations of a building, with every aperture and incident, service outlet, vent grille, lighting or signage fixture being scrupulously anticipated and precisely placed. A variant of the vigorous concrete treatment of vertical elements is the smoothface surface of the ceilings, where in most zones the square planning grid is reflected in the waffle slab module, which provides both visual rhythms generally and a lighting discipline for the recessed luminaires where these occur. On flat soffits lighting occurs as fixed or adjustable surface mounted fittings.

5. Only the principal venues are differentiated by applied surface treatments to be proclaimed as 'buildings within the building' – the Concert Hall with its (restored) and conspicuous orange coated shell (CPB's original proposal for Italian tiling being dropped), and the Theatre with its distinctive claret livery.

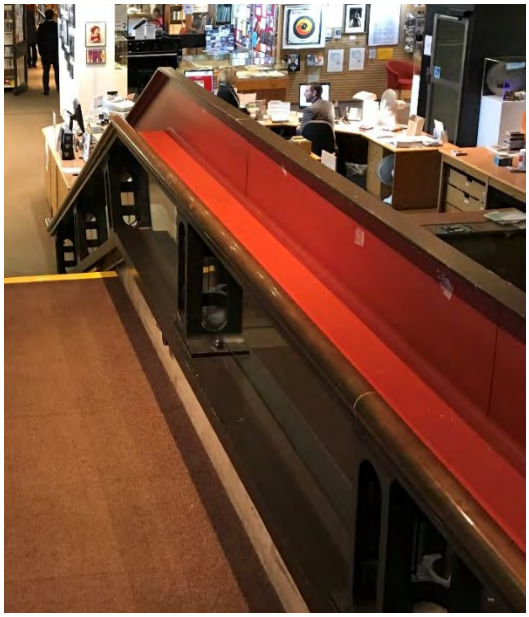
1. The original floor finishes were also designed to complement the interior concept and chosen to a high-quality specification – woodblock flooring being brought in from the vehicular drop-off roadway at level -1 across the threshold into the lower foyer; with a warm /burnt amber carpet being used elsewhere to enliven the timbre of the exposed concrete.

2. An interesting original detail (though revised soon after opening) was the use of alternating carpet colours on the principal staircase flight treads, mirroring the motif in the Concert Hall auditorium, where successive seating rows are articulated in a range of differing fabric colours. The different finishes in the main upper and lower foyers reflect the differing ambiance of these two areas, the former being generally busier and more populated, the latter becoming so during performances or when the temporary theatre is in action. (See below)

3. Original fittings were deliberately limited in variety but were rich in quality. The tubular brass handrails on the sides and centres of staircase flights convey a ceremonious opulence, while the unique guarding rails with their double angled shelf section for the convenience of guests to place cups and glasses have a heroic aspect entirely consistent with the scale of the Centre as a whole.



**The tubular brass handrail detail and stair nosings, convey a ceremonious opulence**




**The unique Barbican guarding shelf section, a guiding presence throughout the Arts Centre**

1. Likewise, the original furniture, purpose-designed by Robin Day, including huge leather sofas arranged in alternating formation, was chosen to underscore the sense of ease and generosity. Signage, originally designed by Ken Briggs, was also deployed sparingly yet to dramatic effect, using a mixture of large scale lettering and specific plaques carefully positioned at key locations.



**Original lighting and carpet, with furniture designed by Robin Day**

**Alterations (within principal foyer spaces, levels -1, G and 1)**

1. There has been a variety of alterations to several of the above areas. The 2000 masterplan replaced the Pentagram fittings with a new scheme more sympathetic to the material qualities of the building fabric. New fitting styles include uplighting within waffle recesses and downlight banks at the head of selected piers. Although they can be set to white throughout, differing lighting colours introduce an undue diversity that is detrimental to the order and consistency of the original design. This is then contrasted the white light within foyers generally, with the expressed livery of the venue facades – orange in the case of the Concert Hall, and claret in the case of the Theatre - thereby 'proclaiming' the venues themselves and emphasizing the 'buildings within a building' concept.

2. The original 'warm' carpet, which enriched the visual quality of the exposed concrete surfaces, was replaced by Pentagram in the mid 1990s with a stridently patterned substitute. This has been replaced again with carpet tiles of a cooler greyer tone. The contrasting colours of alternate steps on the main staircases have also been superseded, with patterned carpet on treads and plain on risers.

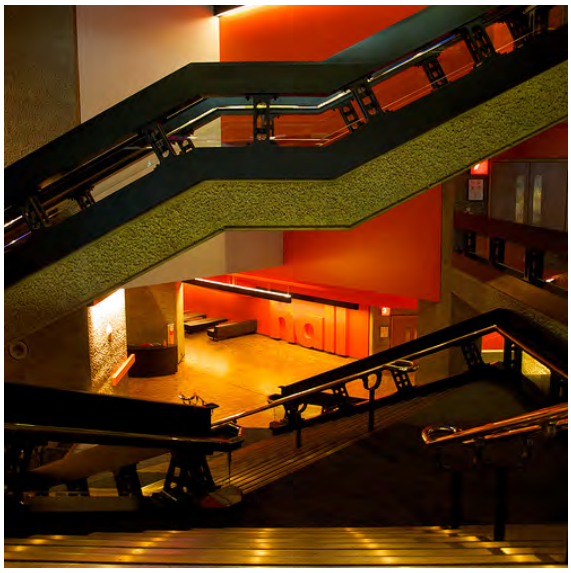
3. Signage has also proliferated under different hands over the years. Significant interventions of the 2000 masterplan include the bas-relief super graphics and illuminated rings at axial crossings designed by Cartlidge Levene and Studio Myerscough, all to good effect. Others are less sympathetically conceived, and the Centre would now benefit from a refreshed signage strategy (complementing the wayfinding) that re-establishes the hierarchy of venues and uses. There has also been a proliferation of other promotional signage – poster frames, hanging banners, electronic display screens, A-boards, etc. Their number and variety has also detracted from the sense of order so characteristic of the original interior.

4. Furniture/fixtures: numerous new items of furniture have been introduced since the original scheme (none of which remained when the 2000 masterplan was developed), including the 'Slow' sofa system by Terence Woodgate (SCP), Duna chairs by Lievore Altherr Molina (Arper) and Atlas tables by Jasper Morrison (Alias) as well as various incidental items such as colour coded waste bins and the like. The ability to clear the foyers when holding commercial events, whilst having furniture too heavy for the public to re-arrange is an operational factor.

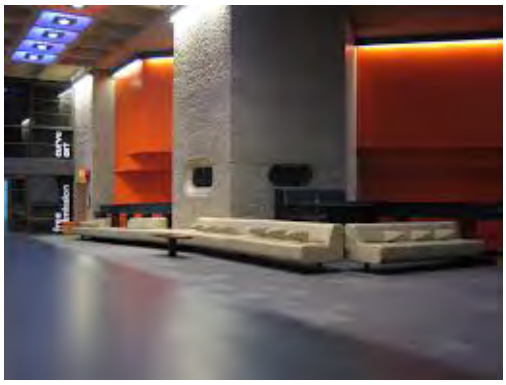
5. In addition, various areas have been used for temporary exhibition or display, with glass cases, presentation stands, pop-up counters, etc. An area of free desking has also been introduced at the west end of the ground level foyer.
Seasonal installations including craft fairs, retail stalls, illuminated decorations and the like, also take place in some of the foyer areas. A system of 4G data cells was also installed in 2014/15 concealed within existing ventilation grilles.



The original Santry light sculpture



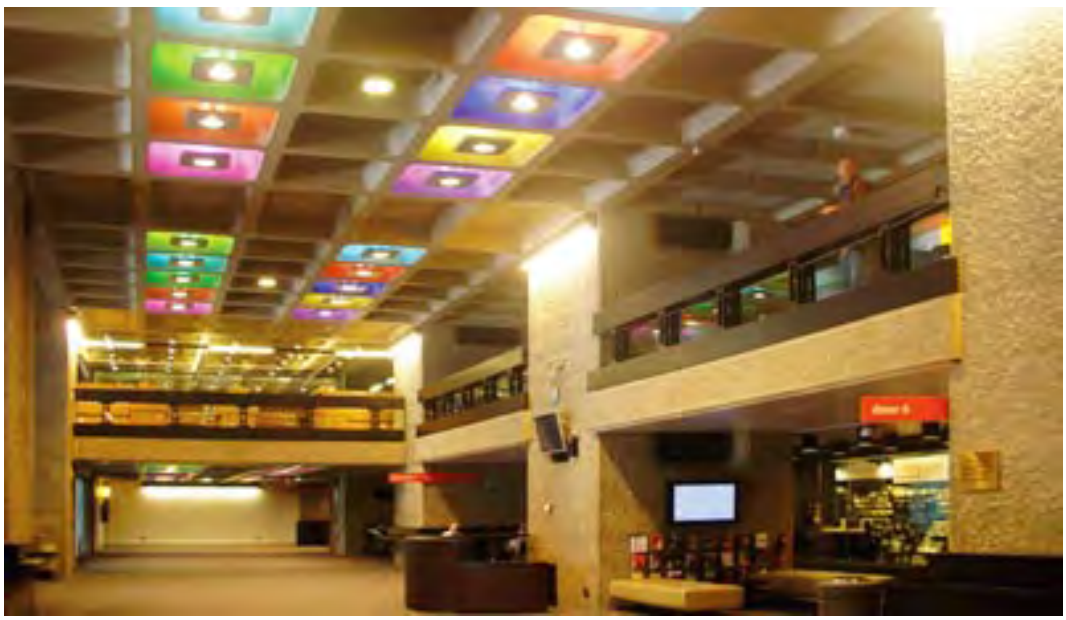
White lighting enhances the orange livery of the Hall



The replacement grey carpet and furniture



New wayfinding signage



Placeholder

Multi-coloured lighting is alien to the sobriety of the Barbican style. Arrays in a single colour (ideally white) are more effective and are recommended as the default setting. Foyer cafe to right.

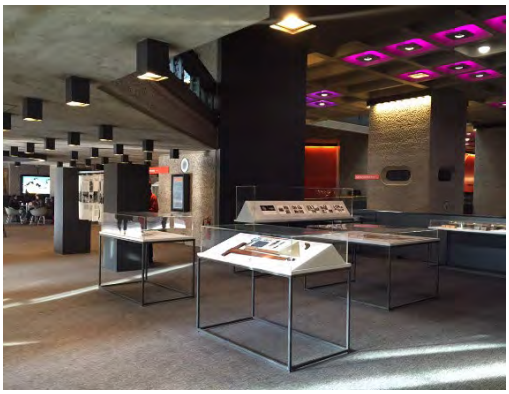


**The gantry apparatus fixed below principal foyer rooflight**



**Artwork suspended from gantry above at main axial intersection (2016)**



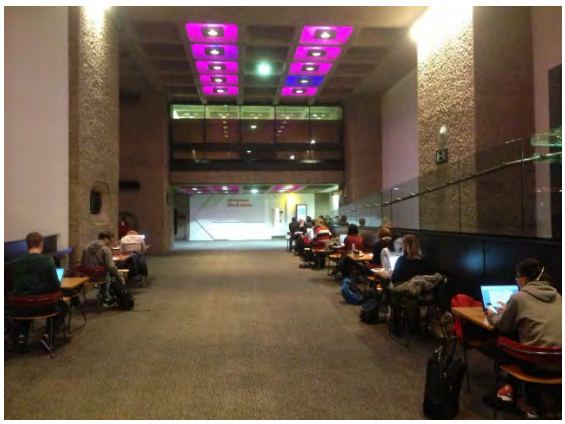


**Foyer café (left), seasonal craft stalls (right)** **Temporary exhibition, foyer level G**




**(Placeholder)**

**Removal of the Crosby bridge restored the integrity of the full height void adjacent to the Theatre façade as originally intended, though this façade view is now interrupted by the new retail floor which extends to the line of the ceremonial plaque, (see above – Space and Volume alterations). The multi-coloured up-lighting clashes with and detracts from the Theatre's signature claret livery. (Photo February, 2016 before insertion of new retail floorplate.)**



Area of free desking in west end of Level G foyer, with new connecting ramp to car park (right).




Stalls Lounge (Level -1) with enclosure to door height only, maintaining continuity of foyer space above and beyond



Illuminated display cases in foyer space



Pop-up retractable bar fittings



Array of waste bins in foyer level -1

**Heritage significance - structure, surface and detail**

1. As noted in Volumes I and II the way concrete is used at the Barbican is exceptional, effectively transforming a commonplace and conventionally unglamourous medium into an almost semi-precious material. The context in which it is seen and the way it is lit is accordingly of particular significance. The original carpet and coordinated design of lighting were key contributory factors in the visual appreciation of the interior ambience of the Arts Centre foyers. The continuity of woodblock flooring from the set-down roadway into the lower foyer was a highly unusual, possibly unique, design feature. The fitting out and furnishing of the interiors were also an integral part of the original design vision.

**Guidance**

2. The interior expressed concrete surfaces of the foyers are of primary heritage value and should remain uncoated and unencumbered. Unlike the exterior material, which has developed a significant weathering patina, the interior concrete is still in mint condition, evidencing the rare quality of the original. Consideration should be given to the periodic maintenance of these surfaces in this condition by industrial vacuum cleaning. The fixing of any further miscellaneous items such as display panels, inessential signage, exposed services and the like, should be avoided and any redundant fixtures removed, taking particular care to make good fixing marks in matching material. New structural interventions or fixings into the visible concrete should certainly be avoided as their effects are unlikely to be reversible.

3. When the opportunity arises replacement of the carpet should be undertaken with careful consideration to the original design and the way in which its warm hue enhanced the total value of the exposed concrete. In any replacement a single specification should likewise be applied throughout all areas originally carpeted, in order to maintain the sense of unity of the interior. The woodblock finish at Level -1 should remain uncovered and carefully maintained to retain its original appearance, which was matt not gloss.

4. When the opportunity arises the lighting installations should be holistically reviewed and reconsidered in order to reduce and better coordinate the variety of types and styles. As intended in the 2000 masterplan, there would be a limited number of lighting genres, which are then deployed systematically throughout the foyers. The highlighting of specific areas can add to visual drama but should be related to key locations in the interior. If different colours of lighting are desired this should avoid clashing with the venue livery colours and be achieved through circuitry/ programming or variable filters in order to ensure a default setting to warm white is always available. If coloured lighting is desired, then whole arrays in a single colour better suit the Barbican ethos than strident harlequin effects. White lighting is recommended as the default setting.

1. The proliferation of numerous different types of furniture should be stemmed, with a progressive move towards judicious selection of a limited number of sympathetic high-quality lines. Incidental items such as waste bins should be located as discreetly as possible, while occasional desk /counter fittings, display stands, pop-ups etc. should be minimized and removed when no longer required.

2. Likewise the variety of signage styles should be progressively reduced, with a consistent graphic culture adopted and then maintained throughout. A clear hierarchy should be established, with the principal venues prioritized over retail elements. Where display signage is temporary/ seasonal it should be achieved by means of re-programmable electronic screens and/ or light projection onto plain surfaces, rather than with fixed panels.

3. The introduction of temporary installations helps to animate the foyer areas, especially during the daytime when the halls are not in use but should have due regard to the overall character of the interior in terms of placing, lighting and fitting design in order to avoid incongruous effects and general clutter. “Temporary” should be agreed on a case by case basis to establish maximum appropriate periods. Interventions intended for longer durations should be referred to the Planning Authority to determine whether a special licence or Listed Building Consent is required.

**Foyers - Facilities**

**Original design – foyer facilities**

4. Within the foyers there are a number of support functions which, though formatted individually, are nevertheless read as parts of the overall volume.

Original plans and photographs suggest that these facilities were discreetly assimilated into the overall interior by being located at the perimeter of their respective spaces, leaving the main foyer areas clear for public congregation.

a Cloakroom and Concert Hall bar and cafe and a Theatre bar at the carpark level (now Level -1), Concert Hall Tickets desk; Theatre tickets and cloaks counter

b. Cloakroom and Concert Hall bar at Level G.

c. Concert Hall balcony bar/ café at Level +1

**Alterations**

These currently include –

a) Level -1: Cloakroom, Ticket Collection Counter, Concert Hall Bar, Theatre Bar, Stalls Lounge, Temporary Stage, Instrument Store

b) Level -1 Mezzanine: Shop (lower level), Advance Tickets/ Information

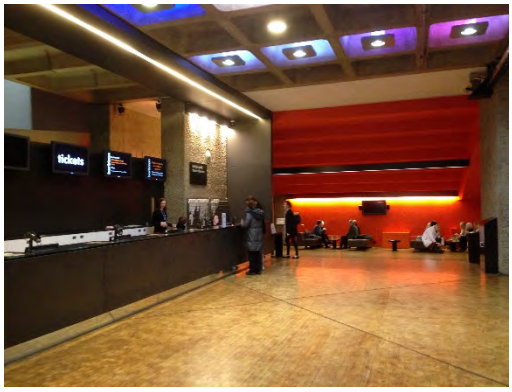
c) Level G: Shop (upper level), Café, Fountain Room & Bar, Information Desk

d) Level +1: Martini Bar

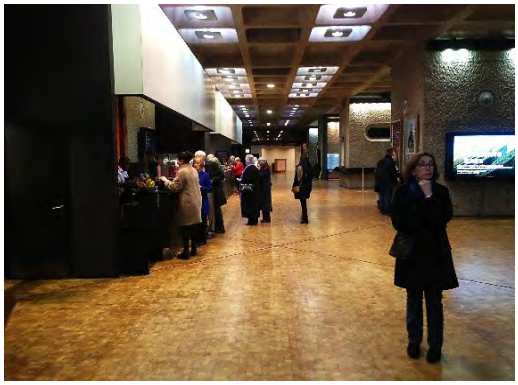
1. The 2005-7 works included installation of an amended cloakroom facility at the west end of the Level -1 foyer. Parallel with this for the width of a structural bay is a new ticket collection counter with framing portal in the same language as the new Silk Street entrance. The Concert Hall Bar on Level -1, previously tucked under the raked undercroft of the Concert Hall, has been relocated alongside the doorway adjacent to the set-down roadway to minimize noise transfer and congestion around the auditorium doors. The bar counter is fitted with a retractable visor which may be lowered when the bar is not in use. The area vacated by the original bar at this level has been converted to sofa seating.



**The cloakroom (Level -1)**



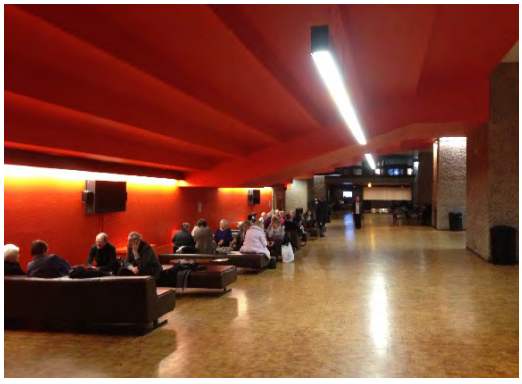
**The ticket collection counter (Level -1)**



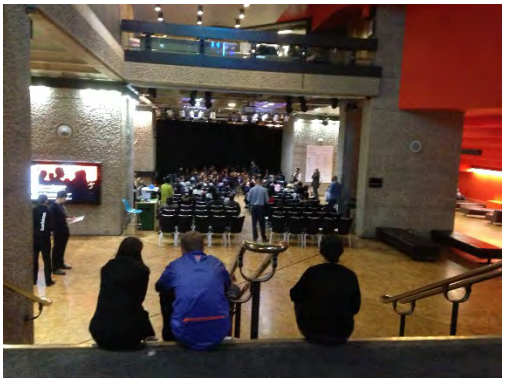
**The Main Bar (Level -1) with visor raised (placeholder)**



**Bar with visor lowered**



**Sofa seating in location of former bar**

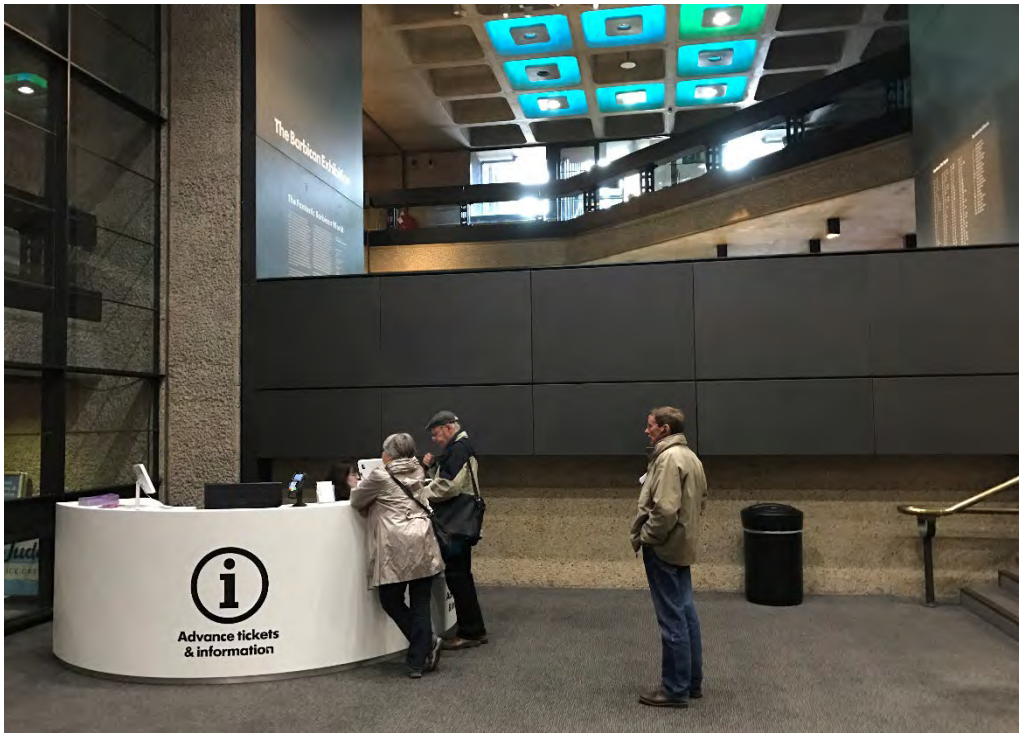


**Temporary theatre in action (Level -1)**

1. Level -1: Mezzanine : The Shop and Advance Ticket Counter (lower level)
On the intermediate level between Ground and -1 the former Hammerson Room has now become the lower part of the new shop. (2016)



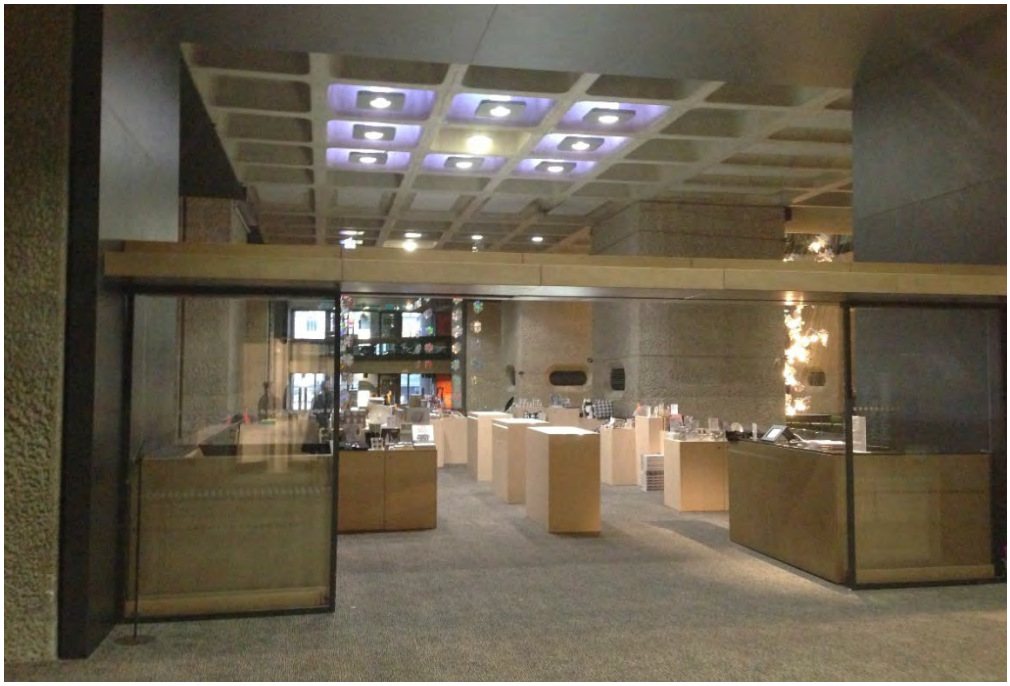
**The new shop, as viewed from the lower level. (See earlier image for original view of this area.)**




**The Advance Tickets Counter, now relocated to the south end of the mezzanine level**

2. The Advance Ticket/ Information Counter, previously opposite the Silk Street entrance, then displaced by the shop, has been relocated to the mezzanine as a free-standing circular desk.

1. Level G: Shop (upper level) Café, Fountain Room & Bar.
On Level G the former gift shop in the area below the raked undercroft of the Concert Hall (previously occupied by the bar) has been relocated onto a new floor plate extending into the void opposite the Silk Street entrance.



**The new shop (displacing the Advance Ticket Desk), as viewed from the Silk Street entrance**



**View of the Café on Level G**

1. To the south west of the ground floor foyer a new function area, the Fountain Room, now encloses two bays of the foyer where there was originally a cloakroom, with a bar on its east facing flank wall. The space encloses what was originally an open area of foyer accommodating the Ground Floor cloakroom and a free-standing staircase leading up to the Library on Level 1. It now provides another private function room, with its own toilets and direct access to the Lakeside Terrace. One of its regular uses is for university graduation ceremonies, so that a curtain arrangement has been installed to improve spatial acoustics. It is drawn when graduate photographic sessions are taking place.





**The Fountain Room, with curtain installation (below). Note portion of smooth fascia, made good following removal of original staircase link to Library above.**

1. Level +1: The Martini Bar
On level 1 a temporary (looking) bar fixture – the Martini Bar – has been installed in the square area of foyer adjacent to the lift lobby overlooking the Lakeside. This appears to operate in the evenings during specified hours only.




**The Martini Bar, located on Level 1 between the lift lobby and the diagonal foyer bridge**

**Heritage significance**

2. The original arrangement of the various supporting facilities was clearly guided by the desire to leave the main foyer areas unencumbered as places for public congregation and promenade. This ensured that the main performance venues – the Concert Hall and the Theatre - presented visibly as the primary magnets within the Centre and that the ambiance of its foyers was essentially cultural.

3. The success of the Barbican Centre over thirty five years of use has greatly increased the demands made on the original supporting facilities, most notably the A3 uses, and introduced additional ones. Specifically, the more recent pressure for cultural buildings of all kinds, from museums to cathedrals, to provide for retail demand had yet to acquire its current dominance.

4. Retail allocation had of course always been planned for the Barbican estate, but (as noted in Vol IV) was originally intended in Frobisher Crescent (Level 2) as distinct from within the actual Arts Centre foyer space. This original intention, as indeed that of locating the original Ticket Office on the same level between the Concert Hall and the Theatre, appears not to have been implemented with the result that these uses have been brought into the foyers themselves. Meanwhile other new uses, such as informal colonization of foyer areas by laptop workers could not have been foreseen. To the extent that these interventions are simply accommodated with loose furniture, they are not detrimental to the foyers' spatial significance, and indeed help animate them during non-performance hours.

1. Their impact on heritage values depends more on the quality of detailed design. The principal 2007 interventions for example – the cloakroom, the bar, the ticket counter - achieve a standard that is worthy of the original. The Martini Bar however surely does not. Interventions that temporarily occupy central floor areas, such as small exhibitions, craft fairs and other such displays all of which add interest and attract visitors, are also without detriment to the special architectural interest for which the Barbican is listed, precisely because they are temporary – a condition that does however need to be properly enforced.

2. The greater challenge are those interventions that enclose space that was originally open. The Fountain Room for example provides a valuable facility that is suitable for a variety of different functions. However, the means by which this is separated from the main foyer – namely retractable translucent screens retaining the option of merging the spaces with visual connection to the lakeside terrace – ensures that any detrimental spatial impact is limited – albeit this flexibility appears to be used infrequently, if at all.

3. The new shop, though finely designed, has a major impact on the main foyer space in subdividing what was previously a double height open volume that fully proclaimed the Theatre facade. The café on Level G is an intermediate case being directly adjacent, and with clientele partly within, the main foyer and is therefore particularly dependent on the standard of furniture design, lighting and customer management. This entails policing the containment of furniture within the demarcated café carpet zone, and preventing it spreading further.

**Guidance**

4. Whilst such diversity of supporting uses adds to the overall attraction (and revenue) of the Barbican Centre as a competitive international destination and place of public resort. It is important that it is accommodated in a way that does not detract from the spatial scale and character of the Arts Centre foyers which constitutes a key aspect of their heritage significance, equal to that of the performance spaces themselves.

5. The original strategy for the supporting functions was to locate these at the edges of the foyer spaces, minimizing their encroachment on the spaces themselves. Furniture and displays in the shop should thus be kept at low level to retain clear sight lines across the space. This strategy should also inform the location and configuration of any additional facilities. Thus, if the space above the TV control room is enclosed it should mirror the Stalls Lounge on the west side, maintaining spatial continuity above and beyond the enclosure itself. It is also important that any interventions within the foyers are of the highest design quality in themselves, and do not present as incongruous or unworthy intrusions in an original interior of such distinctive identity and consistent integrity.

## The Interior

**Other Foyer Areas (Levels 2, 3, 4 and staircase.)**

**Foyers**

**Original design**

1. Above Level 1, the upper foyers on levels 2, 3 and 4 are of lesser significance, being essentially areas of circulation and connection rather than 'dwell' spaces in their own right. Nonetheless they deserve to be maintained in a manner consistent with the listed status of the Arts Centre as a whole.

2. All these levels have direct access from the north from the respective levels of Frobisher Crescent, whilst on the south side they are served by the axial glazed staircase and adjacent lifts. To the east of the staircase position from Level G upwards the foyer zone is separated from the adjacent circulation area by glazed screens and lobbies, beyond which connections are made from the main Arts Centre to other elements of the estate. These zones are considered separately below under Other Common Parts – Outer Lobbies and Walkways.

Level 2

3. This foyer is accessed from Frobisher Crescent on the north and via lifts and the glazed staircase on the south edge, overlooking Lakeside terrace. It provides direct access to the Library and also, via an intermediate lobby, to the Level 2 restaurant. The area is treated as 'external' to the Arts Centre proper inasmuch as the floor is paved in the exterior brick tile finish used throughout the podium, with carpet beginning only at the Library threshold.

4. Wall and ceiling finishes are pick hammered and smoothface concrete respectively, with lighting housed in the waffle slab recesses. On the west side of the corridor connecting the foyer area with Frobisher Crescent was originally located the Ticket Office in a substantial area with a frontage occupying two whole bays of the planning grid.

**Alterations**

5. The Library entrance screen appears to be unaltered, with the original doors, but adjoining it a book return desk with library online terminals has been added in a manner consistent with the Barbican aesthetic language. In both these positions, and around the lift lobby corner new signage and wayfinding supergraphics have been applied to good effect. Going north towards Frobisher Crescent, the original Ticket Office has been converted to office use, while half the original corridor width has also been colonized as office space. (See Offices section.)

Level 3

1. The foyer area on this level gives access to the Garden Room and Art Gallery to east and west respectively and is considerably less than the floor below as the walkway from the Frobisher Sculpture Court leads right up to the line of the venue doorways. Finishes and lighting are treated similarly to Level 2.

**Alterations**

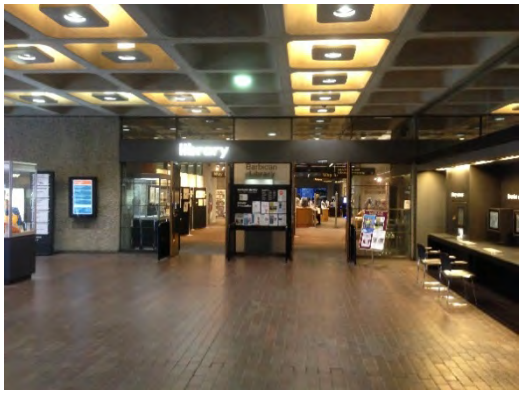
2. Apart from some minor adjustments to the arrangement of the Art Gallery cloakroom desk, there appear to be no alterations from the original design.

Level 4

3. The foyer area on this level gives access to the Conservatory Terrace, the Art Gallery 'rear door', and the lift motor room, with the connection to Frobisher Crescent formed within an arched glazed link.

**Alterations**

4. The original Art Gallery doorway screen has been altered to allow separate access to the lift motor room, the Gallery connection becoming only a secondary exit or means of escape from its upper level.




**The Library entrance, Level 2 foyer**



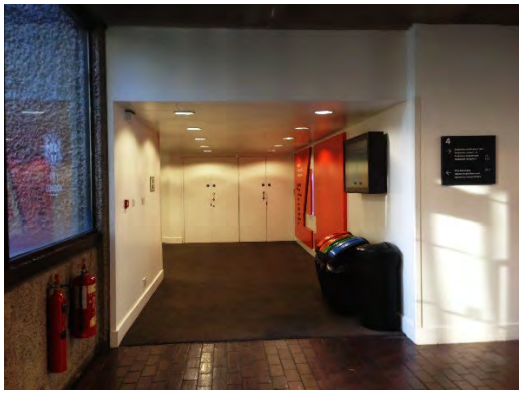
**Book return desk adjacent entrance**



**New supergraphic signage**




**Entrance to Conservatory Terrace, Level 4**



**Art Gallery rear exit, Level 4**



**Glazed link connection to Frobisher Crescent**

**Heritage significance**

1. The foyer spaces described above are not architecturally exalted in the sense that those within the main Arts Centre certainly are. However, they deploy the architectural language of the Barbican in an elegant and consistent manner and deserve to be carefully maintained to respect the original design.

**Guidance**

2. The original finishes and fittings should be retained and refurbished as required to extend their service life. The original screens and doors should be maintained, with any re-glazing undertaken on a like-for-like basis. Concrete and tile surfaces should be left uncovered. Any replacements should be closely matched to the original appearance. The new fittings and signage graphics are sympathetic to the Barbican ethos and any additional or replacement signage should adopt the same style. Miscellaneous additional fittings - waste bins, notice boards, etc should be kept to a minimum and if unavoidable should conform to a consistent specification for the Arts Centre as a whole.

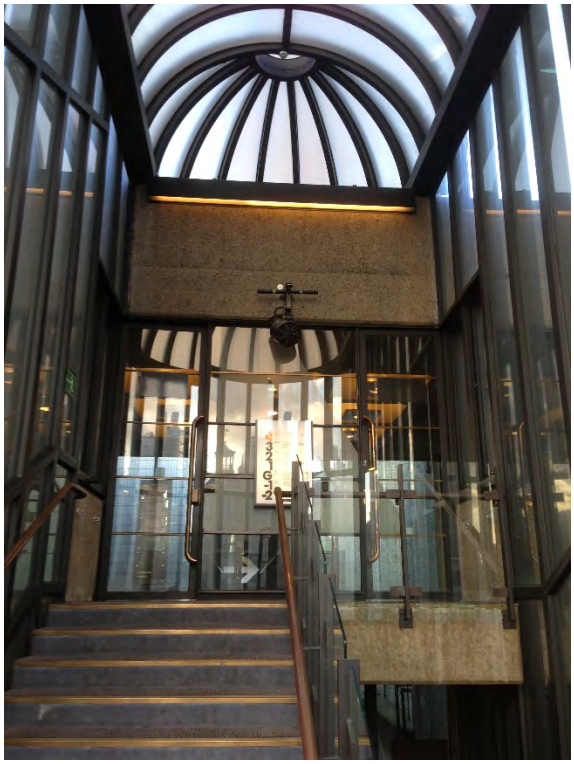
**Staircase**

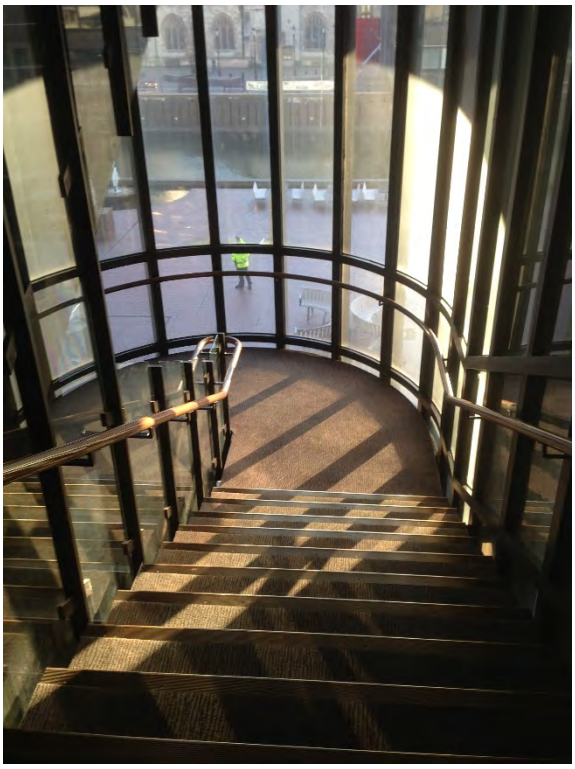
**Original design**

3. The glazed semi-circular staircase on the southern end of the principal north-south circulation axis is a major feature of the original design, connecting up virtually the full height of the Arts Centre, from Level -2 up to Level 4. Formed as an apsidal steel cage it provides a clear navigation point both internally and externally, whilst also affording fine elevated views over the Lake and beyond. The enclosing frame (recoated from bottle green to black with a yellow admixture as per the 2000 masterplan colour palette) is treated as a curtain wall passing outside the landing floor and stairflight edges to present a continuous glazed tower when viewed externally. The concrete staircase is fitted with fine bronze handrails with centre guardings in individual glazed panels. Treads and risers are carpeted, with inlaid floormatting aprons at the two exits to the Lakeside Terrace, Level G. Door screens at landings are in matching black coated steel with wired glass and substantial double swing ‘Barbican’ doors.

**Alterations**

1. With its single glazing and direct southern orientation this staircase is susceptible to overheating in summer as is evidenced by the installation of electric fans at landing positions. Blast protection film has also been applied to the internal glass surfaces. The carpet has also been replaced in the same pattern as used within the main foyers.





**Top flight and typical half landing within the glazed apsidal staircase. Note handrails and door D handles**

**Heritage significance**

2. This staircase is a 'signature element' of the Arts Centre and forms a pivotal feature in the main southern composition. (See cover image and illustrations elsewhere in this document.) The closely spaced steel mullions create a contrasting architectural idiom to the monumental solidity of the exposed concrete that is deployed elsewhere on the estate, either glazed or infilled, e.g. Frobisher Crescent arcade, the Exhibition Hall facades on Aldersgate Street and the Beech Street Cinema. This staircase also constitutes a crucial component of the overall Barbican circulation system, linking all major floors within the Arts Centre itself and, together with its adjacent foyers, also providing connections to the primary north-south routes across the estate.

**Guidance**

3. As is evident from the above, the glazed staircase is a key part of the heritage asset and should be carefully maintained in its original form. Replacement/ repair of damage or deterioration should be undertaken strictly on a like-for-like basis.

1. Glazing replacements must be in curved glass where this is applicable, not in facetted panels. When the carpet requires replacement if should be renewed throughout rather than piecemeal, using the same specification as adopted for the main foyer areas, with uniform metal nosings. Likewise door ironmongery.

## Other Common Parts – Outer Lobbies and walkways

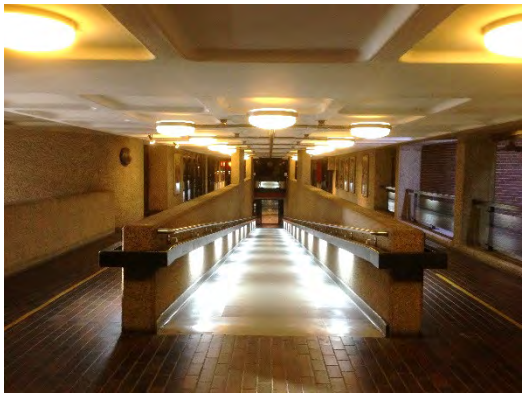
**Original design**

2. Eastwards, beyond the foyer areas adjacent the above staircase, outer lobbies occur on Levels G, 1, and 2. These provide access to adjacent venues within the Arts Centre complex, namely the Theatre Upper Circle and lakeside cafeteria (Level G), the Theatre Gallery and mid-range cafe (Level 1) and formal restaurant (Level 2.) Enclosed with glazed steel screens and 'Barbican' double doors (with elongated portholes and generous brass kickplates) these areas serve as the Arts Centre's 'entry porches' beyond which the space becomes 'external' (albeit covered) and unheated. Barbican finishes prevail throughout – pick-hammered concrete walls, tile paviors and waffle slab soffit with integrated light fittings.

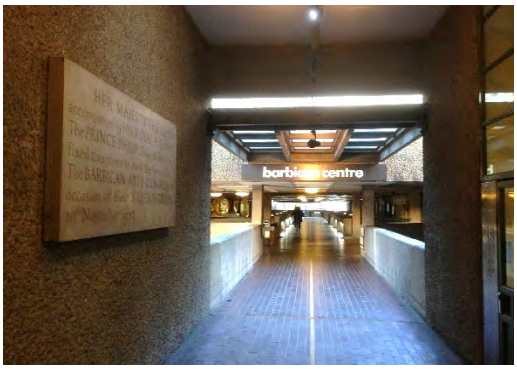
3. On Levels G and 1 ramp connections lead eastwards to link up with the Lakeside Terrace and the north-south spine of Gilbert Bridge. Originally intended as a primary pedestrian thoroughfare the latter walkway skirts the Theatre footprint to re-connect with Frobisher Crescent on the north side of the Theatre.



**Looking east towards outer lobby (Level 2)**



**Ramp connection from the north-south spine**



(placeholder image)

**Looking north on the spine to the Centre entry**



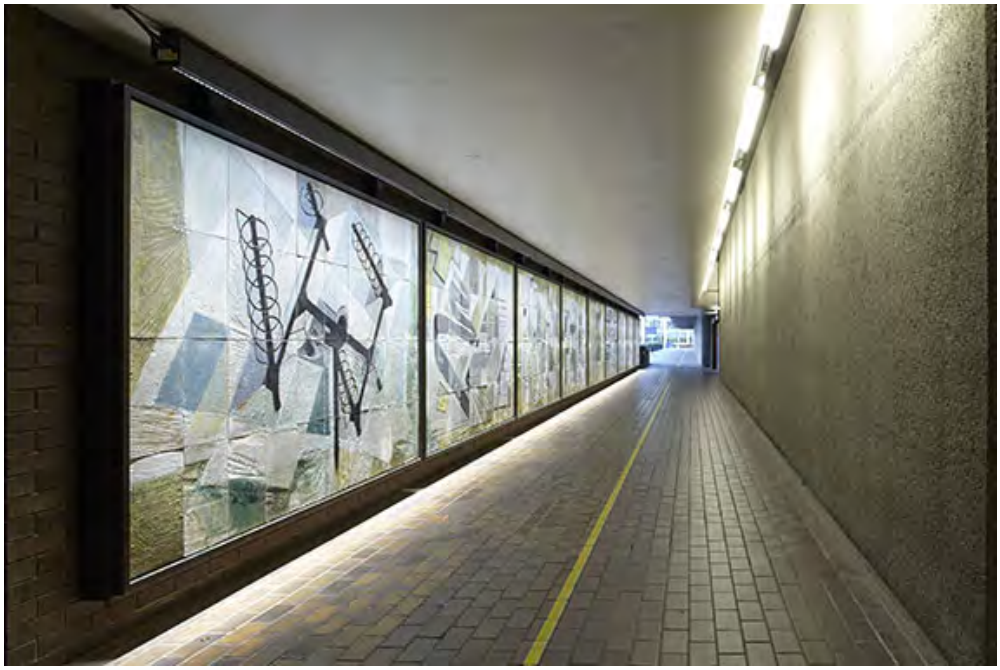
**Barbican Muse at corner of ramp and walkway**

**Alterations**

1. There appear to have been few if any alterations to the above spaces, which being robustly finished have withstood over 30 years of intensive use largely unscathed. One conspicuous intervention is the artwork masks – the Barbican Muse, by Matthew Spender (1994) - that embellish the corner of the ramp link and the north-south spine. A useful navigation aid, this also helps to hide the unglamorous array of drainage pipework immediately behind. Further along the north-south spine walkway as it turns west another significant and highly successful intervention has been the relocation of a Grade II listed mural designed by Dorothy Annan from the former Central Telegraph Office on Farringdon Street.

**Heritage significance**

2. As with the similar upper foyer spaces, these areas are essential elements of the Arts Centre anatomy rather than major architectural statements in themselves. However, as part of the overall composition they are detailed with the same standard of care and deserve to be maintained accordingly. Specifically, the Annan mural has added an artwork of considerable intrinsic importance to an otherwise unremarkable area of the Highwalk, with splendid results.



**The Dorothy Annan mural in its new location.**

**Guidance**

3. The above areas should all be maintained in their authentic design. Uncoated surfaces should remain uncoated, and coated surfaces should be refurbished when necessary to the same specification. Lighting design should remain as it is, upgrading to more energy-efficient lamping as and when feasible. Glazed screens and 'Barbican' doors should be conserved, with any replacement being undertaken strictly on a like-for-like basis. Special care should be taken to ensure the safety of the Dorothy Annan mural. This may be best achieved by promoting awareness of its presence at the Centre so that the walkway is populated, and the mural is regularly enjoyed by visitors.

## Other Common Parts - Toilets

**Original Design**

1. Public toilets accessed from the main foyers are located as follows -

| | |
|---|---|
| Level -2 | Serving the Cinema and Pit Theatre |
| Level -1.5 | Serving Concert Hall, Theatre and Foyer areas generally |
| Level -1 | Serving the Foyer |
| Level G (0) | Serving the Fountain Room |
| Level 1 | Serving the Concert Hall (Balcony Level) |
| Level 3 | Serving the Art Gallery and Garden Room |

(For other toilets accessed from within venues, see the respective venues.)

**Level – 1.5 Toilets**

2. The principal provision is Level -1.5, where the toilets extend across three whole structural bays in a longitudinal back-to-back configuration such that it is possible to pass right through the enclosure to the other side of the foyer. The outer entrances at each end are approached down a half flight of stairs, with the steps, spandrel walls and lower landings finished entirely in terrazzo. Outer doors to the toilet areas are formed in frameless obscured glass, with matching side panels and polished brass push plates, kick plates and patch fittings. Service stores are located at each column position (4 no. total.) Large wall mirrors are placed at each end adjacent to the entrances.

3. Within each zone the layout is symmetrical about the centre axis. In the case of the ladies, a central range of twelve WC cubicles is flanked by two further banks of five cubicles at each end in lobbies that also contain underslung washbasin counters.

4. In the case of the male toilets, the lobbies at each end also contain underslung washbasin counters, with the central area arranged along each side as continuous slab urinals, flanked (on the north run) by two pairs of three WC cubicles. The urinal trough is formed behind a continuous terrazzo plinth edged with two courses of square black quarry tiles.

5. The wall and floor (and service door) finishes are also in terrazzo, with a coved skirting detail, integrated vent grilles and concealed lighting behind a terrazzo pelmet. The washbasin counters are also formed in terrazzo, with foot pedal operation of projecting s/s tap arms over each basin. Individual soap dispensers for each basin are wall fixed through a continuous mirror into which are also set circular ‘dressing room’ style circular lights. Paper towel dispensers and loose disposal bins are located on the opposite walls. WC cubicles (also fully finished in terrazzo) are fitted with open-top doors (in a range of three colours) and back-to-wall wc bowls.

**Alterations**

1. Upgrade works to the male toilets were undertaken in 2016 replacing the degraded slabs and dealing with the inadequate drainage. The outcome of which has substantially improved the functionality and appearance of the urinals. The plastic soap dispensers have also been replaced with superior s/s fittings.

**Heritage Significance**

2. The disciplined symmetrical planning arrangement of the main WC block on Level -1.5 exhibits the same sense of order as is evident elsewhere in the Arts Centre. There was a clear endeavour to make the toilet accommodation worthy of the building. The abundant use of finely detailed terrazzo (even including service doors) is characteristic of the period and conveys a sense of quality, refinement and permanence. The same terrazzo finishes are employed in other toilets elsewhere in the building, creating a consistent material vocabulary.

**Guidance**

3. Inevitably such areas are subject to intensive use and require periodic upgrade. However, the 2016 works demonstrate that this can and should be undertaken without losing the essential character of the original design. Terrazzo finishes should accordingly be retained and refurbished wherever possible. Where deterioration or local damage requires replacement, this should be undertaken by terrazzo specialists on a like-for-like basis. The concealed lighting should be retained, substituting energy efficient lamps behind the original pelmets. The integrated vent grille openings should also be retained.

4. If the urinal slabs are ever removed and individual bowls are substituted the lower wall should be reformed in a quality inorganic material (e.g. ceramic, glass, stainless steel, or matching terrazzo) rather than a wood laminate or plastic based board. Within this lower zone privacy screens between the bowls, if desired, should be formed in matching material to the reformed wall, but retaining the original terrazzo wall above. If the trough is decommissioned, the channel should be made good in matching quarry tiles, retaining the terrazzo plinth front tread.

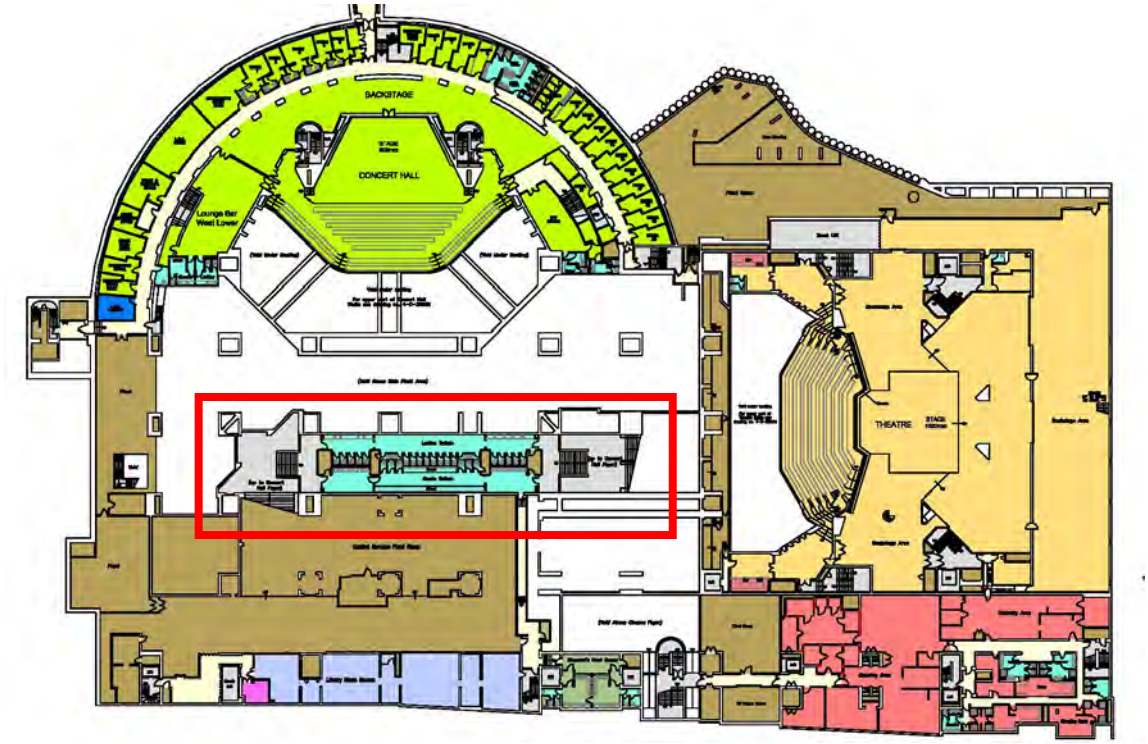
5. The washbasin terrazzo counters should be retained and refurbished, with the underslung bowls being replaced with equivalent fittings if and when necessary. The pedal-operated taps should be maintained if possible, but if not, the taps should remain ‘hands-free’ with sensor operation, and the pedal points replaced with matching terrazzo discs. Plastic soap dispensers are unworthy of the original design, with quality contemporary s/s fittings being more appropriate. Likewise, the function of paper towel dispensers (and associated waste bins) would be better served with high quality s/s warm air dryers.

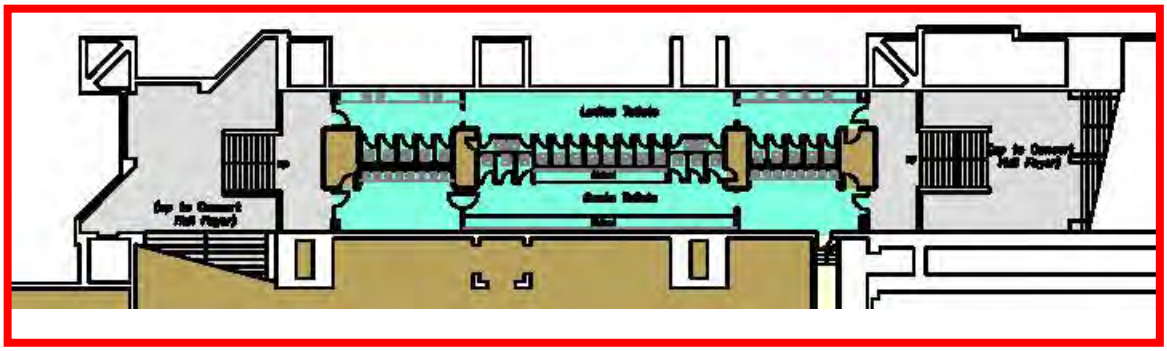
1. If the WC sanitary ware is replaced, then wall hung bowls are to be preferred to the back-to-wall type. The rear wall should then be made good using whichever material is adopted for the urinal wall zone, ie avoiding wood laminate or plastic. Terrazzo areas should be made good as necessary in matching material by a terrazzo specialist.

2. The WC cubicle doors, if and when renewed, should be replaced with good quality solid fully finished sealed doors, preferably of a neutral colour, using good quality s/s ironmongery fittings and furniture to match that on the service doors.

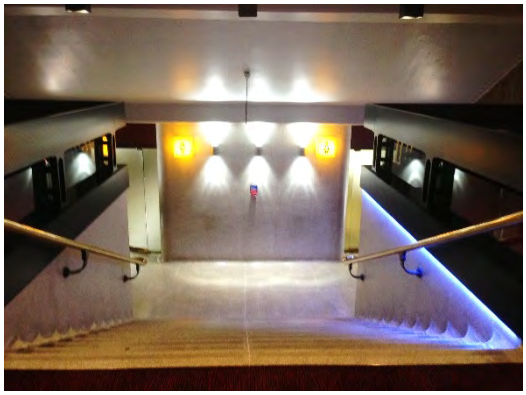
3. The outer glass doors and brass fittings should be retained and refurbished, and replaced only if necessary, on a strictly like-for-like basis.

**Plan, with detail extract below, of main toilet area, Level -1.5**



**IMAGES (March 2017, following upgrade works)**



**Terrazzo staircase and lower landing**



**Male urinals, with terrazzo wall finishes**



**Washbasin counter and mirrors, foot pedal disks, towel dispensers and bins**



**WC cubicles**



**Terrazzo service doors**

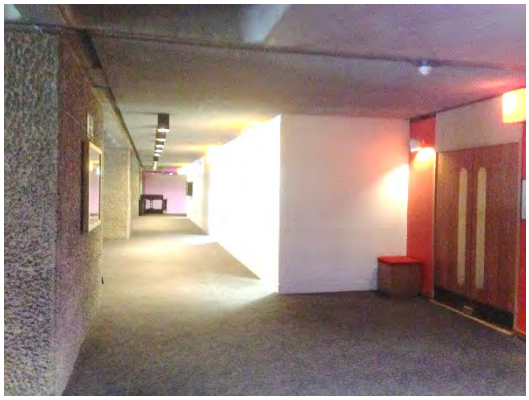
**Level 1 Toilets**

**Original design**

1. These toilets are located behind the rake of the Concert Hall balcony between the auditorium entrances to left and right and are accessed from the narrow Level 1 foyer. Their design adopts the style and materials of the main toilets on Level -1.5 – terrazzo flooring and wall finishes, terrazzo counters with underslung basins, and wall to wall mirrors with 'dressing room' lighting. Individual bowl urinals (rather than slabs) appear to have been specified originally and the same original projecting arm taps are used as in Level -1.

**Alterations**

2. Additional ladies' toilets, and an accessible wc, were added as part of the 2000 masterplan to increase provision in the previous location of the Concert Hall balcony bar. The soap and towel dispensers are more recent fixtures and strike a discordant note. Lamping appears to have been renewed with LED fittings.




**Level 1 foyer with toilets**

**Heritage significance**

3. As noted in the case of Level -1.5 these facilities have been designed to a standard of detail and material finish that matches the high quality of specification throughout the Arts Centre generally. They are accordingly deserving of equivalent care in terms of maintenance and renewal.

**Guidance**

4. Maintenance and repair should be undertaken as required with replacement of any original materials and fixtures on a like-for-like basis. The extensive use of terrazzo flooring in the Arts Centre wc areas is a highly distinctive feature of the original design that should be retained, as should also the small format wall tiling where it survives. The exceptions are the soap and towel dispensers, which should be replaced when required with quality stainless steel fittings.

**Level 3 and Frobisher Crescent Toilets**

1. These serve the Art Gallery, Garden Room and Frobisher Conference/ Hub facilities respectively. Those for the Art Gallery/ Garden Room have been upgraded with new finishes and fittings to a good standard though removing the original design. In Frobisher Crescent the original terrazzo floor finish survives in reasonable condition and should be maintained and retained if possible.



**Level 3 upgraded toilets serving the Arts Gallery and Garden Room**





**Frobisher toilets, with surviving original terrazzo flooring and small format wall tiles**

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. Cleaning of graffiti is permitted in this category provided visual unity with adjacent surfaces is restored. |
| 2 | Redecoration of interior surfaces decorated at the time of listing, with the exception of the internal face of any windows, screens and their surrounds (except originally painted cills and sub-frames), unless the latter is like-for-like refinishing or reconditioning. Removal of non-original coatings to restore original finish and colour.<br><br>Painting the exterior surface of windows and screens is excluded from this category. | References should be made to historical records of finishes and colours to ensure authenticity of works. The windows and screens are part of the overall elevational character of the Arts Centre and any general project for upgrade or re-decoration is subject to LBC, see Red Category. |
| 3 | Introduction of new mechanical, electrical and data services connections provided they are housed within existing containments and are not surface fixed. | The provision applies only to service runs and excludes any new visible service appliances, terminals or apparatus. |
| 4 | Contract cleaning of existing floor or wall finishes including carpet, woodblock, tile, terrazzo or sheet material. | The provision covers general restoration or refresh works only. For alteration or replacement see Red Category. |
| 5 | Like-for-like replacement of original electrical fittings, *eg* light fittings, switch cover plates etc, at same locations and fitting onto existing or renewed back boxes etc,<br>See also item 3 above. | |
| 6 | Like-for-like replacement of WC fittings and finishes in existing or original locations. Areas rated single star only. (ie. low sensitivity). | Refer LBMG Guidance text on toilet areas.. |
| 7 | Refurbishment of existing interior metalwork, ironmongery, bar cabinetry and worktops. | The provision covers general restoration or refresh works only. For alteration or replacement see Red Category. |
| 8 | Replacement of window blinds or curtains in public rooms provided this is undertaken to match existing location, fixing method, colour, material and design. | Replacement of blinds or curtains in a building-wide upgrade Or redesign project is subject to LB Consent |
| 9 | Re –lamping of luminaires with more energy-efficient lamps, provided lighting character is unchanged. | Any project for renewal of light fittings in areas above two star rating will require LBC. See Red category. |

## Interiors: Foyers and Common Parts

**Amber** — **Works where advice should be sought to determine whether a LBC application is required**

| | Example | Guidance |
|---|---|---|
| 1 | Installation of new temporary exhibitions, display cases, pop-up counters or stalls, new desks or fixed seating arrays. | Notification of proposals, including length of temporary periods, should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Insertion of new suspended ceilings in the case of areas which have been rated single star only. (ie. low sensitivity). Two star areas and above will require LBC. | A LBC application will however be necessary if the ceiling line would interfere with the window heads or be visible from outside the building. |
| 3 | Renewal of floor finishes to areas which have been rated single star only. (ie. low sensitivity). Two star areas and above will require LBC | LBC will be required if the works involve covering an original self-finish area (eg. tiling.) |
| 4 | Works in connection with adaptation for people with special needs. | Early consultation is recommended to establish if LBC is required. |
| 5 | Installation of temporary decorations, artwork installations, event banners, posters (other than within existing fixed frames) etc. | Notification of proposals, including length of temporary periods, should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 6 | Extension in area or duration of the Temporary Theatre Club Stage in Foyer level -1 | |
| 7 | Introduction of any new services installations | Recent 4G data services have been discreetly fixed to black ventilation grilles in a manner that did not require LBC. However any similar or visible installations should prompt a prior enquiry. |

## Interiors: Foyers and Common Parts

**RED** **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Changes to internal floor layout. This includes:<br>▪ changes to size, shape and location of any enclosed or semi-enclosed areas (eg.lobbies, foyer bars, cloakrooms, storage enclosures, Fountain Room)<br>▪ partial or wholesale removal of partition walls or addition of new full-height partitions<br>▪ alterations to or removal of internal glazed screens or introduction of new screens<br>▪ relocation/ removal of existing door positions or introduction of new doors<br>▪ Any changes to the foyers or common parts that would manifest externally. | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br>▪ effects of such alteration with regard to external manifestation;<br><br>Removal of non-original enclosures (eg. the former Shop, the Instrument Store adjacent the new cloakroom) is encouraged<br><br>Refer also to guidelines for Exteriors. |
| 2 | Any intervention or infill which would further diminish the open volume or unassigned floor area of the foyers at Levels -1, Mezzanine, Ground, 1 and 2 or impinge on the voids or intervisibility between these areas. | The generous open foyers were an intrinsic aspect of the original design and a key part of the building's special interest that should not be compromised by further infilling. Any enclosure above the TV Control Room should mirror the Stalls Lounge (Level -1) with partitions to door height only so as to maintain spatial continuity above and beyond. Refer to Guidelines text. |
| 3 | Alteration of any details or finishes to stairs and guardings or handrails. | The original guardings and handrails are highly characteristic and should not be altered. |
| 4 | Alteration of extent or replacement (other than like-for-like) of any floor finishes. | LBC would be required for replacement of carpeting, entrance matting, re-surfacing of woodblock or terrazzo flooring (other than contract cleaning, restoration/ refresh as noted in Green category) |
| 5 | Changes to the internal elevation of exterior windows or screens, such as alteration of cill details, or introduction of double or secondary glazing, solar or tinted glass, films, blinds, curtains, black-outs or shutters | Works to windows and screens and related reveals should be approached with care. The fenestration pattern and design of all windows and curtain walling are integral parts of the architectural character of the buildings. A complete and technically competent method statement demonstrating the suitability of the proposed works should be secured before submitting the LBC application. |
| 6 | Alteration or replacement of any original door furniture, including introduction of any new doors or security fittings. | Retention of original fittings is preferred. Any new fittings should adopt the same style as originals. |
| 7 | Alteration to existing, or addition of any new fixtures to walls or main concrete piers, such as frames for promotional posters, electronic display screens, signage of any kind, etc. | Details of proposals, including how power/ data services would be connected in the case of electronic appliances, should be submitted for consideration by Planning Department. |
| 8 | Any changes to pre-formed services openings in self-finished concrete piers, including electric socket outlets, vent terminals, grilles, heater casings, alarm bells, fire hoses, etc. | All original items were strictly controlled and carefully integrated into the structure. |
| 9 | Alterations to, or replacement of major visible services installations such as the passenger or platform lifts (other than local like-for-like repairs.) | Single alterations to individual lifts, including fascias, panelling, control consoles, etc, should be avoided, and the main lift banks be dealt with holistically |
| 10 | Alteration, replacement of fixed furniture or original joinery fittings. | This includes any intervention that would entail making new fixings into an original self-finish material, eg. concrete. |
| 11 | Introduction of any new visible services installations, i.e. new lighting, power and data points, trunking systems, surveillance equipment, routers, radio or server units. | Any new service installation that would be visible in the foyers or common parts is subject to LBC, except within areas of one star rating. |

| | | |
|---|---|---|
| 12 | Any new ceiling or lighting works | Refer LBMG Guidance regarding foyer lighting installations. |
| 13 | Works that would permanently modify or obscure views of the rooflight over the main foyer in the position of the former Santry sculpture. | Any project to introduce louvres, baffles, curtaining as well as any proposal to install a new suspended sculpture, light or similar fitting will require LBC. See also Amber 5 regarding temporary decorations. |
| 14 | Alteration of the decorative finish or colour of the exterior shells of the Concert Hall or Theatre. | The orange and claret livery of the two principal venues are a highly distinctive aspect of the building's character. |
| 15 | Any enlargement of the foyer café or former shop enclosure in their current locations. | Removal of any non-original insertions which were in place at time of designation is encouraged through submission of a formal Listed Building Consent Application. |
| 16 | Insertion of new stairs or ramps within the foyers. | Unless resulting from new DDA requirement, which would entail a LBC. |
| 17 | Allowing any temporary installation to become permanent | |

## Interiors: Foyers and Common Parts

**Black**

**Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | **Example** | **Guidance** |
|---|---|---|
| 1 | Any reduction of the extent of the Concert Hall or Theatre shells that is visible from within the foyers. | Removal of any of the non-original insertions which were in place at time of designation is encouraged through submission of a formal Listed Building Consent Application. |
| 2 | Any intervention that would reduce the extent of visibility and direct access between the foyer at Ground Level and the Lakeside Terrace. | The visual connection between the foyer and Lakeside is a crucial aspect of the original Barbican design. |
| 3 | Any proposal to decorate/ overcoat a self-finished material, including alteration (plastering, painting or over cladding) of any internal feature of self-finished materials, eg. concrete, timber, brick or tile | The exposed concrete surfaces throughout the foyers are a crucial aspect of the Barbican aesthetic language and special interest that should be conserved. |
| 4 | Permanent alterations, including covering or overcoating, of the original areas of woodblock or tile floor. | These finishes were a distinctive aspect of the original building character. |
| 5 | Any alteration or intervention in structural and load-bearing elements of the buildings. | Examples include forming new openings in concrete piers, suspending new platforms, lighting rigs, etc. (See also Red Category Items 1 & 2 regarding enclosure) |
| 6 | Changes to, or reduction of existing internal staircases. | |

**NOTE** As the Barbican Foyers are a 4 star rated area of the Arts Centre in terms of heritage sensitivity any proposed works not specifically covered within the Traffic Light section above, should be treated as Category Amber and proposals discussed prior with the Planning Department to ascertain whether LBC will be required.

## The Barbican Concert Hall

**Original Design**

1. The Concert Hall was always intended as one of the two principal cultural venues of the Arts Centre, alongside the Theatre (see separate section.) It was designed for, and in conjunction with, the London Symphony Orchestra as the resident company following considerable comparative research of other contemporary concert hall projects in Europe and America, with Scharoun's Philharmonie Hall in Berlin reportedly being regarded by Chamberlin and concert impresario Anthony Besch, whom the City had engaged as advisor, as the most favoured model.

2. The initial projected capacity of 1,300 seats was increased to 2,000 during the briefing process (with an eventual figure of 1,943.) The form of the auditorium was determined by the shape of Frobisher Crescent, with a stage (finished in maple timber) capable of accommodating a 120-piece orchestra and, by extension, a choir of 200 singers. The interior is characterized by the unusually generous fixed seating (designed by Robin Day) that avoids guests having to stand up to let others pass, the successive rows being upholstered in alternate colours – green, blue, brown, claret and purple.

3. Behind a series of straight rows at stalls level the auditorium grades upwards in three segmented raked strata arranged as lower, intermediate and upper terraces, with stepped gangways on the mitre lines and outer edges. The stage itself was finished in light maple flooring, with additional modular portions that could supplement the platform area when required.



**Concert Hall Auditorium 1982, showing original lighting, alternating seat colours and concrete fascias**

 (placeholder)

**Auditorium 2017, showing new panelling and convex timber fascias on gallery fronts.**



**The Concert Hall stage, with new adjustable acoustic ceiling panels**

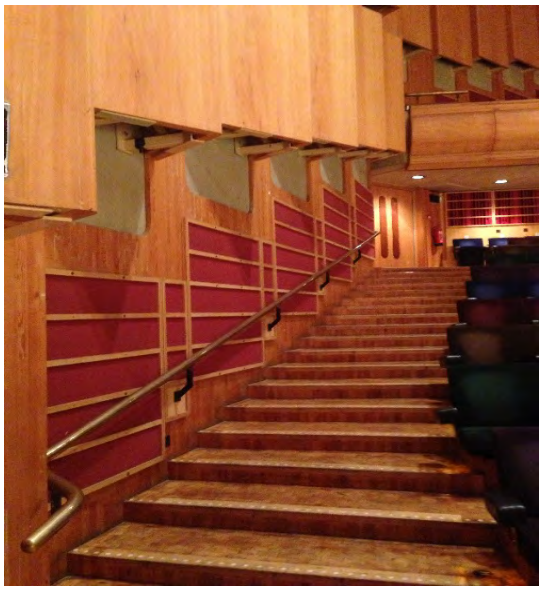
1. Acoustic considerations, originally formulated by the City's consultant Hugh Creighton, dictated that the whole volume of the building section was included within the auditorium with no false ceiling, thereby exposing the massive pairs of twinned beams that span from front to back and side to side. In the former case tracks are inserted within the beam soffits to support a mobile access gantry clad in matching timber to that of the facetted orchestra canopy that could be deployed outwards from the line of the stage portal to service the lighting rigs, etc.

2. Tuning the hall acoustic additionally necessitated the introduction of an array of suspended perspex spheres some of which also accommodated the overhead house lighting. Large speaker arrays were mounted at each side of the stage for sound amplification when the venue is used for conference functions. The concrete shell of the hall was lined with hollow aspen pine reverberation boxes and moulded paneling of varying complexity to enhance the acoustics, while the flooring also continues the timber theme prevailing elsewhere in the lower foyers and is made continuous with the veneered seat backs along their junction with the aisles by a pleasing cove detail.

**Alterations**

3. The hall has undergone a number of alterations over the years, mainly in response to developing views on its acoustic properties. Most significant has been the series of interventions undertaken by architects Caruso St John and Kierkegaard Associates in 2002, which removed the extendable gantry, some other of the timber ceiling elements (the suspended globes having already been removed) and reconfigured the orchestra canopy in a series of adjustable acoustic panels with revised access catwalks and lighting.

4. Additionally the gallery fronts, originally expressed in the bush hammered concrete finish of the Barbican generally, have now been clad in a continuous convex veneered timber fascia thereby obscuring the material continuity of this element of the interior with the rest of the Arts Centre. Further acoustic linings in red fabric and timber latticework panels have been applied to the side and rear walls of the auditorium. Additional stage/ platform extension has also occurred, resulting in removal of several rows of front stalls seating.



**Details of new adjustable acoustic panels and new acoustic linings on side and rear walls**

**Heritage Significance**

1. There can be no doubt that despite the difficulties of fitting such a large performance space into such a constricted site, the Barbican Hall has a unique character among concert venues of similar scale. The interior – a principal 'set piece' of the Arts Centre - has a particular grandeur, dominated as it is by the four mighty ceiling beams, the lavish generosity of the seating arrangements, and the richness of its finishes - the highly wrought timber paneling and the quiet luxury of the upholstery colouring. The more recent alterations, whilst addressing the sensitive issue of acoustic performance, have introduced new elements and materials, most notably the acoustic panels above the stage, which have diminished the architectural consistency of the original design. But the essential spatial drama remains, and it is of the utmost importance that this is protected.



**The Concert Hall platform with its richly profiled timber cladding around the light maple stage.**

**Guidance**

2. The key components of the Concert Hall's special interest and character comprise its overall spatial scale and integrity, the expressed roofbeam structure, the generous fixed seating design (including the distinctive upholstery colours), the rich timber cladding of the stage and side walls, and the woodblock floor finish. These should all be retained and maintained accordingly. The introduction of any new features that would interrupt the main space and seating pattern - for example free-standing control consoles, TV camera platforms or the like - should be avoided, with exceptions only where these are purely temporary installations for a specific performance that are entirely removable afterwards without trace.

1. The introduction of other performance engineering apparatus within the main space, for example, further rigs for lighting or speakers (as on the intermediate gallery fascia) should be discouraged. Existing provision for lighting, speakers and other apparatus should be utilized to maximum capacity before introduction of further infrastructure is considered. Any such additional provision, unless mounted 'invisibly' within the catwalk zone, should prompt an enquiry regarding the requirement for Listed Building Consent (i.e.. Amber category).

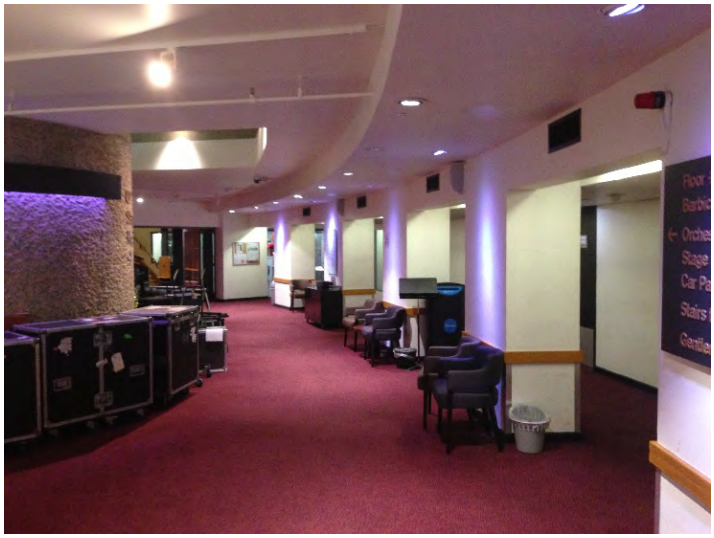
2. Finishes in every category should be maintained to their original character, and replaced if necessary, only on a like-for-like basis. Specifically, in the case of the seating, when renewal becomes necessary, the upholstery fabric should be replaced in the same colours and alternating row pattern as original, preferably dealing with whole rows or areas at a time rather than on a piecemeal basis. Other original details, such as doors, ironmongery, handrails and similar fittings should also be maintained, and if necessary, replaced strictly on a like-for-like basis.

## The Barbican Concert Hall - Backstage Areas

### Original Design

3. Backstage areas occur at each of the principal levels of the building relative to the Concert Hall rear section, ie. at Level – 1.5 (stage level) and Level – 1 (lower foyer level). The former was effectively arranged in two distinct zones: a free circulation space directly behind the stage where performers could assemble before entering the auditorium; and a series of dressing rooms, wc's and technical rooms arranged in a crescent formation, corresponding to the geometry of Frobisher Crescent above (and the service roadway and diaphragm foundations below).

4. The adjacent corridor serving these rooms becomes an open ambulatory with free-standing piers where it runs alongside the central assembly space noted above. At either side, and separated from the backstage area proper, were placed lounge bars and toilet facilities for audience use from the lower levels of the auditorium. In both cases stairs from these areas connected back up to the main lower foyer level. Flanking the stage recess, stair drums and lifts connect each floor up to Level 4.



**Backstage assembly area and ambulatory (right)**

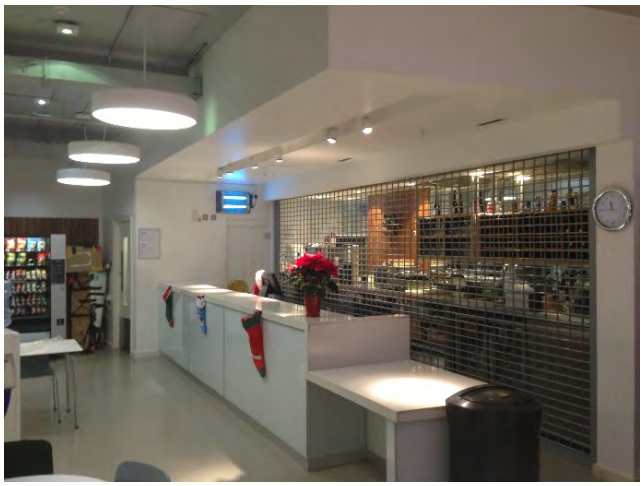



**A typical dressing room**

1. Above, at Level -1, the rear crescent thickens out to the line of piers and includes a number of larger storage spaces, technical rooms, a choir room and toilet areas. Here the circulation space is punctuated by a series of voids above the assembly area below. The two separate lounge areas either side of the stage noted above were repeated at this level. Only around these voids is the characteristic Barbican exposed concrete finish manifested in the stair drums and balustrade parapets, the walls elsewhere being plastered and painted.

*Alterations*

2. There have been a number of alterations to the backstage areas described above. At Level -1.5 an Artists' Bar has been fitted out in one of the larger crescent rooms, while the lower lounge area on the west side has been re-designated for performers' use by introducing pass doors from the assembly area at the head of the staircase leading up to the foyer. Directly above this, a music and technical office has been formed behind the Stalls Lounge. On the east side the lower lounge has been converted to become a TV control room. Consent under the 2000 masterplan to install a floor above was not implemented. The choir room has been subdivided with a flexible retractable screen and extended to include a small kitchen area. Nearby, an instrument store of makeshift construction, has utilized part of the circulation space.






**The Artists' Bar**

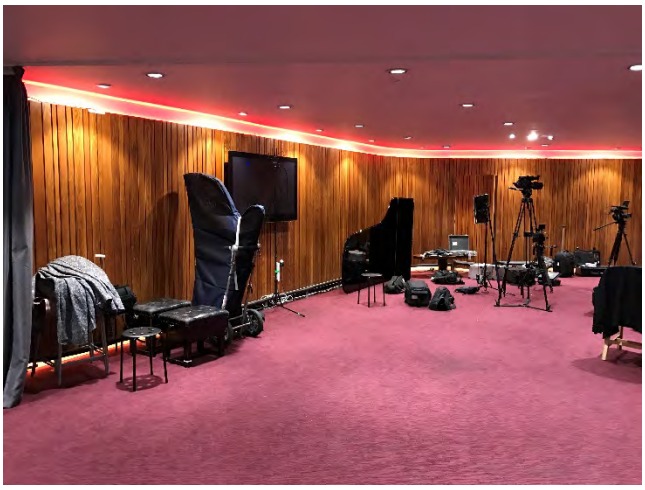
3. At the east end of the crescent corridor a new steel staircase has been introduced in order to provide a direct connection to the backstage areas from an Artists' Entrance adjacent the Silk Street entrance. Apart from these spatial alterations there have been numerous incremental changes and additions in the form of miscellaneous service runs, trunking, lighting, new finishes, fittings etc.

**Heritage significance**

4. The backstage zones of the Barbican Concert Hall are working technical areas designed to support the main performance space and have limited heritage significance per se, other than in the architectural ingenuity with which all the various support functions are fitted into the shape of a building and a site predetermined by a multitude of other factors.

1. The individual rooms have no special architectural interest other than the curving ambulatory with its crescent form which imparts a certain ceremonious quality to the backstage area. The area has clearly undergone fairly considerable change over the years such that only those elements retaining the distinctive exposed concrete finish mark the space as recognizably part of the Barbican. There is also a pattern of casual storage within the main circulation areas – flight cases, large instrument boxes, music stands, folding tables and suchlike – which detracts from the clarity of the spaces and general sense of order.





**Storage of instruments, folding tables, music stands, etc within the backstage circulation areas**

**Guidance**

2. The careful control of any further change to the backstage areas is important more for the quality of accommodation and ambience offered to the distinguished performing artists visiting the Barbican than for reasons of architectural heritage as such. As an arts venue of international standing, it is important that these areas have an appropriate sense of order and prestige. This may best be achieved by avoiding any further incursions of storage enclosures and suchlike into the open circulation areas, maintaining the open original curved colonnade, by keeping spaces and surfaces free of miscellaneous clutter, whether of redundant furniture, services or signage, etc, and by maintaining the quality and good repair of fittings and finishes, most notably lighting, decorations and carpeting, throughout the shared areas and the individual rooms.

3. If the previously consented proposal to install a new lounge area above the TV control room is ever resurrected it should mirror the equivalent facility on the west side of the Concert Hall at Level -1, whereby the enclosure terminates at door height, leaving the overhead space to continue above and beyond to maintain visibility of the continuing foyer volume and curvature of the building form.

(See also Foyers & Common Parts, Traffic Light section, Red Category Item 2.)

# The Barbican Concert Hall and Backstage Areas  Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Adjustments to extent and configuration of stage that do not entail any permanent removal of stalls seating. | Such alterations are assumed to be reversible and necessitated by temporary performance requirements only. |
| 3 | Addition to or re-arrangement of stage lighting that is at catwalk level or able to be accommodated by existing auditorium rigs. | This excludes any enlargement of lighting array that would require additional rig infrastructure within the auditorium. (See Amber category). |
| 4 | Minor like-for-like repair of damaged seating fabric | The original alternating colour pattern must be maintained. |
| 5 | Maintenance/ refurbishment of woodblock flooring or timber cladding provided this results in no change of profile or colour | The provision allows for periodic refresh works only, and excludes any intrusive work that would result in changed appearance. (See Red category). |
| 6 | Any alteration of the adjustable acoustic panels above the stage. | Such alterations are assumed to be reversible and necessitated by temporary performance requirements only. |
| 7 | Re-carpeting or re-decoration within Backstage area | Any works must be contained within the Backstage zone and not involve any coating of original self-finish surfaces.. |
| 8 | Replacement of any cabinetry, kitchen or sanitary fittings within the Backstage area rooms on a general like-for-like basis. | Such works are assumed to arise from general wear and tear, and not to entail any alterations of extent or floor plan. For cabinetry/ joinery works within Backstage assembly area see Amber category. |
| 9 | Temporary modification of amplifier arrays on each side of stage | Such alterations are assumed to be reversible and necessitated by particular performance requirements only. For any additional amplifier infrastructure within the auditorium. (See Amber category). |
| 10 | Installation of temporary platform, control console, TV podium or suchlike within the auditorium area | Any such installations would need to be reversible and necessitated by particular performance requirements only. (See also Black category) |

## Interiors: Concert Hall and Backstage Areas

**Amber** — **Works where advice should be sought to determine whether a LBC application is required**

| | Example | Guidance |
|---|---|---|
| 1 | Installation or extension of new lighting rig infrastructure within auditorium. | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Enlargement of amplifier arrays either side of stage, or addition of further fittings within auditorium. | Any permanent alteration should be discussed with Planning Department to ascertain whether LBC will be required. |
| 3 | Alteration of existing, or installation of new joinery works within the Backstage assembly area. | Details of and new shelving, pelmets, storage cupboards etc should be discussed prior with Planning Department to ascertain whether LBC will be required. |
| 4 | Alterations to existing lighting (except re-lamping or substitution with more energy efficient lamps) within the Backstage area. | Details of new house lighting proposals within auditorium should be discussed prior with Planning Department to ascertain whether LBC will be required. |
| 5 | Installation of any new visible services installations within Backstage assembly area (eg. trunking, conduit, pipework, control apparatus, etc | See also Black category |

## Interiors: Concert Hall and Backstage Areas

**RED** **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Changes to internal floor layout. This includes:<br>▪ changes to size, shape and location of any enclosed or semi-enclosed areas (eg.lobbies, backstage rooms, storage enclosures,<br>▪ partial or wholesale removal of partition walls or addition of new full-height partitions<br>▪ alterations to or removal of internal glazed screens or introduction of new screens<br>▪ relocation/ removal of existing door positions or introduction of new doors<br>▪ Blocking up/ infilling of any openings between Backstage ambulatory piers | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br><br>The open colonnade was a distinctive feature of the original design |
| 2 | Installation of new overhead catwalk decking that would be visible within auditorium | LBC would be required for replacement or re-surfacing of woodblock flooring (other than contract cleaning, restoration/ refresh as noted in Green category) |
| 3 | Alteration of extent or replacement (other than like-for-like) of any floor finishes within auditorium. | |
| 4 | Changes to the internal elevations of auditorium, including alterations of acoustic panelling or linings. | This includes lattice fabric panels to sides and rear of auditorium. |
| 5 | Alterations to design, extent or configuration of signage within the auditorium. | |
| 6 | Works, other than like-for-like replacement, to seating, including upholstery finishes | Alteration of the seating design or its distinctive alternating coloured upholstery would require LBC |
| 7 | Introduction of any permanent new installation, eg. platform, control console, TV podium or suchlike within the auditorium area. | Any proposal that would impact adversely on the open spatial character of the auditorium is likely to be refused. |

## Interiors: Concert Hall and Backstage Areas

**Black**

**Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Any permanent changes to interior arrangement of auditorium, eg. levels, seating, original timber panelling | These are all highly distinctive features of the original design. |
| 2 | Overcoating of any original self-finished surfaces in auditorium or Backstage area | Includes main beams in auditorium and exposed concrete areas in Backstage level -1. |
| 3 | Introduction of any visible/ face fixed services in auditorium | These are distinctive features of the original design. |
| 4 | Infilling of any floor voids in Backstage level -1 | Includes any intervention that would obscure visible extent of the main downstand beams. |
| 5 | Introduction of a false ceiling in the auditorium | |

**NOTE** As the Barbican Concert Hall is a 4 star rated area of the Arts Centre in terms of heritage sensitivity any proposed works not specifically covered within the Traffic Light section above, should be treated as Category Amber and proposals discussed prior with the Planning Department to ascertain whether LBC will be required.

## The Barbican Theatre – Front of house

**Original Design**

1. The Theatre was completed some while after the Concert Hall, but was developed in close conjunction with the prospective company in residence – the Royal Shakespeare Company. An original projected capacity of 800 was increased on the advice of Peter Hall and eventually settled at 1,200. Considerable comparative analysis was undertaken by the architects to arrive at an auditorium configuration that achieved optimum proximity of the audience to the stage, and the resulting section ensured that no seat is further than 20 metres from the 'point of command' – a central position on the platform approx. 2.4 metres from the front edge. The sense of intimacy thus engendered is further enhanced by excluding circulation gangways from the interior and instead arranging access to each row of seating through individual doorways round the perimeter (a strategy trialed in the lecture theatres at CPB's Roger Stevens Building for Leeds University). The continuation of the auditorium stepped section into the adjacent foyers adds considerable architectural drama to these circulation areas, particularly around the open public staircases which provide another Piranesian experience.

2. The seating, like that in the Concert Hall, is of a fixed design finished in dark brown fabric with leather arms and so generously spaced as to enable audience members to pass along the rows without obliging those already seated to stand up. The circulation areas are finished in differing grades of exposed aggregate concrete, contrasting with the richly paneled interior which has bespoke lighting fittings, with the row doors being held on magnetic catches that release just before the performance begins. The section is arranged such that 60% of the seats are stalls, with three balconies of diminishing capacity above planned in a pincer formation. Tubular brass handrails are used to luxurious effect at the auditorium entry doors and throughout the foyers.

3. The foyers themselves are arranged around the rear edges and corners of the auditorium with main staircases ascending within voids to the successive balcony levels. The principal Theatre bar presents to the main foyer on Level -1, with additional small bars at levels -1.5 and 1. In the former case a private toilet was retrofitted, reputedly for a royal visit. Public entry to the theatre occurs from the main foyer at Ground, Mezzanine and -1 levels, with access to further seating levels by the staircases within the theatre envelope itself.

**Alterations**

4. The Theatre has been little altered in any respects that affect its heritage significance. The auditorium seating has been recovered, on a like-for-like basis, retaining the combination of brown upholstery and leather armrests. A central line of seats has been made removable to facilitate the use of roving microphones in audience participatory events. The first three rows of stalls seating have also been made removable to accommodate the equipment needed for live-streaming of performances, a highly lucrative feature of current theatre programming. Modular stage extensions have been introduced for enlarging the thrust section to suit the requirements of particular performances. The carpet has also been replaced on a like-for-like basis, and there has been re-lamping with low energy fittings but retaining original luminaires. A series of acoustic panels, hardly noticeable except to the theatre technicians, has been mounted at high level over the auditorium. The foyers are now subdivided with glazed screens and have added track lighting.

**Heritage Significance**

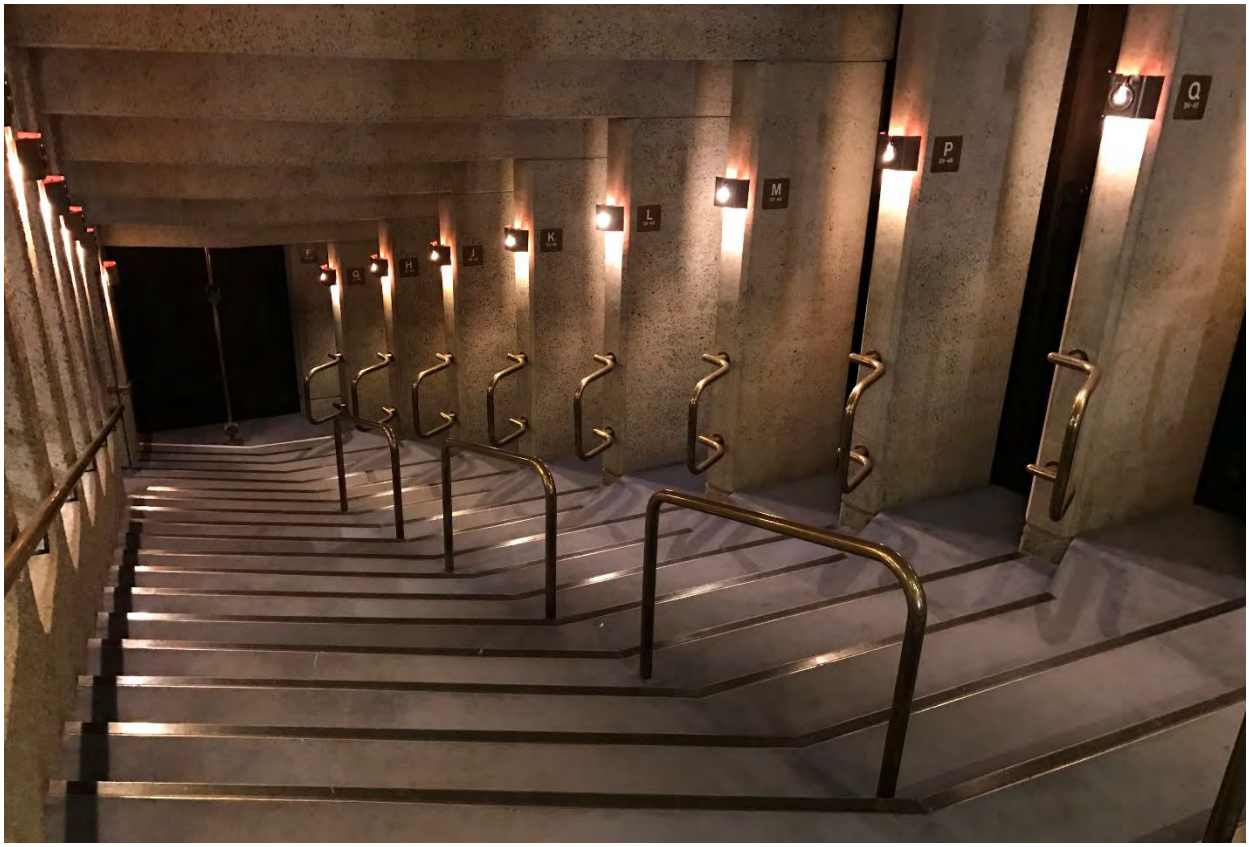
1. The Barbican Theatre is of exceptional heritage significance, both for its innovative re-thinking of spatial and planimetric theatrical conventions – its radical sectional and layout configuration - and in its range of highly bespoke architectural details – its luxurious seating, elegant house lighting, ingenious door entry system, rich paneled finishes, etc – all of which impart a unique and memorable character to the venue. Other less obvious details, such as the 'iron' noted below, or the retractable midrails of the upper balcony guardings intended to facilitate re-rigging of the lighting bars, are also of interest in revealing the architects' innovative approach to operational processes. Thus, the Theatre's significance inheres in all aspects of the auditorium and foyer areas, and of course in the planning strategies evidenced in the overall scheme organization.

**Guidance**

2. The care with which alterations to the public areas of the Theatre have been carried out to date serve as a model of how to continue. All key interventions have consisted of either like-for-like replacement or involved interventions that are reversible. This serves as evidence of the Theatre's capacity to assimilate change without impacting adversely on its heritage interest. There seems no reason why, with conscientious management and ongoing awareness of the Barbican Theatre's rare architectural interest as outlined above, this tradition may not continue.



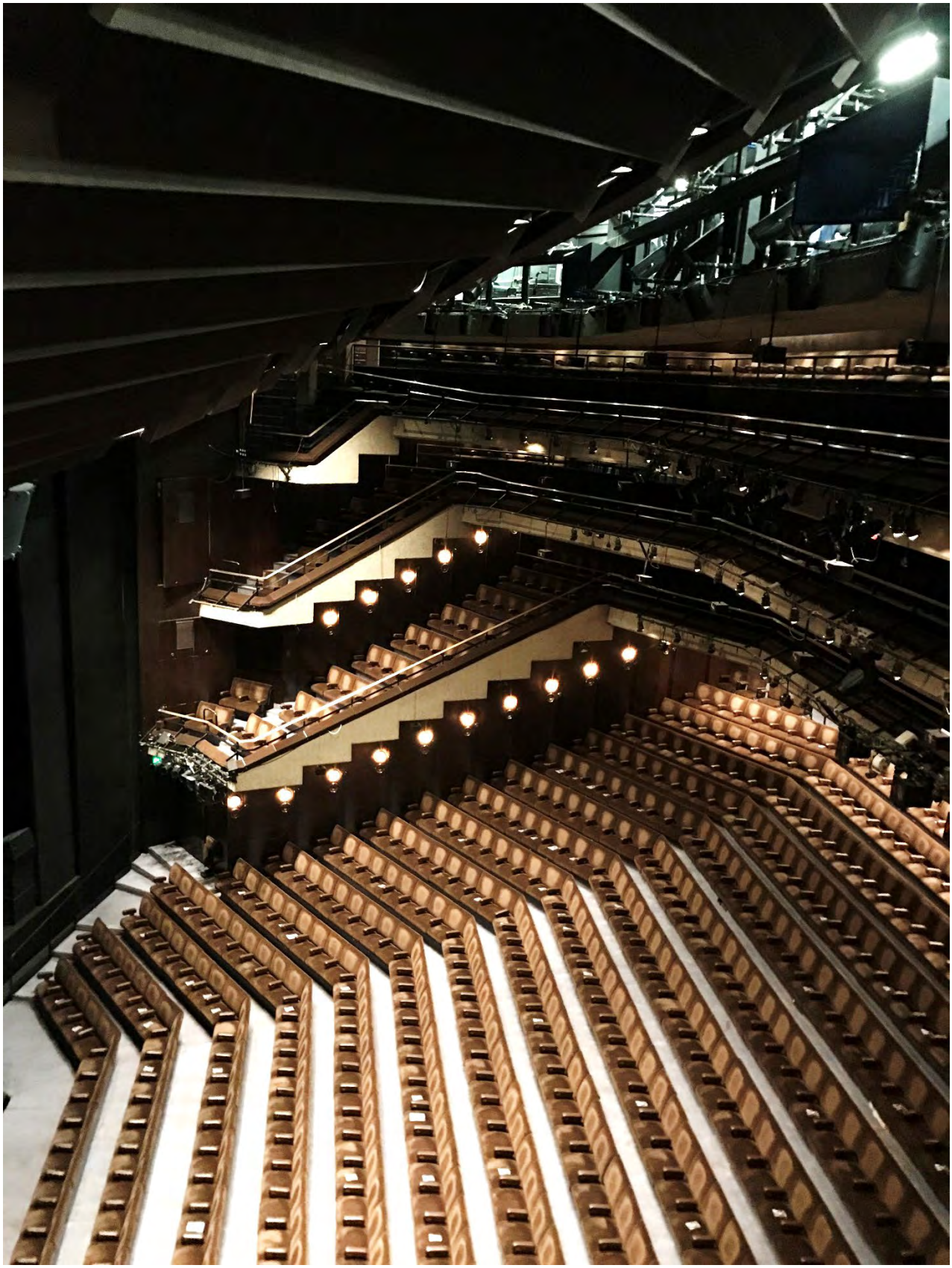
**The Piranesian character of the Theatre public stairs**



**The gangway stairs leading to the theatre interior, with individual doors for each row**



**Upper foyer showing inserted glazed screen and additional face fixed track lighting.**



**The Barbican Theatre Auditorium**

## The Barbican Theatre - Backstage Areas

1. The stage and back-of house areas account for more than half the footprint of the whole theatre and extend outwards from the auditorium to the edges of its large square perimeter, defined on the east and south by the access roadway. The stage itself modified the conventional proscenium format with a partial thrust section in the centre. The safety curtain also took the novel form of a double visor – 'the iron' – with top and bottom sections rising and lowering respectively. On the north edge adjacent the Silk Street entrance and past the Stage Door a vehicle access spur leads to the scenery loading dock with its goods lift extending down to serve the main theatre and the Pit at Levels -1.5 and -2 respectively. Behind the main stage and beneath the roadway lies the vast black box back-stage area, whilst above it the fly tower rises some 30m enabling scenic elements of other shows in repertory to be stored, whilst allowing current show scenery to fly in and out unimpeded.

2. At the lowest level (-2) are located the Green Room, a rehearsal room, a band room, a maintenance workshop and other support rooms. At upper levels the catwalks edge the stage sides and rear in a pentagonal formation, with the remaining space within the perimeter being given over to dressing rooms, wardrobe, toilets and the backstage staircases. Above the auditorium and arranged between a series of three massive hollow beams that serve the theatre as air handling ducts, are further sets of offices and meeting rooms for the theatre company staff, these spaces being toplit from upstand rooflights within the Conservatory above.

**Alterations**

3. The backstage staircases were redecorated in 2002 by the RSC in a range of bright colours to the designs of Michael Wilford. The dressing room washbasins have been replaced, and electronic keypads substituted for conventional locks. In 2013 a major upgrade of the scenery flying equipment was undertaken, replacing the original analogue arrangement with a new digital system. The lighting bridge has also been replaced with a more flexible modern equivalent. The original machinery however, being of some technical interest, has been retained for possible future exhibition. This machinery (stored in Car Park 5, Cage 22) consists of one complete windlass, a flying hoist with drive cabinets, the original patch panel and pulley/divert blocks from the original grid.

**Heritage Significance**

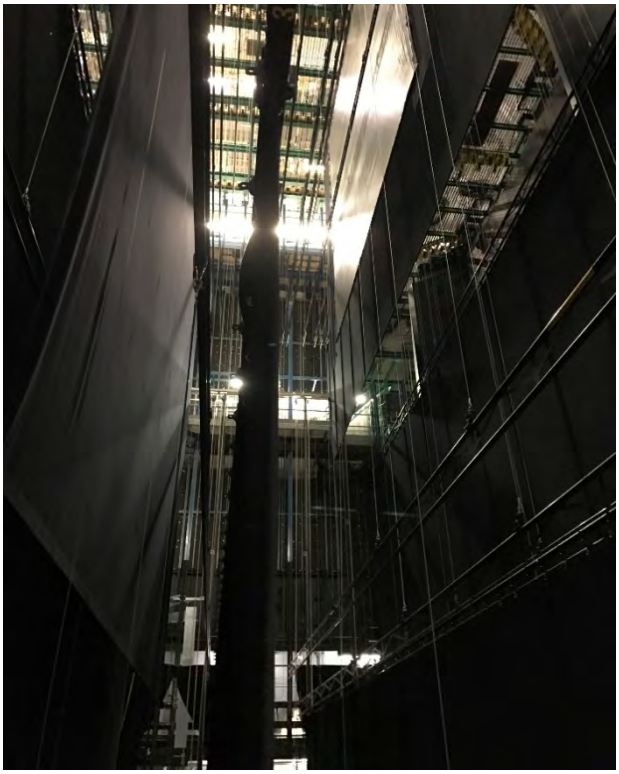
4. The backstage and supporting zones are technical working areas that have little heritage interest as such, but must remain as flexible as possible to serve the continuously evolving presentation of performances.

**Guidance**

5. Subject only to the provision that any future changes within the backstage and support areas are contained within them and do not impact on the adjacent auditorium and foyers. There are no particular constraints on such alteration and intervention that may be needed to sustain optimal operation of the venue. Indeed, the heritage interest in these areas lies precisely in their capacity to assimilate the ongoing cycle of change and renewal that is intrinsic to the workings of a successful theatre. However, the original fly machinery remains of technical interest and should be saved.

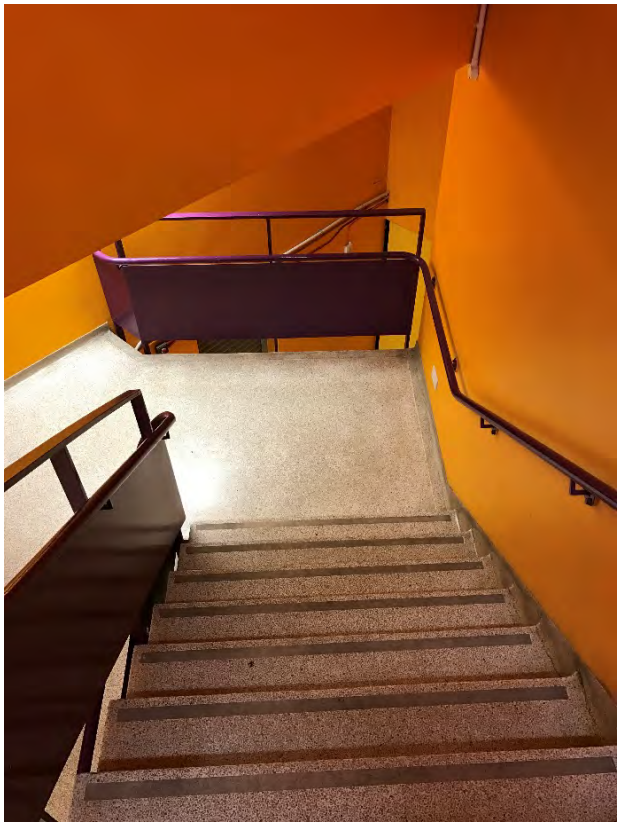
**NOTE: For offices above the Theatre on Level 2, see Office section**





**Backstage views at the Barbican Theatre – wings and flytower (right)**





**Main backstage area**

**Internal staircase, recoated but with original terrazzo**




**Stage Door by Silk Street, with scene dock lift beyond**



**Typical artist's dressing room**



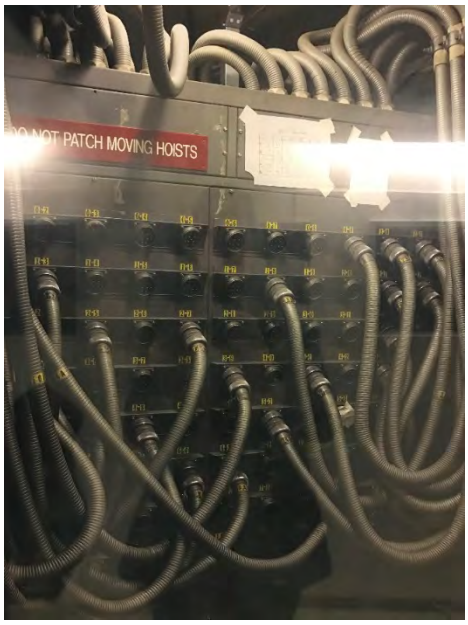


**Green Room restaurant and seating area (Level - 2)**





**Stage staff kitchen and rest area (Level - 2)**






**Record photographs of original scene flying machinery (now stored in Car Park 5, Cage 22)**



# The Barbican Theatre and Backstage Areas  Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Adjustments to extent and configuration of stage that do not entail any permanent removal of stalls seating. | Such alterations are assumed to be reversible and necessitated by temporary performance requirements only. |
| 3 | Addition to or re-arrangement of stage lighting that is at catwalk level or able to be accommodated by existing auditorium rigs. | This excludes any enlargement of lighting array that would require additional rig infrastructure within the auditorium. (See Amber category). |
| 4 | Minor like-for-like repair of damaged seating fabric | The original alternating fabric for seats and armrests must be maintained. |
| 5 | Maintenance/ refurbishment of carpet flooring or timber paneling provided this results in no change of profile or colour | The provision allows for periodic refresh works only, and excludes any intrusive work that would result in changed appearance. (See Red category). |
| 6 | Any alteration of the acoustic panels above the auditorium | Such alterations are assumed to be reversible and necessitated by temporary performance requirements only. |
| 7 | Renewal of floor finishes or re-decoration within Backstage area | Any works must be contained within the Backstage zone and not involve any coating or covering of original self-finish surfaces, (eg. original tiling or terrazzo.) |
| 8 | Replacement of any cabinetry, kitchen or sanitary fittings within the Backstage area rooms on a general like-for-like basis. | Such works are assumed to arise from general wear and tear, and not to entail any alterations of extent or floor plan. |
| 9 | Re-lamping with low energy fittings within existing luminaires | For any works that would result in visible alteration of original auditorium or foyer luminaires see Red category. |

## Interiors:  Theatre and Backstage Areas

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | Installation or extension of new lighting rig infrastructure within auditorium. | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Installation of crane, platform, control console, TV podium or suchlike within the auditorium area | To avoid LBC any such installations would need to be reversible and necessitated by particular performance requirements only. (See also Black category) |
| 3 | Enlargement of lighting/ speaker arrays either side of stage, or addition of further fittings within auditorium. | Any permanent alteration should be discussed with Planning Department to ascertain whether LBC will be required. |

## Interiors: Theatre and Backstage Areas

**RED** — **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Changes to internal floor layout in front of house zones. This includes:<br>▪ changes to size, shape and location of any enclosed or semi-enclosed areas (eg.lobbies, foyer areas, etc<br>▪ partial or wholesale removal of partition walls or addition of new full-height partitions<br>▪ alterations to or removal of internal glazed screens or introduction of new screens<br>▪ relocation/ removal of existing door positions or introduction of new doors in front of house zone | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation; |
| 2 | Any of the above changes in the backstage area that would not be contained within the existing perimeter or that would involve removal of original fittings. | |
| 3 | Installation of new catwalk decking that would be visible within auditorium | |
| 4 | Alteration of extent or replacement (other than like-for-like) of any floor finishes in front of house area. | LBC would be required for replacement or re-surfacing of woodblock flooring (other than contract cleaning, restoration/ refresh as noted in Green category) |
| 5 | Any changes to the internal elevations of auditorium, except alterations of acoustic panels. | This includes doors and panels to sides and rear of auditorium. |
| 6 | Alterations to design, extent or configuration of signage within the auditorium. | |
| 7 | Introduction of any permanent new installation, eg. platform, control console, TV podium or suchlike within the auditorium area. | Any proposal that would impact adversely on the open spatial character of the auditorium is likely to be refused. |

## Interiors: Theatre and Backstage Areas

**Black** — **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Any permanent changes to interior arrangement of auditorium, eg. levels, seating, house lights, panelling | These are all highly distinctive features of the original design. |
| 2 | Overcoating of any original self-finished surfaces in front of house area | Includes all exposed concrete areas. |
| 3 | Introduction of any new visible/ face fixed services in front of house area | Includes auditorium and foyers |
| 4 | Any alterations of public staircases, railings, etc | These are distinctive features of the original design. |
| 5 | Any alteration of front of house doors | These are distinctive features of the original design |

**NOTE** As the Barbican Theatre is a 4 star rated area of the Arts Centre in terms of heritage sensitivity any proposed works not specifically covered within the Traffic Light section above, should be treated as Category Amber and proposals discussed prior with the Planning Department to ascertain whether LBC will be required.

## The Pit Theatre

### Original Design

1. As with the roughly contemporaneous National Theatre on the South Bank, which included the small experimental Cottesloe (now Dorfmann) Theatre alongside its two main auditoria, the Barbican project also includes a studio or experimental theatre below the main auditorium – now known as The Pit – though this is believed to have been an early adaptation, having originally been intended as a rehearsal space. Located at Level -2, this occupies the full width and depth of the auditorium footprint directly above, the area being equally divided between the public/performance area itself and a rear prep/ storage zone. Audience access is via the lower flight of the main glazed staircase on the south edge of the Centre, which leads down through a glazed lobby at roadway level to a subterranean foyer shared with Cinema 1. (See below) The space itself, seating an audience of 200 is conceived as an entirely flexible black box, and is served by the scenery lift from Silk Street descending a further level from that of the main theatre.

### Alterations

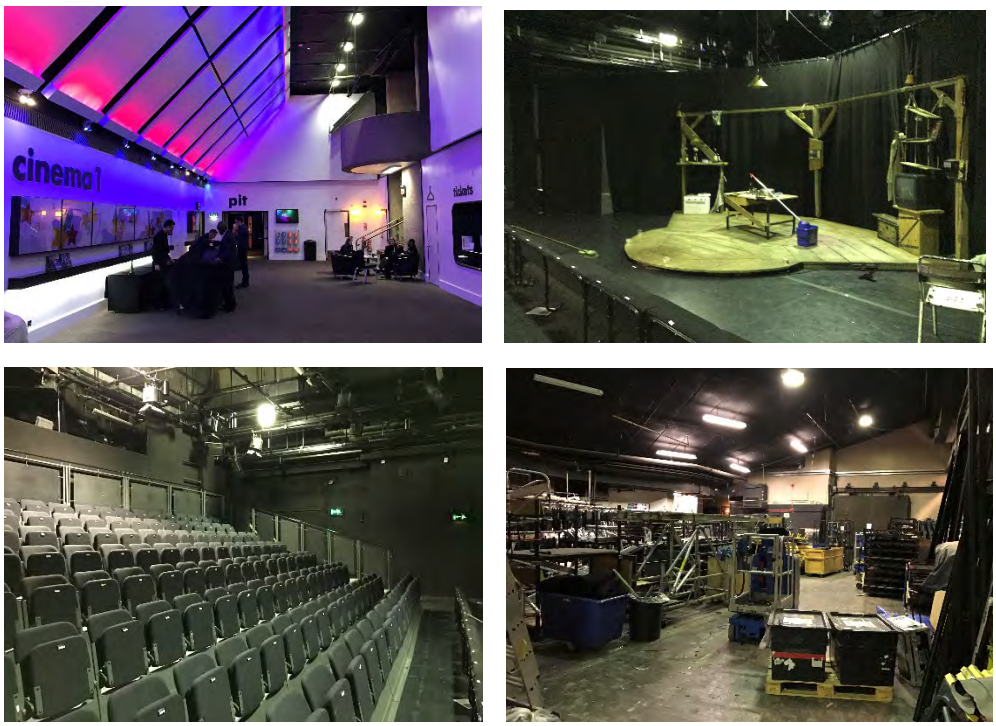
2. Specific alterations are difficult to identify, such is the venue's (quite appropriate) ambiance of improvisation and its continuous state of change to suit new performances.

### Heritage Significance

3. The principal point of significance is the presence of the venue as an experimental adjunct to the main theatre above, and in its ongoing use as such will this significance be best preserved.

**Guidance**

4. The Pit needs only to be maintained as a live venue and contained within its existing perimeter.




**Views of the foyer and stage (top), with seating and backstage area (below)**

# The Pit Theatre Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Adjustments to extent and configuration of seating within the enclosure of the space. | Such alterations are assumed to be in matching design. |
| 3 | Addition/ modification to lighting within the enclosure of the space | |
| 4 | Maintenance/ replacement of floor finishes<br>Re-decoration within the enclosed area | Any works must be contained within the theatre zone and not involve any coating of original self-finish surfaces. |
| 5 | Replacement/ re-arrangement of any theatre fittings or equipment | |
| 6 | Renewal of notices, promotional posters, etc within existing frames. | Such alterations are assumed to result from updating information and new theatre programmes, |
| 7 | | |

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | New access/ H&S installations that would extend outside the theatre enclosure. | Notification of proposals (eg. for DDA compliance) should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Relocation/ alteration of the public entry doorways | Any permanent alteration should be discussed with Planning Department to ascertain whether LBC will be required. |

## Red — Works that require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Change of use from theatre to a different public function | Change of use to night club (for example) may require Planning as well as Listed Building Consent |
| 2 | Alteration of venue enclosing walls, or introduction of permanent new walls within the free floor area | |

## Black — Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss

| | Example | Guidance |
|---|---|---|
| 1 | Change of use to a non-public function | Eg conversion of space for storage only would reduce what has become a valued part of the Barbican offer. |

## The Barbican Library

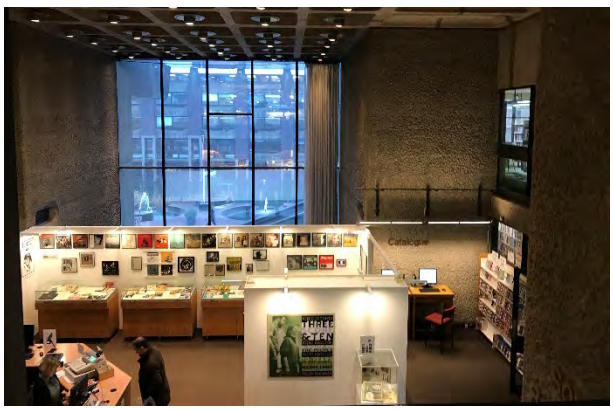
### Original Design

1. The Library was brought into the scope of the Arts Centre brief in 1964, and unlike the other principal venues within the complex, is treated as a largely open sided area suspended within the main foyer column grid with natural lighting and external views. Planned over two levels (1 and 2) the lower floor could originally be accessed from the foyer at Ground Level by means of a dog-leg staircase opposite Lakeside Terrace, (in what is now the Fountain Room) with another 'flying' staircase leading up to the second (more extensive) floor at level 2. From here a further flying staircase, dramatically spanning the triple height void, led up to the Art Gallery above. Around the interior void the floorplates are edged with the highly characteristic Barbican steel and glass guarding. (See image, p.101) Elsewhere the Library floors either about the blank perimeter of the Concert Hall (along its south edge) or overlook the Lakeside from conventional cill height windows on the south façade. This provided dramatic intervisibility to and from the foyers from multiple viewpoints and also a fine outlook for readers towards St Giles over the lake.

2. The open treatment of the floorplates also ensures that the rhythm of exposed concrete piers of the main grid visibly continues through the whole interior. As well as containing a generous stock of reference, fiction and non-fiction, the Library also offers a music section containing scores and recordings originally intended for the benefit of concert goers. Except where they are backed onto the blank walls of the Concert Hall, the books are presented in free-standing units of adjustable double-sided wooden shelving. Areas of metal slatted ceiling are used to clad low level concrete soffits. Individual carrels are installed within the southwest corner of the music section.

### Alterations

3. Two of the original staircases (from Ground to 1st and from 2nd to 3rd) have been removed to establish secure boundaries and single-entry points for the Library and the Art Gallery. As a result, the only mode of access to the Library is now via the foyer at 2nd floor level with the smaller 1st floor platform becoming in effect a satellite floor reached only from the entry floor above. The original sisal floor covering has been replaced by carpet. The original lighting arrangement of circular glass lamps centred within the recesses of the waffle slab ceiling has been supplemented by modern suspended low-energy tube fittings. A lift has been introduced to provide a wheel chair connection between the two floors. Screens have been set against some of the open balustrades.





**Views across the Library, looking south over Lakeside and north towards rear of Concert Hall**




**Approaching the Library entrance, Level 2**



**The exhibition/ display area by the Library entrance**



**Views across the Library showing intervisibility between different levels within foyer.**

**Note the signature Barbican handrail and balustrade guarding.**



**Suspended supplementary lighting tracks**



**Area of reading carrels within the Music Library**

**Heritage Significance**

1. Apart from greatly enriching the range of uses within the Barbican 'offer', the Library forms a highly visible presence within the Arts Centre foyer volume, participating in and contributing to its spatial drama. Key details of the Arts Centre elsewhere – the guarding/ handrail, the centred soffit lighting, the slatted ceiling grid – are deployed through the Library giving it continuity with the rest of the building. The furniture and fittings have a consistency of design that imparts an orderly and unified character to the library as a whole.

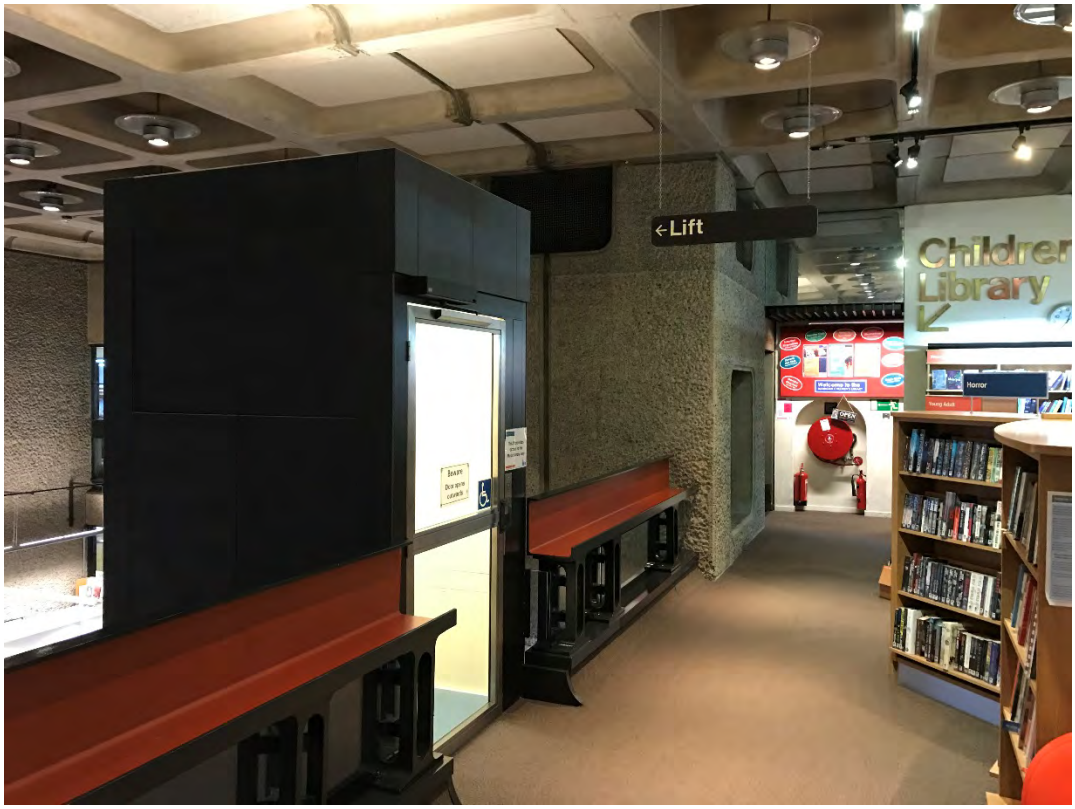
**Guidance**

2. The open character of the Library is dependent on the floor voids on both levels and use of free-standing units within the main floor area that preserve clear space between their top shelves and the underside of the ceiling. It is vital to maintain this open character by avoiding use of any taller bookcases that would block up this clear space. The only exception is the shelving that backs onto the rear walls of the Concert Hall, where the space stops anyway. The consistency of the bookcase fittings is also an important element of the Library character that is important to maintain. Any new fittings should conform to this pattern, and individual non-matching elements be avoided. The introductory exhibition area at the entrance with its changing displays (existing at the time of listing though believed not to be original) enriches the Library 'offer' and should be maintained.

3. Although the display of posters and pictures adds animation to the interior, their proliferation should be controlled and any permanent new fixtures into the expressed concrete surfaces be avoided. The views over Lakeside are an important part of the Library experience and no interventions, such as new partitions or full height shelving, should be introduced that would obscure or diminish these. Any enclosure of floor areas to provide offices or self-contained rooms should be located on the north edge, ensuring that Lakeside views are not interrupted, and floor voids are not infilled. Any enclosure on void edges should be glazed, not solid. The original unpainted soffits are continuous with the wider foyer area and should remain unpainted.



**The southern outlook from the Library windows**




**The lift connecting the two Library floors. Note consistent use of guarding detail.**

# The Barbican Library  Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Adjustments to extent and configuration of shelving that do not entail any blockage of clear views across the space. | Such alterations are assumed to be in matching design, reversible and necessitated by temporary requirements only. |
| 3 | Addition to lighting that is of uniform design with existing fittings. | This excludes any permanent change of lighting design or removal of original fittings. (See Amber & Black categories). |
| 4 | Maintenance/ refurbishment of carpet flooring | The provision allows for periodic refresh works only, and excludes any replacement that would result in changed appearance. (See Amber category). |
| 5 | Re-decoration within the Library area | Any works must be contained within the Library zone and not involve any coating of original self-finish surfaces. |
| 6 | Replacement of any cabinetry, desk fittings, display cabinets etc within the Library and entrance exhibition area on a like-for-like basis. | Such works are assumed to arise from general wear and tear, and not to entail any alterations in design. (See Amber category). |
| 7 | Renewal of notices, promotional posters, etc within existing frames, and replacement of exhibition displays using existing display cabinetry. | Such alterations are assumed to result from updating information and new exhibition programmes, not involving extending the wall coverage or making new fixings into original concrete surfaces. |

## Interiors: The Barbican Library

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | Installation or extension of new lighting fittings within the Library area. | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Installation of new bookshelving, desking, carrels or display cabinetry. | The need for LBC would depend upon the impact of such installations on the clear spatial character of the Library. |
| 3 | Complete replacement of Library floor finish. | Any permanent alteration should be discussed with Planning Department to ascertain whether LBC will be required. |
| 4 | Relocation/ alteration of the security portals | Depending on impact on the general arrangement of the Library, this may require LBC. |

## Interiors: The Barbican Library

**RED** **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Changes to internal floor layout. This includes:<br>▪ changes to size, shape and location of any enclosed or semi-enclosed areas (eg. lobbies, reception desks, carrels, storage enclosures, etc)<br>▪ introduction of new full-height partitions, screens or shelving units<br>▪ relocation/ removal of existing door or screen positions or introduction of new doors<br>▪ relocation/ alterations of the passenger lift | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br><br>New partitioning or fittings that would block the open spatial character of the Library would require LBC |
| 2 | Changes to the internal elevations of the Library shell including alterations of wall finishes, panelling or existing grid ceiling linings. | |
| 3 | Introduction of any permanent new enclosing walls around or within the free floor area, or infilling of any floor voids | Any proposals that would impact adversely on the open spatial character of the Library will be considered in relation to their impact on its significance and special architectural interest and whether any resulting harm would be outweighed by public benefit |
| 4 | Alterations to lighting that would involve removal of original fittings, or introduction of new non-matching fittings. | The centrally mounted glass fittings within the waffle slab grid are a distinctive feature of the Library. Additional lighting, if required, should extend the use of the existing suspended track installation. |

## Interiors: The Barbican Library

**Black** **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Any changes to the windows, or that would block or reduce the Library's outlook over the Lakeside. | The southern views from the Library are highly distinctive features of the original design. |
| 2 | Overcoating of any original self-finished surfaces in the Library area | Includes columns and exposed concrete ceiling areas |
| 3 | Introduction of any visible/ face fixed services in Library | Any installations involving face-fixed conduit, trunking, wiring etc are likely to be refused. |
| 4 | Alteration, or masking of any aspect of the original balustrade guarding | The steel angle handrail detail and supporting stub columns with infilled glass panelling are highly distinctive features of the original design used throughout the Barbican. |
| 5 | Introduction of any new false ceiling areas | Includes any intervention that would obscure visible extent of the main concrete soffit. |

## The Barbican Art Gallery

**Original Design**

1. Like the Library, the Art Gallery was originally conceived in early scheme designs as a stand-alone separate building before it became integrated into the composite Arts Centre complex. The as-built plans show the gallery extending over two levels (now Levels 3 and 4) with two staircases connecting these internally as well as linking down to the Library on Level 2. The principal floor was planned to give onto a sculpture court (the Concert Hall roof) on the north side, framed by Frobisher Crescent, and on the south a series of open terraces separated and supported by large intermediate planter troughs acting as cantilevers from the main structural piers.

2. The upper level was arranged as a series of eight discrete pavilions or pods accessed by a continuous figure-of-eight gallery bisecting and overlooking two open wells. Whilst the lower level was extensively glazed to provide natural light and views out north and south, the upper level was toplit by a grid of rooflights, with the pavilions presenting externally as solid white tile-clad boxes that define the volumetric modelled character of the Arts Centre as viewed from the south. On the west end a further elongated pod on Level 4 (with its own escape stair) extends over the grand flight of entrance steps leading up from the Barbican podium. Adjacent is a smaller staff room and goods lift originating from Level -1.5.

**Alterations**

3. The main structural alteration has been the removal of the lower staircase and void that connected the Gallery with the Library, such that the two venues are now managed as separate institutions. The relationship of the Gallery with its immediate external spaces – the sculpture court and the terrace - has also been largely severed on the north side by the introduction of a row of offices partitioned off from the exhibition space, and on the south by blocking off the series of glazed screens along the façade. Additionally, the west entrance has also been closed to enable access to the venue to be controlled from a single direction, the foyer on Level 3. Finally, the rooflights have also been blocked out, albeit by removable covers.

4. As a result the Gallery has been transformed into an autonomous ‘black box’ space, with its own retail area and controlled environmental conditions and entirely lit by internal artificial lighting. Additionally, the original floor covering appears to have been replaced by a polished screed finish. Other alterations include overpainting of originally exposed concrete soffits in white, and replacement of the original flat rooflights with a series of pyramidal lights for improved weather resistance. The foyer access at Level 4 has also become an emergency exit/ staff door only.

**Heritage Significance**

5. Whilst the various alterations noted above have made the Gallery more usable (and its exhibits capable of being suitably insured) by virtue of being wholly amenable to independent internal modification and controllable by artificial lighting to suit different exhibition requirements, the original heritage significance of its several relationships to the exterior has been all but lost. The Gallery’s volumetric modelling, the tiled finishes and the terrace planters nonetheless remain key aspects of the external identity of the Arts Centre as experienced from the south, west and north.

1. With the exception of the offices along the north side of Level 3, the rooflights and overpainting of soffits, all the above alterations are however believed to be reversible. The offices and support areas have no heritage interest in themselves.

**Guidance**

2. The various ways in which the original sources of natural light to the Gallery have been blocked off are all generally reversible, which protects the opportunity to retrieve much of the original character of the space, should this ever be regarded as a desirable objective. It is therefore recommended that any proposals to render these alterations permanent should be avoided. Furthermore, any exhibition installation designs that enable the availability of natural light to be exploited – and thereby the original character of the Gallery to be experienced even temporarily by visitors – should be encouraged. Similarly, no alterations should be made that would permanently prevent opportunities being exploited to provide access to the Gallery from the west portico or to exhibit sculpture in Frobisher Court, when circumstances permit. In this way the original heritage significance of the Gallery should be future proofed.









**Sculpture Court in use as originally intended (1981)**



**The Art Gallery, now a black box space**



**The internal staircase**



**Painted soffit with removable black-out panels**



**Staff offices overlooking Frobisher Crescent**



**View of replacement rooflights from within staff office**



**View of staff office within west facing pod**

# The Barbican Art Gallery  Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Any new exhibition installations that do not entail permanent alterations of the Gallery shell. | Such installations are assumed to be reversible and necessitated by temporary requirements only. |
| 3 | Additions to lighting for specific exhibitions that forms part of the temporary installation. | This excludes any permanent change of lighting design or removal of original fittings. (See Amber & Black categories). |
| 4 | Maintenance/ refurbishment of screed flooring | The provision allows for periodic refresh works only, and excludes any replacement that would result in changed appearance. (See Amber category). |
| 5 | Re-decoration within the Gallery area | Any works must be contained within the Gallery zone and not involve any coating of original self-finish surfaces. |
| 6 | Replacement of any cabinetry, desk fittings, display cabinets etc within the Gallery and shop area on a like-for-like basis. | Such works are assumed to arise from general wear and tear, and not to entail any alterations in design. (See Amber category). |
| 7 | Renewal of notices, promotional posters, etc within existing frames, and replacement of exhibition displays using existing display cabinetry. | Such alterations are assumed to result from updating information and new exhibition programmes, not involving extending the wall coverage or making new fixings into original concrete surfaces. |

## Interiors: The Barbican Art Gallery

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | Installation of permanent new lighting fittings within the Gallery area. | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Complete replacement of the Gallery floor finish. | Any permanent alteration should be discussed with Planning Department to ascertain whether LBC will be required. |
| 3 | Reconfiguration of the Gallery shop area | Depending on impact on the general arrangement of the Gallery, this may require LBC. |

## Interiors: The Barbican Art Gallery

**RED** — **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Permanent changes to internal floor layout. This includes:<br>▪ changes to size, shape and location of any enclosed or semi-enclosed areas (eg. lobbies, offices, storage enclosures, etc)<br>▪ introduction of new full-height partitions, screens or display units<br>▪ relocation/ removal of existing entrance doors or screen positions or introduction of new doors | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br><br>New partitioning or fittings that would alter the original shell of the Gallery would require LBC |
| 2 | Any alteration of the design of the blackout panels to the rooflights | Such alterations could impact on the original manifestation of rooflight positions. |
| 3 | Alterations that would affect access to, or extent of planting of the terraces along the south facing facade | Any alterations that would manifest externally would require LBC |

## Interiors: The Barbican Art Gallery

**Black** — **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Any changes to the windows and rooflights that would permanently block or reduce the Gallery's outlook over the Lakeside or availability of toplighting. | The southern and northern views from the Gallery are features of the original design that should remain available for potential future use of natural lighting |
| 2 | Permanent infilling of floor voids, Level 4 | Excludes temporary installations for specific exhibition needs. (Refer Green 2) |
| 3 | Overcoating of any remaining original self-finished surfaces in the Gallery area | Includes columns and exposed concrete ceiling areas |
| 4 | Introduction of any new visible/ face fixed services in Gallery | Any installations involving face-fixed conduit, trunking, wiring etc are likely to be refused. |
| 5 | Alteration, or masking of any aspect of the original staircase handrail or balustrade guarding | The steel angle handrail detail and supporting stub columns with infilled glass panelling are highly distinctive features of the original design used throughout the Barbican. The temporary use of the handrail section for mounting exhibition information plaques would not require LBC |
| 6 | Introduction of any permanent new false ceiling areas | Includes any intervention that would obscure visible extent of the main concrete soffit. |

## The Curve

**Original Design**

1. The Curve is located on Ground Level in the space between the rear of the Concert Hall and the semi-circular ramp of the Barbican internal roadway. Original plans show the area as an open ambulatory continuous with the foyer and reached by descending a few steps from the Silk Street entrance lobby. As the other mode of access to the main foyer from this entrance involved descending to the Mezzanine (Level -1) and then walking back up, it seems likely that many visitors would have used the Curve as the most comfortable way of reaching the foyer on the south of the Concert Hall – the heart of the venue. At each end of the space are doorways from the rear of the Concert Hall stalls. Although the space was furnished with several of the large Robin Day sofas and used to exhibit artworks of various kinds, it was not enclosed or branded as a destination as such.

**Alterations**

2. The Curve space is now enclosed with screens at each end and operates as a stand-alone black-box gallery and used for its own exhibitions, events and private functions. By introducing the ramped bridge connecting the Silk Street entrance with the main foyer overlooking Lakeside, the half-flight staircase originally reconciling its floor level with that of the entrance has been relocated within the gallery itself beyond a short landing. (The same ramped bridge intervention has necessitated the introduction of a further new staircase to retain the connection with the Concert Hall.) The interior walls have largely been lined out with flush boarding to facilitate redecoration for changing displays, while eye bolts have been inserted in the concrete ceiling to enable Unistrut sections to be rigged as necessary for hanging lighting and exhibits. A small platform lift has recently been installed to deal with the change of level inside the entrance.

**Heritage Significance**

3. Although the enclosure of the space has altered its relationship with the free-flowing foyer, the principal architectural interest of the Curve inheres in its unfolding shape and lofty scale. It draws the echo of Frobisher Crescent into the Centre, and offers a highly distinctive environment for events, display and perambulation. It adds yet another experience to the rich lexicon of Barbican spaces.

**Guidance**

4. Now that the Curve has become a self-contained venue in its own right, it must necessarily serve the functions of a gallery and changing display facility. Most of its original wall surfaces having been concealed behind paneling so there is no constraint on when and how the paneling itself is used or redecorated. However, where there is original exposed aggregate concrete, it should remain uncovered. The provision now made for suspending exhibits from the ceiling enables any installations to be introduced and removed without lasting implications. Whilst the west screen has been masked, the entry screen at the east end should preferably remain clear so that the existence of the space registers with arriving visitors. Provided there is no permanent intervention that would interrupt or diminish the continuity and scale of the whole spatial experience the Curve may continue to function as a flexible display and events venue without detriment.



**View of new staircase adjacent the Silk Street entrance lobby. Platform lift visible, near right. (placeholder image)**



**A temporary display fixed from Unistrut**




**The masked screen at the west end**

# The Barbican Curve  Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Any new exhibition installations that do not entail permanent alterations of the Curve shell. | Such installations are assumed to be reversible and necessitated by temporary requirements only. |
| 3 | Additions to lighting for specific exhibitions that forms part of the temporary installation. | This excludes any permanent change of lighting design or removal of original fittings. (See Amber & Black categories). |
| 4 | Maintenance/ refurbishment of screed flooring | The provision allows for periodic refresh works only, and excludes any replacement that would result in changed appearance. (See Amber category). |
| 5 | Re-decoration within the Curve enclosure | Any works must be contained within the Curve and not involve any coating of original self-finish surfaces. |
| 6 | Introduction of any cabinetry, desk fittings, display cabinets, buffet bars etc within the Curve in connection with temporary exhibitions and events. | Such works are assumed not to entail any alterations in the enclosure shell. (See Amber category). |
| 7 | Renewal of notices, promotional posters, etc within existing frames, and replacement of exhibition displays using existing display cabinetry. | Such alterations are assumed to result from updating information and new exhibition programmes, not involving making new fixings into original concrete surfaces. |

**Interiors:  The Barbican Curve**

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | Installation of permanent new lighting fittings within the Gallery area. | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Permanent installation of new fixed furniture or display cabinetry. | The need for LBC would depend upon the impact of such installations on the clear spatial character of the Curve. |
| 3 | Complete replacement of the Curve floor finish. | Any permanent alteration should be discussed with Planning Department to ascertain whether LBC will be required. |

## Interiors: The Barbican Curve

**RED** **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Permanent changes to internal floor layout. This includes:<br>▪ introduction of new full-height partitions, screens or display units<br>▪ relocation/ removal of existing entrance doors or screen positions or introduction of new doors. | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br><br>New partitioning or fittings that would permanently alter the original shell of the Curve would require LBC |
| 2 | Introduction of any new visible/ face fixed services on remaining original self-finished surfaces | Any proposal that would impact adversely on the open spatial character of the Curve is likely to be refused. |

## Interiors: The Barbican Curve

**Black** **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Overcoating of remaining original self-finished surfaces in the Curve area | The exposed concrete ceiling areas should remain uncoated. |
| 2 | Introduction of any permanent new enclosing walls around or within the free floor area | Any proposal that would impact adversely on the open spatial character of the Curve is likely to be refused. |
| 3 | Introduction of any permanent new false ceiling | |

## Cinema 1 and Frobisher Crescent Cinemas

**Original Design**

1. The Barbican originally contained three cinemas – Cinema One on Level -2, and Cinemas Two and Three at each end of Frobisher Crescent on Level 4. Cinema One was the premier venue, being reached by the main southern staircase via a foyer shared with the Pit Theatre (see above). The staircase was decorated with a specially commissioned mural by the artist Gillian Wise. The foyer itself was originally a simple black box space resembling a back stage area, with an array of lights suspended from an exposed steel grid. The raked cinema was furnished with brightly coloured seats arranged in a randomized pattern. The walls were lined with serrated fibrous plaster mouldings.

2. Cinemas Two and Three were of smaller capacity, being formatted within the width of Frobisher Crescent. They are also raked with a front stage and rear projection cabin. In all cases the inclusion of a small platform or 'stage' in front of the screen enabled the spaces to be used for other types of event such as colloquiums, award ceremonies and the like.

**Alterations**

3. The Cinema One foyer has been substantially altered by the insertion of a sloping false ceiling over half of the floor area, and the application of painted plasterboard linings around the remaining walls. New lighting and graphics have been installed. Pentagram's work in the mid-1990s introduced a free-standing box office in the centre of the foyer, relegating the former box office to becoming a secondary sales kiosk. The 2000 masterplan reinstated the original arrangement. Within the cinema itself the original seating has been changed and now has a uniform upholstery finish. The fibrous plaster wall linings appear to be original, though redecorated. The lighting installation has also been upgraded with new fittings and lamps.

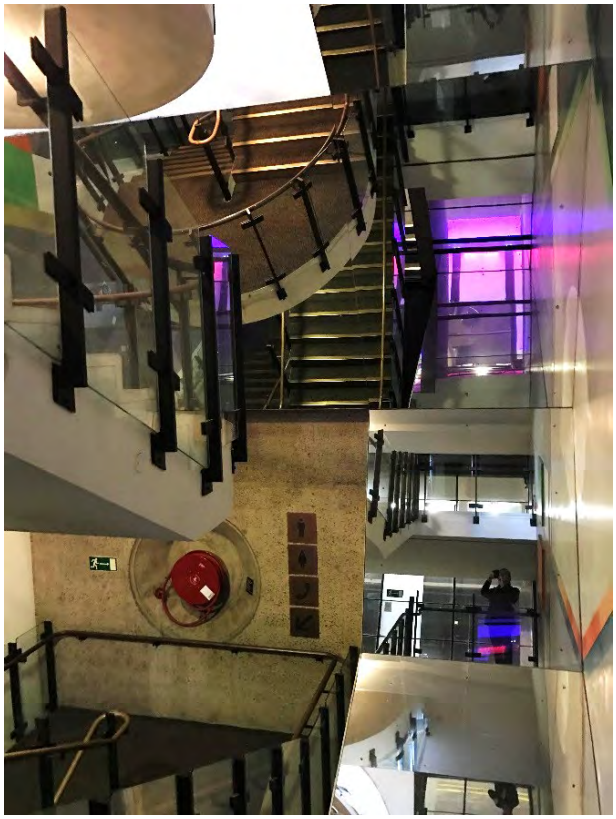
4. Cinemas Two and Three have been completely refitted and following the conversion of the upper floors of Frobisher Crescent to residential use, have effectively become lecture auditoria as distinct from cinemas to avoid problems of noise disturbance. Their original function has been relocated to the new cinemas formed within the Exhibition Halls on Beech Street. (See below)

**Heritage Significance**

5. As so little of the original fittings and furnishings of the cinemas remain their heritage significance consists chiefly in the continued use of the spaces themselves as places of public assembly and entertainment, and as such, evidence of the rich diversity of the original Barbican Arts Centre 'offer'.

**Guidance**

6. As indicated above, there are no particular heritage sensitivities in relation to any of the three cinemas other than preserving their use as public auditoria. However, there are certain details to be safeguarded including such items as the distinctive Barbican doors, the fibrous plaster moldings, the toilets in Cinema One and the Gillian Wise mural. In the event of new wheelchair access requirements, refer to section on Special Needs at the beginning of this document.






**Views of staircase and mural down to Cinema 1, and the foyer with new ceiling, wall linings and graphics.**



**Original view of Cinema One, with its multi-coloured seating.**




**One of the cinemas in Frobisher Crescent, now used as a lecture auditorium.**

## Cinema 1 and Frobisher Crescent Cinemas  Traffic Light section

**Green** — **Works that will not require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Any new installations that do not entail permanent alterations of the cinema shells. | Such installations are assumed to be reversible and necessitated by temporary fit-out requirements only. |
| 3 | Amendments to lighting within existing fit-out | This excludes any permanent change of lighting design or removal of original fittings. (See Amber & Black categories). |
| 4 | Maintenance/ refurbishment of flooring | The provision allows for periodic refresh works only, and excludes any replacement that would result in changed appearance. (See Amber category). |
| 5 | Re-decoration within the cinema enclosures | Any works must be contained within the cinema and not involve any coating of original self-finish surfaces. |
| 6 | Introduction of any cabinetry, desk fittings, display cabinets, buffet bars etc within the Cinema One foyer in connection with temporary festivals and events. | Such works are assumed not to entail any alterations in the enclosure shell. (See Amber category). |
| 7 | Renewal of notices, promotional posters, etc within existing frames, and replacement of exhibition displays using existing display cabinetry. | Such alterations are assumed to result from updating information and new film programmes, not involving making new fixings into original concrete surfaces. |

### Interiors:  Cinema 1 and Frobisher Crescent Cinemas

**Amber** — **Works where advice should be sought to determine whether a LBC application is required**

| | Example | Guidance |
|---|---|---|
| 1 | Installation of permanent new lighting fittings within the Cinema One foyer or cinema enclosures | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Permanent installation of new fixed furniture or cabinetry in Cinema One foyer | The need for LBC would depend upon the impact of such installations on the spatial character of the foyer. |
| 3 | Complete replacement of upholstery or floor finishes. | Any permanent alteration should be discussed with Planning Department to ascertain whether LBC will be required. |

## Interiors: Cinema 1 and Frobisher Crescent Cinemas

**RED** — **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Permanent changes to internal floor layout. This includes:<br>▪ introduction of new full-height partitions<br>▪ relocation/ removal of existing entrance doors or introduction of new doors.<br>▪ Introduction of any permanent new enclosing walls around the free floor area | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br>New partitioning or fittings that would permanently alter the original shells of the cinemas would require LBC |
| 2 | Introduction of any new visible/ face fixed services on remaining original self-finished surfaces | If such installation/s are required, eg. for H&S reasons, the most visually unobtrusive routes and material/s should be specified, avoiding red coated wiring if possible. |
| 3 | Alterations to arrangement or finishes of toilets in Cinema One | As these have remained in their original form any significant intervention is likely to require LBC |
| 4 | Change of public use<br>▪ | Change of use to, say, night club, bar or the like would require Planning as well as Listed Building Consent |

## Interiors: Cinema 1 and Frobisher Crescent Cinemas

**Black** — **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Overcoating of any remaining original self-finished surfaces in the cinemas and foyer (eg,. staircase) | The exposed concrete areas should remain uncoated. |
| 2 | Introduction of a new use that would entail permanent alteration of the original cinema shells. | The spaces should remain venues of public entertainment. Any proposals for conversion to non-public use, eg. office or residential use are likely to be refused. |
| 3 | Any intervention that would conceal or remove the Gillian Wise murals | These are distinctive original features that contribute to the special interest of the Arts Centre |

**NOTE: The new cinemas on Beech Street are dealt with in the Exhibition Halls section**

## The Offices within the Barbican Centre

**Original Design**

1. There are several areas of offices within the Arts Centre and also within the lower levels of Frobisher Crescent (the upper floors having been converted from offices to residential use.) On level 2 immediately below the Podium, the large irregularly shaped floorplate north of Frobisher Crescent and edged by Silk Street and Beech Street on the east and north respectively contains offices and support facilities for a variety of departments, including Management, Finance and Technical/estates.

2. On the same level, within the arc of Frobisher Crescent is another range of offices, currently occupied by Customer Experience, IT and Music Departments. Only those offices overlooking Silk Street, and adjacent the small enclosed courtyard wrapped around the east stair turret, receive natural light directly through conventional windows. Those alongside the inner and outer edges of Frobisher Crescent look out into the covered walkway of the crescent itself.

3. Within the perimeter of the Theatre, also at level 2, theatre staff offices are located between the massive hollow beams/ ducts that span onto the proscenium portal. These are toplit from rooflights within raised plinths in the Conservatory. (See Conservatory Section.)

4. In Frobisher Crescent staff offices for the Art Gallery, the LSO, Development, Commercial and Corporate Events fill the entire arc at Level 6, while Level 4 is occupied by suites of meeting rooms and a corporate reception area – the Frobisher Hub – the upper volumes of these spaces extending into Level 5. At the southern ends of the crescent on these levels are the original Cinemas 2 and 3. (See Cinema Section.)

**Alterations**

5. There have been innumerable local modifications within the above areas, although all the spaces registered as offices on the original plans remain in this use. Frobisher Crescent (Level 4) has been completely re-fitted to a high standard. Radial subdivision of the meeting rooms is now at closer intervals, though retractable screens allow the spaces to be conjoined if required. Running directly adjacent the Theatre west wall on Level 2, a new tranche of offices has been introduced into the main walkway connecting Frobisher Crescent with the southern glazed stair tower. This has approximately halved the width of the walkway and receives only indirect light from the covered corridor itself. With the latter exception, the original envelope of these offices remains in place.

**Heritage Significance**

6. Whilst heritage significance may be attributed to the continuing use of the above areas for their original office purpose, so much of the interior arrangements and fit-out has now been changed that there is minimal heritage sensitivity in relation to their future internal modification in response to new operational demands. This is subject only to the proviso that any such change is contained within existing original envelopes and that their exterior facade fabric remains unaffected.

**Guidance**

7. As noted above, care should be taken to ensure the exterior facades of office areas remain unchanged. Where original materials and details remain, these should be preserved.






**Office windows overlooking Silk Street (Level 2)** **Internal corridor reconfigured**





**Silk Street offices with original windows and expressed mushroom columns**



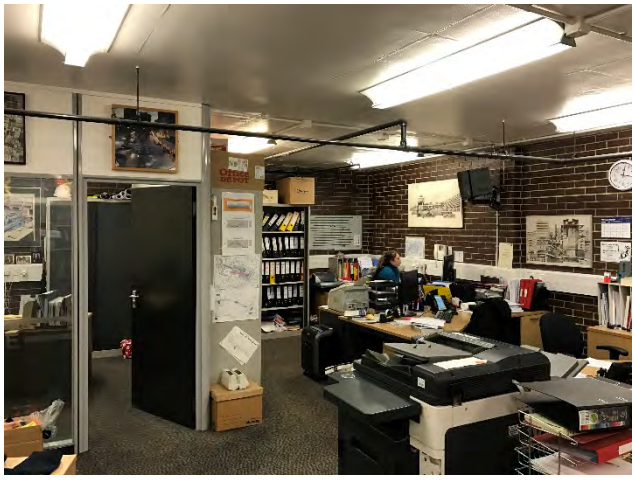


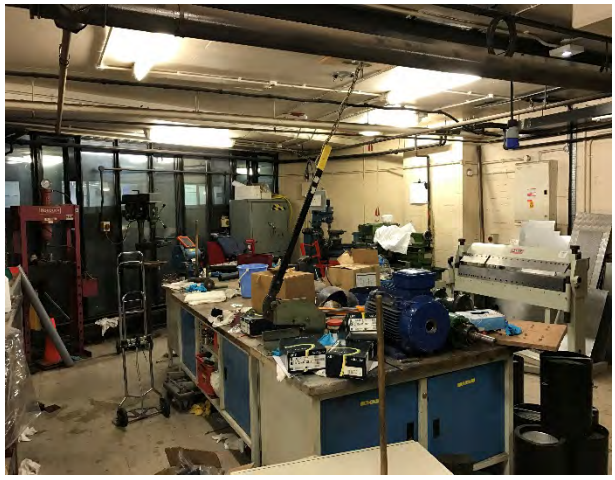
**Staff offices surrounding the enclosed courtyard around eastern staircase turret**





**Offices surrounding Frobisher Crescent walkway, showing original close mullioned façade screen**

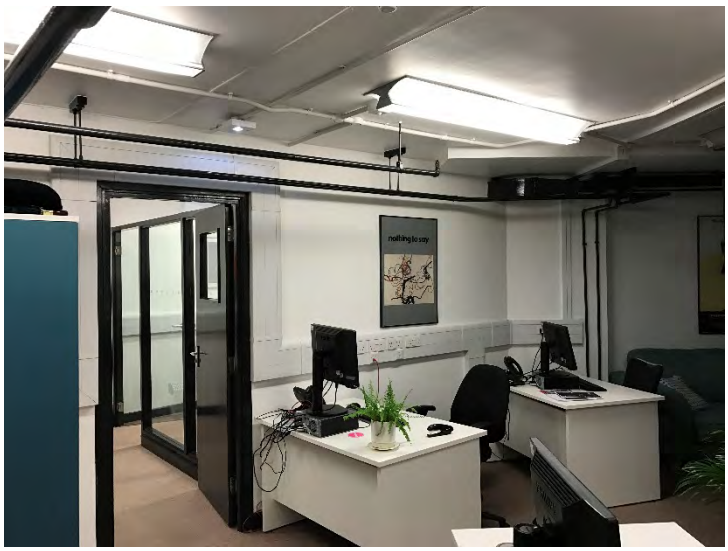




**Typical office (above) and workshop (right) in the zone adjoining Frobisher Crescent**



**Internal corridor with original tile floor**



**Typical recent office refit**





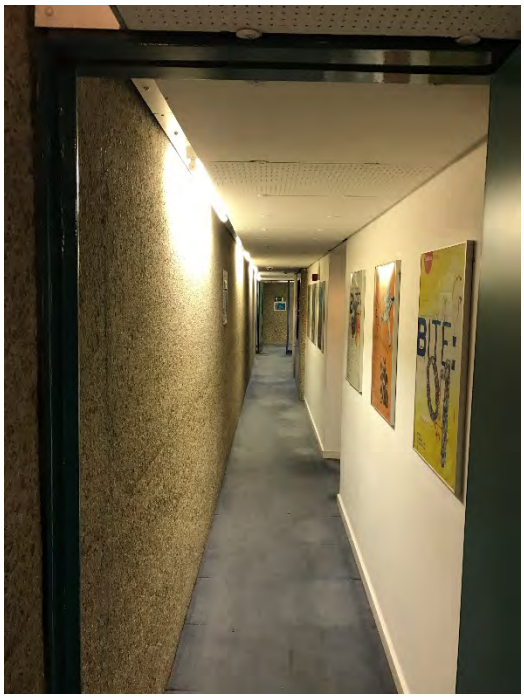
**Typical corridor views within Theatre area (Level 2)**



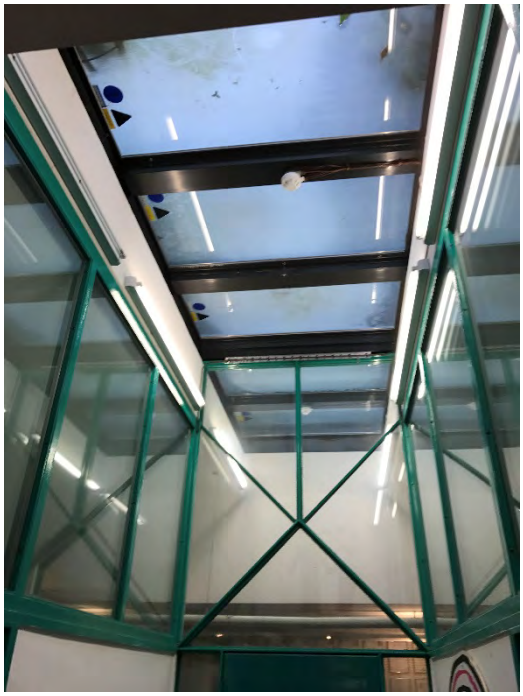
**Internal office toplit from Conservatory**



**Original oval slotted duct detail**



**Corridor with original exposed concrete**



**Glazed toplight detail**



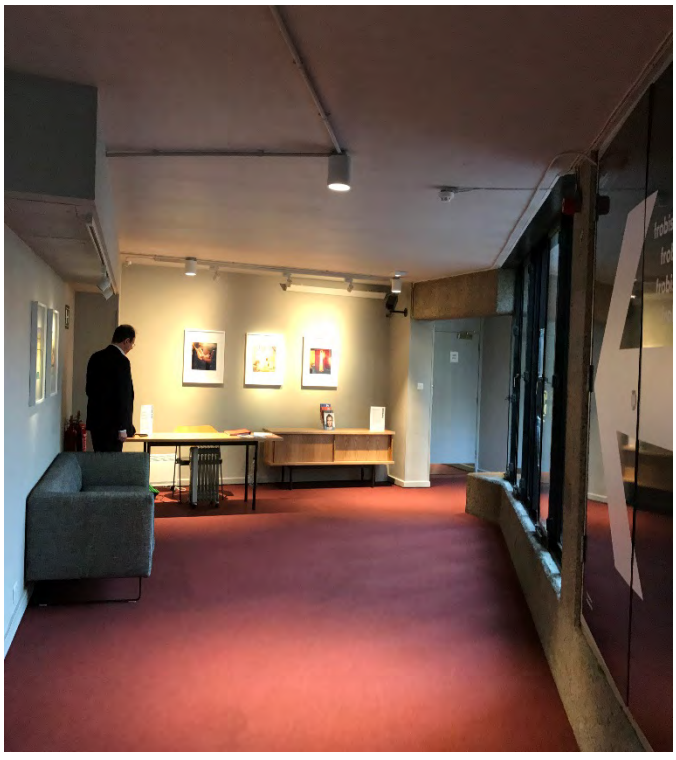
**Frobisher inner gallery, Level 5**



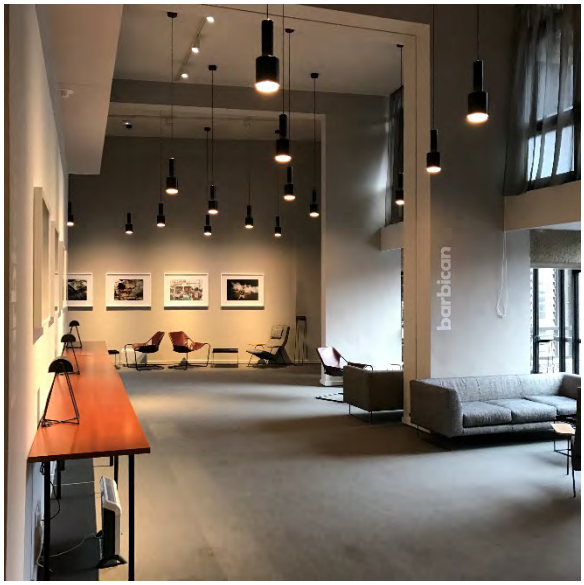

**Frobisher outer gallery, Level 4 – The Hub**

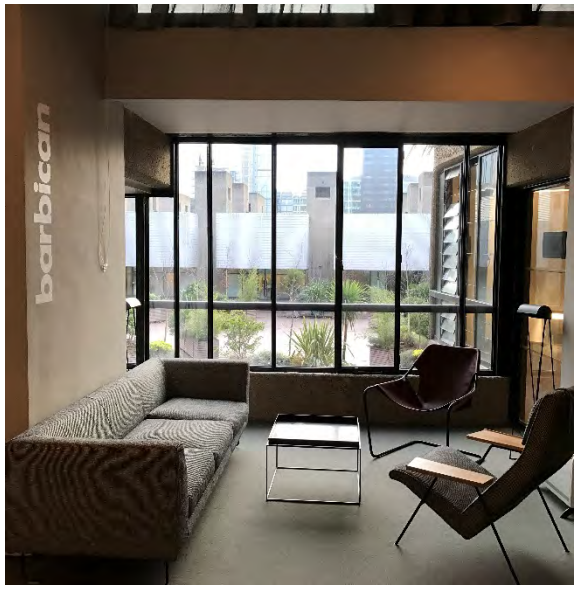


**Frobisher corridor, Level 4**



**Reception / Sign in area**




**Frobisher Hub Reception Suite (Level 4)**



**Meeting Room with retractable partition**



**New partition for separate access to lecture suite**



**Window detail with new double glazing**




**Typical office interiors, Level 6.**




**Original external façade windows and screens remain, with exposed uncoated concrete elements.**





**New tranche of offices formed within main north-south walkway, Level 2**

# The Barbican Offices Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Any new installations or refits that do not entail permanent alterations of the building shell. | Such installations are assumed to be contained within existing office area footprints. |
| 3 | Additions to/ replacement of lighting within office space. | This excludes any permanent change of lighting design or removal of original fittings. (See Amber category). |
| 4 | Maintenance/ replacement of carpet flooring. | The provision excludes any new covering/s that would result in changing original tile or terrazzo finishes. |
| 5 | Re-decoration within the office areas | Any works must be contained within the office zone and not involve any coating of original self-finish surfaces. |
| 6 | Replacement of any cabinetry, desk fittings, shelving, cupboards, etc within office areas. | Such works are assumed to arise from general wear and tear, or to suit new operational requirements. ( |
| 7 | Renewal of notices, signage, promotional posters, etc within existing frames. | Such alterations are assumed to result from updating information and new exhibition programmes, not involving extending the wall coverage or making new fixings into original concrete surfaces. |

**Interiors: The Barbican Offices**

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | Installation of permanent new lighting fittings within office areas that would manifest externally | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Installation of permanent new fittings within Frobisher gallery corridors, eg reception counters, etc | The need for LBC would depend upon the impact of such installations on the spatial character of the gallery. |
| 3 | Reconfiguration of spaces within the Hub area | Any permanent alteration should be discussed with Planning Department to ascertain whether LBC will be required. |
| 4 | Removal of original ceiling panels | Includes original slotted oval duct and ceiling panels. |
| 5 | Refitting of catering kitchen within FrobisherHub area | Any re-fit would need to be contained within the existing shell. Otherwise treat as Red category. |

## Interiors: The Barbican Offices

**RED** **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Permanent change to a whole office area footprint. This includes:<br>▪ changes to size, shape and location of any whole office areas (including lobbies, corridors, etc)<br>▪ relocation/ removal/ alteration of existing Barbican style entrance doors or introduction of new doors | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br>New partitioning or screens that would alter the exterior line of the original shell of the office area would require LBC.<br>Only like-for-like works are likely to be permitted. |
| 2 | Replacement or modification of original windows, screens or close mullioned façade screens on Frobisher Crescent. | Any alterations that would manifest externally would require LBC. Includes introduction of double glazing where none currently exists. |
| 3 | Alteration or replacement of lighting along Frobisher gallery corridors that would manifest externally | |

## Interiors: The Barbican Offices

**Black** **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Any changes to the original external windows and screens that would materially alter their appearance. | The Silk Street office windows and the southern and northern screens around Frobisher external galleries are key features of the original design. |
| 2 | Overcoating of any remaining original self-finished surfaces in the office areas. | Includes columns, brickwork and exposed concrete beams, upstand walls, ceiling areas in corridors and galleries, tiling and terrazzo. |
| 3 | Introduction of any permanent new enclosing walls within the Frobisher Hub area | Any proposal that would impact adversely on the exterior form or open flexible character of the Hub is likely to be refused. |
| 4 | Introduction of any new visible/ face fixed services or service apparatus on external surfaces | Any installations involving face-fixed conduit, trunking, wiring etc are likely to be refused. |
| 5 | Alteration, or masking of any aspect of the original staircase handrails or door ironmongery. | The brass handrail detail and door furniture are highly distinctive features of the original design and part of the Barbican livery. |
| 6 | Proposals for permanent change of use of a whole office area | A change of use that could have knock-on effects on adjacent public areas of the Centre is likely to be refused. |

## The Restaurants within the Barbican Arts Centre

**Original Design**

1. The original scope of amenities for the Arts Centre as recommended in Anthony Besch's report of 1964 included "an extensive range of catering facilities". Accordingly, the architects designated a prime location for these on the south side of the complex adjacent the wide terrace overlooking the lake. Three different venues are arranged in tiers, the lowest giving directly onto the public terrace, the middle tier exploiting the roof of the lowest as its own terrace, and the top tier enjoying an elevated view across the water to St Giles. The exterior is finished in white tiling that acts as a counterfoil to the tiled elements – the Library and the Art Gallery – on the west side of the central stairtower. The facilities are serviced from the internal roadway at Level -1, with staff rooms, office and storage areas on Levels -1 and -1.5. Toilets for all three restaurants are configured in a cylindrical turret at the east end of the catering block.

**Alterations**

2. The three venues are licensed and present a range of catering and ambience choices. The concessionaire has changed over the years but is typically established as follows. At Ground level is a canteen type cafeteria with open food counters and shared refectory tables. Level 1 provides a mid-range restaurant offer, and on Level 2 is a comfortable restaurant for more formal dining.

3. All the interiors have undergone successive fit-outs, but the following features do remain. In the ground level cafeteria, the floor and ceiling finishes remain respectively as brick tile (albeit a replacement finish continuous with the external paving) and exposed concrete waffle slab (albeit painted in defined areas). In the case of the upper floors only the soffits remain partially exposed, though also painted, other elements of the interiors having been entirely re-fitted. Original terrazzo and tiling finishes remain in the toilet areas. The original doors and windows also generally remain intact.

**Heritage Significance**

4. The heritage significance of these areas consists essentially in the continuing use for their original purpose and their contribution to the overall diversity of the Barbican Arts Centre offer. However, where original features and finishes remain, as noted above, they continue to exhibit heritage significance and should be conserved.

**Guidance**

5. The heritage sensitivities in relation to any of the three restaurants relate to preserving their use as public catering venues, though not excluding other hospitality and private hire functions. Where specific original details remain, they should be safeguarded as representing part of the essential Barbican character. Such items include the distinctive Barbican doors, tile and terrazzo wall and floor finishes, any original exposed concrete surfaces and exposed waffle slab soffits, and the windows on all levels. The ground floor toilets are of some significance in having retained their original form and finishes, though sanitaryware may require replacement in the future. Any commercial restaurant signage should be subservient to the main Barbican venue and wayfinding signage and not be unduly dominant when seen from the foyers and circulation areas.






**The Cafeteria at Ground Level adjacent Lakeside, currently the 'Barbican Kitchen'.**






**The mid-level restaurant Level 1, currently the 'Bonfire'.**




**The formal dining restaurant Level 2, currently the 'Osteria'.**

# The Interior : The Barbican Restaurants Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. |
| 2 | Any new installations that do not entail permanent alterations of the restaurant shells. | Such installations are assumed to be reversible and necessitated by temporary fit-out requirements only. |
| 3 | Amendments to lighting within existing fit-out | This excludes any permanent change of lighting design or removal of original fittings. (See Amber & Black categories). |
| 4 | Maintenance/ refurbishment of flooring | The provision allows for periodic refresh works only, and excludes any replacement that would result in changed appearance. (See Amber category). |
| 5 | Re-decoration within the restaurant enclosures | Any works must be contained within the venue and not involve any coating of original self-finish surfaces. |
| 6 | Alterations to cabinetry, counters, display cabinets, buffet bars etc within the restaurant shells. | Such works are assumed not to entail any alterations to the enclosure shell. (See Amber category). |
| 7 | Renewal of notices, promotional posters, etc within existing frames. | Such alterations are assumed to result from updating information not involving making new fixings into original concrete surfaces. |

## Interiors: The Barbican Restaurants

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | Complete replacement of lighting fittings within the restaurant enclosures. | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Permanent installation of new fixed furniture or cabinetry within restaurant shells. | The need for LBC would depend upon the impact of such installations on the spatial character of the venue. |
| 3 | Covering of floor finishes in Ground Level restaurant. | The existing brick tile flooring is continuous with the Lakeside terrace. Any alteration should be discussed with Planning Department to ascertain whether LBC will be required. |
| 4 | Installation of free standing furniture on the external terrace/s (Ground and Level 1) | The introduction of temporary canopy structures, light standards, patio heaters, etc should be discussed prior with the Planning Department. |
| 5. | Installation of new commercial signage | The size and location of any new signage should be discussed prior with the Planning Department. |

## Interiors: The Barbican Restaurants

**RED** **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Permanent changes to internal floor layout. This includes:<br>▪ introduction of new full-height partitions<br>▪ relocation/ removal of existing entrance doors or introduction of new doors.<br>▪ Toilet areas in the east turret | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br>New partitioning or fittings that would permanently alter the original shells would require LBC. |
| 2 | Any works, except like-for-like replacement, to original internal or external finishes. | Includes brick pavior flooring, tiling and terrazzo |
| 3 | Any form of permanent enclosure of, or structure upon, the open terrace on Level 1 | The open terrace is an intrinsic part of the external composition of the Arts Centre.<br>(See Building Exterior section, Red Category Item 11.) |

## Interiors: The Barbican Restaurants

**Black** **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Overcoating of any remaining original self-finished surfaces in the restaurants | The exposed concrete areas should remain uncoated. |
| 2 | Introduction of any permanent new enclosing walls around or within the free floor area | Any proposal that would impact adversely on the spatial character of the adjacent foyers is likely to be refused. |
| 3 | Introduction of any new visible/ face fixed services on remaining original self-finished surfaces | Any installations involving face-fixed conduit, trunking, wiring etc on exposed concrete are likely to be refused. |
| 4 | Alteration, replacement (except on like-for-like basis) or blocking up of any windows. | The fenestration of the restaurant block is a conspicuous element of the Arts Centre's external identity. |
| 5 | Introduction of a new use that would entail permanent alteration of the original restaurant shells. | The spaces should remain venues for public dining/ hospitality use. Any proposals for conversion to office or residential use are likely to be refused. |

**NOTE: The new restaurant on Beech Street is dealt with in the Exhibition Halls section**

## The Conservatory

**Original Design**

1. The architectural camouflage of the Theatre flytower by cloaking it with a glazed conservatory was one of the most creative and ambitious design strategies of the original scheme. The huge pyramidal form could be read as an augmented echo of the glass pyramid that appeared in some of the earliest sketches of the Barbican development and was illustrated in the architects' report of April 1959. The enclosure extends from Level 2 up and beyond Level 5 and is arranged as a series of mitred facets around the pentagonal outline of the flytower. The planes of glazing are supported on rows of trussed steel portals rising vertically from the perimeter at entry level before pitching over the floor area to abut the concrete flytower core. Secondary steel purlins distribute the loading and carry the areas of single glazing formatted in narrow rectangular panes. Intermittent sections of glazing are in the form of adjustable louvred infills.

2. The western zone is subdivided into a series of pathways and planters and is finished in the same Barbican brick paviors used throughout the Podium and elsewhere across the estate. In the central area is a grid of raised flat topped rooflights providing natural light to the Theatre offices below. (See Theatre section). The eastern zone is laid out more informally with curving dwarf walls and an arabesque pool.

3. Apart from the main superstructure, which is painted white, all other metalwork – handrails, lamp standards, etc is in black painted steel, with tensioned cable guardings. The central flytower core is exposed concrete, with various arrays of service pipework, cable trays, etc slung alongside. Toilets are inserted into the narrow service zone that edges the space on the west side. These retain their original terrazzo floors and coved skirtings.

**Alterations**

4. Apart from the spectacular development of the planting very little has been altered within the Conservatory other than the addition of some new lighting and various further items of service apparatus, which is generally adequately concealed by the planting itself, together with some patio heaters, added c. 2015. The only 'structural' intervention has been the insertion of a staircase between the Conservatory and the Garden Room in order to link the two spaces.

**Heritage Significance**

5. The Conservatory is of major significance to the Arts Centre both for its architectural prowess and in adding a uniquely rich recreational attraction to the Barbican public offer. There is no comparable amenity in any UK housing estate, and indeed nothing equivalent in its period.

**Guidance**

6. The conservation and continued good stewardship of the Conservatory is essential to protect the heritage significance of this unique asset. As well as regular maintenance of its physical fabric and informed management of the vegetation it is important that operational policies provide for optimal public access and enjoyment, commensurate with its primary use as an events venue.



**The Conservatory Level 3, showing brick planters and paviors, glazed superstructure and exotic planting.**



**The Conservatory under construction**



**The fishpond located at the northern end of the Conservatory**



**Original post-top lighting**



**Storage area in northern triangular recess**



**Principal gathering area on centre axis of Theatre with new patio heaters**

## The Garden Room

**Original Design**

1. The Garden Room lies immediately adjacent the Conservatory, being superimposed upon the catering block overlooking Lakeside, and linked through a fully glazed door screen. The two facilities can be used in conjunction for formal receptions, private dinners and other such events, being serviced by a kitchen supplied by the same means as those for the restaurants below. The principal room occupies two whole bays of the structural grid, with another fully glazed double height screen on the south façade that gives onto an open stepped terrace with cantilevered planter troughs of similar design to those of the Art Gallery terrace. This is finished in the standard concrete and brick pavior Barbican palette.

**Alterations**

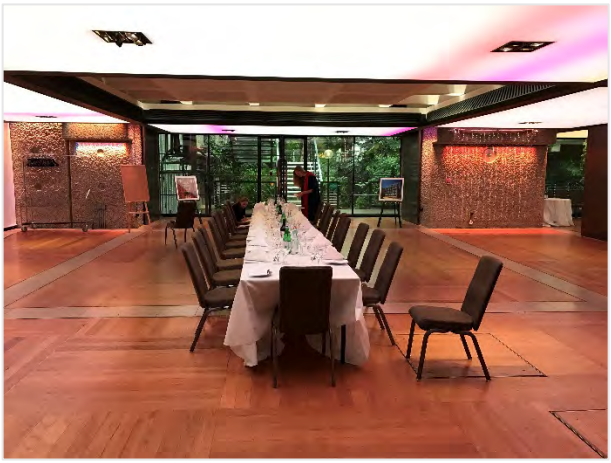
2. The Garden Room interior has been refitted to a high standard, with new wood flooring, illuminated false ceilings and new lighting. The central ceiling zone however still reveals the original waffle slab above, and areas of the original concrete finish of the main piers also remain exposed.

**Heritage Significance**

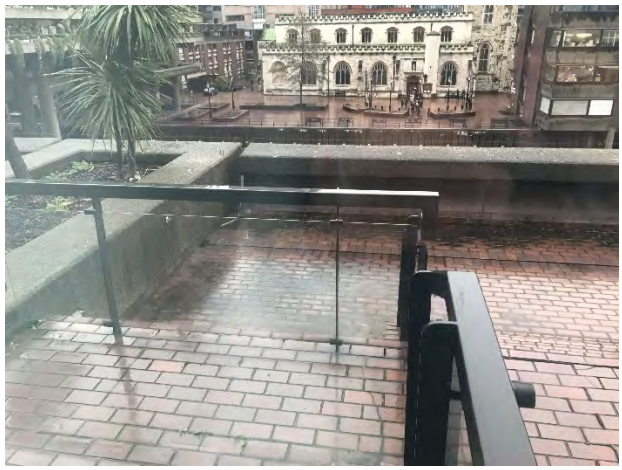
3. The Garden Room should be understood as an integral adjunct to the Conservatory and, since externally it forms the crown of the Theatre facade as seen from the south, an essential part of the original Barbican architectural composition. Its surviving original finishes evidence the consistency of architectural vocabulary throughout the Arts Centre.

**Guidance**

4. The Garden Room is a prestigious venue within the Barbican Centre and deserves to be maintained to a commensurately high standard. Original uncoated surfaces should remain uncoated. Beneficial use of the external terrace would enrich the facility, subject to appropriate safety guarding measures and avoidance of disturbance to nearby residents.



**Garden Room looking towards the Conservatory**



**View over terrace towards St Giles (placeholder)**

# The Interior : The Conservatory & Garden Room  Traffic Light section

## Green — Works that will not require a LBC application

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Removal of non-original items is encouraged. Replacement of damaged glazing on a like-for-like basis will not require LBC. |
| 2 | Any event-related installations that do not entail permanent alterations of the Conservatory or Garden Room shells. | Such installations are assumed to be reversible and necessitated by temporary requirements only. |
| 3 | Amendments to lighting within existing design | This excludes any permanent change of lighting design or removal of original fittings. (See Amber & Black categories). |
| 4 | Maintenance/ refurbishment of flooring | The provision allows for periodic refresh works only, and excludes any replacement that would result in changed appearance. (See Amber category). |
| 5 | Like-for-like re-coating of steelwork elements. | Any works must be contained within the venue and not involve any coating of original self-finish surfaces. |
| 6 | Re-stocking of plants in Conservatory or terrace planters | Such works are assumed not to entail any alterations to the enclosure shell. (See Amber category). |
| 7 | Provision of new signage for plant identification | Such alterations are assumed to result from updating information not involving making new fixings into original concrete surfaces. |
| 8 | Replacement of full height curtains to glazed screen on south facade | As these effectively present as a significant aspect of the Arts Centre as viewed from the south, these curtains should be dealt with as a complete item, not replaced individually with differing character. |

## Interiors:  The Conservatory and Garden Room

## Amber — Works where advice should be sought to determine whether a LBC application is required

| | Example | Guidance |
|---|---|---|
| 1 | Complete replacement of lighting fittings within the venue enclosures. | Notification of proposals, including reversibility should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Permanent installation of new fixed furniture or equipment within venue shells. | The need for LBC would depend upon the impact of such installations on the spatial character of the venue. |
| 3 | Renewal/ replacement (except like-for-like) of curtaining to double height screen on south façade of Garden Room. | As this could affect the external appearance of the Arts Centre, any alteration should be discussed with Planning Department to ascertain whether LBC will be required. |
| 4 | Introduction of new service pipework, engineering appliances, trunking, ductwork and the like within the Conservatory. (See Black category for Garden Room). | Prior discussion with the Planning Department is required to ascertain potential impact of such installations on the space. |

## Interiors: The Conservatory and Garden Room

**RED** — **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Permanent changes to internal floor layout. This includes:<br>▪ introduction of new full-height partitions<br>▪ relocation/ removal of existing entrance doors or introduction of new doors.<br>▪ new structures within Conservatory | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br>New partitioning or fittings that would permanently alter the original shells would require LBC. |
| 2 | Any works, except like-for-like replacement, to original internal or external finishes. | Includes brick pavior flooring, tiling and terrazzo |
| 3 | Replacement of Conservatory glazing (except like-for-like to deal with local breakage) | If double glazing is ever proposed, this should be configured as closely as possible to match the existing appearance, using deeper rather than wider glazing bars. LBC will be required. |
| 4 | Installation of additional guarding/s on southern terrace | The standard boat edge parapet here is below compliance height. Any new guardings should take the form of a glazed stand-off barrier located well back from the inside edge to avoid visibility from the south. |

## Interiors: The Conservatory and Garden Room

**Black** — **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Overcoating of any remaining original self-finished surfaces in Conservatory or Garden Room. | The exposed concrete and terrazzo areas should remain uncoated. |
| 2 | Introduction of any permanent new enclosing walls around or within the free floor area | Any proposal that would impact adversely on the spatial character of the venues is likely to be refused. |
| 3 | Introduction of any new visible/ face fixed services on remaining original self-finished surfaces in the Garden Room. (See Amber category for Conservatory) | Any installations involving face-fixed conduit, trunking, wiring etc on exposed concrete are likely to be refused. |
| 4 | Alteration, replacement (except on like-for-like basis) or blocking up of any windows. | The fenestration of the restaurant block (including the Garden Room) is a conspicuous and complete element of the Arts Centre's external identity as viewed from the south. |
| 5 | Introduction of a new use that would entail permanent alteration of the original restaurant shells. | The spaces should remain venues for public dining. Any proposals for conversion to office or residential use are likely to be refused. |
| 6 | Any form of enclosure of, or structure upon, the open terrace outside the Garden Room (Level 3) | The open terrace is an intrinsic part of the external composition of the Arts Centre and should remain so. |

## The Exhibition Halls

**Original Design**

1. The Exhibition Halls occupy the substantial land plots north of Beech Street on the area of the estate known as North Barbican. The facility is split into two 2 storey sections, divided by the southern end of Golden Lane as it joins Beech Street, and 'contained' under the podium which runs across the street and joins up the estate as a whole. The eastern section is L shaped in plan with a large service/ delivery yard on its north east corner. Beyond the foyer entered from Golden Lane the Beech Street tranche consisted of a large open plan space, punctuated by the coupled columns that support Ben Jonson House, with a double height zone on the north edge. A reception suite (now named The Last Stand) occupied the south west corner, the remaining space being given over to toilets, offices, storage and plant. The western section is slightly smaller and rectangular in plan. It is also entered off Golden Lane with large open plan areas on both levels and a double height portion on the north edge.

**Alterations**

2. These spaces have been subject to intensive use over the years with numerous interventions in the form of partitioning, false ceilings, new floor finishes, lighting and décor. The spaces are now regularly used as exam halls by London University. The eastern section has more recently been converted to provide two cinemas (relocated from Frobisher Crescent) and a new restaurant.

**Heritage Significance**

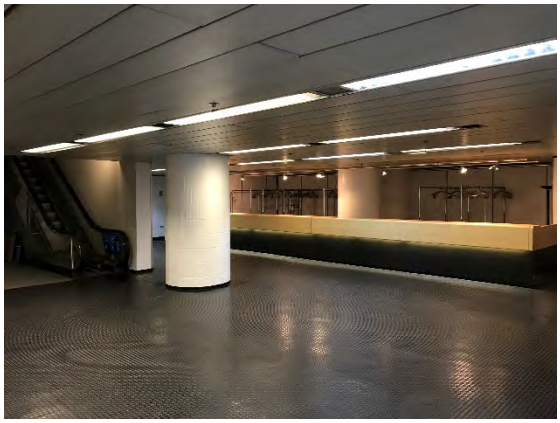
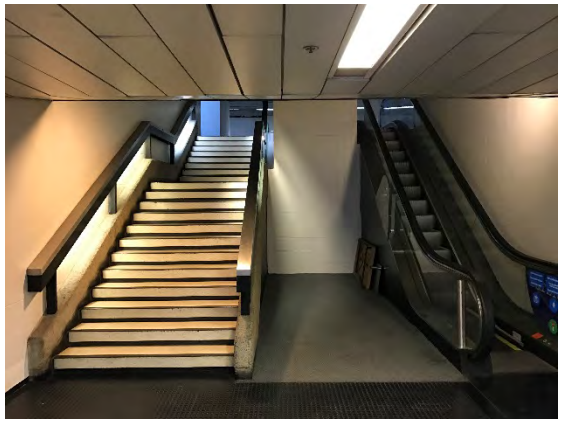
3. Apart from the sheer size and spatial ambition of these areas the only remaining elements of heritage significance comprise timber paneling in The Last Stand, the staircase and escalators in Hall 1, the tiled staircase turrets and scalloped galleries, some original doors and ironmongery and the characteristic narrow mullioned treatment of the exterior façade (See image below)

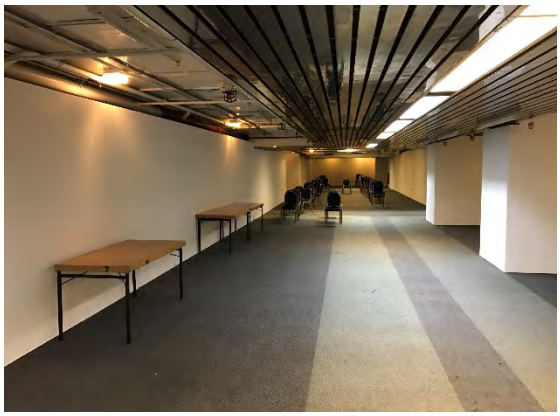
**Guidance**

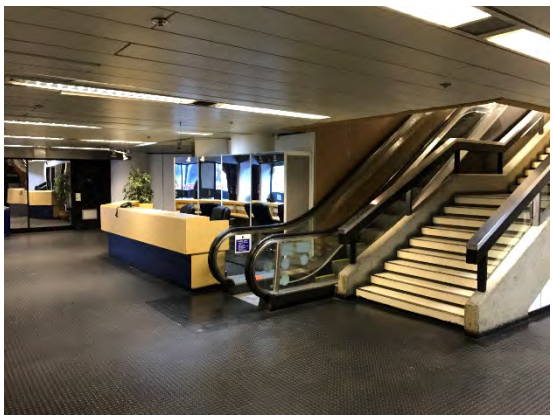
4. Apart from good maintenance of surviving original elements noted any modifications are acceptable subject to their containment within the building envelope and quality of design.



**The delivery yard, with paneled façade. Breton House is above the podium level.**




**Range of views within the Exhibition Halls, east and west of Golden Lane.**

## The Interior : The Exhibition Halls  Traffic Light section

**Green** — **Works that will not require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Like-for-like local repairs or matching replacement of any damaged fixture or finish existing at the time of listing. | Includes re-conditioning of paneling and original fittings within The Last Stand. Removal of non-original items is encouraged. |
| 2 | Any event-related installations that do not entail permanent alterations of the Exhibition Hall shells. | Such installations are assumed to be reversible and necessitated by temporary requirements only. |
| 3 | Amendments to lighting within existing design | This excludes any permanent change of lighting design or removal of original fittings. (See Amber & Black categories). |
| 4 | Maintenance/ replacement of floor finishes | The provision allows for refresh works and replacement except where this would result in permanent alteration/ loss of an original finish. (See Amber category). |
| 5 | Like-for-like re-coating of steelwork elements. | Any works must be contained within the venue and not involve any coating of original self-finish surfaces. |
| 6 | Removal/ replacement of redundant plant and service installations. | Such works are assumed not to entail any alterations to the enclosure shell. |
| 7 | Redecoration of already coated surfaces | Excludes overcoating of original concrete surfaces. |
| 8 | Introduction of new partitions and screens for temporary purposes only. | Examples could include screening of exam areas. |

## Interiors: The Exhibition Halls

**Amber** — **Works where advice should be sought to determine whether a LBC application is required**

| | Example | Guidance |
|---|---|---|
| 1 | Complete replacement of lighting fittings within the venue enclosures. | Notification of proposals, should be submitted to the Planning Department for prior clarification as to whether LBC will be required. |
| 2 | Permanent installation of new fixed furniture or equipment within venue shells. | The need for LBC would depend upon the impact of such installations on the spatial character of the venue. |
| 3 | Replacement of false ceilings or extension of their coverage. | Should be discussed with Planning Department to ascertain whether LBC will be required. |
| 4 | Permanent changes to internal floor layout. This includes:<br>▪ introduction of new full-height walls<br>▪ relocation/ removal of original entrance doors or their ironmongery<br>▪ new structures within the Exhibition Halls<br>▪ infilling floor voids within the double height areas | The following issues may also need to be considered:<br>▪ fire compartmentation and escape routes;<br>▪ stacking of services and accommodation;<br>New partitioning or fittings that would permanently alter the original shells would require LBC.<br><br>Includes permanent new platforms, staircases, etc |

## Interiors: The Exhibition Halls

**RED** **Works that require a LBC application**

| | Example | Guidance |
|---|---|---|
| 1 | Any permanent works, except like-for-like replacement, to original finishes. | Includes exposed concrete, brick pavior flooring, tiling and terrazzo |
| 2 | Replacement of external framed panelling (except like-for-like infill to deal with local breakage) | The framed panelling is an original element of the Barbican facade vocabulary deployed in several locations across the estate. Replacement or alteration would require LBC. |
| 3 | Introduction of a new use (eg. retail) that would entail permanent alteration of the original hall shells. | The new cinemas are a good example of assimilation of new use. However for such interventions LBC (and potentially Planning Consent) is required. |

## Interiors: The Exhibition Halls

**Black** **Proposals for which a LBC application would be required, which would have an impact on the significance of the building and could cause substantial harm or loss**

| | Example | Guidance |
|---|---|---|
| 1 | Modification or removal of the scalloped gallery detail around the double height spaces. | This is a characteristic feature of the original design |
| 2 | Alteration or blocking up of original stair turrets or staircases. | As above |



**Turret staircase with original tiling**

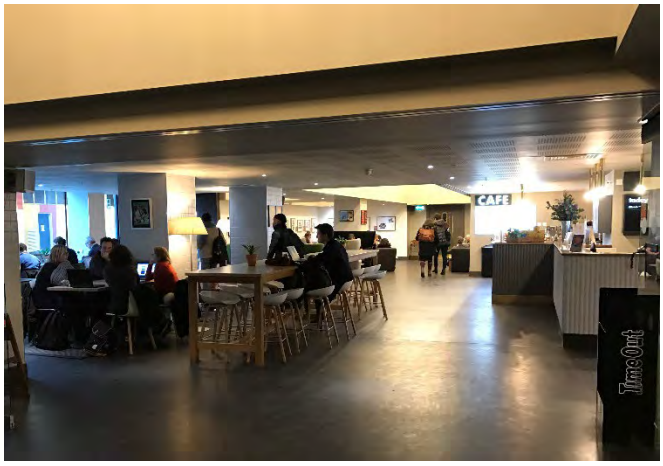


**Inside view of paneling on external façade**



**Double height space in the western section of the Exhibition Halls. Note scalloped gallery detail, left edge.**




**Views of new cinema foyers formed within Exhibition Hall space, and accessed from Beech Street**





**Views of new cinema auditoria**



**Entrance to new restaurant on Beech Street formed within eastern section of Exhibition Halls**

## The Interior: The Plant areas – Note

1. For a complex of the scale of the Barbican Arts Centre there was a massive demand for engineering plant and services, and the volumes needed to accommodate them. These spaces are distributed in several locations and levels across the Centre, the principal areas being beneath the main foyer and Concert Hall (at Levels -1.5 and -2) and on the north edge of the Theatre (at Levels -1.5 and -1). Smaller plant rooms occur at various levels and locations elsewhere (see plans).

2. These extensive installations have undergone various modifications over the years and essential operational elements will continue to require maintenance and periodic renewal of systems and components. Provided these interventions are contained within the ample spaces provided it is not considered that any heritage sensitivities will be affected, and therefore that Listed Building Consents will not be applicable for any such works.

3. In the event that such a major alteration is required that it would require modification to the external envelope of a plant room or would manifest on the exterior of the building, then prior discussion should take place with the Planning Department to establish whether a formal consent will be required. (ie. Such works should be treated as Amber category.)





**Typical views in the main plant room**

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# THE BARBICAN

## Listed Building Management Guidelines Volume IIIA
## The Barbican Arts Centre

## Appendices

- References
- John Honer – Original notes, 1982
- Acknowledgements and Consultation
- Early CPB drawings of the Arts Centre
- Plans as built
- Floor Plans and Occupancy Details (August 2010)
- Exhibition Hall plans showing conversion works, 2015

# References


- *Report to the Court of Common Council of the Corporation of the City of London on residential development within the Barbican area, prepared on the instructions of the Barbican Committee by Chamberlin, Powell & Bon, Architects*, *April 1959.* Referred to as Architects' Report, April 1959

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- Honer, John *Notes on the Barbican Arts Centre Theatre (RSC*) 1982

- Kenyon, Nicholas, *The City of London* Thames & Hudson, 2012

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- http://www.barbican.org.uk/buildingthebrutal Photographic archive by Peter Bloomfield

BARBICAN REDEVELOPMENT
ARTS CENTRE: CONCERT HALL (LSO)

The Concert Hall, accommodating an audience of approximately 2,000, was designed to the specific requirements of the London Symphony Orchestra, who prescribed that a 'rich' and 'full' quality of sound be produced. To achieve this the Corporation's Acoustic Consultant, Hugh Creighton, determined that the volume of the hall be not less than 300 Cu.Ft. of space per seat, since he interpreted the London Symphony Orchestra's requirements as necessitating an average reverberation time of approximately 2 seconds.

Bearing in mind the extremely restricted site available, and the need to respect levels of circulation already established by previous phases of the Barbican Redevelopment, it was necessary to include the spaces defined by the roof beams within the volume of the hall to achieve the required quality of sound. This, however, presented further problems in that sound being reflected from the sides of the 12' deep roof beams would produce unacceptable echos within the hall. It was therefore necessary to diffuse the sound and to this end a large number of perspex spheres were suspended within the roof spaces, which although primarily introduced for acoustic reasons were exploited to decorative effect, some of which accommodate the house lighting.

In order to test the effect of the materials incorporated within the design of the hall an eighth full-size model was constructed for this purpose. By this means it was possible to assess the quality of sound at any selected position in the hall.

The stage of the Barbican Hall has been designed to accommodate an orchestra of 120 players, and is capable of forward extension by approximately 80 to accommodate a choir of 200 in addition to the orchestra. The canopy over the stage has been profiled to reflect the sound towards the audience and the rear and side walls of the stage area are lined with reverberation boxes, concealed by a perforated decorative screen.

A nine-month tuning period was allowed for in the construction programme during which a number of test concerts were carried out and minor adjustments made. These tests revealed a deficiency in the reverberation time at lower frequencies requiring adjustment to the spheres and to the construction of the seats.

The prime purposes of the hall is for symphonic music which requires no amplification. A secondary purpose is served by the use of the hall for Conferences. Because of the inherent incompatibility between the acoustic requirements for music and those for speech, a sound amplification system has been introduced for conference use only.

All construction details were verified by the Acoustic Consultant who was extremely influential in determining internal finishes, the type of upholstery and fabric of which seats are constructed, the construction of the stage floor and canopy etc.

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BARBICAN REDEVELOPMENT
ARTS CENTRE: THEATRE (RSC)

In 1955 Chamberlin, Powell and Bon, Architects, were commissioned to carry out a feasibility study for the Corporation of London to demonstrate the potential for housing on the Barbican site. Included in their proposals were new facilities for the Guildhall School of Music and Drama which is administered by the Corporation of London. This included a Theatre and Concert Hall. This particular scheme was rejected by the London County Council on planning grounds because they considered the density of housing to be too high.

In 1956 Chamberlin, Powell and Bon submitted alternative proposals to the Corporation of London for housing on an enlarged site at a slightly reduced density. This scheme not only included accommodation for the Guildhall School of Music and Drama but also new premises for the City of London School (for boys) and The City of London School for Girls. In an attempt to provide a whole which was greater than the sum of its parts, the assembly halls of the boys and girls schools, and the Theatre and Concert Hall of the Guildhall School were grouped around a court to form a cultural centre for the benefit of the residential community as well as for the students of the three schools.

By 1959 various changes in requirements were made including the abandonment from the Barbican scheme of the boys school. This of course invalidated CPB previous proposals. At this time the Corporation appointed Dr. Richard Southern as a specialist consultant to advise them on the detailed requirements of the Guildhall School Theatre and Concert Hall so that these would be suitable to accommodate public performances by professional companies as well as to serve the school. His proposals included the provision of a 700 seat theatre with proscenium stage and orchestra pit suitable for Opera, and for Restoration, Georgian, Victorian and Modern drama. They also included the provision of a 1,000 seat concert hall which could not only accommodate a full orchestra and choir but which could also be adapted for those types of drama for which the proscenium theatre is unsuitable such as for Theatre in the Round and for Elizabethan (forestage) productions.

Between 1959 and 1969 the residential phases of construction were set under way. During this period also the Corporation of London sought further advice, this time from Mr. Anthony Besch concerning the commercial and technical viability of the constituant elements of the Arts Centre. Mr. Besch's report of 1964 recommended the following:-

i) The Guildhall School of Music and Drama to be provided with separate accommodation suitable for its own particular requirements.

ii) The provision of a Theatre to seat approximately 1,200 persons.

iii) The provision of a Concert Hall to seat approximately 2,000 persons.

iv) The inclusion of accommodation for the City's principal Lending Library and Art Gallery.

v) The inclusion of an extensive range of catering facilities.

vi) The provision of appropriate circulation space and services.

Mr. Besch was influential in convincing the City Corporation of the merits of designing the Theatre and Concert Hall to the specific requirements of existing well established companies. Consequently the Concert Hall was designed to meet the specific requirements of the London Symphony Orchestra, and the Theatre to meet those of the Royal Shakespeare Company.

The Barbican Theatre is intended to replace the Royal Shakespeare Company's current use of the Aldwych Theatre in London. It is the policy of the Royal Shakespeare Company in it's use of the Aldwych Theatre to concentrate primarily on productions of Shakespeare and on 19th Century and Modern drama.

In the design of the Barbican Theatre considerable attention has been given to the provision of good sight lines from every seat in the auditorium and to achieving as close a proximity of all seats to the stage as possible. No seat is further than 65' from the point of command, being a position in the centre of the stage 8' behind the front edge of the stage from which an actor can encompass the whole of the auditorium in his peripheral vision.

The volume of the auditorium has been reduced to the minimum possible by:-

i) excluding all circulation space in the form of gangways from within the auditorium enclosure which would otherwise occupy space better suited to favourably placed seats. The auditorium is approached by means of stepped Foyers from which the seat row is selected, access being obtained by means of a door at the end of each row.

ii) the provision of three balconies containing only two rows each projecting forward towards the stage thus incurring a reduction rather than an increase in headroom. The balconies also step down towards the stage around the sides of the auditorium.

iii) the design of the main beams which support the roof to the auditorium which are upstanding beams and are therefore external to the volume of the auditorium. Furthermore, these beams, being hollow, provide the means by which the conditioned air is supplied to the auditorium, the vitiated air being extracted via plenum ducts beneath the seats. Most of the air supply and extract ducts are therefore also external to the volume of the auditorium.

The distribution of seats, which are fixed (not tip-up), is as follows:-

| | |
|---|---|
| Stalls | : 726 Seats |
| 1st Balcony | : 196 Seats |
| 2nd Balcony | : 141 Seats |
| 3rd Balcony | : 137 Seats |
| Total | : 1,200 |

| | |
|---|---|
| Longest Row (rear of stalls) | : 50 Seats |
| Shortest Row (front of stalls) | : 24 Seats |
| Row Spacing (back to back) | : 3'4" |
| Clear space between seats (front to back) | : 1'4" |

Critical dimensions of the Stage are as follows:-

| | | |
|---|---|---|
| Proscenium Opening | : | 73' |
| Opening between fixed front masking screens: (rear masking screens are flown) | | 44' |
| Stage depth | : | 48' |
| Proscenium Height | : | 30' |
| Stage Rake (fixed) | : | 1:18 |

A "double height" Flytower is provided to enable the flats within the company's repetoire to be stored at the top of the tower as well as for the intermediate level to serve the current production. The height of the tower is 110' from stage to underside of grid, from which are suspended 76 scene bars operated by motorised winches.

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# Acknowledgements and Consultation

Avanti Architects wish to acknowledge the valuable assistance of the following people and organisations in the preparation of this document -

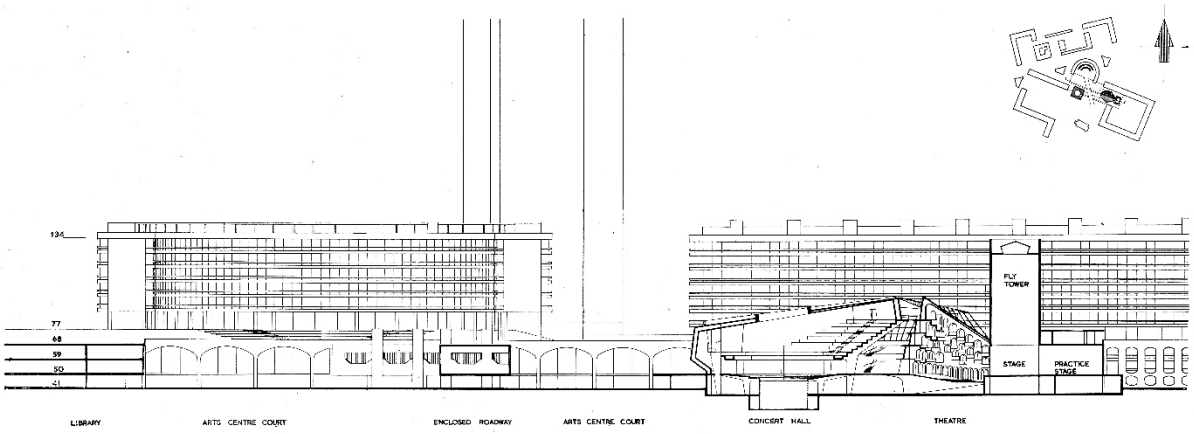
- Sir Nicholas Kenyon, Managing Director The Barbican Arts Centre
- John Honer, Project Architect of the Arts Centre, formerly of Chamberlin, Powell & Bon
- Jonathon Poyner, Director of Operations & Buildings, Barbican and Guildhall School
- Michael Dick, Helen Kearney, Laura Whitticase, Jim Turner, Christopher Bate, Maria Sommer, Barbican Arts Centre
- Petra Sprowson, Paul Robertshaw, Clive Cornwell, City of London Department of Planning and Transportation
- Ashley Pickles, The Barbican Theatre
- Carol Boswarthack, The Barbican Library
- Peter Morris, Alford Hall Monaghan & Morris, Architects

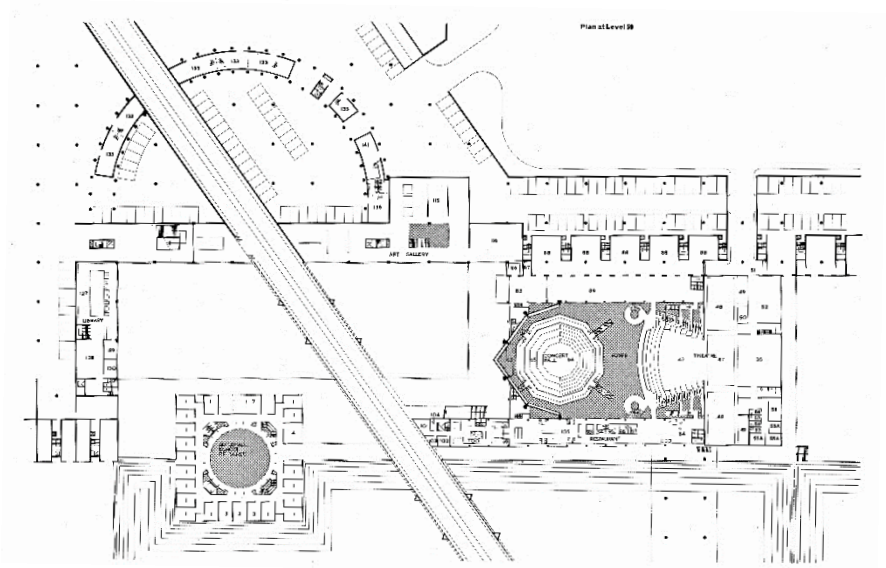
The following stakeholders have also been consulted in the process of finalizing this document -

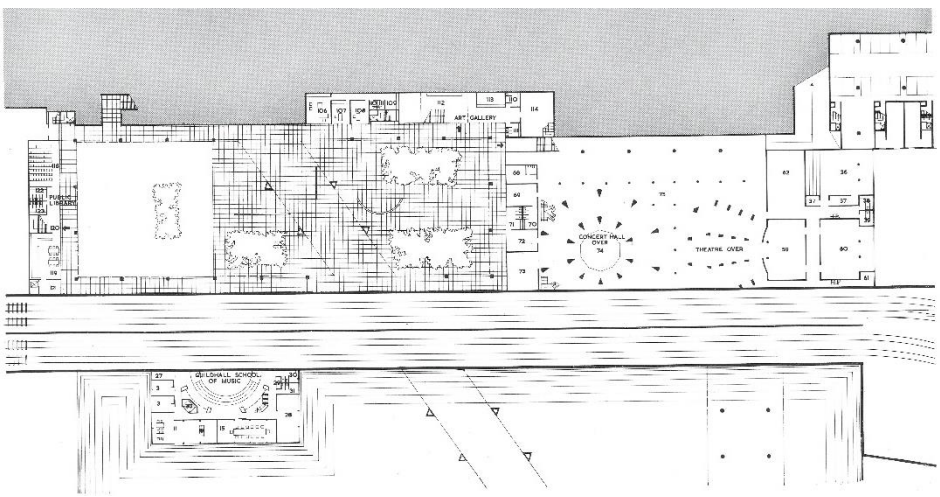
- The Barbican Residents' Association
- Historic England
- The Twentieth Century Society

Drawings

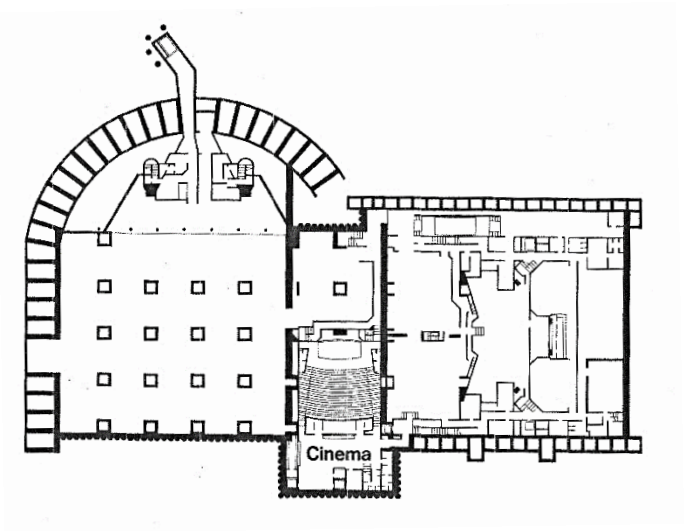
Early CPB drawings of the Arts Centre (1959)



Plans as built

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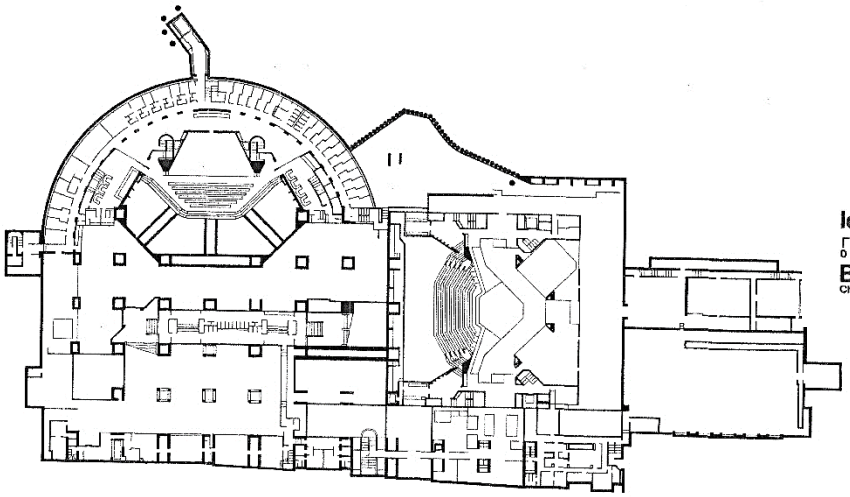
Chamberlin Powell and Bon architects



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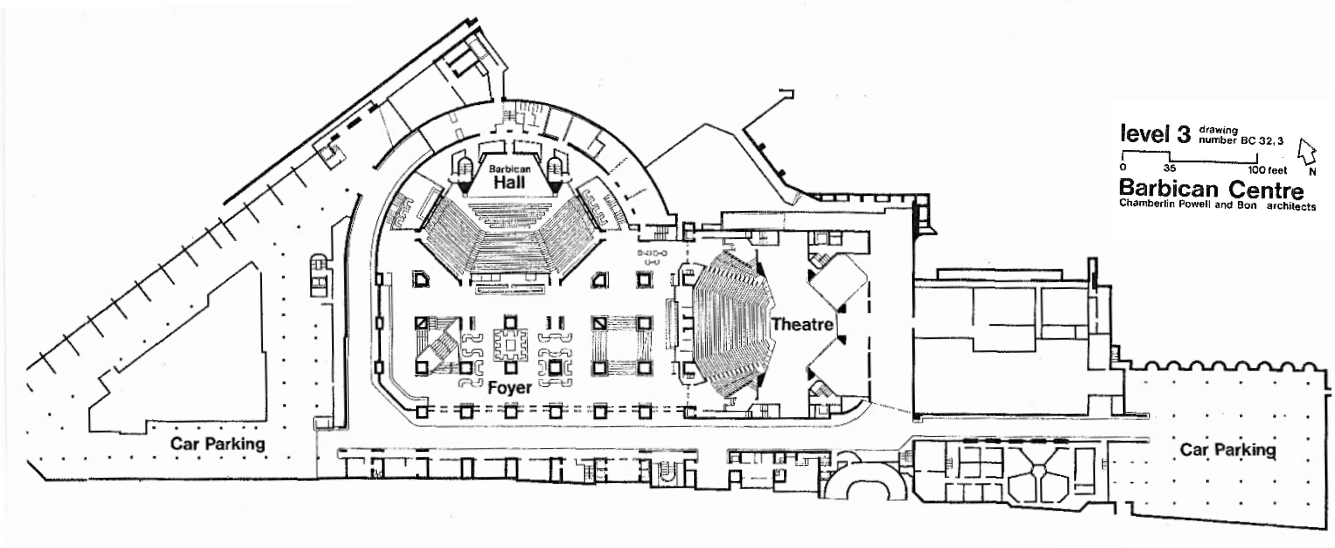


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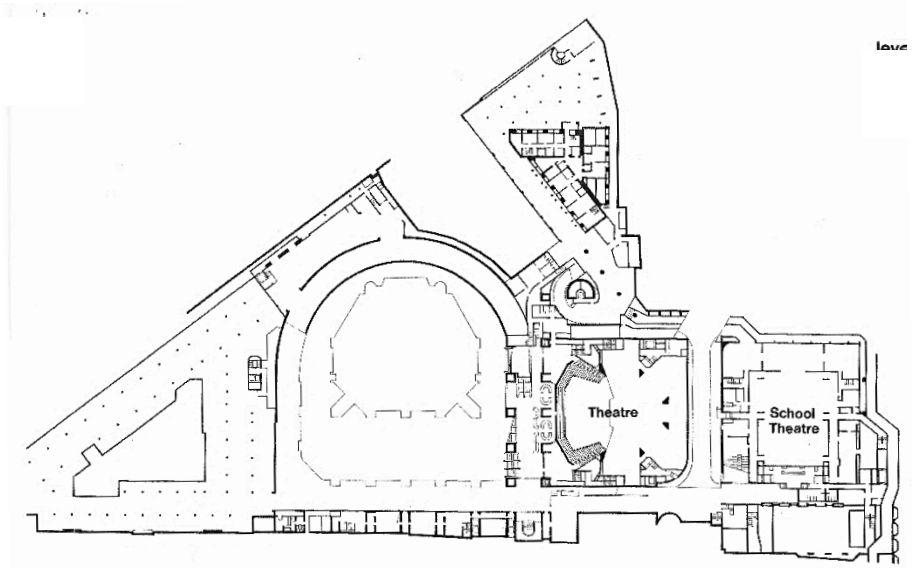


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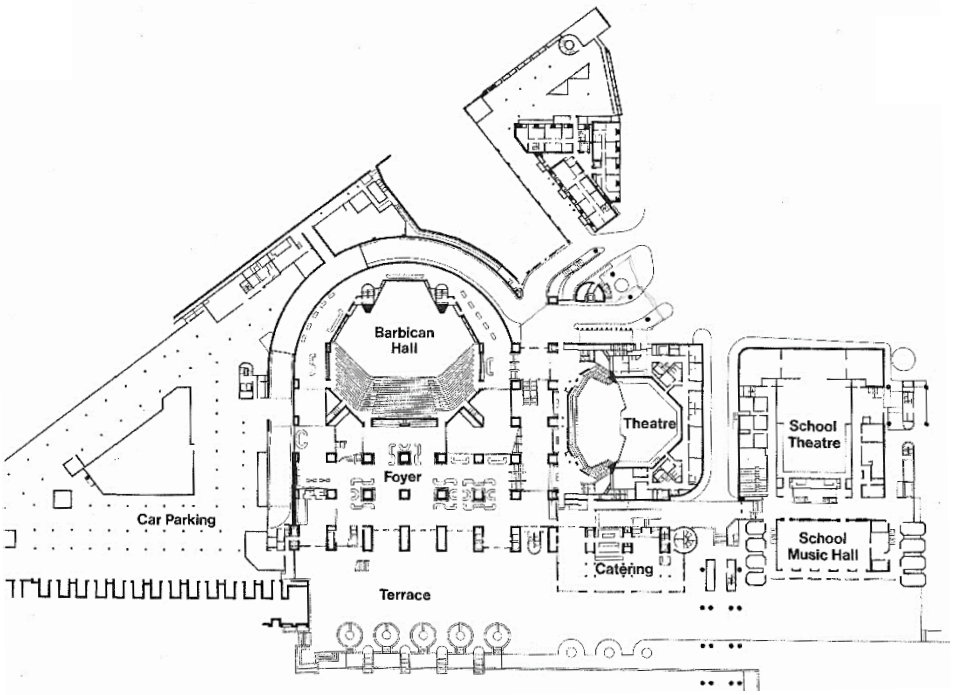


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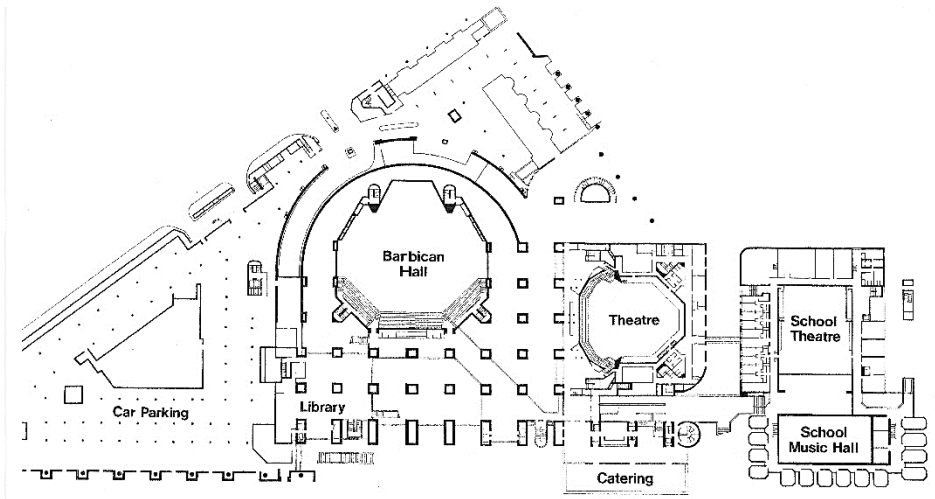
Chamberlin Powell and Bon architects

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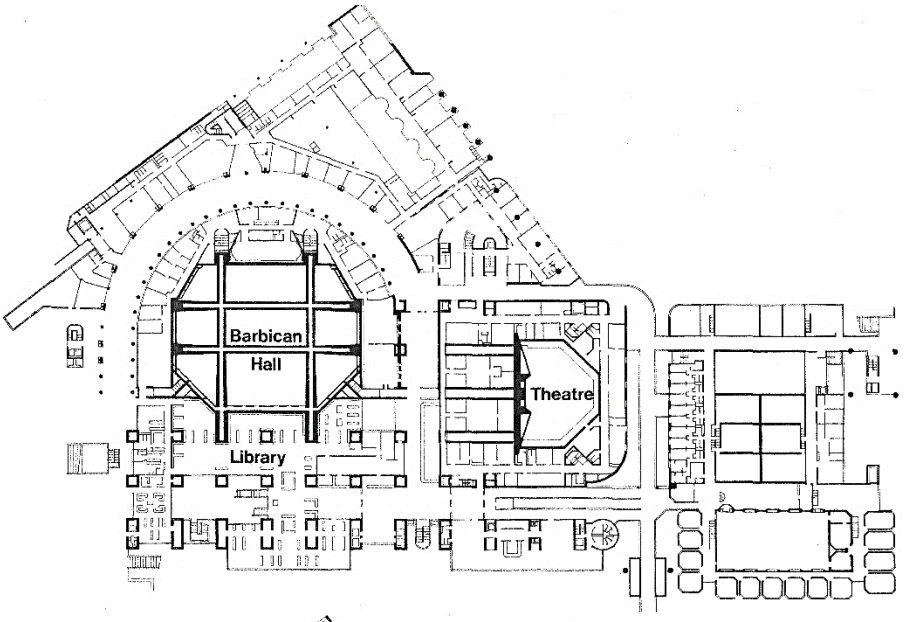


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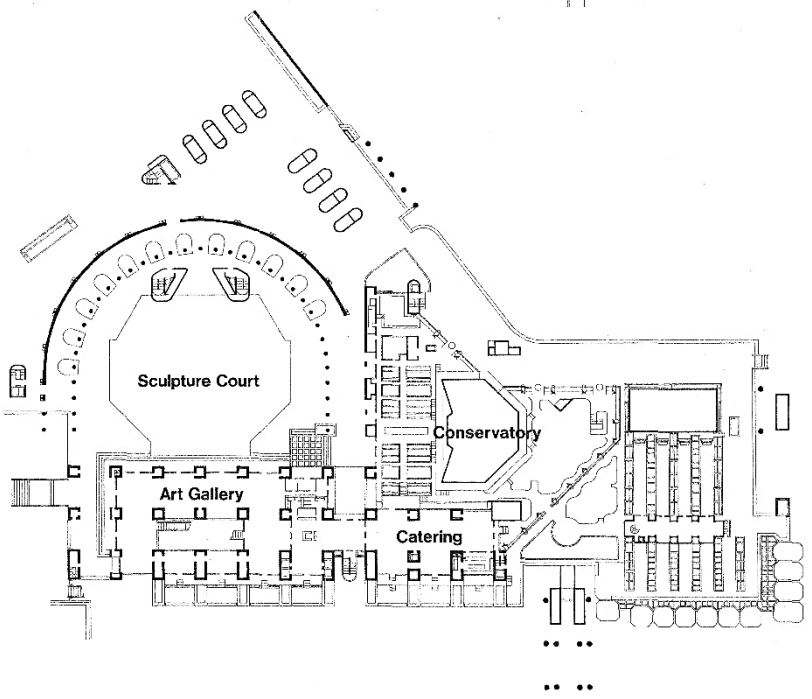


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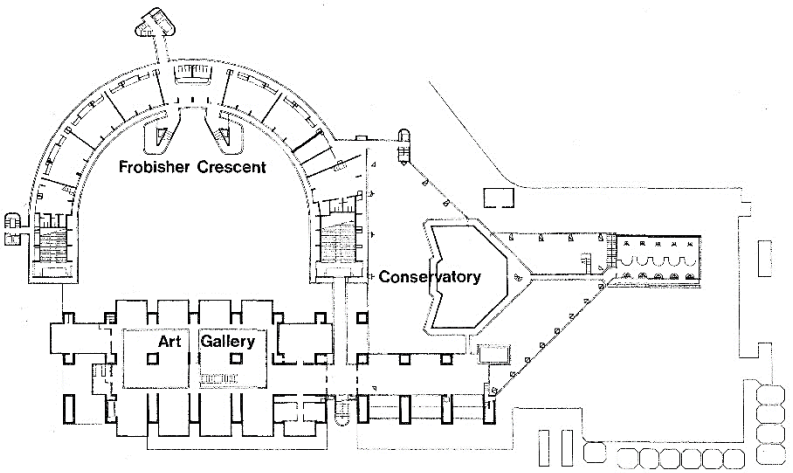
Chamberlin Powell and Bon architects




level 9 drawing number BC 32,9
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Barbican Centre
Chamberlin Powell and Bon architects

# Barbican Arts and Conference Centre

## Floor Plans and Occupancy Details

Produced August 2010

Information compiled by City Surveyors Department Corporate Property Review Team.

This document will be periodically revised.

To obtain the latest information or to notify of any errors or omissions please contact;

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david.rawlings@cityoflondon.gov.uk

**Schedule of Plans**

| Level | Facilities | Drawing Number | Revision | Date |
|---|---|---|---|---|
| | | | | |
| Level -3 | Cinema 1 (lower part) | 4-C-30989 LO 03 | | June 2010 |
| Level -2 | Cinema 1<br>Pit Theatre | 4-C-30990 LO 03 | | June 2010 |
| Level -1.5 | Barbican Hall Stalls (lower part)<br>Theatre Stalls (lower part)<br>Catering Admin and Kitchens<br>Car Park 2 | 4-C-30991 LO 03 | | June 2010 |
| Level -1 | Barbican Hall Stalls (upper part)<br>Theatre Stalls (upper part)<br>Car Park 3 | 4-C-30992 LO 03 | | June 2010 |
| Level -1 Mezzanine | Theatre Circle<br>Car Park 4 | 4-C-30993 LO 03 | | June 2010 |
| Level 0 | Silk Street Reception and Main Foyer<br>Barbican Hall Circle<br>Theatre Upper Circle<br>Curve Gallery<br>Waterside Café<br>Lakeside Terrace<br>Car Park 5 | 4-C-30994 LO 03 | | June 2010 |
| Level 1 | Barbican Hall Balcony<br>Theatre Gallery<br>Barbican Music Library<br>Balcony Café | 4-C-30995 LO 03 | | June 2010 |
| Level 2 | Barbican Library<br>Barbican Centre Main Office Level<br>Searcy's Restaurant | 4-C-30996 LO 03 | | June 2010 |
| Level 3 | Art Gallery<br>Conservatory<br>The Garden Room | 4-C-30997 LO 03 | A | June 2010 |
| Level 4 | Art Gallery (upper level)<br>Cinemas 2 and 3<br>Conservatory Terrace<br>Conference Rooms | 4-C-30998 LO 03 | | June 2010 |
| Level 5 | Cinemas 2 and 3 (upper part) | 4-C-30999 LO 03 | | June 2010 |
| Level 6 | Frobisher Crescent Offices | 4-C-31000 LO 03 | B | August 2010 |
| Level 7 | Frobisher Crescent Residential Development | 4-C-31001 LO 03 | | June 2010 |
| Level 8 | Frobisher Crescent Residential Development | 4-C-31002 LO 03 | | June 2010 |
| Level 9 | Frobisher Crescent Residential Development | 4-C-31003 LO 03 | | June 2010 |
| Roof Level | Frobisher Crescent Roof Level | 4-C-31004 LO 03 | | June 2010 |
| Exhibition Hall 1 Lower Level | Exhibition Hall | 4-C-31005 LO 03 | | June 2010 |
| Exhibition Hall 1 Upper Level | Exhibition Hall | 4-C-31006 LO 03 | A | June 2010 |
| Exhibition Hall 2 Lower Level | Exhibition Hall | 4-C-31007 LO 03 | | June 2010 |
| Exhibition Hall 2 Upper Level | Exhibition Hall | 4-C-31008 LO 03 | A | June 2010 |

This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.

**Artistic**

Cinema

**Commercial & Buildings**

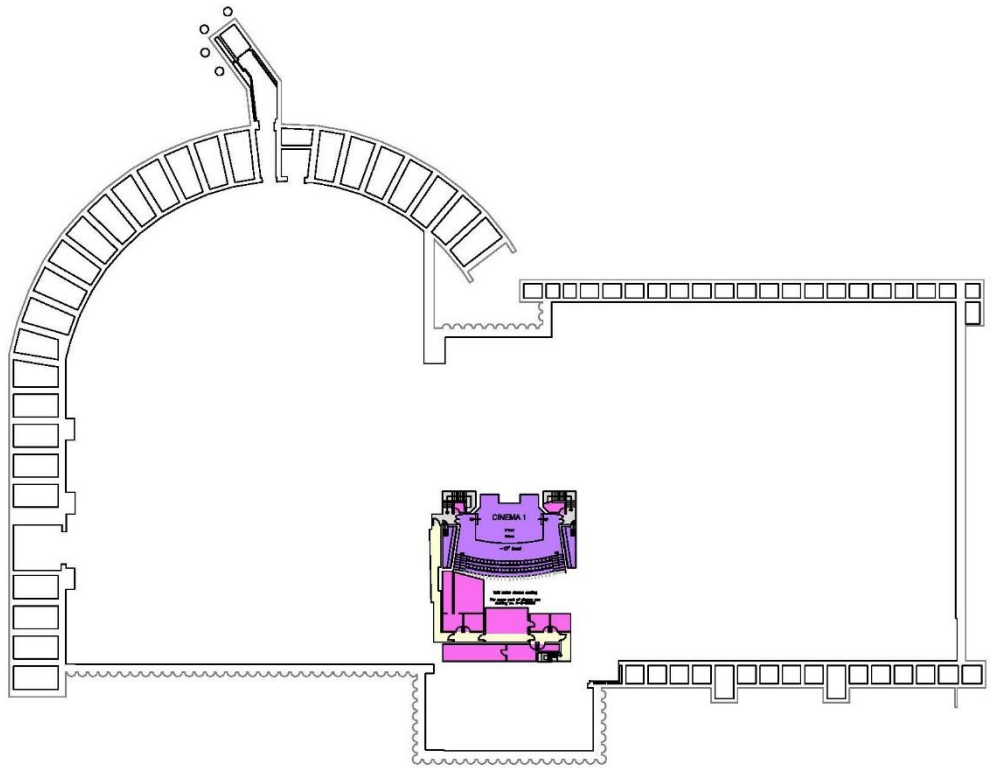
Technical

**Primary Circulation Routes**

**Vertical Circulation**

**Toilet Facilities**

**Plant**







| Rev | | Drawn | Date |
|---|---|---|---|

CITY OF LONDON

*P.G.Bennett, MA (Cantab) FRICS*
*City Surveyor*

**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

Title :
Level -3
Cinema 1 lower level

| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Pro code: | 0151 |
| | | UPRN: | 000095500018 |
| Drawing No : | 4-C-30989 LO 03 | | |
| Revision | | | |

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CITY OF LONDON

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*City Surveyor*

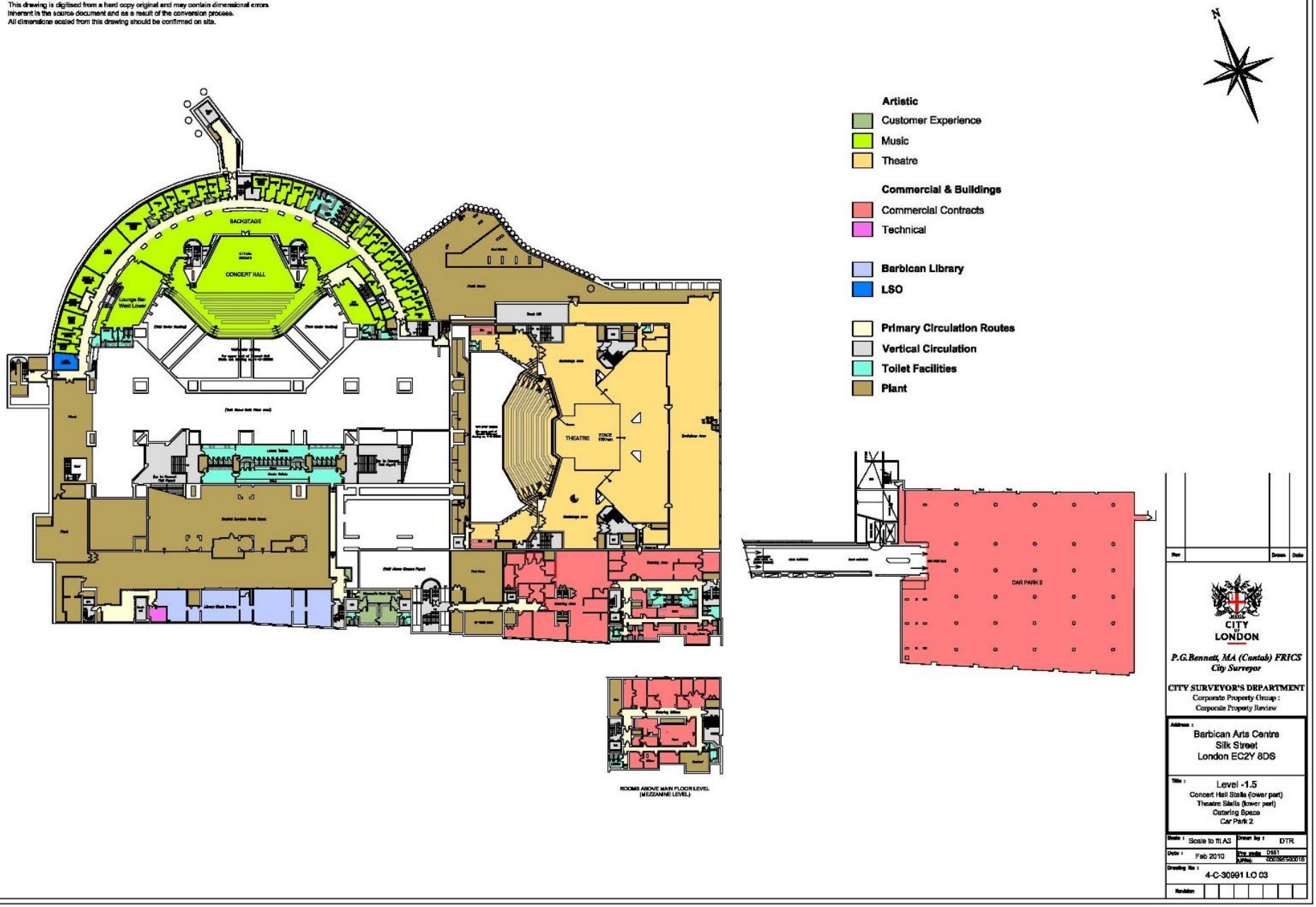
**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

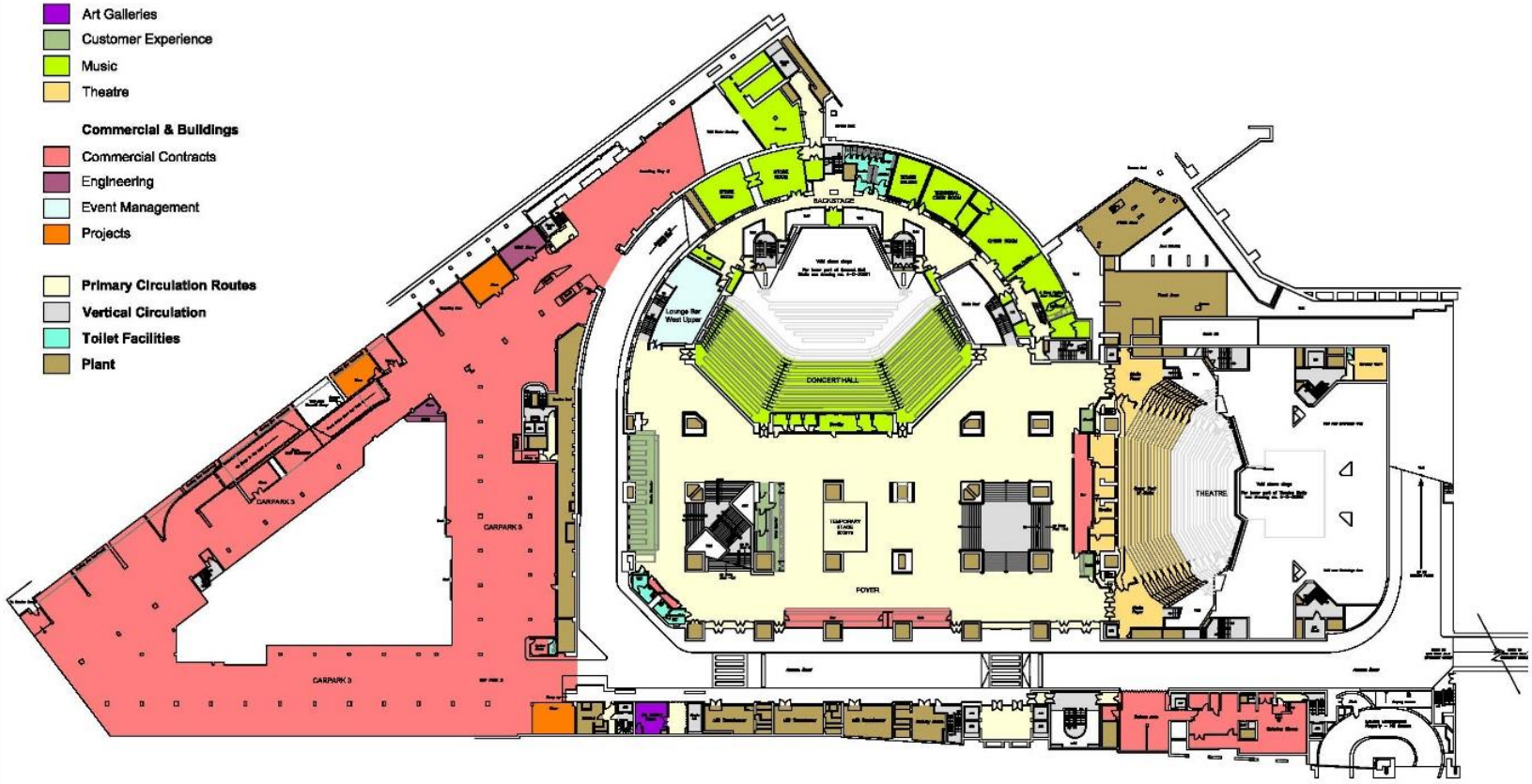
Title :
Level -2
Cinema 1
Pit Theatre

Scale : Scale to fit A3 | Drawn by : DTR
Date : Feb 2010 | Proj. code : 0161 | UPRN: 000085500116
Drawing No : 4-C-30990 LO 03
Revision

This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.



This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.




CITY OF LONDON

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*City Surveyor*

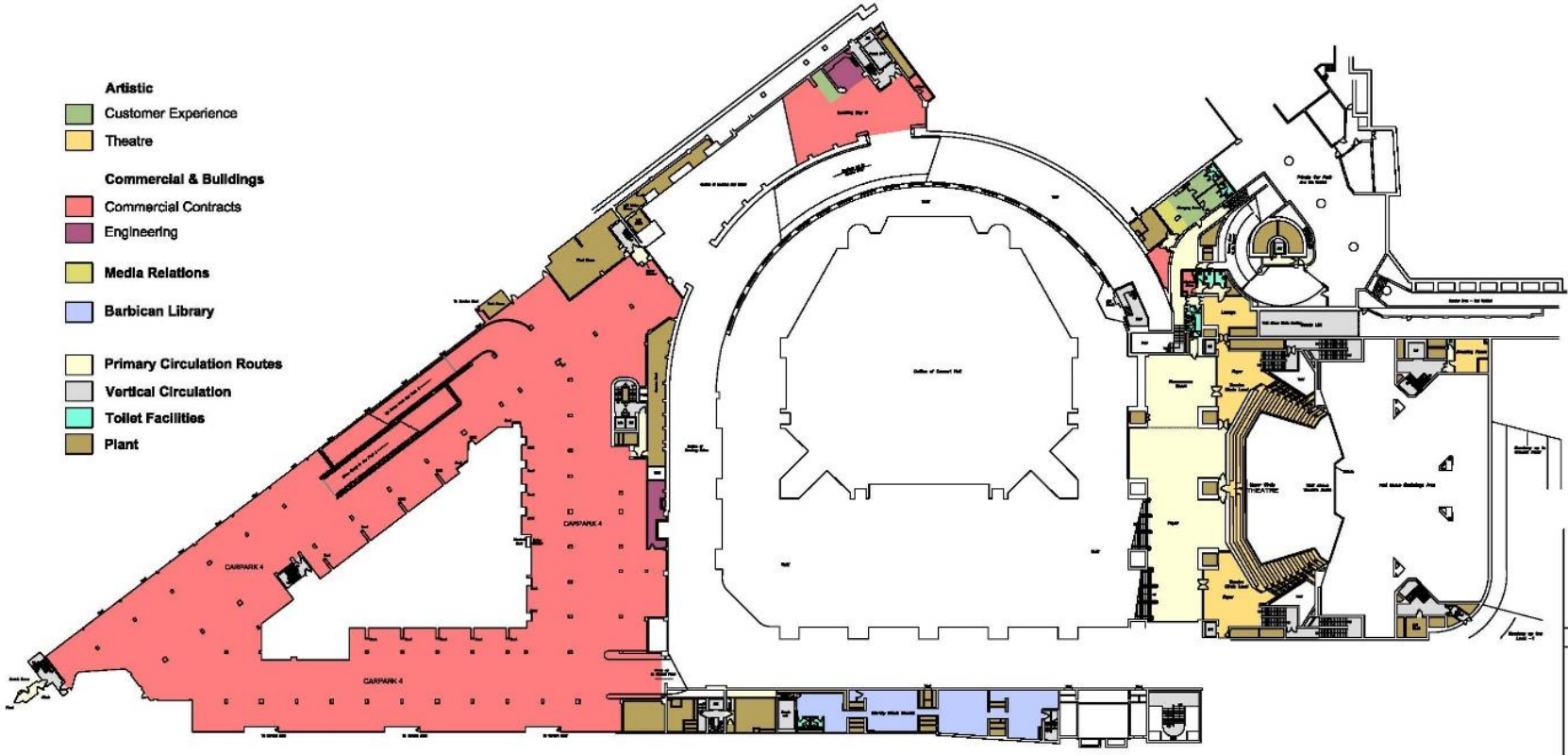
CITY SURVEYOR'S DEPARTMENT
Corporate Property Group :
Corporate Property Review

Barbican Arts Centre
Silk Street
London EC2Y 8DS

Level -1
Concert Hall Stalls (upper part)
Theatre Stalls (upper part)
Car Park 3

Scale to fit A3 | Drawn by : DTR
Date : Feb 2010
Drawing No : 4-C-30992 LC 03

This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.




N

Rev | Drawn | Date

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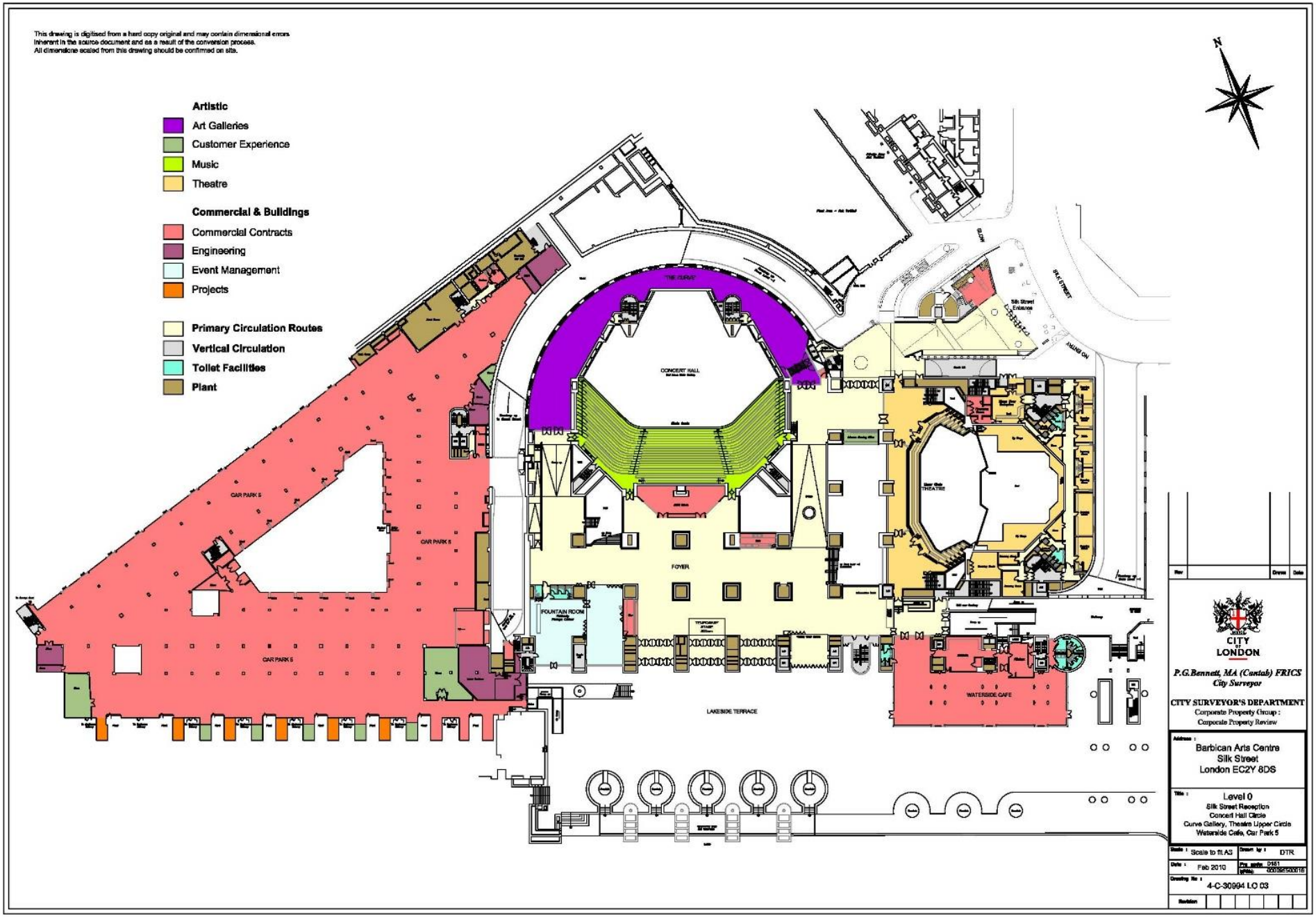
*City Surveyor*

**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corpocate Property Review

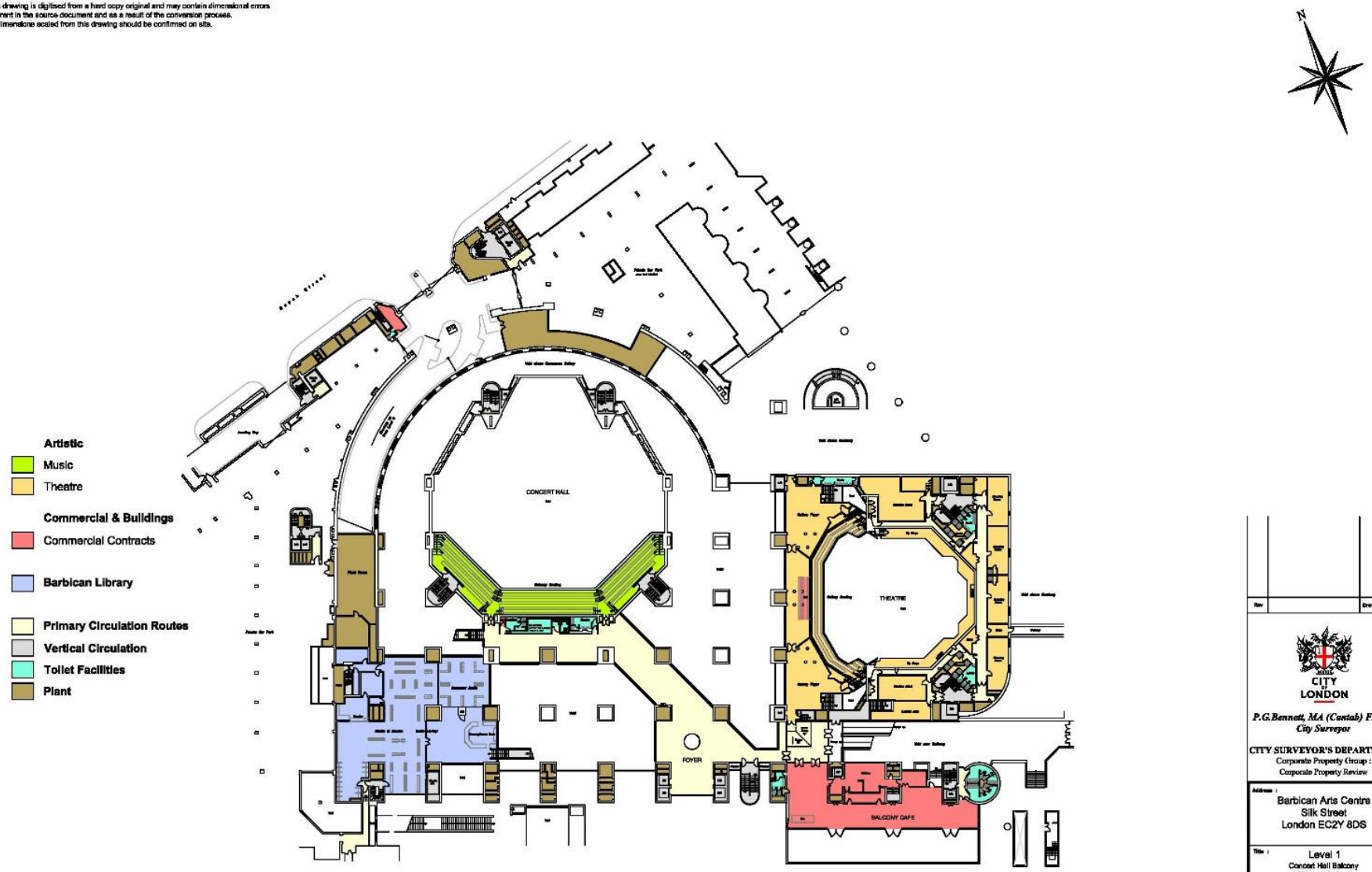
Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

Title :
Level -1 Mezzanine
Theatre Circle
Car Park 4

Scale : Scale to fit A3 | Drawn by : DTR
Date : Feb 2010 | Proj. code : D161
Drawing No : 4-C-30993 LO 03
Revision


This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.
Artistic
Art Galleries
Customer Experience
Music
Theatre
Commercial & Buildings
Commercial Contracts
Engineering
Event Management
Projects
Primary Circulation Routes
Vertical Circulation
Toilet Facilities
Plant
N
CONCERT HALL
FOYER
FOUNTAIN ROOM
LAKESIDE TERRACE
WATERSIDE CAFE
CAR PARK 5
CITY OF LONDON
P.G.Bennett, MA (Cantab) FRICS
City Surveyor
CITY SURVEYOR'S DEPARTMENT
Corporate Property Group :
Corporate Property Review
Barbican Arts Centre
Silk Street
London EC2Y 8DS
Level 0
Silk Street Reception
Concert Hall Circle
Curve Gallery, Theatre Upper Circle
Waterside Cafe, Car Park 5
Scale to fit A3
DTR
Feb 2010
4-C-30994 LO 03

This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.




| Rev | | Drawn | Date |
|---|---|---|---|

CITY OF LONDON

*P.G.Bennett, MA (Cantab) FRICS*
*City Surveyor*

**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

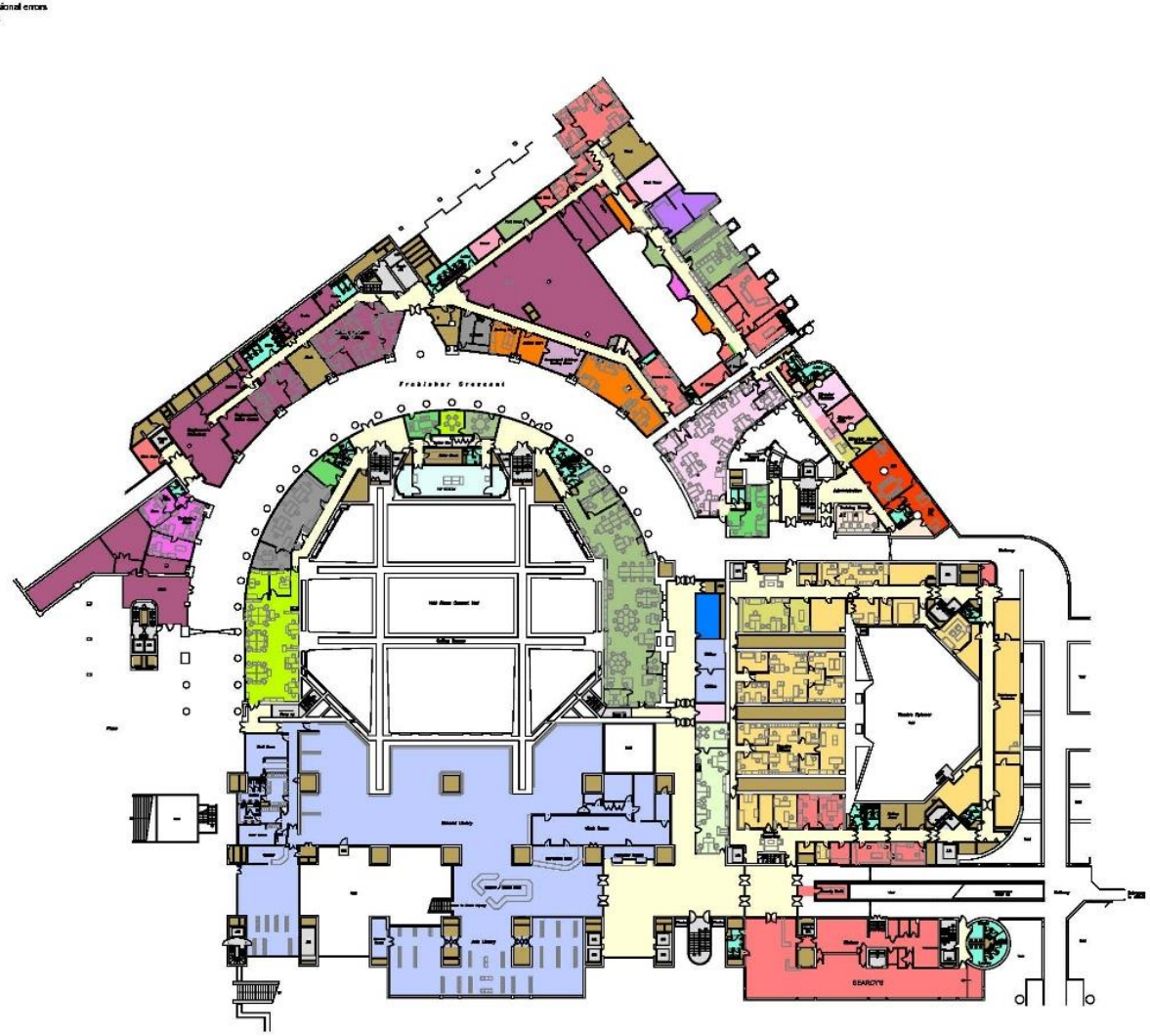
Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

Title :
Level 1
Concert Hall Balcony
Theatre Gallery
Barbican Music Library
Balcony Cafe

| | |
|---|---|
| Scale : Scale to fit A3 | Drawn by : DTR |
| Date : Feb 2010 | Proj code: D151 / LPRN: 000095500016 |
| Drawing No : 4-C-30995 LO 03 | |
| Revision | |

This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.

- **MD**
- **Artistic**
- Cinema
- Customer Experience
- Music
- Theatre
- **Commercial & Buildings**
- Commercial Contracts
- Engineering
- Event Management
- Projects
- Technical
- **Finance**
- **Human Resources**
- IT
- **Media Relations**
- Shared Facilities
- **Barbican Library**
- **GSMD**
- **LSO**
- **Primary Circulation Routes**
- **Vertical Circulation**
- **Toilet Facilities**
- **Plant**




| Rev | | Drawn | Date |
|---|---|---|---|

CITY OF LONDON

*P.G.Bennett, MA (Cantab) FRICS*
*City Surveyor*

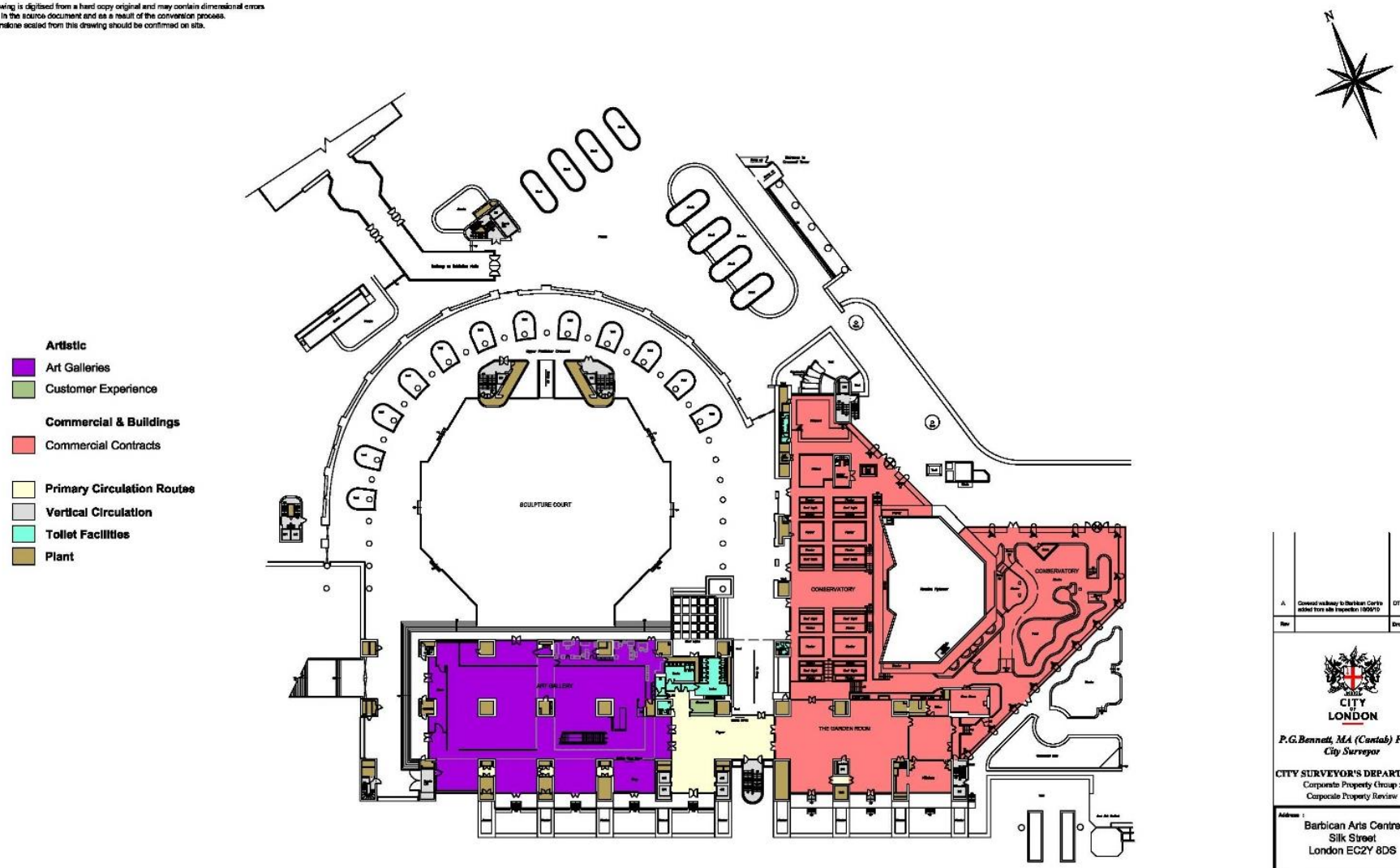
**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

Title :
Level 2
Barbican Library
Barbican Centre Main Office Level
Searcy's Restaurant

| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Proj. code: | D161 |
| | | LPRN: | 000095500016 |
| Drawing No : | 4-C-30996 LO 03 | | |
| Revision | | | |

This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.




| Rev | | Drawn | Date |
|---|---|---|---|
| A | Covered walkway to Barbican Centre added from site inspection 18/09/10 | DTR | Jun10 |

CITY OF LONDON

*P.G.Bennett, MA (Cantab) FRICS*
*City Surveyor*

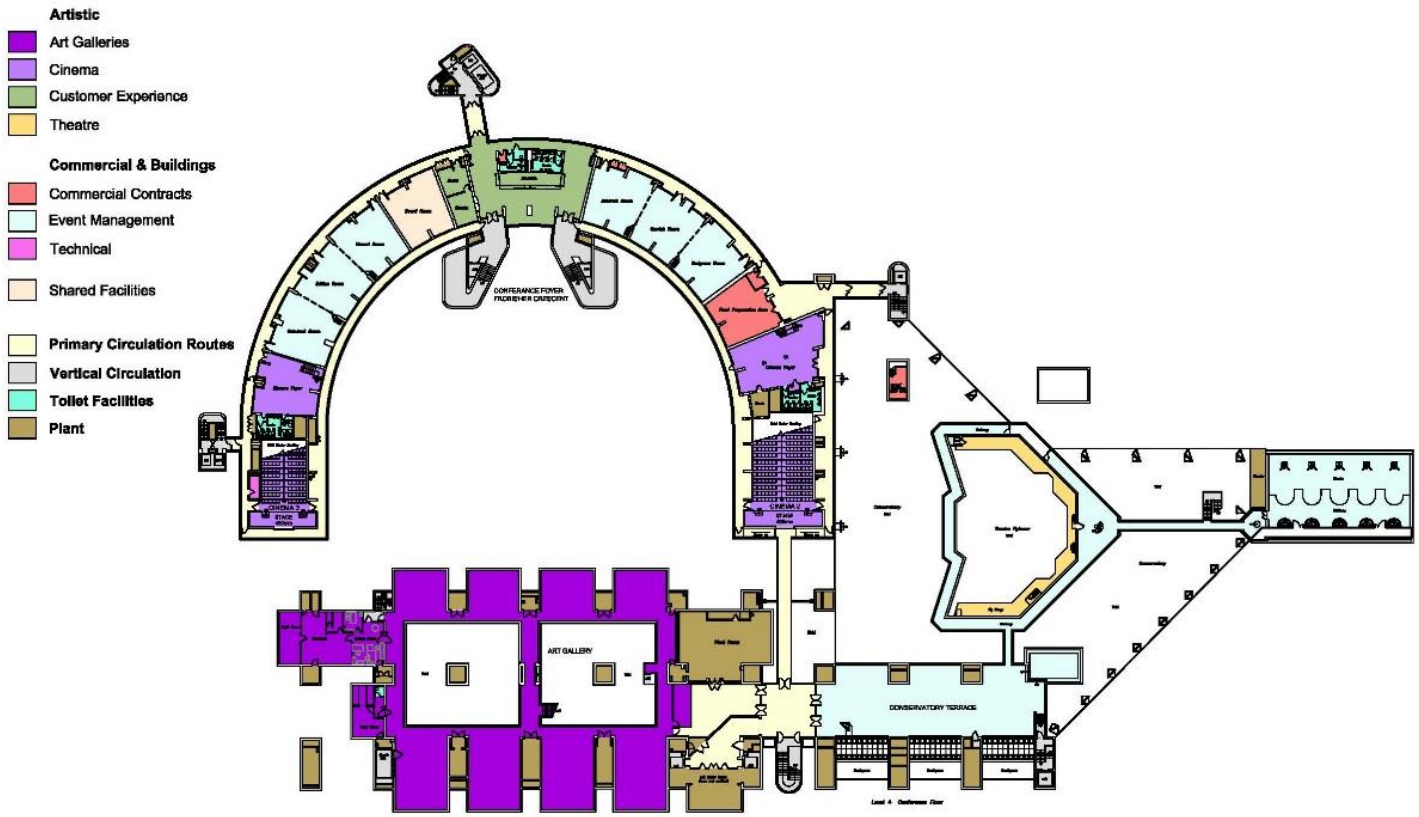
**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

Title :
Level 3
Art Gallery
Conservatory
The Garden Room

| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Proj code: | D151 |
| | | Lpmnt: | 000095500016 |
| Drawing No : | 4-C-30997 LO 03 | | |
| Revision | A | | |

This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.



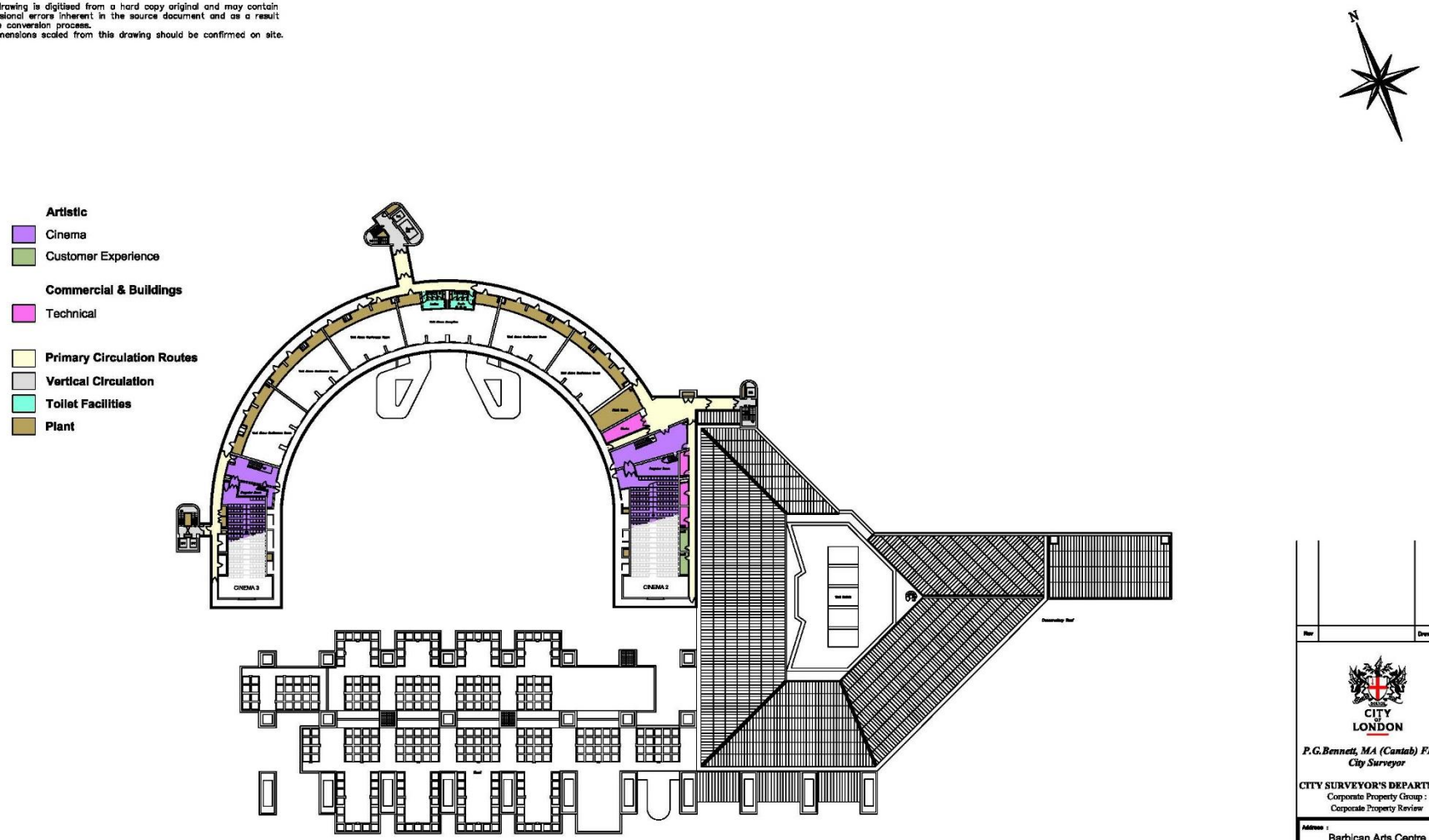

CITY OF LONDON
P.G.Bennett, MA (Cantab) FRICS
City Surveyor
CITY SURVEYOR'S DEPARTMENT
Corporate Property Group :
Corporate Property Review

Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

Title :
Level 4
Cinemas 2 & 3
Conference Rooms
Art Gallery (upper level)
Conservatory Terrace

Scale : Scale to fit A3
Drawn by : DTR
Date : Feb 2010
Proj. code: 0451
UPRN: 400098500016
Drawing No : 4-C-30998 LC 03
Revision

This drawing is digitised from a hard copy original and may contain dimensional errors inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.




| Rev | | Drawn | Date |
|---|---|---|---|

CITY OF LONDON

*P.G.Bennett, MA (Cantab) FRICS*
*City Surveyor*

CITY SURVEYOR'S DEPARTMENT
Corporate Property Group :
Corporate Property Review

Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

Title :
Level 5
Cinemas 2 & 3 (upper part)

| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Pro code: | 0151 |
| | | UPRN: | 000095500018 |
| Drawing No : | 4-C-30999 LO 03 | | |
| Revision | | | |

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All dimensions scaled from this drawing should be confirmed on site.

**Artistic**
- Art Galleries
- Cinema
- Education
- International

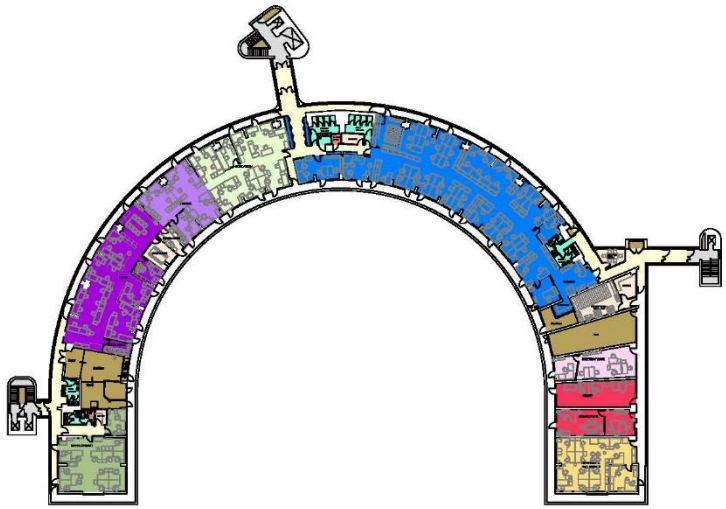
**Commercial & Buildings**
- Commercial Contracts
- Corporate & Events

**Development**

**LSO space**

Shared Facilities

**Primary Circulation Routes**
**Vertical Circulation**
**Toilet Facilities**
**Plant**






| Rev | | Drawn | Date |
|---|---|---|---|
| B | Partition & furniture layout revision based upon CS plan no. 4-C-30810-03 rev B, dated Dec 2009 and Simmons Taylor Hall 'Proposed Space Plan Layouts', ref. 785 Arts SK1A, 785 Devel SK1A, 785 Ch SK1A, 785 Edu SK1A, 785 SK1A, dated Dec 2009 & 785 M1 dated 20/05/2010. Proposed layouts have not been confirmed on site.<br><br>NOTE:<br>Due to minor discrepancies in the scales of these drawings detail has been drawn as a best fit. All measurements scaled from this plan should be confirmed on site. | DTR | Aug10 |
| A | Partition layout amended in line with LSO Lease plan,(C.S. ref. 4-C31786-01) | DTR | Jun10 |

CITY OF LONDON

*P.G.Bennett, MA (Cantab) FRICS*
*City Surveyor*

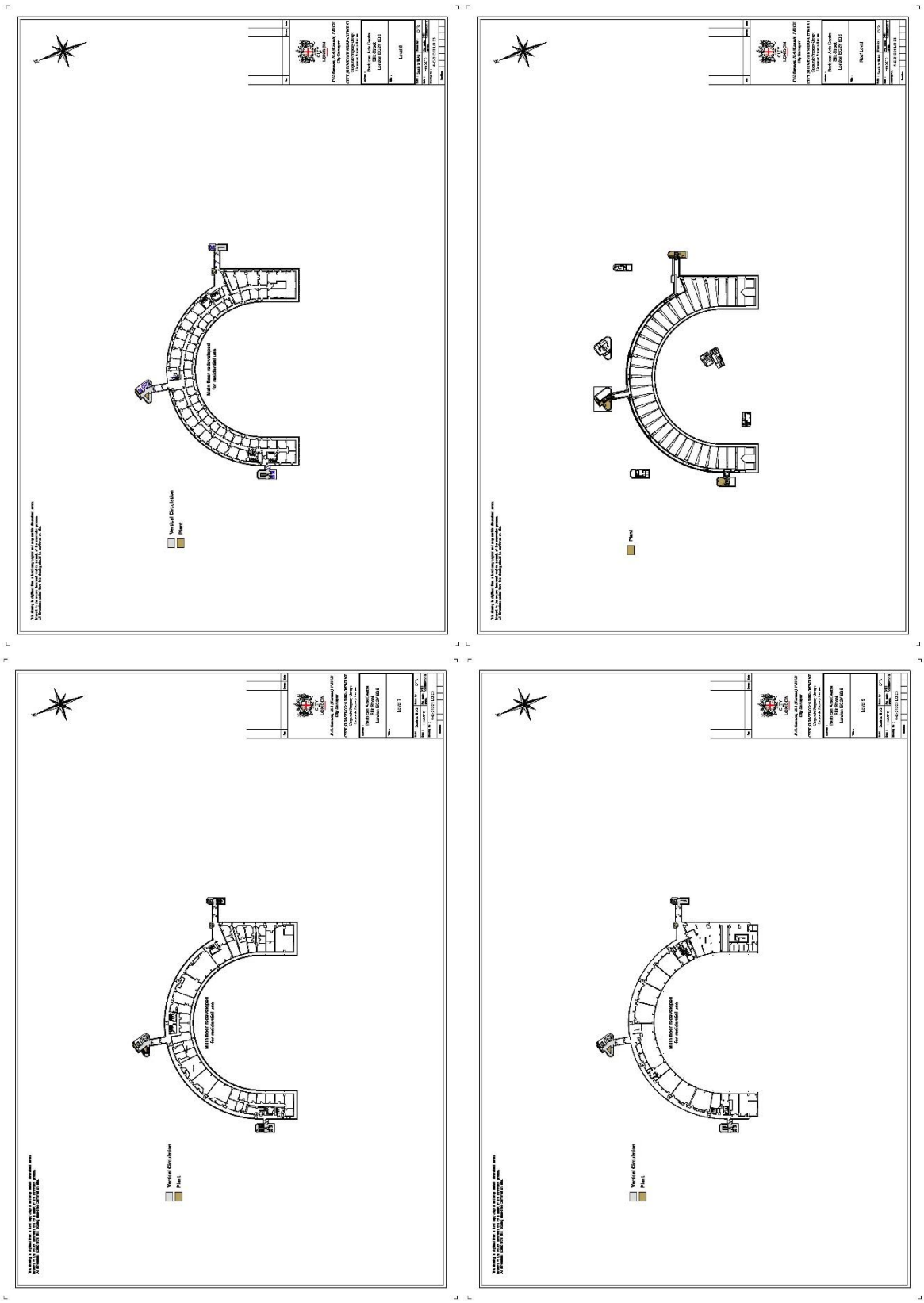
**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

Address :
Barbican Arts Centre
Silk Street
London EC2Y 8DS

Title :
Level 6
Frobisher Crescent Offices

| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Pro code: | 0151 |
| | | MFRN: | 000095500018 |
| Drawing No : | 4-C-31000 LO 03 | | |
| Revision | A B | | |

# Frobisher Crescent plans at upper (residential) levels



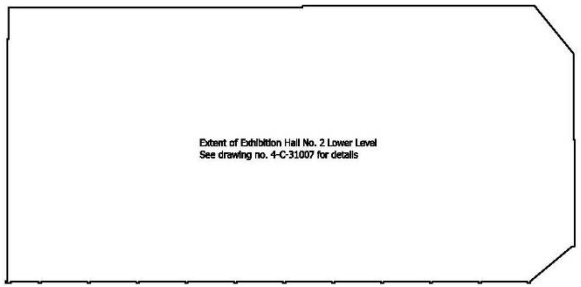
This drawing is digitised from a hard copy original and may contain dimensional errors
Inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.

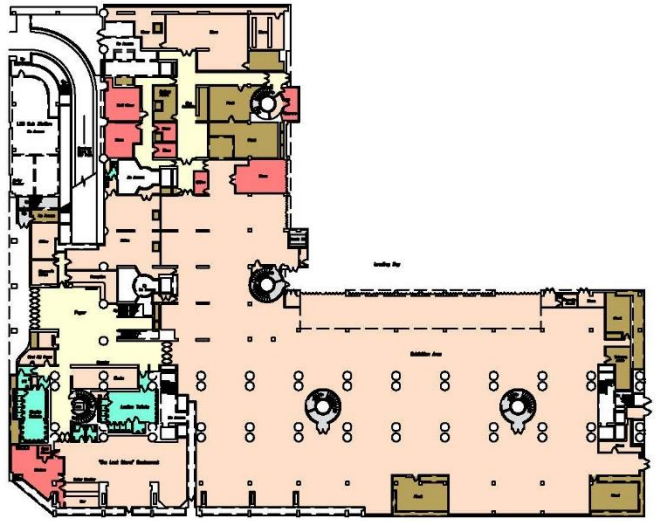
N

**Commercial & Buildings**

- Commercial Contracts
- Exhibition Halls

- **Primary Circulation Routes**
- **Vertical Circulation**
- **Toilet Facilities**
- **Plant**



G o l d e n  L a n e

B e e c h  S t r e e t

| Rev | | Drawn | Date |
|---|---|---|---|

CITY OF LONDON

*P.G.Bennett, MA (Cantab) FRICS*
*City Surveyor*

**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

Address :
Barbican Trade Centre
Golden Lane
London EC2Y 8DS

Title :
Exhibition Hall 1
Lower Level

| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Proj. code: | tbc |
| | | UPRN: | 200000073028 |

Drawing No :
4-C-31005 LO 03

Revision

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All dimensions scaled from this drawing should be confirmed on site.

**Artistic**

Marketing

**Commercial & Buildings**

Commercial Contracts

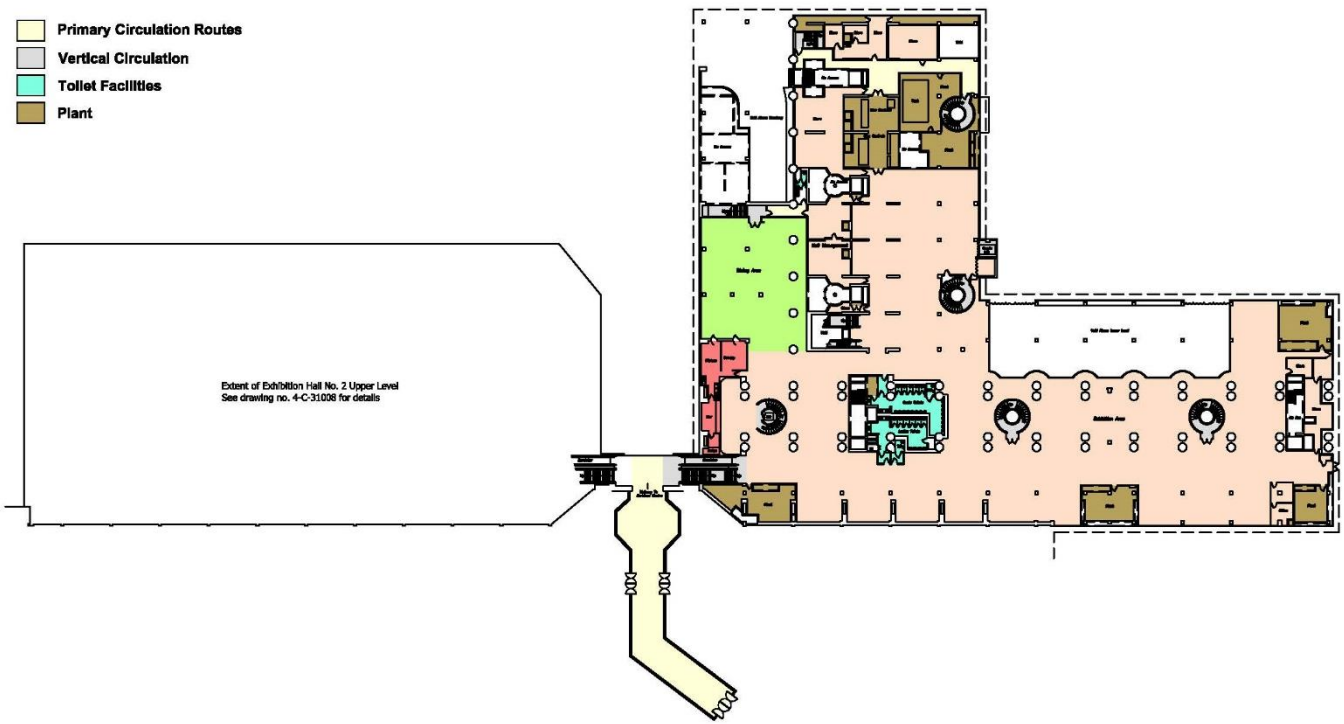
Exhibition Halls

**Primary Circulation Routes**

**Vertical Circulation**

**Toilet Facilities**

**Plant**







| Rev | | Drawn | Date |
|---|---|---|---|
| A | Covered walkway to Barbican Centre added from site inspection 18/08/10 | DTR | Jun10 |

CITY OF LONDON

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*City Surveyor*

**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

Address :
Barbican Trade Centre
Golden Lane
London EC2Y 8DS

Title :
Exhibition Hall 1
Upper Level

| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Pre code: | tbc |
| | | UPRN: | 200000073028 |
| Drawing No : | 4-C-31006 LO 03 | | |
| Revision | A | | |

This drawing is digitised from a hard copy original and may contain dimensional errors
Inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.

N

**Commercial & Buildings**

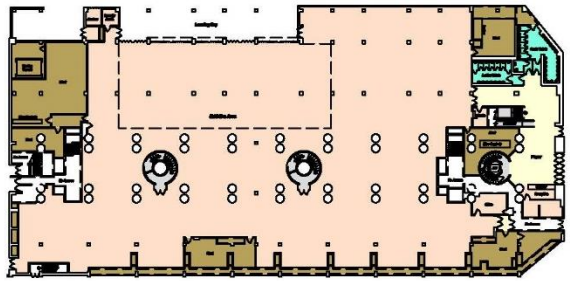
Exhibition Halls

**Primary Circulation Routes**

**Vertical Circulation**

**Toilet Facilities**

**Plant**



Golden Lane

Extent of Exhibition Hall No. 1 Lower Level
See drawing no. 4-C-31005 for details

Beech Street

| Rev | | Drwn | Date |
|---|---|---|---|

CITY of LONDON

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*City Surveyor*

CITY SURVEYOR'S DEPARTMENT
Corporate Property Group :
Corporate Property Review

Address :
Barbican Trade Centre
Golden Lane
London EC2Y 8DS

Title :
Exhibition Hall 2
Lower Level

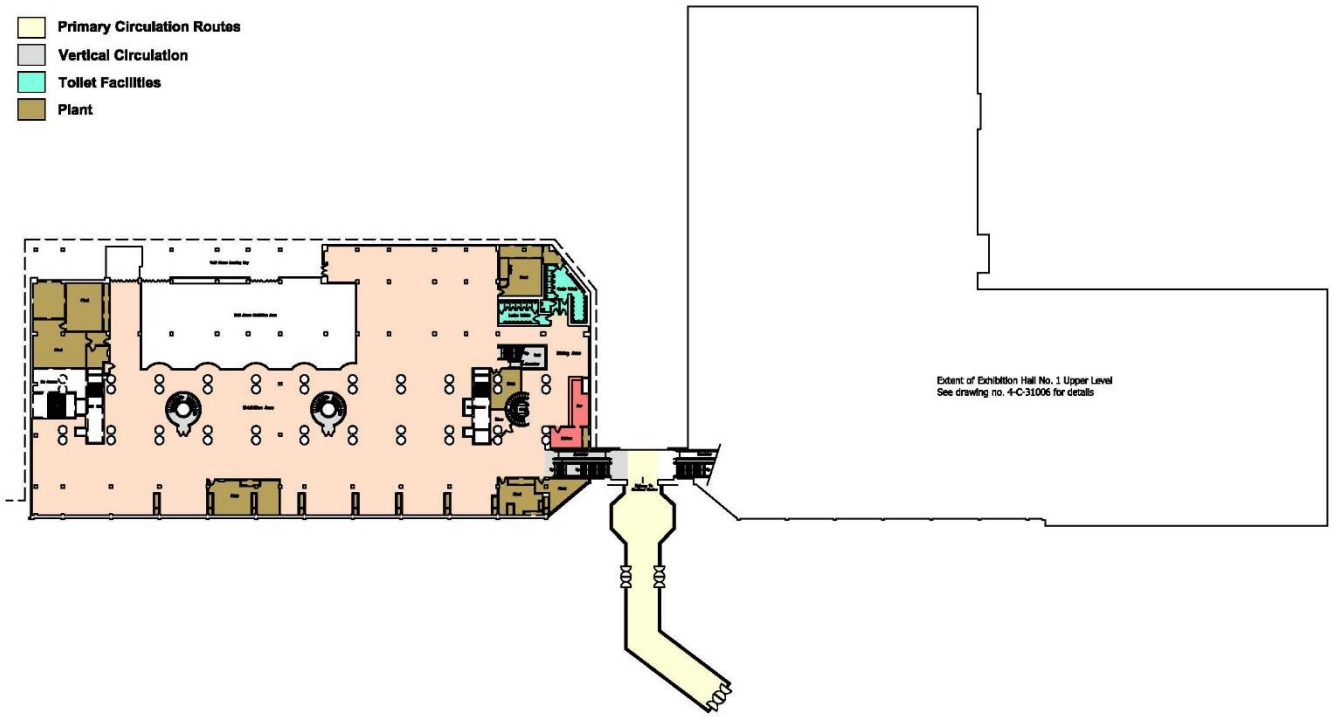
| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Proj code: tbc<br>UPRN: | 200000073028 |
| Drawing No : | 4-C-31007 LO 03 | | |
| Revision | | | |

This drawing is digitised from a hard copy original and may contain dimensional errors
Inherent in the source document and as a result of the conversion process.
All dimensions scaled from this drawing should be confirmed on site.

**Commercial & Buildings**

- Commercial Contracts
- Exhibition Halls

- **Primary Circulation Routes**
- **Vertical Circulation**
- **Toilet Facilities**
- **Plant**




| Rev | | Drawn | Date |
|---|---|---|---|
| A | Covered walkway to Barbican Centre added from site inspection 19/09/10 | DTR | Jun10 |

CITY OF LONDON

*P.G.Bennett, MA (Cantab) FRICS*
*City Surveyor*

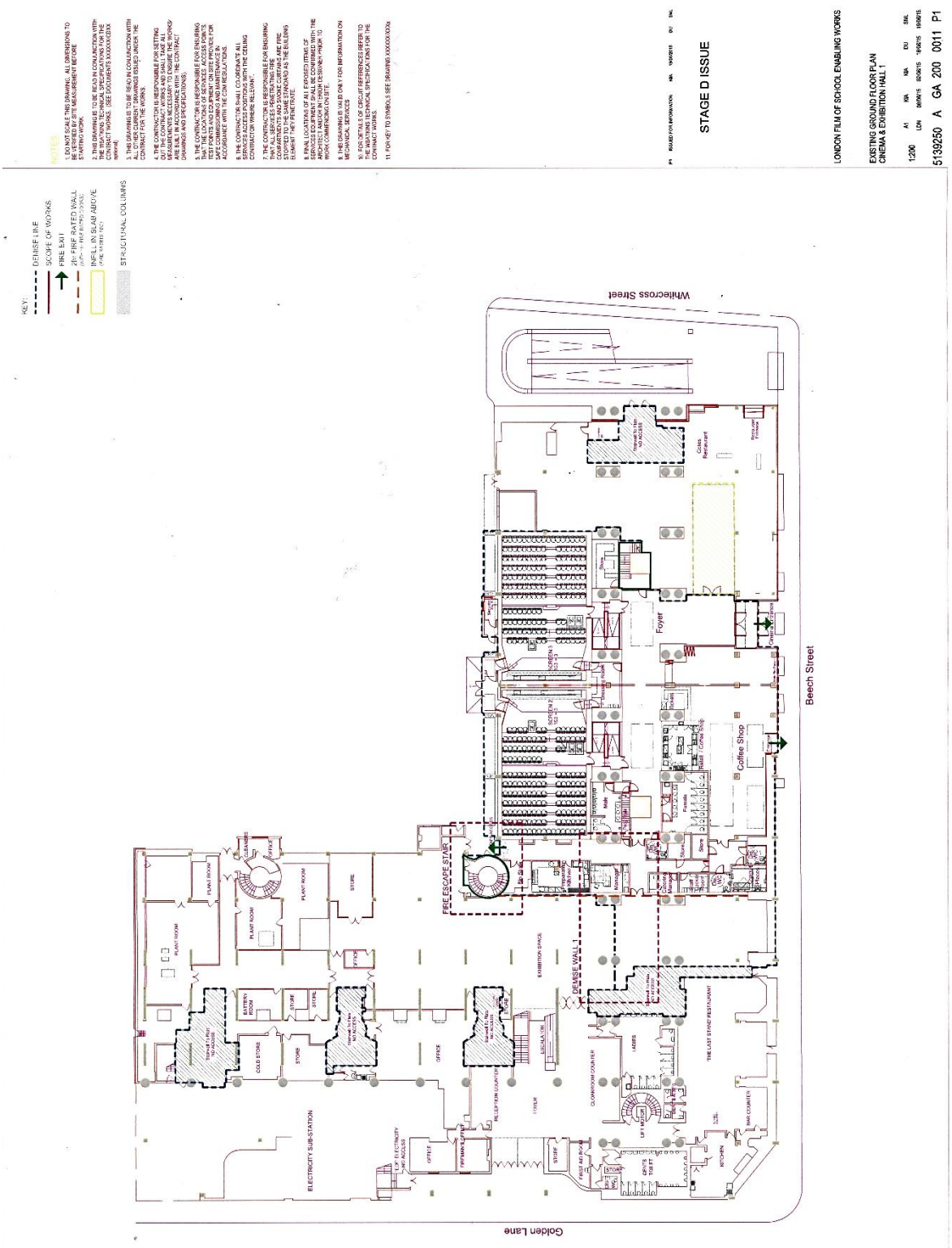
**CITY SURVEYOR'S DEPARTMENT**
Corporate Property Group :
Corporate Property Review

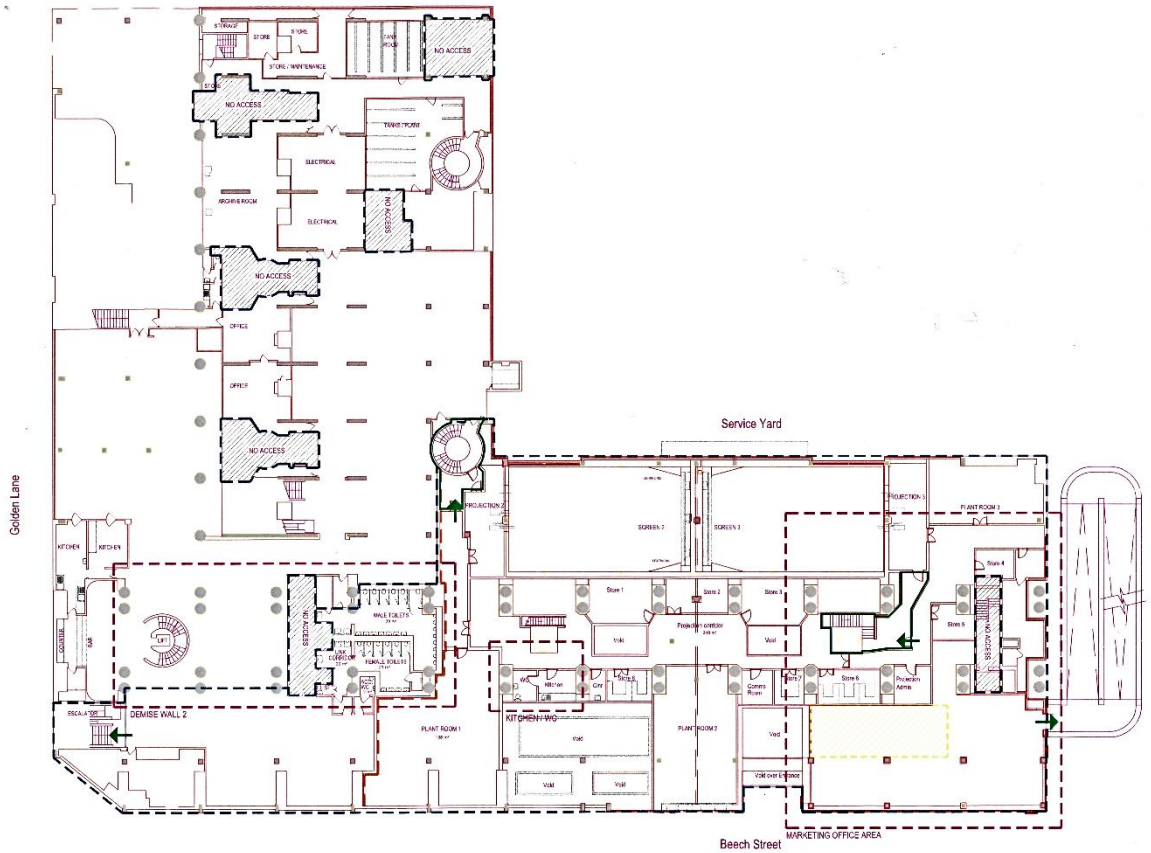
Address :
Barbican Trade Centre
Golden Lane
London EC2Y 8DS

Title :
Exhibition Hall 2
Upper Level

| | | | |
|---|---|---|---|
| Scale : | Scale to fit A3 | Drawn by : | DTR |
| Date : | Feb 2010 | Pro code: tbc<br>UPRN: | 200000073028 |
| Drawing No : | 4-C-31008 LO 03 | | |
| Revision | A | | |

# Exhibition Hall plans showing conversion works, 2015






KEY:

- DEMISE LINE
- SCOPE OF WORKS
- FIRE EXIT
- 2hr FIRE RATED WALL (WITH 1hr FIRE RATED DOORS)
- INFILL IN SLAB BELOW
- STRUCTURAL COLUMNS

NOTES:

1. DO NOT SCALE THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED BY SITE MEASUREMENT BEFORE STARTING WORK.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE WSATKINS TECHNICAL SPECIFICATIONS FOR THE CONTRACT WORKS. (SEE DOCUMENTS XXXXXX/CXXX optional)
3. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER CURRENT DRAWINGS ISSUED UNDER THE CONTRACT FOR THE WORKS.
4. THE CONTRACTOR IS RESPONSIBLE FOR SETTING OUT THE CONTRACT WORKS AND SHALL TAKE ALL MEASUREMENTS NECESSARY TO ENSURE THE WORKS ARE BUILT IN ACCORDANCE WITH THE CONTRACT DRAWINGS AND SPECIFICATION(S).
5. THE CONTRACTOR IS RESPONSIBLE FOR ENSURING THAT THE LOCATIONS OF SERVICES, ACCESS POINTS, TEST POINTS AND EQUIPMENT ON SITE PROVIDE FOR SAFE COMMISSIONING AND MAINTENANCE IN ACCORDANCE WITH THE CDM REGULATIONS.
6. THE CONTRACTOR SHALL CO-ORDINATE ALL SERVICES ACCESS POSITIONS WITH THE CEILING CONTRACTOR WHERE RELEVANT.
7. THE CONTRACTOR IS RESPONSIBLE FOR ENSURING THAT ALL SERVICES PENETRATING FIRE COMPARTMENTS AND SMOKE CURTAINS ARE FIRE STOPPED TO THE SAME STANDARD AS THE BUILDING ELEMENT THEY PENETRATE.
8. FINAL LOCATIONS OF ALL EXPOSED ITEMS OF SERVICES EQUIPMENT SHALL BE CONFIRMED WITH THE ARCHITECT AND/OR INTERIOR DESIGNER PRIOR TO WORK COMMENCING ON SITE.
9. THIS DRAWING IS VALID ONLY FOR INFORMATION ON MECHANICAL SERVICES
10. FOR DETAILS OF CIRCUIT REFERENCES REFER TO THE WSATKINS TECHNICAL SPECIFICATIONS FOR THE CONTRACT WORKS.
11. FOR KEY TO SYMBOLS SEE DRAWING XXXXXXXXXx

| | | | | | |
|---|---|---|---|---|---|
| P1 | ISSUED FOR INFORMATION | KIA | 19/06/2015 | DU | SML |

STAGE D ISSUE

LONDON FILM OF SCHOOL ENABLING WORKS

EXISTING FIRST FLOOR PLAN
CINEMA & EXHIBITION HALL 1

1:200 | A1 | KIA | KIA | DU | SML
LDN | 08/06/15 | 02/06/15 | 18/06/15 | 19/06/15

5139250 A GA 200 0012 P1

# TEST OF RELEVANCE: EQUALITY ANALYSIS (EA)

The screening process of using the Test of Relevance template aims to assist in determining whether a full Equality Analysis (EA) is required. The EA template and guidance plus information on the Equality Act and the Public Sector Equality Duty (PSED) can be found on Colnet at: http://colnet/Departments/Pages/News/Equality-and-Diversity.aspx

**Introduction**

**The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have 'due regard' to the need to:**

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership.
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation



| What is due regard? | How to demonstrate compliance |
|---|---|
| • It involves considering the aims of the duty in a way that is proportionate to the issue at hand<br>• Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision<br>• Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.<br><br>The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.<br><br>Even in cases where it is considered that there are no implications of proposed policy and decision making on the PSED it is good practice to record the reasons why and to include these in reports to committees where decisions are being taken.<br><br>It is also good practice to consider the duty in relation to current policies, services and procedures, even if there is no plan to change them. | Case law has established the following principles apply to the PSED:<br>• **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.<br>• **Sufficient Information** – must be made available to the decision maker<br>• **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.<br>• **Real consideration** – consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.<br>• **Sufficient information** – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty<br>• **No delegation** - public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.<br>• **Review** – the duty is continuing applying when a policy is developed and decided upon, but also when it is implemented and reviewed. |

**However there is no requirement to:**

- Produce equality analysis or an equality impact assessment
- Indiscriminately collect diversity date where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make services homogeneous or to try to remove or ignore differences between people.

**The key points about demonstrating compliance with the duty are to:**

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications
- Keep adequate records of the full decision making process

**Test of Relevance screening**

The Test of Relevance screening is a short exercise that involves looking at the overall proposal and deciding if it is relevant to the PSED.

**Note: If the proposal is of a significant nature and it is apparent from the outset that a full equality analysis will be required, then it is not necessary to complete the Test of Relevance screening template and the full equality analysis and be completed.**

The questions in the Test of Relevance Screening Template to help decide if the proposal is equality relevant and whether a detailed equality analysis is required. The key question is whether the proposal is likely to be relevant to any of the protected characteristics.

Quite often, the answer may not be so obvious and service-user or provider information will need to be considered to make a preliminary judgment. For example, in considering licensing arrangements, the location of the premises in question and the demographics of the area could affect whether section 149 considerations come into play.

There is no one size fits all approach but the screening process is designed to help fully consider the circumstances.

**What to do**

In general, the following questions all feed into whether an equality analysis is required:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities? At this initial screening stage, the point is to try to assess obvious negative or positive impact.

If a negative/adverse impact has been identified (actual or potential) during completion of the screening tool, a full equality analysis must be undertaken.

If no negative / adverse impacts arising from the proposal it is not necessary to undertake a full equality analysis.

On completion of the Test of Relevance screening, officers should:

- Ensure they have fully completed and the Director has signed off the Test of Relevance Screening Template.
- Store the screening template safely so that it can be retrieved if for example, Members request to see it, or there is a freedom of information request or there is a legal challenge.
- If the outcome of the Test of Relevance Screening identifies no or minimal impact refer to it in the Implications section of the report and include reference to it in Background Papers when reporting to Committee or other decision making process.

| | | | | | |
|---|---|---|---|---|---|
| **1.** | **Proposal / Project Title:** Barbican Listed Building Management Guidelines Vol IIIA (Arts Centre) SPD | | | | |
| **2.** | **Brief summary (include main aims, proposed outcomes, recommendations / decisions sought):** The Barbican Arts Centre Listed Building Management Guidelines Volume III draft is a document which is aims to guide future changes, maintain and protect the historical and architectural significance of the Grade 2 listed Barbican Estate | | | | |
| **3.** | **Considering the equality aims (eliminate unlawful discrimination; advance equality of opportunity; foster good relations), indicate for each protected group whether there may be a positive impact, negative (adverse) impact or no impact arising from the proposal:** | | | | |
| | **Protected Characteristic (Equality Group)** ☒ | **Positive Impact** | **Negative Impact** | **No Impact** | **Briefly explain your answer. Consider evidence, data and any consultation.** |
| | Age | ☐ | ☐ | ☒ | The proposed documents have no relevant content |
| | Disability | ☒ | ☐ | ☐ | Where appropriate, the documents encourage enhancements to access |
| | Gender Reassignment | ☐ | ☐ | ☒ | The proposed documents have no relevant content |
| | Marriage and Civil Partnership | ☐ | ☐ | ☒ | The proposed documents have no relevant content |
| | Pregnancy and Maternity | ☐ | ☐ | ☒ | The proposed documents have no relevant content |
| | Race | ☐ | ☐ | ☒ | The proposed documents have no relevant content |
| | Religion or Belief | ☐ | ☐ | ☒ | The proposed documents have no relevant content |
| | Sex (i.e gender) | ☐ | ☐ | ☒ | The proposed documents have no relevant content |
| | Sexual Orientation | ☐ | ☐ | ☒ | The proposed documents have no relevant content |
| **4.** | **There are no negative/adverse impact(s)** Please briefly explain and provide evidence to support this decision: | The documents touch on equalities issues only where access to the buildings/streetscape/public realm is concerned. They encourage enhancements to access where appropriate. | | | |
| **5.** | **Are there positive impacts of the proposal on any equality groups?** Please briefly explain how these are in line with the equality aims: | Please see above. | | | |
| **6.** | **As a result of this screening, is a full EA necessary? (Please check appropriate box using ☐)** | **Yes** ☐ | **No** ☒ | **Briefly explain your answer:** The proposed documents are neutral in equalities terms aside from the positive aspect referred to above. | |
| **7.** | **Name of Lead Officer:** Ruby Raw | **Job title:** Planning Officer | | **Date of completion:** 06 November 2020 | |

| | | | |
|---|---|---|---|
| **Signed off by Department Director :** | | **Name:** | **Date:** |

| Committee(s) | Dated: 16th February 2021 |
|---|---|
| Planning and Transportation Committee – for decision | |
| **Subject:** Local Flood Risk Management Strategy 2021-27 | **Public** |
| **Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?** | **1, 11, 12** |
| **Does this proposal require extra revenue and/or capital spending?** | **N** |
| **If so, how much?** | **n/a** |
| **What is the source of Funding?** | **n/a** |
| **Has this Funding Source been agreed with the Chamberlain's Department?** | **n/a** |
| **Report of:** Director of the Built Environment | **For Decision** |
| **Report author:** Holly Smith - Environmental Resilience Team | |


## Summary

The *Flood and Water Management Act 2010* assigns various responsibilities to Lead Local Flood Authorities including the requirement to develop, maintain, apply and monitor a strategy for local flood risk management in its area - the Local Flood Risk Management Strategy (LFRMS). The City Corporation, as unitary authority for the Square Mile, is the Lead Local Flood Authority for the City.

This strategy identifies the approach the City Corporation is taking to the flood risks that affect the City, the actions that are underway or planned to reduce these risks and the processes by which this strategy will be kept up to date.

The City currently has a LFRMS that runs from 2014-2020. Substantial progress has been made in implementing the LFRMS 2014-2020 but there is still more to do, not least to address the impacts of climate change on flood risk in the City and to improve awareness of the actions that businesses, residents and visitors to the City can take to minimise the risks and consequences of flooding.

The Environmental Resilience Team have reviewed and updated the LFRMS for the period 2021-2027. The LFRMS was put out to consultation with risk management authorities in our area and the public as outlined in the Flood and Water Management Act 2010. The strategy has also been linked to the Climate Action Strategy. The next step is to get committee approval for the revised strategy, so the measures can be implemented over the next 6 year.


## Recommendation(s)

Planning and Transportation members are asked to:

- Adopt the Local Flood Risk Management Strategy 2021 – 2027 (appendix 1).

## Main Report

### Background

1. The City Corporation, as unitary authority for the Square Mile, is the Lead Local Flood Authority (LLFA) for the City. The *Flood and Water Management Act 2010* assigns various responsibilities to Lead Local Flood Authorities including the requirement to develop, maintain, apply and monitor a strategy for local flood risk management in its area – the Local Flood Risk Management Strategy (LFRMS).

2. The City of London's LFRMS contains information on how the City Corporation plan to work together with communities, businesses and other Risk Management Authorities (RMAs) to manage and mitigate local flood risk in our area (the Square Mile). This strategy identifies the approach the City Corporation is taking to the flood risks that affect the City, the actions that are underway or planned to reduce these risks and the processes by which this strategy will be kept up to date.

3. The City Corporation currently has a LFRMS that runs from 2014-2020. The second cycle of action under the Flood Risk Regulations 2009 and Flood and Water Management Act 2010 is now due. This requires a review of the City of London LFRMS.

### Current Position

4. There has been substantial progress in implementing the LFRMS 2014-2020, appendix 2 shows a review of the 2014-2020 measures that were to be implemented during this period. The majority of the measures have been completed or are on-going actions. All work to date relating to the LFRMS has been absorbed from current local risk resources.

5. But there is still more to do, not least to address the impacts of climate change on flood risk in the City and to improve awareness of the actions that businesses, residents and visitors to the City can take to minimise the risks and consequences of flooding.

6. The Environmental Resilience Team have reviewed and updated the LFRMS for the period 2021-2027, which includes how to implement the objectives and measures that form part of the Environment Agency's Flood Risk Management Plan for the Thames Basin. These objectives and measures were approved under delegated authority by the director of the Built Environment and presented at the September 2020 P&T Committee for information.

7. The draft LFRMS was approved to go out to consultation with risk management authorities in our area and the public as outlined in the Flood and Water Management Act 2010 by this committee in October 2020. This consultation period has ended and the LFRMS has been amended to reflect comments received.

8. Appendix 3 is a summary of all the comments received and alterations made. There were no major changes from the version presented to this committee in October.

9. The LFRMS is linked directly to the City of London's Climate Action Strategy, as many of the actions will help to implement climate resilience measures from the City of London's Climate Action Strategy.

**Proposals**

1. Appendix 1 is proposed Local Flood Risk Management Strategy for the period 2021-2027 as developed by the Environmental Resilience Team. This report is asking for the Planning and Transportation committee to adopt the Local Flood Risk Management Strategy 2021-2027.

2. The measures in the strategy will be kept under review by the Environmental Resilience Team and periodical presented to the Planning and Transportation Committee for information.

**Corporate & Strategic Implications**

3. **Strategic implications** - The LFRMS is a statutory document that all LLFAs must produce under the Flood Risk Regulations 2009 and the Flood and Water Management Act 2010. The LFRMS links to the Corporate Plan outcomes 11 (*We have clean air, land and water and a thriving and sustainable natural environment*) and 12 (*Our spaces are secure, resilient and well-maintained).*

4. **Financial and Resource implications** – The LFRMS is heavily linked with the Climate Action strategy, with many measures from the LFRMS incorporated into the Climate Action Strategy. The Environmental Resilience Team in DBE has a remit to implement the LFRMS. As can be seen from appendix 2, the previous LFRMS was almost totally completed due to the Environmental Resilience Team's efforts. All work to date relating to the LFRMS has been absorbed from current local risk resources, there are no additional financial implications resulting from this report

5. **Legal implications** - No legal implications have been identified.

6. **Risk implications** – The LFRMS and associated outputs will form part of the evidence base that may change our approach to risk mitigations under CR30n (owned by Director of the Built Environment). Stuart Wright and Kate Smith were consulted on this risk and its links to the LFRMS.

7. **Equalities implications** - The LFRMS has been subject to an Equalities Assessment. Recommendations from this have been incorporated into the document.

8. **Climate implications** – the LFRMS is fully integrated into the climate action strategy with measures from the LFRMS included in the CAS action plan. The LFRMS has also been subject to a Strategic Environment Assessment. Recommendations from this have been incorporated into the document.

9. **Security implications** - There are no security implications which have been identified.

## Conclusion

10. The Environmental Resilience Team have reviewed, consulted and updated the LFRMS for the period 2021-2027 that identifies the approach the City Corporation is taking to the flood risks that affect the City.

11. This report is asking for the Planning and Transportation committee to adopt the Local Flood Risk Management Strategy 2021-2027.

## Appendices

Appendix 1 –LFRMS 2021-2027 for Adoption
Appendix 2 – LFRMS 2014-2020 Final Review
Appendix 3 – LFRMS 2021-27 Consultation Responses

## Background Papers

Planning and Transportation Committee 8th September 2020. Agenda item 16.
Planning and Transportation Committee 6th October 2020. Agenda item 9.

## Report author

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T: Available via Teams

# City of London Corporation

# Local Flood Risk Management Strategy

# 2021-2027

## January 2021

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**Forward**

We are now entering the second cycle of action under the Flood Risk Regulations 2009 and Flood and Water Management Act 2010. This requires a review of the City of London Local Flood Risk Management Strategy (LFRMS). We have made substantial progress in implementing the LFRMS 2014-2020 but there is still more to do, not least to address the impacts of climate change on flood risk in the City and to improve awareness of the actions that businesses, residents and visitors to the City can take to minimise the risks and consequences of flooding.

Flooding does not respect local authority boundaries so the flood risks in the City are influenced by policies and actions implemented in other Lead Local Flood Authority (LLFA) areas. The City Corporation is committed to working in partnership with LLFAs Thames Water and other risk management authorities to collectively address the flood risks we face.

# 1 Introduction

1.1 The City is at relatively low risk of flooding with specific areas at some risk from tidal and river flooding and surface water/sewer flooding (Fig 1). However, the consequences of flooding in these restricted parts of the City could be very high in terms of disruption to business, inconvenience to occupiers and reputational damage.

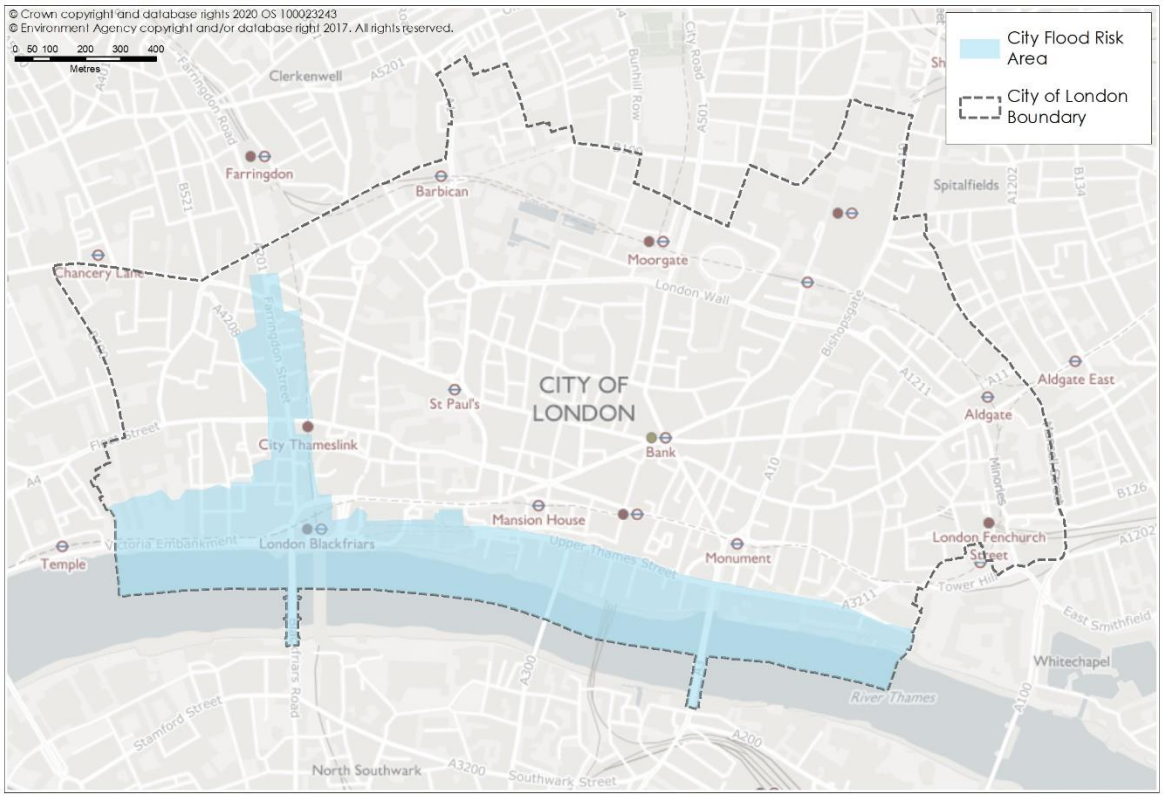



**Figure 1: Flood Risk in the City of London from Local Plan Policies map**

1.2 Our changing climate means that past experience of flooding is not a predictor of future flood risk. Sea level rise will increase the risk of tidal river flooding and more intense rainfall will make surface water flooding and sewer surcharge more likely.

1.3 Tackling flood risk requires local and regional action. The Environment Agency's Thames Estuary 2100 Plan requires flood defence raising in the City alongside replacement of the Thames barrier to provide continued protection. The implementation of Sustainable Drainage Systems (SuDS)across a wide catchment extending to Hammersmith in the west and Hampstead to the north is needed to reduce flood risk in the City

1.4 Resistance and resilience measures will help with speedy recovery in the event of flooding, preventing water entering properties and enabling rapid recovery, whilst emergency planning provides reassurance that the City can respond effectively.

1.5 This strategy identifies the approach the City Corporation is taking to the flood risks that affect the City, the actions that are underway or planned to reduce these risks and the processes by which this strategy will be kept up to date.

1.6 The Flood and Water Management Act 2010[1] assigns various responsibilities to Lead Local Flood Authorities including the requirement to develop, maintain apply and monitor a strategy for local flood risk management in its area. The City Corporation, as unitary authority for the Square Mile is the Lead Local Flood Authority for the City.

1.7 Although Local Flood Risk only covers flood risk from surface water runoff, groundwater and ordinary watercourses this LFRMS must also include any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009. Actions related to river and tidal flood risk have therefore been included in this strategy

1.8 This strategy covers flood risk affecting the City's geographic area; it does not include flood risks on City owned or managed land beyond the City's boundaries.

[1] See Appendix 1 Legislative context

# 2 Flood Risk Management Strategy requirements

2.1 The Flood and Water Management Act 2010 specifies the Lead Local Flood Authority's duties regarding Local Flood Risk Management Strategies and outlines the elements that must be included in a Local Flood Risk Management Strategy. Table 1 shows these requirements and where each one is covered in the City of London Local Flood Risk Management Strategy 2020.

Table 1: Flood and Water Management Act 2010 section 9 (4) Strategy Requirements

| The Flood and Water Management Act 2010 section 9 (4) requires that the strategy must specify: | Where it is covered in this strategy |
|---|---|
| (a) the risk management authorities in the authority's area, | Appendix 2 |
| (b) the flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area, | Appendix 2 |
| (c) the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009), | Section 5 |
| (d) the measures proposed to achieve those objectives, | Section 6 |
| (e) how and when the measures are expected to be implemented, | Section 6 |
| (f) the costs and benefits of those measures, and how they are to be paid for, | Section 7 |
| (g) the assessment of local flood risk for the purpose of the strategy, | Section 4 |
| (h) how and when the strategy is to be reviewed, and | Section 8 |
| (i) how the strategy contributes to the achievement of wider environmental objectives. | Section 9 |

# 3 Assessment of local flood risks

*Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements*

*This section deals with:*

*(4)(g) the assessment of local flood risk for the purpose of the strategy*

3.1 **Flood risk modelling**. Historically the City has not experienced significant flooding, but weather patterns are changing due to climate change. To predict future risk of flooding The City's Strategic Flood Risk Assessment 2017 has used modelling to predict future flood risk. This incorporates risks from climate change and urbanisation, to identify those parts of the City that are at highest risk and the likely impact in terms of flood depths and velocities. Neighbouring boroughs' SFRAs and Local Flood Risk Management Strategies provide further evidence of the risks elsewhere in London which may affect the City. The Environment Agency publish various flood maps for coastal and river flooding, flood maps for surface water and reservoir flood maps which give a wider perspective. However, the SFRA modelling carried out for the City reflects the most accurate picture for the Square Mile and has been incorporated into the Environment Agency's Maps.

3.2 **River and tidal flood risk**. The City of London 2017 Strategic Flood Risk Assessment (SFRA) shows that limited areas of the City are at risk from river flooding in the absence of any flood defences. The Environment Agency Breach modelling 2017 shows that the risk is confined to the riverside south of Upper and Lower Thames Street (A3211) and the Temples area (Fig 2). The Thames Barrier and local flood defences protect the City, but changes will be needed to address risks from sea level rise. The Thames Estuary 2100 Plan identifies the need to raise flood defences in central London by 0.5m by 2065 and by 1 m by 2100, to provide protection up to a 1:10,000-year standard. These dates may need to be brought forward if sea level rise accelerates.

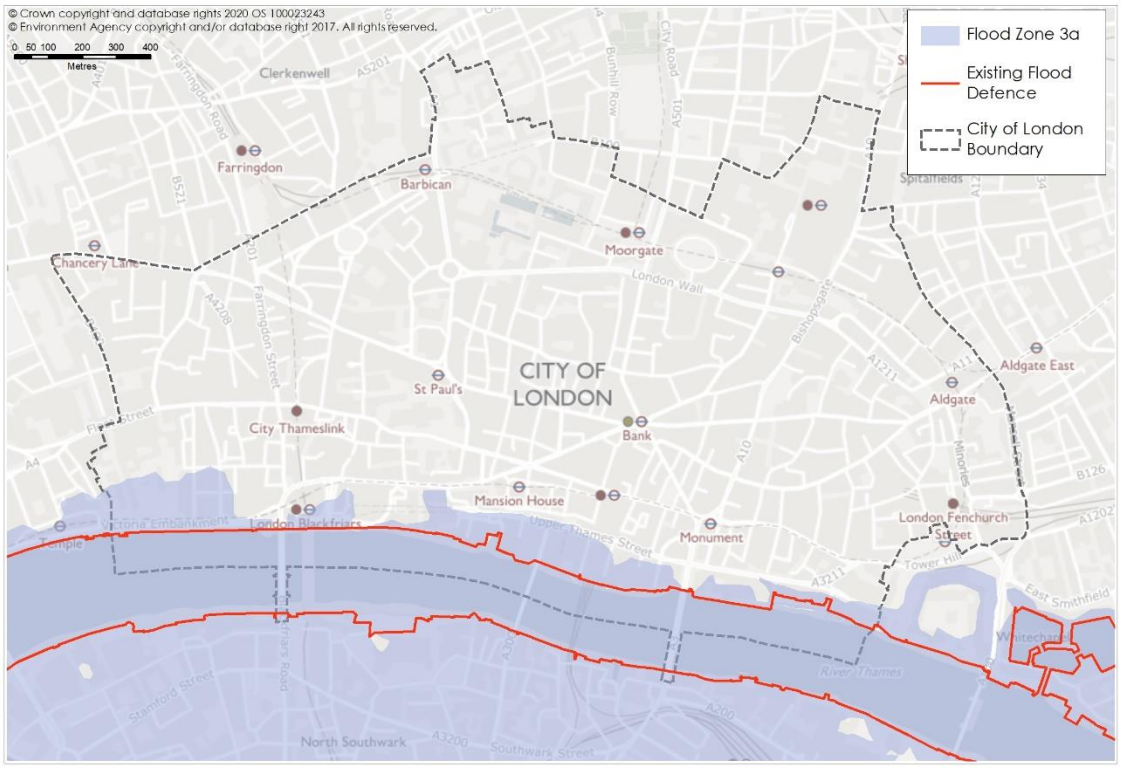



**Figure 2 Areas at risk of river flooding**

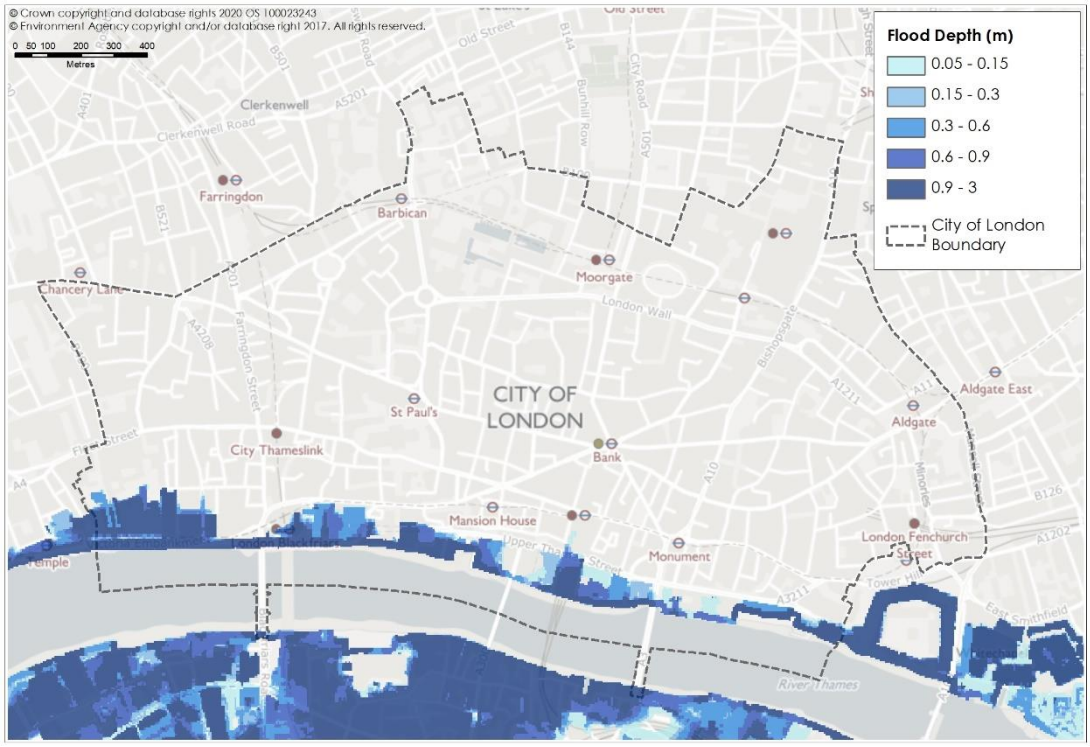



**Figure 3: Thames Tidal Breach modelling flood extent**

3.3 **Surface water and sewer flood risk**. The risk of flooding from surface water and sewer overflow is also confined to restricted areas of the City including the former Fleet Valley at Farringdon Street and the Thames Riverside (fig 4). This flooding is caused by overloading of the combined drainage and sewer network resulting in overflows from manholes in these areas. The use of Sustainable Drainage Systems in buildings and landscaping helps to reduce the rate at which surface water enters the sewer network thus reducing the risk of sewer surcharges. Local action is not sufficient to prevent this flooding, SuDS measures need to be implemented over a wide catchment area (fig 5 and 6).

**Example of local actions to reduce surface water flood risk**

The City's Open Spaces Department supports this corporate strategy by making sure paving in the City's gardens drains to natural ground, for example by using soak-aways, rather than to the piped City drainage system. Trees and other planting, the use of green roofs and green walls are also assisting in flood risk reduction, where appropriate.

Given the density of the buildings and development in the City, building rainwater harvesting is encouraged through the planning process. An example is the harvesting of rainwater as part of the redevelopment of 10 Trinity Square to irrigate Seething Lane Garden

Monitoring of the impact of SuDS secured through the Planning System is underway and will be reported to the City's Officer level Flood Risk Steering Group

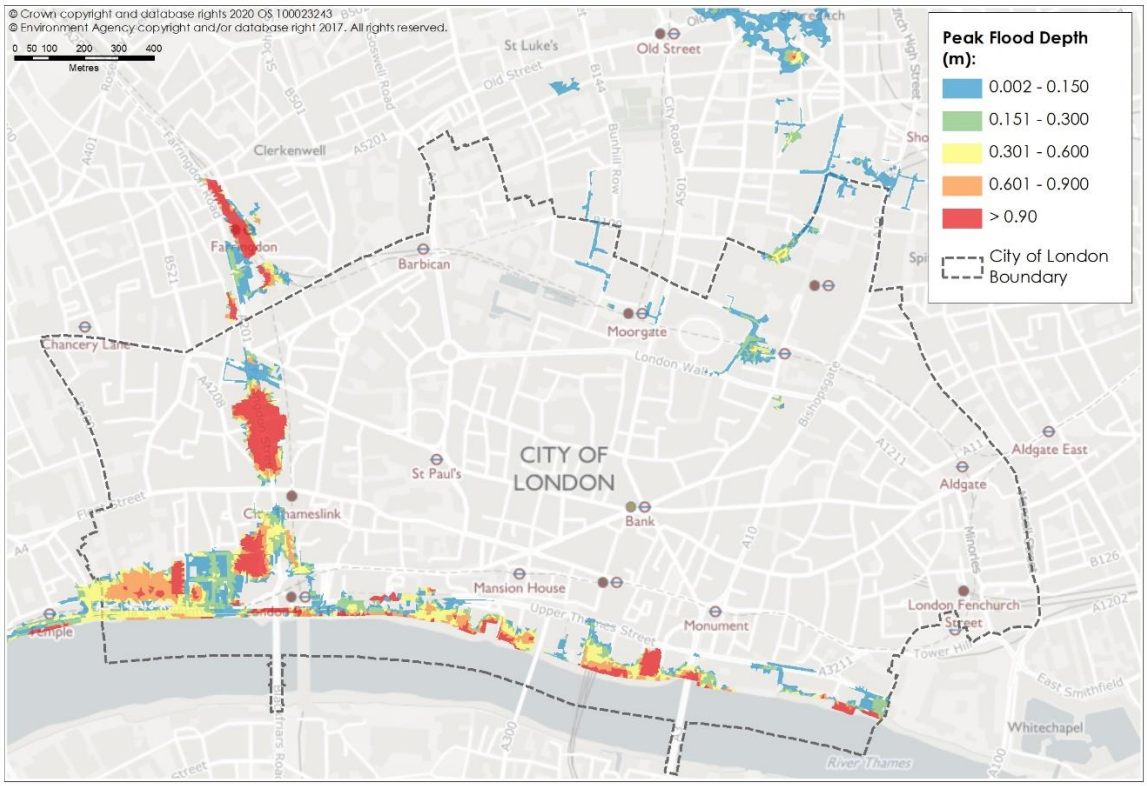



**Figure 4: Map showing Surface Water Peak Flood Depth 1 In 100 (Annual Probability) +40% Climate Change**

**Example of a wider action which reduces flood risk in the City.**

The surface water catchment areas for the City's flood risk areas extend to the edge of Hampstead Heath (Figs 5 & 6). The City Corporation has carried out works to ensure that the pond dams on Hampstead Heath do not fail or cause flooding in the local area following a major rainfall event. This provides consequential benefits in reducing the risk of sewer overflows elsewhere in this catchment area, including the flood risk areas in the City.

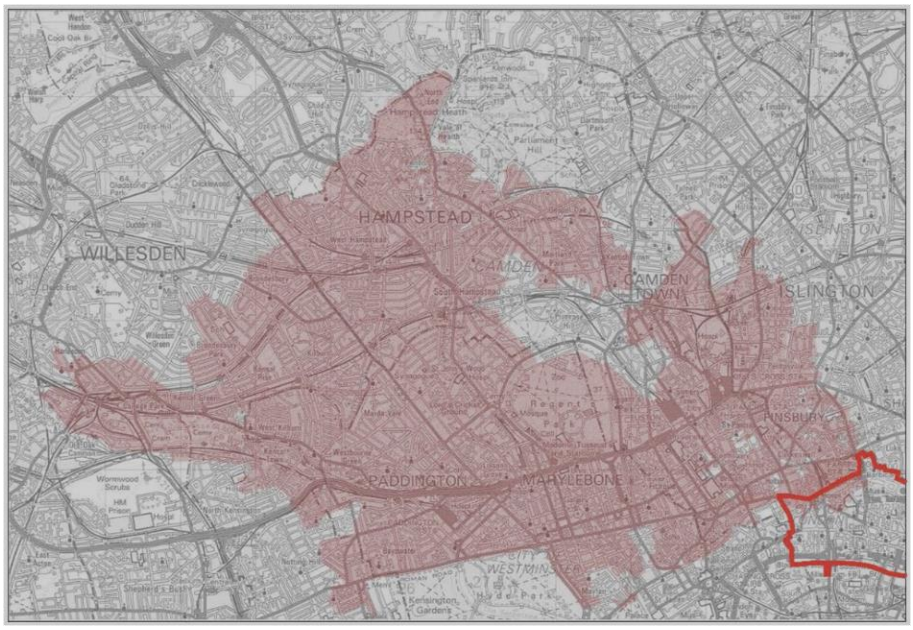



**Figure 5: Catchment area for flood risk in Farringdon Street**

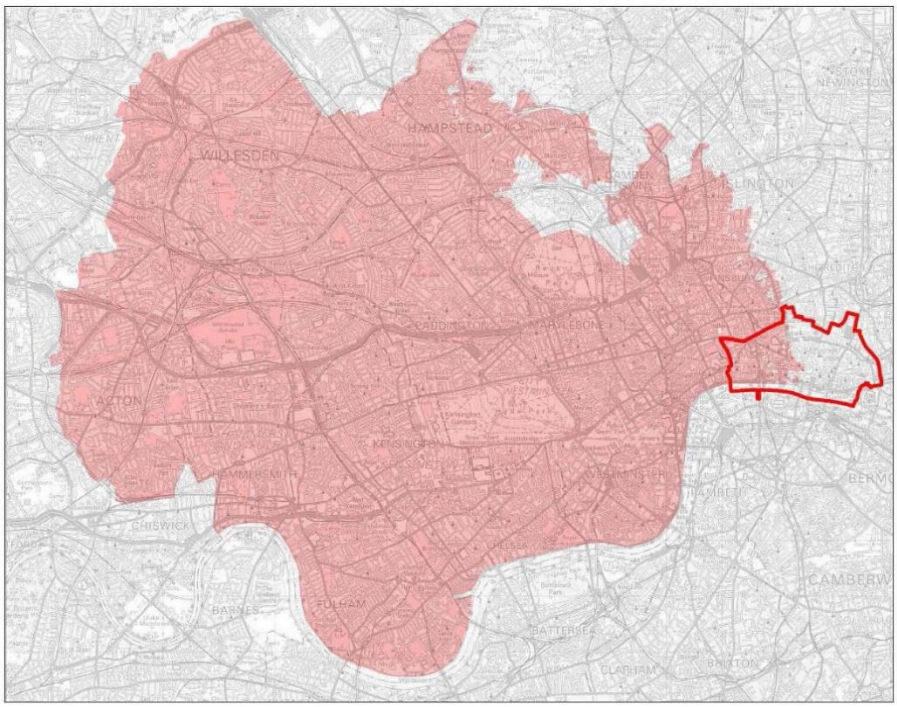



**Figure 6: Catchment area for flood risk in the Paul's Walk area**

3.4 **Ground water flood risk**. The City is protected from ground water flooding by the GARDIT programme which maintains groundwater levels in the deep chalk aquifer at between -30 and -50 m AOD. The City may also be vulnerable to groundwater flooding from the shallow aquifer which comprises sand and gravel with high porosity and permeability (fig 7). Complex interactions between rainfall infiltration, basement barriers and the predominance of impermeable surfaces in the City, makes this type of flood risk difficult to predict, however flooding from this source is not thought to be likely in the short to medium term. Longer term impacts of climate change on ground water flood risk are less certain.

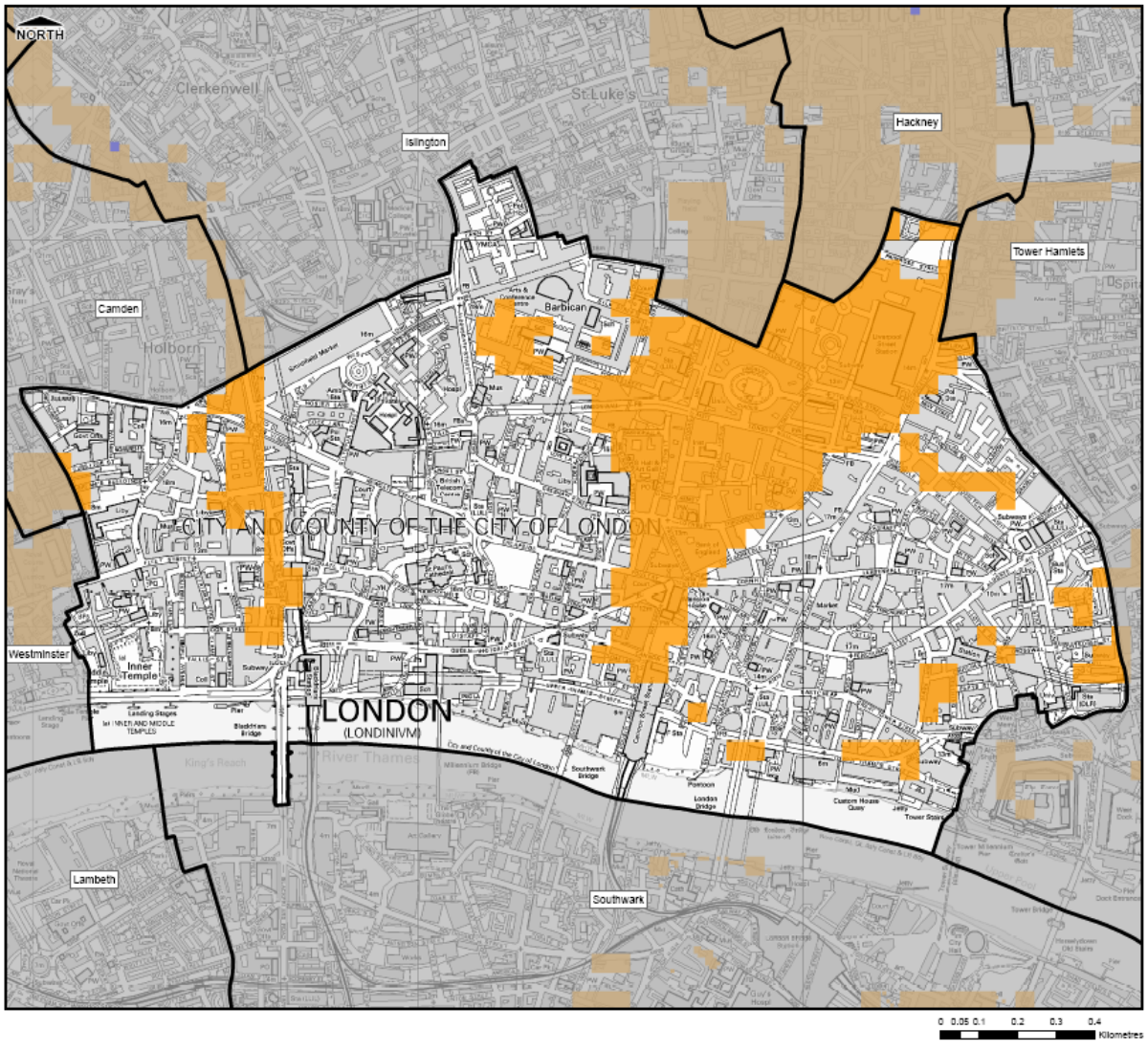



**Figure 7: Areas with increased potential for elevated groundwater**

3.5 **Climate change and flood risk**. Our climate is changing and is likely to continue to change for many decades to come. With climate change, the frequency, velocity, depth, patterns and severity of flooding are forecast to increase causing flash flooding. Heavier average winter precipitation will put us at greater risk of flooding. The City of London Climate Action Strategy (2020) includes climate resilience measures based on probabilistic data from the UK Climate Projections 2018 (UKCP18). No climate model can give a single definite answer to what the future will look like, however, CP18 predicts that winter rainfall could increase by around 20% by 2080 with greater intensity of rainfall increasing the risk of localised flash flooding and sewer surcharge (Table 2).

Table 2 Change in average precipitation rate (%) compared to 1981-2000 average

| | Summer rainfall % change | Winter rainfall % change |
|---|---|---|
| 1990-2025 | -5.9 | +10.3 |
| 2025-2050 | -26.5 | +8.9 |
| 2050-2080 | -33.9 | +19.7 |

3.6 **Sea level rise**. Sea level is predicted to rise with consequential increases in flood risk from the tidal Thames. Although the Thames Barrier and any future replacement barrier will provide protection, local flood defences will also be needed to be enhanced to cope with peak tides and surges as outlined in the Environment Agency's TE2100 plan.

# 4 Objectives for managing flood risk in the City

*Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements*

*This section deals with*

*(c) the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009),*

The following objectives for managing local flood risk aim to reduce the risk and impact of flooding on the City. These objectives have been developed in conjunction with the Environment Agency who are co-ordinating the Thames River Basin District Flood Risk Management Plan (2nd cycle).

1. **Climate resilient places – reducing the likelihood of flooding**

*By 2027 risk management authorities[2] will have worked together to develop and implement adaptive approaches to future flooding to enhance the resilience of the flood risk area.*

2. **Minimising the consequences of flooding for human health**

*By 2027 risk management authorities will have developed and delivered a programme of flood risk management capital schemes and maintenance to reduce risk of flooding and coastal change and its adverse consequences for human health and wellbeing.*

3. **Minimising the consequences of flooding for the environment including cultural heritage**

*By 2027 actions by risk management authorities to address current and future risk of flooding and coastal change will have helped achieve the environmental objectives set out in the river basin district's river basin management plan.*

4. **Minimising the consequences of flooding for economic activity (infrastructure)**

*By 2027 risk management authorities will have provided evidence and advice to infrastructure providers and supported them to take account of future flooding and coastal change in their infrastructure investment.*

5. **Minimising the consequences of flooding for economic activity (businesses)**

*By 2027 risk management authorities will have worked with communities and businesses to understand and implement a plan for how flood and coastal erosion risk management activities can contribute towards sustainable growth and prosperity in a climate resilient way (and vice versa).*

[2] See Appendix 2 – Risk Management Authorities include Lead Local Flood Authorities (LLFA), the Environment Agency, water companies, highways authorities, internal Drainage Boards (not relevant to the City), District and borough councils.

## 6. A nation of climate champions – reducing the likelihood of flooding

*By 2027, risk management authorities will have worked with communities across the risk area to: raise awareness of the level of flood risk that they face; help them understand the role of emergency responders and ensure they know what to do in an emergency to help themselves*.

# 5 Measures to achieve the objectives

*Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements*

*This section deals with*

*(d) the measures proposed to achieve the objectives,*

*(e) how and when the measures are expected to be implemented,*

A series of measures aimed at fulfilling each objective has been drawn up. These measures form the local interpretation/ implementation of what the City Corporation will lead on to fulfil each objective. These measures cover surface water, sewer surcharge, river and coastal flood risks for the Square Mile.

**5.1 Objective 1: Climate Resilient places – reducing the likelihood of flooding.**
By 2027 risk management authorities will have worked together to develop and implement adaptive approaches to future flooding to enhance the resilience of the flood risk area.

5.1.1 As the climate changes, parts of the City will become more vulnerable to flooding. The area between the riverside walk and Thames Street will be at risk from sea level rise and without action could flood to a depth of up to 3 meters.[3] Working with developers, landowners the Environment Agency and others to implement the Thames Estuary 2100 Plan, the City Corporation will facilitate plans to raise flood defences on the City's riverside to protect the City against higher tides.

5.1.2 Farringdon Street and New Bridge Street (the former valley of the River Fleet) will become more susceptible to sewer overflow flooding, as will the Thames Riverside. This is because London's extensive sewage network, which runs under these streets and walkways, is a combined system which collects rainwater in the same pipes as foul drainage. Heavy rainfall over a wide catchment area collects in these sewers which can surcharge when overloaded. We will need to reduce the speed and quantity of rainwater entering drains, through the implementation of Sustainable Drainage Systems (SuDS) wherever possible, reductions in peak flows and increases in storage capacity to reduce the risk of sewers surcharging. We also need to encourage the use of building level measures to protect individual developments within the vicinity.

5.1.3 Groundwater flooding is not expected to increase in the short to medium term. However, climate change is likely to increase the existing groundwater flood risk due to higher rainfall and increased leakage from drains and sewers

[3] https://www.cityoflondon.gov.uk/assets/Services-Environment/climate-action-climate-reslience-flood-risk-sfra-thames-tidal-breach-modelling-flood-extent-2017.pdf

infiltrating into the ground. Increased water levels in the Thames will also increase groundwater levels. We will review groundwater levels and continue to model other flood risks, through our Strategic Flood Risk Assessment review every 5 years, so that we can bring forward flood resilience plans if climate impacts accelerate.

5.1.4 Action now will help to reduce the likelihood of flooding and improve the City's resilience to changed weather patterns whilst protecting and enhancing opportunities for biodiversity and the City's historic assets. All measures implemented to improve flood resilience must be designed to comply with disability requirements.

5.1.5 What we will do:

**Measure 1: Incorporating SuDS in the public realm and minor development**. By Q4 of 2022 the City of London Corporation will have procedures in place to maximise the use of sustainable drainage systems, using the SuDs hierarchy, in new public realm works and appropriate minor developments to reduce the risk of flooding.

**Measure 2: Strategising flood defence raising.** By Q2 of 2021 the City of London Corporation will have prepared a Riverside Strategy which will drive forward the requirements of the Thames Estuary 2100 Plan to reduce the risk of flooding, while unlocking sustainable growth opportunities along the Thames in the Square Mile, including protecting heritage assets.

**Measure 3: Reviewing the Strategic Flood Risk Assessment.** By Q4 of 2022 the City of London Corporation will have reviewed its Strategic Flood Risk Assessment to provide sound information on the flood risk in the City. This will include identifying infrastructure at risk of flooding from all sources including burst watermains, guidance on safe access and egress plans for all from development in at-risk areas and analysis of flooding events.

5.1.6 **Links to the Climate Action Strategy** These actions will help to implement **seven** climate resilience measures from the City of London's Climate Action Strategy[4]:

- Resilience Action 2.1 Continue to fund flood modelling, which includes SuDS and other mitigation strategies, to complement EA flood models
- Resilience action 2.4 Sacrificial land and/ or natural flood risk management areas
- Resilience action 2.5 Sustainable rain and surface water management policies and implementation
- Resilience action 2.7 Increase the quality and provision of green space and coverage in the Square Mile and wider City Corporation spaces
- Resilience Action 3.1 Building retrofit programme

[4] City of London Climate Resilience Adaptive pathways report 2020 prepared by Buro Happold for the City Corporation. Available on request from floodrisk@cityoflondon.gov.uk

- Resilience Action 3.3 Flood defence assets maintenance and management regimes
- Resilience Action 4.2 Expand use and availability of non-sensitive data

5.2 **Objective 2: Minimising the consequences of flooding for human health**. By 2027 risk management authorities will have developed and delivered a programme of flood risk management capital schemes and maintenance to reduce risk of flooding and coastal change and its adverse consequences for human health and wellbeing

5.2.1 It is impossible to completely eliminate the risk of flooding in the City. The measures proposed under this objective aim to minimise the consequences of flooding enabling efficient recovery if flooding does occur. This can be done through property level resistance and resilience measures.

5.2.2 Resistance measures prevent the ingress of flood water and include flood defence walls, flood gates and local emergency measures such as the use of sandbags to divert flood waters. Effective maintenance of such structures, that is sensitive to their historic and biodiversity value, is imperative to ensure that they function when needed.

5.2.3 Resilience measures enable efficient recovery from flooding and include moving flood sensitive equipment onto higher floors, using flood resilient materials such a tiles or solid surfaces, avoiding the use of areas at risk of flooding for storage and providing sumps and soak-aways.

5.2.4 These measures can be implemented as part of new development or routine maintenance in vulnerable areas but must begin now to embed these actions across all properties that are at risk of flooding.

**5.2.5 What we will do:**

**Measure 4: Promoting flood resilience measures.** By 2025, the City of London Corporation will have reviewed opportunities to improve the flood resilience in residential properties in the Square Mile and taken action to implement these measures. Funding will be sought from sources including the Flood Defence Grant in Aid, Local RFCC Levy and private funding sources where appropriate.

**Measure 5: Enabling effective maintenance of flood risk assets.** By 2026, the City of London Corporation will have continued to maintain a register of flood defence assets, including information of their condition where appropriate. Using this data, the City of London Corporation in partnership with asset owners, Team 2100 and other stakeholders will review mechanisms for ensuring that assets remain in good condition, minimising the consequences of flooding.

5.2.6 **Links to Climate Action Strategy** These actions will help to implement **five** climate resilience measures from the City of London Climate Resilience Adaptive Pathways Report:

- Resilience Action 2.8 Introduce climate resistant and adaptive landscaping
- Resilience Action 3.1 Building retrofit programme

- Resilience Action 3.3 Flood defence assets maintenance and management regimes
- Resilience Action 3.4 Protect key assets, critical infrastructure and sensitive equipment in flood zones
- Resilience Action 4.7 Strengthen resilience requirements for planning

5.3 **Objective 3: Minimising the consequences of flooding for the environment including cultural heritage**. By 2027 actions by risk management authorities to address current and future risk of flooding and coastal change will have helped achieve the environmental objectives set out in the river basin district's river basin management plan

5.3.1 The City of London is the historic centre of London and has a rich and varied historic environment that reflects this, including over 600 listed buildings alongside other historic statues, monuments, sculptures and archaeological remains.

5.3.2 Although these assets have survived numerous stresses over the centuries the threat caused by climate change presents new challenges. Flooding could damage sensitive structures or create environments that are unsuitable for their current uses. Historic assets on the City's riverside to the south of Thames Street and Tudor Street and along Farringdon Street are particularly at risk as are the historic Inner and Middle Temple Gardens.

5.3.3 By acting now in conjunction with Historic England we can develop guidance to enable building owners to minimise the consequences of flooding for their historic assets.

**5.3.4 What we will do:**

**Measure 6: Managing flood risk for historic assets**: By 2023, the City of London Corporation will have identified all historic assets in the Square Mile at risk of flooding and will work to encourage building owners to develop and adopt resilient design measures, minimising the consequences of flooding for the City's cultural heritage, through guidance for retrofitting flood resistance and resilience measures specifically for historic assets.

5.3.5 These actions will help to implement **one** climate resilience measure from the City of London Climate Resilience Adaptive Pathways Report:

- Resilience Action 3.1 Building retrofit programme

5.4 **Objective 4: Minimising the consequences of flooding for economic activity (infrastructure).** By 2027 risk management authorities will have provided evidence and advice to infrastructure providers and supported them to take account of future flooding and coastal change in their infrastructure investment.

5.4.1 The City relies on a range of utility services and transport infrastructure to function. Flooding of these assets and infrastructure could adversely affect the City's businesses, residents and visitors through temporary interruptions in

services. Prolonged service breakdown could also affect the City's reputation as a resilient place to do business.

5.4.2 The responsibility for protection of infrastructure rests with the utility owner e.g. UK Power Networks, Thames Water, Transport for London and National Rail but businesses in the City can also draw up contingency plans if they know the risks that they may face from flooding of such infrastructure.

5.4.3 Working with utility and transport providers the City Corporation can help to identify vulnerabilities and disseminate information to enable suitable prevention measures to be put in place.

5.4.4 What we will do:

**Measure 7: Engaging with Thames Water on mains bursts and sewerage infrastructure.** By Q4 of 2022 the City of London Corporation, working in partnership with Thames Water, will have identified sensitive properties at risk of water main burst and sewer surcharging and will have developed guidance with Thames Water and property occupiers on measures to mitigate these risks thus minimising the consequences of this type of flooding.

**Measure 8: Liaising with infrastructure providers (electricity, gas, pipe-subways, transport etc)** By Q4 of 2024 the City of London Corporation, working in partnership with utility providers and other infrastructure owners will have shared information on assets at risk of flooding and encouraged owners to take steps to mitigate this risk where appropriate thus reducing the consequences of flooding for economic activity.

5.4.5 These actions will help to implement **five** climate resilience measure from the City of London Climate Resilience Adaptive Pathways Report

- Resilience Action 3.2 Diversify energy sources and partner with regional organisations and utility providers to increase back up power for critical services
- Resilience Action 3.4 Protect key assets, critical infrastructure and sensitive equipment in flood zones
- Resilience Action 4.2 Expand use and availability of non- sensitive information
- Resilience Action 5.3 Strengthen community and business networks to build adaptive capacity
- Resilience Action 5.5 Public communications and awareness raising campaigns

5.5 **Objective 5: Minimising the consequences of flooding for economic activity (businesses**) By 2027 risk management authorities will have worked with communities and businesses to understand and implement a plan for how flood and coastal erosion risk management activities can contribute towards sustainable growth and prosperity in a climate resilient way (and vice versa).

5.5.1 As planning authority for the Square Mile, the City Corporation has a responsibility to ensure that new development does not put future occupants at risk from flooding. The City Plan 2036 includes policies which strengthen the previous approach, thus minimising the risks to new development from all

sources of flooding, incorporating resilience and addressing flood emergency planning.

5.5.2 For existing commercial buildings, the safety of occupants is the responsibility of the building owner or by agreement the leaseholder. The City Corporation has a role in ensuring that flood risk information and guidance is available to enable businesses to develop suitable flood resilience programmes.

**5.5.3 What we will do:**

**Measure 9: Implementing City Plan 2036 flood risk policies**. By Q4 2021 the City of London Corporation will have adopted new flood risk and urban greening policies through the City Plan 2036 and produced procedures to ensure that the policies relating to flood risk and climate resilience from the City Plan 2036 are being universally implemented and are being effectively monitored thus contributing to sustainable growth.

**Measure 10: Managing flood resilience for commercial buildings**. By 2023, the City of London Corporation will have collated guidance specific to retrofitting flood resistance and resilience measures to commercial buildings (including those in Farringdon Street, Pauls Walk and Victoria Embankment), minimising the consequences of flooding for economic activity.

5.5.4 **Links to Climate Action Strategy** These actions will help to implement **three** climate resilience measure from the City of London's Climate Resilience Adaptive Pathways Report:

- Resilience Action 3.3 Building retrofit programme
- Resilience Action 4.7 Strengthen resilience requirements for planning
- Resilience Action 2.1 Continue to fund flood modelling, which includes SuDS and other mitigation strategies, to complement EA flood models

5.6 **Objective 6: A nation of climate champions – Reducing the likelihood of flooding**. By 2027, risk management authorities will have worked with communities across the risk area to: raise awareness of the level of flood risk that they face; help them understand the role of emergency responders and ensure they know what to do in an emergency to help themselves.

5.6.1 The City Corporation has Emergency Response plans in place. These plans include the Multi Agency Flood Plan, the Emergency Management Manual and Rest Centre Plans for those evacuated from their homes. In exercising these plans any equality implications will be highlighted.

- The **Multi Agency Flood Plan** (MAFP) An agreed framework between category 1 and 2 responders which sets out a co-ordinated response and recovery phase to severe flooding in the City of London.

- The **Emergency Management Manual** is a plan used by the City Corporation to respond to major incidents within the City.

- The City Corporation also has a **Rest Centre Plan** which details how the Local Authority could care for those evacuated from their homes due

to an incident. The City Corporation has plans for Rest Centres in more than one location within the City.

5.6.2 Local Authorities can be contacted 24/7 to initiate a response capability. The contact numbers for the City Corporation (daytime hours) are 020 7332 3417/1969/3584 and 3914. Out of hours the City Corporation can be reached on 020 7606 3030.

5.6.3 During the latter stages of a major flooding incident (the recovery period and return to normality) the City Corporation may be able to provide services and staff to assist with a range of issues ( see Multi Agency Flood Plan for details)

5.6.4 Where more than one property is affected by a single source of flooding, the City Corporation will investigate the causes and impact of flooding and prepare a report outlining any actions to reduce the risk of reoccurrence.

5.6.5 Unlike other local authority areas, the predominant community in the City is the business community with almost 18,000 businesses and over 500,000 workers based in the City. Alongside this there is a resident community of around 7500 people and up to 21.5 million visitors to the City annually. We must engage in different ways with each of these communities to make sure that they remain safe from flooding. Different working patterns due to the COVID19 pandemic may affect these figures in the future. Nonetheless flood resilience will remain important.

5.6.6 Property insurance claims for flood damage across the UK have increased significantly over recent years and are set to increase further due to the impacts of climate change. The Flood RE reinsurance scheme provides affordable flood insurance for residents but not for commercial premises. Providing appropriate information on flood risk will not only reduce the consequences for human health but may also reduce insurance costs for these businesses.

5.6.7 People who are not familiar with the City such as visitors or students need more immediate information if a flooding incident is imminent but may also be interested in the history, experience and future climate impacts on flooding for the City.

5.6.8 Climate impacts are likely to affect disadvantaged communities disproportionately and may affect some people with protected characteristics such as people with a disability. Awareness raising and support will be particularly important for these communities.

**5.6.9 What we will do:**

**Measure 11: Exercising a reviewed Multi Agency Flood Plan.** By Q2 of 2021 the City of London Corporation will have reviewed and updated the Multi Agency Flood Plan. The plan will be tested in regular exercises thus reducing the consequences of flooding for human health.

**Measure 12: Communicating flood risk** By 2027, the City of London Corporation will explore innovative ways to engage with our workers, residents, visitors and learners

to communicate flood risk and resilience and help them understand the risks they may face thus reducing the consequences of flooding for human health.

5.6.10 **Links to Climate Action Strategy** These actions will help to implement **four** climate resilience measures from the City of London Climate Resilience Adaptive Pathways Report:

- Resilience Action 5.3: Strengthen community and business networks to build adaptive capacity
- Resilience Action 4.3: Embed principles of inclusion and equity throughout all climate action strategies
- Resilience Action 5.5 Public communications and awareness raising campaigns
- Resilience Action 4.2 Expand use and availability of non-sensitive information

# 6 Costs, benefits and funding of measures

*Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements*

*This section deals with*

*(f) the costs and benefits of those measures, and how they are to be paid for,*

6.1 Costs

| | Measure | Who | When | Resources | Funding |
|---|---|---|---|---|---|
| 1 | SuDS in public realm | DBE Developers | Q4 2022 | DBE Public realm and resilience teams | Climate Action budget |
| 2 | Riverside strategy | DBE, EA riparian owners | Q2 2021 | DBE resilience team | DBE climate action budget and TRFCC[5] funding |
| 3 | SFRA | DBE | Q4 2022 | DBE Planning team | DBE planning budget |
| 4 | Flood resilience measures- residential | DBE, DCCS | 2025 | DBE resilience team | Residential property owners |
| 5 | Flood defence asset maintenance | City Surveyor | 2026 | City Surveyors | City Surveyors |
| 6 | Flood resilience guide historic assets | DBE, Historic England | 2023 | DBE resilience team | DBE budget |
| 7 | Water mains and sewer infrastructure | DBE CPAT | Q4 2022 | DBE resilience team CPAT Thames Water | Thames Water |
| 8 | Other infrastructure (transport, electricity, gas, etc) | DBE CPAT | Q4 2024 | DBE resilience team Transport strategy team | Infrastructure providers |
| 9 | City Plan 2036 | DBE | Q4 2021 | DBE planning | DBE planning |

[5] Thames Regional Flood and Coastal Committee

| | | | | | |
|---|---|---|---|---|---|
| | | | | | budget |
| 10 | Resilience in commercial buildings | City Surveyors | 2023 | Commercial property owners, DBE resilience team, CPAT | Commercial property owners |
| 11 | Emergency Planning | Town Clerks | Q2 2021 | Emergency and contingency planning team | Town Clerk's budget |
| 12 | Communications | Town Clerks, DBE | 2027 | Communications team | Town Clerk's budget |

6.2 Implementation of these measures will contribute to ensuring that the Square Mile remains at low risk from flooding and is prepared to resume normal working quickly after any flooding incident. Several of these measures will also have benefits further afield than the Square Mile:

- SuDS in the public realm will help to protect down-stream areas in Tower Hamlets and beyond from surface water/ sewer flooding
- The Riverside Strategy will act as a pilot for other riparian boroughs demonstrating the challenges and opportunities of implementing the TE2100 plan
- Flood defence maintenance will help to protect areas up and downstream of the City
- Working with infrastructure providers will help to develop resilience of their networks across wider parts of London
- Guidance on flood resilience of historic assets will be applicable to many historic assets elsewhere

6.3 Funding & Resources

Funding and resources to implement this strategy will come from a number of different sources.

- As LLFA the **City Corporation** is responsible for co-ordination and co-operation with other risk management authorities to address flood risk in the City and in this role will use existing resources to fulfil many of the actions identified in the action plan. This work will be integrated into the City's Climate Action Strategy work in order to maximise benefits across a range of climate risks.
- In addition to this, **grant funding** may be available from external sources such as the GLA and TfL and the flood and coastal erosion risk management Grant in Aid (FDGiA) which is administered by the Environment Agency on behalf of Defra, TRFCC levy funding and organisations such as infrastructure providers .
- **Thames Water** is responsible for the upgrading of sewerage infrastructure to prevent sewer flooding and to take account of future climate predictions.

- Utility companies and **property owners** are responsible for site specific flood risk alleviation, resistance and resilience of their premises. Where premises will benefit from wider flood alleviation schemes property owners will be encouraged to provide a contribution towards such schemes.
- City **developers** are responsible for ensuring that flood risks are addressed in building design and associated landscaping.

Resourcing considerations will need to include direct project funding, staff resources, expert consultancy requirements and training needs to implement the Local Flood Risk Management Strategy.

# 7 Strategy monitoring & review

*Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements*

*This section deals with:*

*(h) how and when the strategy is to be reviewed,*

*And Flood and Water Management Act. Section 9 (6)*

*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*

7.1 **Public Consultation and adoption.** The draft Local Flood Risk Management Strategy was subject to public consultation in Autumn 2020 in line with the requirements of the Flood and Water Management Act 2010. The Local Flood Risk Management Strategy was adopted by the Planning and Transportation Committee on <insert date>.

7.2 **Governance**. Implementation of the LFRMS will be overseen by the officer led Flood Risk Steering Group. The Flood Risk Steering Group is chaired by the City Corporation's District Surveyor and Environmental Resilience Director and includes representatives from Built Environment, City Surveyors, Contingency Planning, and Town Clerks. Authority to exercise the City's functions as Lead Local Flood Authority in relation to the Flood and Water Management Act 2010 have been delegated to the Director of the Built Environment.

7.3 **Monitoring** Progress in implementation of the proposed measures will be overseen by the officer led Flood Risk Steering Group. Periodically progress against the LFRMS objectives and Climate Action Strategy aims will be made public through reporting to the City Corporation's Planning and Transportation Committee. Reporting of progress to the Environment Agency/ Defra will be carried out on request – normally on an annual basis.

7.4 **Review.** The Local Flood Risk Management Strategy will be reviewed by the Planning & Transportation Committee every six years in line with the Environment Agency's Flood Risk Management Plan for the Thames river basin. The next review is due in 2027.

# 8 Wider sustainability objectives

*Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements*
*This section deals with*
*(i)how the strategy contributes to the achievement of wider environmental objectives*

8.1 **Strategic Environmental Assessment**. The City of London draft Local Flood Risk Management Strategy has been subject to Strategic Environmental Assessment (SEA) which evaluates the impact that the strategy will have on wider sustainability objectives. Strategic Environmental Assessment (SEA) is the process by which strategic plans and programmes are assessed to ensure that they take account of social, environmental and economic objectives for the area, fulfilling the requirements of the Strategic Environmental Assessment (2001/EC/42) (SEA Directive). SEA was used during the preparation of the strategy to evaluate options for achieving the flood risk objectives against a series of wider sustainability objectives.

8.2 The sustainability objectives relevant to the Local Flood Risk Management Strategy were determined at the SEA scoping stage in 2014 which included consultation with the Environment Agency, English Heritage, Natural England, GLA and flood risk partnership group members and are as follows:

- To protect the health, wellbeing and safety of workers, residents and visitors
- To protect property and essential infrastructure
- To protect the historic environment, archaeological heritage and landscape
- To protect and enhance biodiversity
- To protect water quality and resources
- To adapt to the impacts of climate change
- To minimise adverse impacts on the economy

8.3 The impact of the flood risk strategy options was assessed against these wider sustainability objectives taking account of the positive, negative and neutral impacts, and the geographic scale and timescale of the impact (short, medium or long term). Comments are included to highlight the significant effects of the preferred options in terms of direct or indirect effects, whether effects are permanent or temporary and whether there are likely to be cumulative effects.

8.4 The conclusions of the SEA are reported in the Strategic Environmental Assessment Report and are summarised below:

**SEA Objective 1: To protect the health safety and wellbeing of workers, residents and visitors.** Assessment concluded that implementation of the LFRMS measures would have positive impacts for the health safety and wellbeing of workers residents and visitors. For some measures this will be a local impact but for others such as those associated with SuDS and flood defences the impact would extend outside the Square Mile.

**SEA Objective 2: To enable social and economic inclusion for all.** Assessment identified some uncertainty regarding the impact of several measures particularly on

people with disabilities. The design of some physical measures, such as SuDS and flood emergency plans, will be key to preventing accessibility problems. Suitable wording has been included to emphasise the need for accessible design.

**SEA Objective 3: To protect and enhance biodiversity.** The assessment identified that measures 2 and 5 would benefit from greater emphasis on biodiversity. Changes to the supporting text for these measures is recommended

**SEA Objective 4: To protect water quality and resources.** The measures proposed will have beneficial impacts on water quality and resources. In particular, Measure 7 focusses on water quality and resources issues in collaboration with Thames Water.

**SEA Objective 5: To mitigate and adapt to the impacts of climate change**. The measures proposed will assist in adaptation to climate change and are strengthened by supporting guidance elsewhere which emphasises the need for climate change to be considered in SFRAs.

**SEA Objective 6: To minimise adverse impacts on the economy.** The assessment concluded that the measures proposed will have positive impact on the City's economy, providing protection from flooding in comparison with other global financial centres which are more vulnerable.

**SEA Objective 7: To protect property and essential infrastructure** Positive impacts on property and essential infrastructure are expected from these measures.

**SEA Objective 8: To protect the historic assets, archaeological heritage and landscape.** The appraisal identified that measure 5 regarding maintenance of flood risk assets did not sufficiently address protection of heritage assets. Additional supporting text is proposed.

**Overall conclusion** The appraisal showed that the implementation of these measures will have mainly beneficial impacts against the SEA objectives. Where uncertainties exist clarification within the supporting text is recommended

# Appendix 1 Legislative context

Flood risk planning has assumed a high profile due to the increasing frequency of extreme flooding events over the last 2 decades. In 2009/10 the City assumed new duties under the Flood Risk Regulations 2009 and the Flood and Water Management Act 2010, requiring liaison with the Environment Agency to produce a Flood Risk Management Plan for areas at risk of flooding and preparation of a Local Flood Risk Management Strategy for the City's geographic area. We are now entering the second cycle of these plans having successfully implemented the first plans over the last decade.

**The Flood Risk Regulations 2009** came into force on 10th Dec 2009. These regulations transpose EC Directive 2007/60/EC assessment and management of flood risks and impose duties on the Environment Agency and local authorities, including the City as a lead local flood authority. The 2nd cycle of flood risk regulations requires. The Floods and Water (Amendment etc.) (EU Exit) Regulations 2019 ensure that floods and water legislation will continue to be operable in the United Kingdom after the UK leaves the EU[6]. The duties include:

- Preparation of a preliminary flood risk assessment, showing the probability of flooding and consequences for human health, the environment, cultural heritage and economic activity
- Preparation of flood risk maps and flood hazard maps
- Preparation of a flood risk management plan for areas which are at significant risk of flooding – this includes most of Greater London.

**Flood and Water Management Act 2010** – received Royal Assent on 8th April 2010. It gives local authorities responsibilities as Lead Local Flood Authorities (LLFA):

**Part 1** of the act requires all Lead Local Flood Authorities in England to:

- Develop, maintain, apply, and monitor the application of, a strategy for local flood risk from surface run off, groundwater and ordinary watercourses, in their area. The strategy must at least set out who the risk management authorities are in the area and their relevant functions, the authority's objectives for managing flood risk, as well as proposed measures to deliver the objectives, and timescales for implementation of the measures; how those measures are to be paid for as well as their costs and benefits, how and when the strategy will be reviewed, and how the strategy contributes to

[6] Explanatory memorandum to The Floods and Water (Amendment etc) (EU exit)Regulations 2019 https://www.legislation.gov.uk/ukdsi/2019/9780111176283/pdfs/ukdsiem_9780111176283_en.pdf

Floods directive 2007/50/EC will be carried forward – no further amendments will be made after UK Exit day https://www.legislation.gov.uk/eudr/2007/60/chapter/v

the achievement of wider environmental objectives. The Lead Local Flood Authority must consult affected risk management authorities and the public about its strategy and provide guidance on the application of the strategy.

- Investigate flooding incidents in its area and report on its findings.
- Establish and maintain a register of structures or features which may significantly affect flood risk in their area including information regarding ownership and state of repair.
- Contribute to sustainable development in the discharge of its flood risk duties.
- Assume the power to designate features with respect to flood risk and subsequently to act as responsible authority for such features.

**Part 2** of the act gives local authorities new duties as "approving bodies" with regard to drainage including:

- Approving rainwater drainage systems before commencement of any construction works which have drainage implications
- Adopting and maintaining approved systems which affect more than one property
- Approval of surface water drainage systems prior to connection to public sewers. (Automatic right of connection to public sewers is removed by this Act).

**Part 3** of the act provides legislative powers for:

- Consolidation of legislation relating to flood risk including Water Industry Act 1991, the Water Resources Act 1991, the Land Drainage Act 1991, the Reservoirs Act 1975, the Highways Act 1980 (so far as relevant to water), the Environment Act 1995 (so far as relevant to water), the Public Health Act 1936 (so far as relevant to water) and the Coast Protection Act 1949.
- Provision of funding by Parliament to pay for expenditure under the Act

As Lead Local Flood Authority, the City Corporation is responsible for preparing and implementing a Local Flood Risk Management Strategy for the City. The Requirements of the Flood and Water Management Act with respect to this Local Flood Risk Management Strategy are set out in Figure 9.

(1)A lead local flood authority for an area in England must develop, maintain, apply and monitor a strategy for local flood risk management in its area (a "local flood risk management strategy").

(2)In subsection (1) "local flood risk" means flood risk from—

(a) surface runoff,

(b) groundwater, and

(c) ordinary watercourses.

(3)In subsection (2)(c) the reference to an ordinary watercourse includes a reference to a lake, pond or other area of water which flows into an ordinary watercourse.

(4)The strategy must specify—

(a) the risk management authorities in the authority's area,

(b) the flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area,

(c) the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009),

(d) the measures proposed to achieve those objectives,

(e) how and when the measures are expected to be implemented,

(f) the costs and benefits of those measures, and how they are to be paid for,

(g) the assessment of local flood risk for the purpose of the strategy,

(h) how and when the strategy is to be reviewed, and

(i) how the strategy contributes to the achievement of wider environmental objectives.

(5)The strategy must be consistent with the national flood and coastal erosion risk management strategy for England under section 7.

(6)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.

(7)A lead local flood authority must publish a summary of its local flood risk management strategy (including guidance about the availability of relevant information).

(8)A lead local flood authority may issue guidance about the application of the local flood risk management strategy in its area.

(9)A lead local flood authority must have regard to any guidance issued by the Secretary of State about—

(a) the local flood risk management strategy, and

(b) guidance under subsection (8).

**Fig 9: Requirements of the Flood and Water Management Act 2010 Section 9 Local flood risk management strategies: England**

This strategy must be subject to Strategic Environmental Assessment (SEA) as required by the SEA Directive and will be reviewed by other stakeholders during a period of public consultation prior to adoption.

**Civil Contingencies Act 2004**

Local Authorities have 7 duties under the Civil Contingencies Act 2004

- To operate with other local responders to enhance coordination and efficiency;
- Ensure information is shared with local responders to enhance coordination:
- Carry out risk assessments
- Have emergency plans in place

- Have business continuity management arrangements in place
- Have arrangements in place to warn and inform the public in the event of an Emergency
- Provide advice and assistance to businesses and voluntary organisations regarding business continuity management

**Planning Guidance**

The National Planning Policy Framework (NPPF) was introduced in 2012 and provides Government guidance on Planning. The Core Planning principles include the following requirements

- support the transition to a low carbon future in a changing climate, taking full account of **flood risk** and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, **flood risk mitigation**, carbon storage, or food production)

Section 10 of the NPPF states that "Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.

**National Planning Policy Framework requirements for development**

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

● applying the Sequential Test;

● if necessary, applying the Exception Test;

● safeguarding land from development that is required for current and future flood management;

● using opportunities offered by new development to reduce the causes and impacts of flooding; and

● where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

The NPPF is supported by National Planning Practice Guidance which provides details of how the flood risk elements of the NPPF should be applied.

**Other City of London strategies and plans**

The City Corporation has adopted a number of plans and strategies which are relevant to this Flood Risk Management Strategy and these have been taken into account in its preparation:

- **Responsible Business Strategy**

The City of London Corporation's Responsible Business Strategy includes under outcome 2 *The Planet is Healthier* and Priority 4 *Climate Change,* a commitment to reduce the risk and impact of flooding on the Square Mile by implementing the City of London Local Flood Risk Management Strategy.

- **Climate Action Strategy**

The City of London's draft Climate Action Strategy includes a range of climate resilience actions related to flood risk. Key short-term actions are taken from the City of London Adaptive Pathways Study.

- **Climate change adaptation strategy**

The City of London's Climate Change Adaptation Strategy (2010 update) uses the UK Climate Projections, UKCP09 and builds on the impacts previously identified in the London Climate Change Partnership's publication, 'London's Warming'1.

The climate change risks for the City are summarised below:

- Hotter, drier summers,
- Milder, wetter winters,
- More frequent extreme high temperatures,
- More frequent heavy downpours of rain,
- Significant decreases in soil moisture content in summer,
- Sea level rise and increases in storm surge height,
- Possible higher wind speeds.
- Longer periods when weather systems are locked into the same pattern

The City of London's Climate Change Adaptation Strategy, aims to identify the priority risks associated with climate change and proposes adaptation measures which are designed to ensure that the City's infrastructure and services cope under a changing climate. The City Corporation will continue to review emerging

experience of climate change affecting south east England for its impacts on the City.

- **Local Plan 2015 and emerging City Plan 2036**

The City's Local Plan 2015 sets out the future vision and key polices for planning the City of London. This will be replaced by the City Plan 2036 in 2021/22. The Plan sets out the vision for shaping the Square Mile in the future and contains the policies by which planning decisions will be made.

The Local Plan 2015 and emerging City Plan 2036 set out the City's approach to flood risk associated with new development requiring flood risk assessments for any development sites located in the City Flood Risk Area.

The Local Plan is accompanied by a Policies Map (in two parts) that shows where its policies operate.

- **Multi Agency Flood Plan**

The Multi Agency Flood Plan outlines the various responsibilities of different organisation with regard to emergency and contingency planning for flood risk.

# Appendix 2 Flood Risk Powers and Responsibilities

| |
|---|
| Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements<br>a) The risk management authorities in the authority's area and<br>b) The flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area, |

**Risk Management Authorities and other interested parties**

The Flood and Water Management Act 2010 recognises the following authorities as risk management authorities:

- Lead Local Flood Authorities (LLFA)
- The Environment Agency
- Water companies
- Highways authorities
- Internal Drainage Boards (not relevant to the City)
- District and borough councils

These risk management authorities have a duty to co-operate with each other in the exercise of their duties and the power to take on flood risk functions from other authorities by mutual agreement.

The relevant risk management authorities for the City are the City Corporation as LLFA for the square mile, the Environment Agency which exercises a national and regional role in co-ordinating flood risk management, Thames Water as the water company and sewerage undertaker for the City, and Transport for London as the Highways Agency for parts of the City.

A number of other authorities, although not defined as risk management authorities, have a role to play in the management of flood risk in the City. These include the Greater London Authority (GLA) and Transport for London TfL; Network Rail which manages mainline stations feeding the City; the Emergency Services and first responders in tackling flooding incidents; the Marine Management Organisation and the Port of London Authority; and neighbouring boroughs as LLFAs for their areas since they also influence the City's flood risk management.

**Risk management functions in the City**

| Authority | Function | Responsibilities |
|---|---|---|
| City Corporation | Lead Local Flood Authority | Strategic role in overseeing the management of local flood risk i.e. flood risk from surface water runoff, groundwater and ordinary watercourses. This includes responsibility for<br>• Preparing a Local Flood Risk Management Strategy<br>• Investigation of flooding incidents and preparation of flood incident reports<br>• Maintaining register of assets that impact |

| Authority | Function | Responsibilities |
|---|---|---|
| | | on flood risk and registering appropriate assets<br>• Implementing SuDS Approval Body (SAB) |
| City Corporation | Planning Authority | Ensuring that development does not increase vulnerability to flood risk for new and existing properties |
| City Corporation | Category 1 responder under the Civil Contingencies Act | Ensuring that systems and processes are in place to provide emergency response to flooding |
| City Corporation | Highway Authority | Duty to maintain the highway including responsibility for drain and gully maintenance on non-strategic roads in the City |
| Environment Agency | Strategic Role | Taking a strategic overview of the management of all sources of flooding and coastal erosion. This includes setting the direction for managing the risks through strategic plans; providing evidence and advice to inform government policy and support others; working collaboratively to support the development of risk management skills and capacity and providing a framework to support local delivery. |
| Environment Agency | Operational role | Operational responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea, as well as being coastal erosion risk management authority.<br>Responsible for inspection of flood defences and maintenance of the Thames Barrier.<br>Advisory and statutory consultee role in the assessment of flood risk associated with planning policy and development.<br>Advisory role in assessment of Multi Agency Flood Plans. |
| Marine Management Organisation | Strategic Role | Responsibility for preparing marine plans for English inshore and offshore waters including the tidal extent of the River Thames |
| Thames Water | Sewerage undertaker | Responsible for provision and maintenance of the sewer network<br>Upgrade of sewer network to facilitate increased drainage capacity requirements |

| Authority | Function | Responsibilities |
|---|---|---|
| | | Responsible for implementation of Thames Tideway Tunnel to reduce sewer outflows into the Thames |
| Transport for London | Transport infrastructure provider | Responsible for provision and maintenance of strategic road network and London Underground and bus networks ensuring their resilience to flood risk |
| Network Rail | Transport infrastructure provider | Responsible for provision and maintenance of railway network serving mainline stations in the City and their resilience to flood risk |
| Greater London Authority | Drain London/LoDEG | Facilitation of co-ordinated working on flood risk across London including provision of guidance and information |
| Neighbouring boroughs | LLFA s for their areas | Strategic role in overseeing the management of local flood risk in their areas and liaison with other LLFAs affected. |
| Businesses and Residents | Property owners | Responsible for flood resistance and resilience and emergency and contingency planning associated with properties<br>Riparian owners are responsible for the maintenance of flood defences |
| Utility companies | Utility providers | Responsible for provision and maintenance of utility infrastructure – electricity, gas telecommunications etc. and ensuring its resilience to flood risk |

# Appendix 3 Glossary

**City Flood Risk Areas** – Areas of the City that are at risk of river or surface water flooding as defined in the City of London Local Plan

**Flood Zones** – Environment Agency defined zones with varying probabilities of river flooding

- Flood Zone 1- Low probability of flooding - less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)
- Flood Zone 2 – Medium probability of flooding - between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%)
- Flood Zone 3 - High probability of flooding - a 1 in 100 or greater annual probability of river flooding (>1%)

**FMfSW – Flood Map for Surface Water –** National scale maps published by the Environment Agency showing surface water flood risk.

**LLFA - Lead Local Flood Authority** – The local authority with the statutory responsibility for flood risk management in its local area. The City Corporation is the LLFA for the City of London geographic area.

**LFRMS – Local Flood Risk Management Strategy** – Strategy for managing flood risk at a local level as required by the Flood and Water Management Act 2010

**MAFP Multi Agency Flood Plan** – Emergency Plan for responding to flooding

**NPPF – National Planning Policy Framework** – The government's statement of planning guidance to local planning authorities, issued by the Department of Communities and Local Government in March 2012. The City Corporation must take account of it in preparing and implementing its planning policies.

**Preliminary Flood Risk Assessment –** preliminary assessment of the risk of flooding as required by the Flood Risk Regulations 2009

**Risk Management Authorities** – authorities defined in the Flood and Water Management Act as having flood risk responsibilities

**Sequential Test and Exceptions Test –** Tests to be applied to proposals for new development in order to avoid allowing vulnerable uses in areas that are prone to flooding. Details of these tests can be found in the National Planning Practice Guidance to the National Planning Policy Framework

**SEA – Strategic Environmental Assessment** – assessment of the likely environmental, social and economic assessment of the implementation of plans and programmes as required by the EU Strategic Environmental Assessment Directive

**SFRA – Strategic Flood Risk Assessment –** comprehensive assessment of the risks of flooding from all sources

**Surface Water Management Plan** – plan for the management of surface water to reduce risk of flooding from this source.

**TE2100 – Thames Estuary 2100 Plan** – Environment Agency's plan for addressing flood management in the Thames Estuary up to 2100

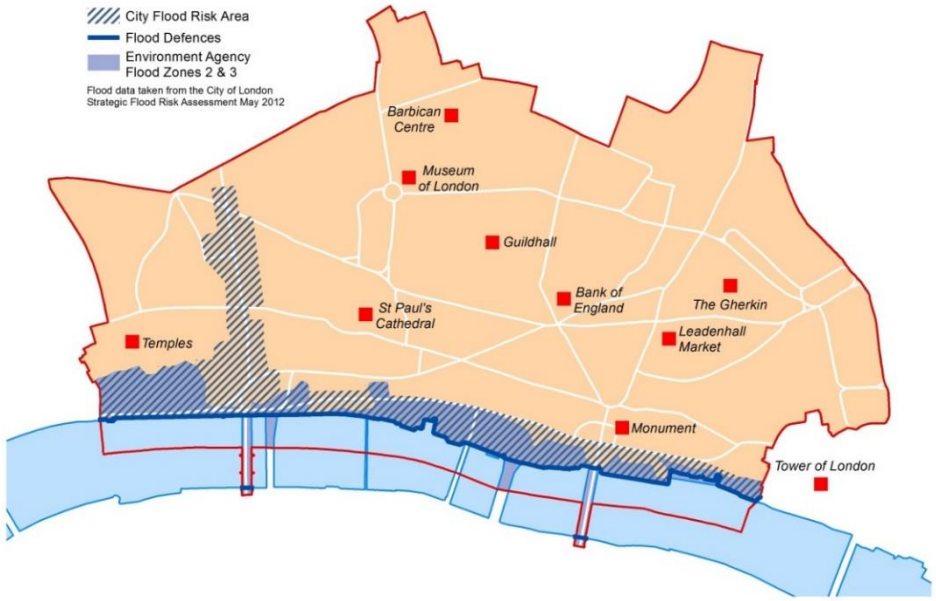
Contact: flood.risk@cityoflondon.gov.uk

# Local Flood Risk Management Strategy 2014-2020 Final Review Dec 2020

**1 Introduction:** The City of London Local Flood Risk Management Strategy 2014-2020 was adopted in September 2014 and covers the period to 2020. This review highlights the progress that has been made against the objectives of this strategy.

**2 Flood Risk Management Strategy requirements:** The Flood and Water Management Act 2010 (section 9) requires that the City Corporation, as Lead local Flood Authority for the City, must develop, maintain, apply and monitor a strategy for local flood risk management in its area. This review forms the final monitoring of the Local Flood Risk Management Strategy 2014-2020 and will be reported to the Flood Risk Steering Group and the Planning & Transportation Committee.

**3 Assessment of local flood risks summary:** The City of London is at relatively low risk of flooding however there are specific areas that are at risk from river flooding, surface water/ sewer surcharge and ground water flooding.




**4 Objectives for Managing Flood Risk in the City**

The Local Flood Risk Management Strategy sets out a series of objectives for managing flood risk in the City and an action plan for achieving these objectives. Tables 1- 5 show progress against the action plan as green for actions that are complete or on- going

with procedures in place, orange where further work is needed to progress the actions or red where an action has been delayed beyond the intended completion date. Where actions are to be carried forward into the revised LFRMS 2020-27 this is indicated in the recommendations column.

| | |
|---|---|
| | Actions that are complete or on- going with procedures in place |
| | Further work is needed to progress the actions |
| | Action has been delayed beyond the intended completion date. |

**4.1 Table 1 Progress against Objective 1: Flood Risk Information**

To provide up to date information regarding the level of flood risk within the City taking account of emerging climate change impacts

| Action | Who | When | Final Review Dec 2020 | Recommendation |
|---|---|---|---|---|
| We will review the City of London SFRA at least every 5 years or more frequently if evidence suggests that this is necessary. This frequency of review will enable the impacts of climate change to be taken into account as evidence emerges. | Built Environment- Planning<br><br>Resilience Team | 2017 | The City of London Strategic Flood Risk Assessment was revised in 2017<br><br>Work is progressing with Thames Water to review flood risk from burst watermains. This will be included in the next review of the SFRA in 2022 | Further review of the SFRA is due in 2022.<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 3** |
| We will keep under review the SFRAs and flood risk modelling that is carried out for neighbouring boroughs through the Central London North Flood Risk Partnership Group | Built Environment Planning<br><br>Drainage | Annually | Review of neighbouring SFRAs up to date | Continue to review and comment on SFRA's from our partner boroughs in the Central London North Partnership Group |
| We will provide the most up to date mapping and modelling to the EA for incorporation in future reviews of the FMfSW | Built Environment<br><br>Planning | 2013 to be reviewed by 2019 | The most up to date modelling has been supplied to the EA and included in the 2017 SFRA | Provide updated modelling when SFRA is reviewed in 2022 |

| | | | | |
|---|---|---|---|---|
| City Corporation as LLFA will continue to engage with other risk management authorities and other interested parties to improve data on flood risk for the City | Built Environment<br><br>Other risk management authorities and interested parties | Ongoing | Engagement with other risk management authorities is progressing through partnership groups, GLA/LoDEG and through individual discussions | Continue engagement with other risk management authorities |

**4.2 Table 2 Progress against Objective 2: Reduced vulnerability and cost of flooding**

To reduce the vulnerability and cost to City businesses, residents and visitors of flood risk

| Action | Who | When | Final Review Dec 2020 | Recommendation |
|---|---|---|---|---|
| Apply the National Planning Policy Framework (NPPF) and National Planning Practice Guidance on flood risk, developing and implementing flood risk policy in the Local Plan which accords with the Sequential and Exceptions Tests. | Built Environment Planning | On-going | All planning applications for development within the City Flood Risk Area have been determined in line with NPPF and practice guidance. The draft City Plan 2036 provides up to date Local Plan policy which is due for adoption in 2022. | Continue to determine applications for development in the City Flood Risk Area in line with NPPF and practice guidance<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 9** |
| Implement planning policy to avoid the development of vulnerable uses in the City Flood Risk Area as defined on the City of London Local Plan Policies Map | Built Environment Planning | On-going | All planning applications for development within the City Flood Risk Area have been determined in line with NPPF and practice guidance | Continue to determine applications for development in the City Flood Risk Area in line with NPPF and practice guidance<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 9** |
| Require the use of green roofs and green walls and other urban drainage techniques in new development and encourage in existing buildings to improve flood | Built Environment Planning<br><br>District Surveyors | On-going | The Local Plan monitoring report on green roofs shows that there is now 42 600 $m^2$ of green roofs in the City. Other urban drainage techniques are encouraged through the SuDS approvals process. The draft City Plan 2036 includes an Urban Greening Factor policy which aims to | Stronger Urban Greening policies will improve flood resilience in the Square Mile<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 9** |

| Action | Who | When | Final Review Dec 2020 | Recommendation |
|---|---|---|---|---|
| resilience subject to impacts on heritage value | ~~Town Clerks~~ | | maximise greening of new development | |
| Highlight the need for future raising of flood defences along the riverside to developers of property in this area encouraging a strategic approach to local flood defences. | Built Environment Planning | 2013-2065 | A Riverside Strategy is being developed with a main aim on implementing the aims of the TE2100. | Finalise the Riverside Strategy to provide a pilot for other riparian boroughs and a framework for flood protection in line with the TE12100 requirements<br><br>**This action has been carried forwards into the LFRMS 2021-27as Measure 2** |
| Use pre-application meetings to promote flood resistance and resilience measures to property owners considering refurbishment or redevelopment in the City Flood Risk Area. | Built Environment Planning | On-going | Flood resistance and resilience is now routinely discussed at the relevant pre application meetings | Continue to promote climate resilience including flood resilience at pre application meetings. |
| Promote flood resistance and resilience measures to property owners in the City Flood Risk Area ensuring that the heritage implications of mitigation measures are taken into account. | ~~Town Clerks~~<br><br>Resilience Team | 2013-14 | Guidance notes and flood risk briefing notes have been prepared for riverside sites | Continue to develop guidance to assist property owners to mitigate against flood risk<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 6 for historic assets and Measure 10 for commercial buildings** |

| Action | Who | When | Final Review Dec 2020 | Recommendation |
|---|---|---|---|---|
| Work to ensure all City Corporation infrastructure is resistant and resilient to flood risk, such as the Waste Transfer Station at Walbrook Wharf | ~~Town Clerks~~<br><br>Built Environment Highways & Cleansing<br><br>City Surveyors | On-going | The electricity substation at Walbrook Wharf has been relocated and other measures have been taken to reduce flood risk at this site | Continue to review flood risk of City Corporation owned premises incorporating flood resilience measures in line with the City's Climate Action Strategy |
| Seek funding contributions from those who will benefit from any collective flood resistance and resilience measures | ~~Town Clerks~~<br><br>City Surveyors<br><br>Resilience Team | On-going | Funding of local flood defences has been included in riparian development sites.<br><br>The riverside strategy is considering options for funding of flood defence raising to 2100 | Continue to address funding of flood resilience measures through planning and the Riverside Strategy |
| Continue to monitor the progress of the Flood RE proposals and assess their impact on the City | ~~Town Clerks~~<br><br>Built Environment<br><br>Resilience Team | 2013-2025 | The Flood RE scheme runs until 2039 and applies to residential development therefore has limited applicability within the City | Evaluate any proposed insurance schemes to cover flood risk |
| Continue to assess flood risk for the City's risk register in the light of emerging information. | Built Environment<br><br>City Surveyors | Annually | | |

| Action | Who | When | Final Review Dec 2020 | Recommendation |
|---|---|---|---|---|
| Continue to develop the necessary SAB processes within the City Corporation to fulfil this obligation within the timeframe laid down by Government | Built Environment | 2014/15 | The City Corporation has instigated an effective process for evaluation of Sustainable Drainage Measures in new development in line with government guidelines | Continue to evaluate SuDS and extend to cover public realm and minor development |
| The City Corporation has implemented a dynamic Highway Management System (HyMS). This will include information on assets which have an impact on flood risk. Public access to this register will be made available through the City of London web site | Built Environment Highways & Cleansing | On-going | Assets that have an impact on flood risk have been identified and mapped on the City Corporation's website | Continue to keep register of flood risks assets up to date |
| Update the condition and state of repair of the flood risk assets on HyMS incorporating Environment Agency data on river flood defence walls annually. | Built Environment Highways & Cleansing<br><br>District Surveyor's Engineering Team | On-going | Systems are now in place to record the state of repair of flood risk assets via the Environment Agency for Flood defence walls and Thames water, and highways and drainage contractors for other assets | Continue to keep state of repair data up to date on 6 monthly cycle |

| Action | Who | When | Final Review Dec 2020 | Recommendation |
|---|---|---|---|---|
| Continue to maintain the register of flooding incidents | Built Environment Highways & Cleansing<br><br>Resilience Team | On-going | Procedure is in place to record and investigate flooding incidents affecting more than one property in the City | Continue to maintain a register of flooding incidents and investigations |
| Produce flood investigation reports for instances of multiple property flooding from a single source | Built Environment Highways & Cleansing | On-going | Procedure is in place to record and investigate flooding incidents affecting more than one property in the City | Continue to maintain a register of flooding incidents and investigations |
| Continue to support the City's businesses and residents by warning and informing them of flood risks and supporting business continuity and emergency plans | Town Clerks<br><br>Security and Contingency Planning<br><br>City Property Association<br><br>Resilience Team | On-going | The City's Multi Agency Flood Plan is under review in line with new government guidance which was issued in Sept 2020 | Review MAFP in line with new guidance<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 11** |
| Work with the City Property Association and other business and resident associations, as appropriate, | City Property Association | On-going | Guidance and riverside property briefing notes are available on the City Corporation's website | |

| Action | Who | When | Final Review Dec 2020 | Recommendation |
|---|---|---|---|---|
| to raise awareness of flood risk amongst their members | City Businesses<br><br>City residents | | | |
| Encourage businesses and communities that are at risk of flooding to use the Environment Agency's flood warning service for river and groundwater flooding and any future flood warning system for surface water / sewer flooding. | Environment Agency<br><br>City Businesses<br><br>City residents | On-going | Guidance has been prepared to ensure that Flood Emergency Plans are in place for all new development | Continue to take all opportunities to promote flood resilience and warning measures |
| Prepare and implement site specific flood risk management plans for Farringdon Street, Paul's Walk and Victoria Embankment seeking contributions from beneficiaries of any area-wide flood alleviation measures | ~~Town Clerks~~<br><br>Built Environment<br><br>Security & Contingency Planning | 2014/15 | A Riverside Strategy is being prepared. Flood risks elsewhere will be covered by guidance for different building types | Finalise the Riverside Strategy and flood resilience guidance for different premises types<br><br>**This action has been taken forward into the LFRMS 2021-27 through Measures 2, 6 and 10** |

**4.3 Table 3 Progress against Objective 3: Emergency response to flooding**

To respond effectively in the event of flooding providing emergency assistance to those in need

| Action | Who | When | Final Review Dec 2020 | Recommendations |
|---|---|---|---|---|
| Ensure that emergency arrangements and plans are in place to respond to major incidents | Security and Contingency Planning | On-going | Security and Contingency Planning have comprehensive plans in place to respond to major incidents in the City including flooding. | Continue to review major incident plans in the light of climate projections |
| Embed the current MAFP by training and exercising it with appropriate partners. | Security and Contingency Planning | On-going | Training and exercising of major incident plans including the Multi Agency Flood Plan is ongoing | Continue to exercise major incident plans |
| Review and update the MAFP every five years or more frequently if circumstances require this. | Security and Contingency Planning<br><br>Resilience Team | 2017 | The City's Multi Agency Flood Plan is under review in line with new government guidance which was issued in Sept 2020 | Review MAFP in line with new guidance<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 11** |

**4.4 Table 4 Progress against Objective 4: Recovery from flooding**

To assist in recovery enabling the City residents and businesses to resume normal activities promptly

| Action | Who | When | Final Review Dec 2020 | Recommendations |
|---|---|---|---|---|
| Ensure that recovery arrangements and plans are in place to deal with flood recovery. | Security and Contingency Planning | On-going | Security and Contingency Planning have comprehensive plans in place to respond to major incidents.<br><br>Businesses should have their own recovery plans in place | Use revised Strategic Flood Risk Assessment (SFRA) to publicise flooding risk and promote contingency planning |

**4.5 Table 5 Progress against Objective 5: Partnership working**

To engage with other flood risk management authorities taking action to reduce flood risk through partnership working within and beyond the City's boundaries

| Action | Who | When | Final Review Dec 2020 | Recommendations |
|---|---|---|---|---|
| Work through Drain London to contribute to a coherent London wide approach to flood risk | Built Environment<br><br>Planning & Drainage | On-going | City Corporation officers regularly contribute to the Drain London LoDEG meetings and share knowledge to promote a London wide approach to flood risk. | Continue to contribute to LoDEG |
| Work with the Central London North Flood Risk Partnership Group to ensure that appropriate policies are included in our partner's Flood Risk Strategies and Local Plans | Built Environment Planning & Drainage | On-going | City Corporation officers attend quarterly meetings and contribute to the Central London North Partnership Group. | Continue to contribute to the Central London North Partnership Group |
| Work with the Environment Agency to implement the City's actions from the TE 2100 Plan and the requirements of the Flood Risk Regulations | Town Clerks | Short term 2010 to 2035<br><br>Medium term 2035 to 2050<br><br>Long term 2050 to 2100 | The City Corporation is working closely with the Environment Agency on implementation actions from the TE2100 plan including the development of a riverside strategy as a pilot for riparian authorities elsewhere | Finalise the Riverside Strategy and share learning |

| Action | Who | When | Final Review Dec 2020 | Recommendations |
|---|---|---|---|---|
| Continue to discuss possible funding of local projects with the Environment Agency | Built Environment | Short term 2010 to 2015 | The City Corporation secured TRFCC levy funding to progress the Riverside Strategy Approach | Seek future funding for local actions |
| Engage with Thames Water and OFWAT to progress widespread retrofitting of SuDS into existing properties through the Thames Water draft twenty five year plan consultation process | Built Environment | Consultation on plan for 2015 to 2040 | Thames Water funding for SuDS is uncertain. Partnership working continues with Thames Water on the Drainage and Wastewater Management Plan | Continue engagement with Thames Water<br><br>**This action has been taken forward into the LFRMS 2021-27 as Measure 7** |
| Work with utility providers to build resistance and resilience to flood risk ensuring prompt recovery following a flood incident | ~~Town Clerks~~<br><br>Built Environment | On-going | Progress has been made on individual sites e.g. UK Power Networks at Walbrook Wharf. Wider engagement is needed with other infrastructure providers | Develop wider engagement with infrastructure providers<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 8** |
| Work with transport providers to ensure implementation of flood resilience for transport networks | ~~Town Clerks~~<br><br>Built Environment<br><br>Transport for London | On-going | London Underground has not included any City stations in its list of stations most at risk of flooding | Develop wider engagement with transport providers<br><br>**This action has been carried forward into the LFRMS 2021-27 as Measure 8** |

| Action | Who | When | Final Review Dec 2020 | Recommendations |
|---|---|---|---|---|
| | Network Rail | | Further engagement is needed with transport providers | |
| Work with technical bodies to provide technical guidance and training to increase awareness of flood risk and mitigation. | ~~Town Clerks~~<br><br>Built Environment | On-going | The Resilience Team actively feeds into consultations and guidance development on flood risk and resilience | Continue to engage with technical bodies |
| Work with emergency services to provide effective response to flooding incidents | Security and Contingency Planning | On-going | Security and Contingency Planning officers have regular liaison with emergency services | Continue to engage with emergency services |



**5 Conclusion**

As the renewal of the Local Flood Risk Management Strategy approaches in January 2021 significant progress has been made in the fulfilment of the actions from the previous LFRMS 2014-20. Progress on this work has been accelerated through the City Corporation's decision to fund the Environmental Resilience Team in 2018. This work is essential for implementation of the resilience actions in the City's Climate Action Strategy.
Important steps have been taken in progressing a Riverside Strategy which is anticipated to be a major flooding priority for the City, this builds on the already available riverside site briefing notes. Measures to reduce surface water risk continue including expanding

SuDs to minor development and the public realm and introducing flooding resilience precautions in Corporately owned properties. However further progress is still be required in these areas.

Engagement continues with other Risk Management Authorities including with our neighbouring LLFAs (through the partnership meetings), London more widely (through LoDEG) and the EA as part of the Riverside Strategy Development. Discussions are also underway with Thames Water concerning watermains burst and the drainage and wastewater management plan. Additional action will be required to engage and co-operate with other organisations such as utility and transport providers to properly understand their risks and potential implications of flooding to the Square Mile.

The Multi-Agency Flood Plan is a fundamental part of ensuring that the City is prepared for major flooding and this will be updated to reflect new governmental guidance. Guidance notes have all been prepared and are available on the website to educate occupiers and building owners on the possible impact of flooding to business and best practise preparations.

**Local Flood Risk Management Strategy Consultation Report 27/11/2020**

1. The draft City of London Local Flood Risk Management Strategy was approved for consultation by P&T Committee on 6th Oct 2020.
2. The public consultation took place between 19th Oct 2020 to 27th Nov 2020.
3. The following consultation documents were made available on the City of London Corporation website:
    - Local Flood Risk Management Strategy for consultation 2021-27
    - Strategic Environmental Assessment
    - Equality Impact Screening
4. Key stakeholders were contacted directly via email and invited to comment. This included other risk management authorities, statutory bodies, riparian owners, neighbouring LLFAs and regional bodies - see appendix 1 for list of consultees.
5. The consultation was publicised through partnership groups, London Climate Change Partnership, LoDEG and London Councils.
6. A total of 29 responses were received from 10 different respondents, and relevant changes were made to the draft LFRMS. A summary of the comments and the changes made is set out in table 1.
7. The final strategy was approved by the Flood Risk Steering Group on 2nd Dec 2020 and recommended for adoption by the City of London Planning and Transportation Committee in February 2021.



Contact: flood.risk@cityoflondon.gov.uk

| Table 1: Consultation responses and changes to the draft LFRMS | | | | |
|---|---|---|---|---|
| | Name | Organisation | Comment summary | Response |
| 1 | Richard Snowdon | Honourable Society of the Inner Temple | Note the effect of climate change on flood risk and the lack of suitable flood defences at Temples. Note the intention to provide guidance on suitable measures for historic fabric of the City. Await results in 2023. | Comment noted.<br>No change to LFRMS |
| 2 | Lucinda Robinson | Marine Management Organisation | Provides list of the relevant policies in the draft South East Inshore Marine Plan for review | Comment noted. There are no conflicts between the marine Plan policies and the LFRMS<br>No change to LFRMS |
| 3 | Lucinda Robinson | Marine Management Organisation | Page 34 recommend mention of the draft South East Marine Plan in Appendix 1 Legislative context | The draft South East Marine Plan has not been included since it is a draft plan at this stage.<br>The Marine Management Organisation has been added to the Risk Management Functions in the City table on page 35 |
| 4 | Sharon Jenkins | Natural England | Defines statutory purpose of Natural England and confirms that Natural England have no comment to make on this consultation | Response noted<br>No change to LFRMS |
| 5 | Andrzej Nowosielski | Thames Water | In the paragraph 5.1.2 where you mention “We will need to reduce the speed and quantity of rainwater entering drains” As well as the solution you put forward here (SuDS), I think it could be added that new development and | Wording in para 5.1.2 altered to read: “We will need to reduce the speed and quantity of rainwater entering drains, through the implementation of Sustainable Drainage Systems (SuDS) wherever possible, *reductions* |

| | | | | |
|---|---|---|---|---|
| | | | renovation of buildings should address where possible reductions to peak flow, such as storage, which would also reduce the speed and quantity of rainwater entering drains | *in peak flows and storage* to reduce the risk of sewers surcharging |
| 6 | Andrzej Nowosielski | Thames Water | It may be built into the way that these strategies are implemented but there is no mention of work done by your neighbouring boroughs | An additional paragraph has been added to the Forward emphasising our commitment to partnership working with LLFAs and other risk management authorities |
| 7 | Andrzej Nowosielski | Thames Water | Generally, a well expressed and presented strategy | Comment noted<br>No change to LFRMS |
| 8 | Paul Baker | LB Hammersmith & Fulham | No detailed comments on the LFRMS document but I do like the way the document is set out so clearly and it is easy to navigate your way through each section. | Comment noted.<br>No change to LFRMS |
| 9 | Patricia Cuervo | Royal Borough of Kensington and Chelsea | I think it is a clear document which shows the correct amount of information to understand flood risk in the City. The text is clear and accessible which is difficult in this type of documents so well done to you and the team.<br>I like the fact that you have related the objectives and measures to those within the Climate Action Strategy and the FRMP. I think it should be also future proof for | Comment noted<br>No change to LFRMS |

| | | | | |
|---|---|---|---|---|
| | | | when the FCERM action plan comes along | |
| 10 | Patricia Cuervo | Royal Borough of Kensington and Chelsea | The only thing that I think may be missing is information about how you are going to report the monitoring of the strategy. Will it be through the AMR (through Planning annually) through the monitoring of the Climate Action Strategy, or some other way? | An additional paragraph has been added 7.3 stating that "*Progress in implementation of the proposed measures will be overseen by the officer led Flood Risk Steering Group. Periodically progress against the LFRMS objectives and Climate Action Strategy aims will be made public through reporting to the City Corporation's Planning and Transportation Committee. Reporting of progress to the Environment Agency/ Defra will be carried out on request – normally on an annual basis.*" |
| 11 | Patricia Cuervo | Royal Borough of Kensington and Chelsea | Also, and this does not need to be on the strategy itself, it may be useful to see what you have done so far since the LFRMS was first adopted in 2015. You have done a lot of good work and you should shout out about it | Comment noted<br>Progress since 2015 will be included as an appendix to the Planning & Transportation Committee report seeking adoption of this strategy |
| 12 | Natasha Gibbs | Environment Agency | Section 1.1 Figure 1 - Does this include SW FR from only a certain event? As its missing some 1in1000 extent in the north of the borough | This map shows the City Flood Risk Area from the Local Plan policies map which is based on a 1 in 100 annual probability + 40% climate change. Figure 1 caption has been amended to read Figure 1: Flood Risk in the City |

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| | | | | of London *from Local Plan Policies map* |
| 13 | Natasha Gibbs | Environment Agency | Section 3.3 Local examples of SuDS - could a reference to how this is being monitored or captured be added if available | An additional sentence has been added to the Local examples box stating that *Monitoring of the impact of SuDS secured through the Planning System is underway and will be reported to the City's Officer level Flood Risk Steering Group* |
| 14 | Natasha Gibbs | Environment Agency | Section 3.3 After the catchment maps, maybe a reference to the effect on SW FR for CoL and reference working with partners (LLFAs and TW) around this. | An additional paragraph has been added to the forward *Flooding does not respect local authority boundaries so the flood risks in the City are influenced by policies and actions implemented in other Lead Local Flood Authority (LLFA) areas. The City Corporation is committed to working in partnership with LLFAs Thames Water and other risk management authorities to collectively address the flood risks we face.* |
| 15 | Natasha Gibbs | Environment Agency | Sections 4 and 5 Objectives and Measures: We may need to reference that the measures relate to the SW FRA for London covering CoL, though include weighting for flood risk overall for City of London | A sentence has been added stating that *These measures cover surface water, sewer surcharge, river and coastal flood risks for the Square Mile* |
| 16 | Natasha Gibbs | Environment Agency | Para 5.6.3 Could remove these responsibility references as they will be included in other | Paragraph 5.6.3 amended to read: "During the latter stages of a major flooding incident (the recovery period and return to normality) the City |

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| | | | documents (MAFP and Major Incident Plan) | Corporation may be able to provide services and staff to assist with *a range of issues ( see Multi Agency Flood Plan for details )"* the detailed list has been removed |
| 17 | Natasha Gibbs | Environment Agency | Para 6.1 Use of word multiples? Has definitive trigger been agreed internally for CoL, or is it just more than 1 property will trigger a S19? | Amendment made for clarity 5.6.4<br>Where ~~multiple properties are~~ *more than one property is* affected by a single source of flooding, the City Corporation will investigate the causes and impact of flooding and prepare a report outlining any actions to reduce the risk of reoccurrence. |
| 18 | Natasha Gibbs | Environment Agency | Remove EA reference - resilience measures are hard to fund in projects as the main option (as we found out) as they don't stop flooding, rather decrease effects on property when flooding | Reference to EA removed from 6.1 (4) |
| 19 | Natasha Gibbs | Environment Agency | The TRBMPs and FRMPs are reviewed every 6 years under the flood risk regs, whilst the FRMS doesn't have a specific timeline for update, they're required under the FWMA. Change 5 to 6 years in reference to keep in line with use of Objs and measures under FRMP | Timescale in para 7.4 changed to 6 years |
| 20 | Natasha Gibbs | Environment Agency | Add link to those local CoL plans/policies if available online | The City Corporation's website policy does not allow links in this type of document<br>No change made to LFRMS |

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| 21 | Tom Campbell | Environment Agency | It's great to see the Thames Estuary 2100 requirements for the City of London referred to throughout the strategy, specifically the need to raise tidal defences in 2065 and 2100.<br><br>It's also good to see the production of the Riverside Strategy included as an outcome for this year too. | Comment noted<br>No change to LFRMS |
| 22 | Tom Campbell | Environment Agency | I wondered however whether there is something missing around implementation of the Riverside Strategy following its completion, principally around ensuring development applications consider the information and guidance outlined within the Riverside Strategy, but also actions around engaging with landowners on its contents and recommendations. | Paragraph 5.1.1 has been amended as follows:<br>Working with *developers, landowners* the Environment Agency *and others* to implement the Thames Estuary 2100 Plan, |
| 23 | Michael Atkins | Port of London Authority | The PLA supports the reference under Measure two of the strategy which states that by quarter two of 2021 the city of London Corporation will have prepared a riverside strategy which will drive forward the requirements of the Thames Estuary 2100 Plan to reduce the risk of flooding whilst unlocking sustainable growth | Comment noted<br>PLA will continue to be consulted as appropriate.<br>No change to LFRMS |

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| | | | opportunities along the Thames in the Square Mile, including protecting heritage assets. The PLA request to continue to be consulted on the proposed Riverside Strategy at the appropriate time, particularly with regard to any specific proposals on or alongside the Thames within the City of London. | |
| 24 | Lauren Wilkinson | LB Southwark | We broadly agree with the approach taken to the Local Flood Risk Management Strategy Comments made in relation to areas of clarity and proofing. In paragraph 1.1 it says" at some risk from river flooding", should this be tidal or flooding from rivers and seas for clarity and accuracy | Paragraph 1.1 amended to read The City is at relatively low risk of flooding with specific areas at some risk from *tidal and* river flooding and surface water/sewer flooding (Fig 1). |
| 25 | Lauren Wilkinson | LB Southwark | Para 1.3 the first word should be tackling not tacking | Correction made |
| 26 | Lauren Wilkinson | LB Southwark | Para 3.2 Flood and tidal risk it would be useful to include a map of modelled breach extents. Has latest EA product 4 data been used? It would be useful if this could be set out | Modelled tidal breach extents map added |
| 27 | Lauren Wilkinson | LB Southwark | Para 3.3 Surface water and flood risk it would be useful to reference Critical Drainage Areas, including a map of these areas | The City corporation considers the whole of the city to be a critical drainage area due to the interconnected combined drainage |

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| | | | | network. Reducing volumes and speeds of surface water entering the drainage network is critical throughout the City since it could result in surcharges elsewhere<br>No change made to LFRMS |
| 28 | Lauren Wilkinson | LB Southwark | On page 14 the hyperlink does not work please review | Hyperlink renewed |
| 29 | Lauren Wilkinson | LB Southwark | It could be useful to have a list of figures, maps and tables for reference | We will consider including this in the final adopted version |

**Appendix 1 List of consultees**

Cheapside BID
City Bridge Trust
City of London Police
City of London School
City of Westminster
City Property Association
Diocese of London Church of England
Environment Agency
GLA
Highways England
Historic England
Historic Royal Palaces
Inner Temple
LB Camden
LB Hackney
LB Hammersmith & Fulham
LB Islington
LB Lambeth
LB Southwark
LB Tower Hamlets
London Councils
Marine Management Organisation
Middle Temple
Museum of London
Natural England
Network Rail
Port of London Authority
RB Kensington & Chelsea
Thames Water
The Aldgate Partnership
The Mermaid Theatre
Transport for London
UK Power Networks
Vintners Hall

| **Committee(s)** | **Dated:** |
|---|---|
| Planning and Transportation - for information<br>Resources Allocation Sub Committee - for information | 16 February 2021<br>17 February 2021 |
| **Subject:** Local Implementation Plan - Transport for London funded schemes 2020/21 | **Public** |
| **Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?** | 9. We are digitally and physically well-connected and responsive.<br><br>12. Our spaces are secure, resilient and well-maintained. |
| **Does this proposal require extra revenue and/or capital spending?** | **N** |
| **If so, how much?** | **£** |
| **What is the source of Funding?** | **Transport for London** |
| **Has this Funding Source been agreed with the Chamberlain's Department?** | **Y** |
| **Report of:** Director of DBE | **For Information** |
| **Report author:** Samantha Tharme | |


**Summary**

This report covers the provision of Transport for London funding to the City of London Corporation. It seeks approval for the re-allocation of funds within the financial year.

The allocation for 2020/21 was approved at RASC on 17 October 2019. The reallocation is within the £100,000 threshold which can be approved by Director for Department of the Built Environment.

These projects will help deliver the road safety, public realm and transport management objectives of current Local Implementation Plan and the Corporations Transport Strategy.

In April all TfL funding was paused to prioritise funding for Covid-19 response measures. In November Transport for London (TfL) were able to release some Local Implementation Plan (£368k) and Liveable Neighbourhood (£150k) funding for the remainder of 2020/21. This is approximately a third of the previously agreed Local Implementation Plan (LIP) programme for the year. Those schemes which are part way through delivery and have necessary approvals were prioritised for completion this financial year. All other schemes within the LIP remain on pause until further funding decisions are made.

For the current financial year 2020/21, it is requested to reallocate a total of £95,000 as set out in table 1, to priority schemes which can be delivered in the current financial year.

## Recommendation(s)

- Approve reallocations within 2020/21 to a total of £95,000 as set out in table 1, for the EV charge point enabling works, Healthy Streets minor schemes and Puddle Dock pedestrian route scheme.

## Main Report

### Background

1. Under Section 159 of the Greater London Authority Act 1999, TfL is empowered to provide grants to London boroughs and the City for the provision of safe, efficient and economically viable transportation facilities and (or) services to, from or within Greater London. In May 2019 the 3 year Local Implementation Plan for the City was submitted to TfL and approved.
2. For the 2020/21 financial year TfL agreed the following grants to the City of London:

    - A combined grant of £100,000 for Local Transport Initiatives and £867,000 under the Corridors, Neighbourhoods and Supporting Measures and Local Transport Initiatives programmes.
    - £105,000 under the Principal Road Maintenance funding programme.
    - Additional funding through the discretionary, Liveable Neighbourhoods programme allocated £200,000 in 2020/21.
3. Spending against these projects was approved in October 2019.
4. In April 2020 Transport for London were required to pause all 2020/21 funding, in order to prioritise spend on emergency Covid-19 response measures.

### Current Position

5. A decision to release funds (£368k) for the remainder of 2020/21 has now been possible as TfL have secured a financial package with central government. This is approximately a third of the previously agreed programme for the year. The spend will focus on schemes that are essential and high priority against current Corporate objectives; furthermore, given approval stages are able to progress and deliver within this financial year. These are to:

    - Complete delivery of the City' Corporation's elements of the Puddle Dock scheme.
    - Deliver three Healthy Streets minor schemes to improve the experience and safety of people walking at Old Broad Street by Pinners Passage, Creechurch Lane by Leadenhall Street and Gresham Street by Wood Street.
    - Scope opportunities for further pavement widening and pedestrian priority within the Healthy Streets programme, in line with the Transport strategy and Climate Action Strategy;

- Install barriers at Baynard House Car Park as part of the delivery of the rapid charging hub, in support of the Electric Vehicle Charging infrastructure plan.

6. £150,000 of Liveable Neighbourhood funding has also been released for the City Cluster Area Programme.

## Proposals

7. Table 1 shows the reallocated amount under the Local Transport Initiatives and the updated allocations for programmes of work within the Corridors and Neighbourhoods and Liveable Neighbourhoods Programme.

| **Table 1: Approved Annual Spending Submission (ASS) for 2020/21 and revised allocation as at November 2020.** | | |
|---|---|---|
| | **Approved Allocation Oct 2019 (£)** | **Revised Allocation Nov 2020 (£)** |
| **Local Transport Initiatives** | | |
| ZEZ City Cluster; Barbican/Golden Lane | 50,000 | - |
| City-wide 15mph – scheme development | 50,000 | - |
| Electric Vehicle charge point enabling works | - | 40,000 |
| Healthy Streets minor schemes | - | 10,000 |
| ***Sub Total*** | **100,000** | **50,000** |
| **Corridor, Neighbourhoods & Supporting Measures** | | |
| Healthy Streets minor schemes | 130,000 | 103,000 |
| Legible London City-wide Roll Out | 257,000 | - |
| Puddle Dock Pedestrian safety and route severance scheme | 170,000 | 215,000 |
| Mansion House Station walking and public realm improvements | 60,000 | - |
| 100 Minories public realm enhancements | 40,000 | - |
| Road Danger Reduction campaigns, behaviour change & engagement | 90,000 | - |
| Lunchtime Streets | 60,000 | - |
| Thames Riverside Walkway – Globe View section | 60,000 | - |
| ***Sub total*** | **867,000** | **318,000** |
| **Liveable Neighbourhoods** | | |
| City Cluster Scheme* | 200,000 | 150,000 |
| ***Sub Total*** | **200,000** | **150,000** |
| **Central London Cycling Grid** | | |
| City Cycleways Programme | 1,400,000 | - |
| ***Sub Total*** | **1,400,000** | **-** |
| **Principal Road Renewal** | **105,000** | **102,000** |
| **Mayors Air Quality Fund** | **50,000** | **50,000** |
| **GRAND TOTAL** | **2,722,000** | **670,000** |

*n.b. for the City Cluster, the committee report (Oct 2019) included total for all funding sources, this is the TfL only funding for this scheme.

8. Alternative funding sources have been identified for some projects, as reported to Planning & Transportation committee on the 15th December 2020. All other LIP funding is on pause pending further decisions for TfL.

9. In November of each year it is usual for London Authorities to submit their bid for TfL Local Implementation Plan funding for the subsequent financial year the Annual Spending Submission (ASS). This year however TfL are not asking for the ASS as they have not yet indicated what funding will be available for 2021/22.

**Corporate & Strategic Implications**

10. Delivery of the Transport Strategy supports the delivery of Corporate Plan outcomes 1, 3, 5, 8, 9, 11 and 12. It also indirectly supports the delivery of Corporate Plan outcomes 2 and 4.
11. Delivery of the Transport Strategy also helps mitigate corporate risks CR20 – Road Safety and CR21 – Air Quality.
12. Schemes within the Healthy Streets schemes are prioritised to help deliver the Climate Action Strategy.

**Conclusion**

13. It is requested that the reallocation is agreed to support delivery of those programmes which have approval and will complete this year and to support delivery of the EV infrastructure programme, which has mostly been funded by TfL. This funding is required to be spent in the current financial year.

**Report author**

Samantha Tharme Transport Planner, Department of the Built Environment.

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T: 07542 228918

| **Committees:** | | **Dates:** |
|---|---|---|
| Planning & Transportation Committee | *[for decision]* | 16 February 2021 |
| Projects Sub | *[for decision]* | 23 February 2021 |
| Markets Committee | *[for information]* | 10 March 2021 |
| Capital Buildings Committee | *[for information]* | 23 March 2021 |

| **Subject:**<br>West Smithfield & Charterhouse Street (Thameslink) Bridges Remedial Works<br><br>**Unique Project Identifier:**<br>12021 | **Gateway 5:**<br>**Regular**<br>**Authority to start work** |
|---|---|
| **Report of:**<br>Director of the Built Environment<br>**Report Author:**<br>Jagdeep Bilkhu | **For Decision** |

# PUBLIC

| 1. Status Update | **Project Description:**<br>Essential refurbishment/maintenance at three highway structures over railway near Smithfield Market to extend the life of the existing structures and to mitigate the Corporation's risk from third party claims.<br>**RAG Status:** Amber (Amber at last report to Committee)<br>**Risk Status:** Medium (Medium at last report to committee)<br>**Total Estimated Cost of Project (excluding risk):**<br>£645,500<br>**Change in Total Estimated Cost of Project (excluding risk):** Decrease of **£198,500** since last report to Committee.<br>**Spend to Date:** £50,877.61<br>**Costed Risk Provision Utilised:** Zero<br>**Slippage:**<br>A delay in approving this report could have an impact on the programme of the new Museum of London project as the above ground works of this project are scheduled to be undertaken between March and April 2021 at the time of writing this report. |
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| **2. Requested decisions** | **Next Gateway:** Gateway 6: Outcome Report<br>**Next Steps:**<br>• If the requested decisions are agreed the next steps would be to confirm these decisions to Buro Four, to issue a formal instruction to the main contractor, Dyer & Butler to commence the works.<br>• Furthermore, with the main contractor formally on-board, supporting documentation for access and methodology agreement with Network Rail will be discussed and formalised.<br>**Requested Decisions:**<br>1. Members to agree the total revised project budget of **£645,000** (excluding risk);<br>2. Approve the appointment of Dyer & Butler (incumbent Tunnel Lids contractor) by means of a variation to their currently approved works order in the total value of £390,000.<br>3. That a Costed Risk Provision of **£150,000** is approved over and above the £645,000 (to be drawn down via delegation to Chief Officer). |
| **3. Budget** | 3.1 The total cost of the project is £645,000.<br>3.2 The total cost of the construction works was estimated in the previous G1-4 report of September 2018. The G4 Issue Report of September 2019 included a change in scope to include similar work adjacent to the original two bridges. For this report the total construction cost has been estimated by the proposed main contractor as £390,000, which is £17,000 less than we estimated at £407,000 in the G4 Issue Report (incl. the change in scope). There are some notable assumptions that the contractor has made which do mean that it would be prudent to keep monies within the budget for further investigations, e.g. more trial pits at highway level and also for an asbestos survey, which the contractor has not allowed for in his estimate.<br>3.3 It should be noted that in the cost build up below, £80,000 that was set aside for investigations has been placed in the risk provision. Any investigations that are still deemed required by the contractor have been itemed as an item in the risk register. |

| Item | Reason | Funds/ Source of Funding | Cost (£) |
|---|---|---|---|
| Staff Costs | Site Supervision (Part-time) | CWP | 10,500 |
| Consultants Fees | Design and detailing | CWP | 55,000 |
| Consultant Fees | CDM Principal Designer | CWP | 5,000 |
| Consultant Fees | Quantity Surveyor & Network Rail Planner | CWP | 18,000 |
| Consultant Fees | Estimated site supervision at weekends and night time | CWP | 20,000 |
| Network Rail Management Costs | Project Management | CWP | 27,000 |
| Network Rail | Advance access booking | CWP | 120,000 |
| Main contractor | Works cost | Split between CWP & Additional Capital Funds for City Fund Properties Programme | 390,000 |
| **Total** | | | 645,500 |

**Costed Risk Provision requested for this Gateway: £150,000** which is also likely to be met from the Additional Capital Funds for City Properties Programme or CWP.
(as detailed in the Risk Register – Appendix 4)

| | |
|---|---|
| **4. Design summary** | Key Features of the Project Design<br><br>4.1 The work in this project has broadly been spilt into that which (i) is proposed to be undertaken to the bridges from ground level, i.e. from the highway and (ii) work to the soffits which will require access from the railway.<br><br>4.2 The above ground works comprise a new spray applied waterproofing system and re-surfacing. The key point to note is that the bridges on Charterhouse House Street have numerous services, in the form of ducts and cables above the bridge deck. The proposal on Charterhouse Street is to undertake waterproofing above the services. Ordinarily, waterproofing would be applied to the top of the bridge deck but in this instance undertaking such a task would be significantly more expensive as well as logistically more complex and prohibitive. There is the potential that utilities companies will need access to their apparatus and therefore the waterproofing may need to be breached. Should this be the case, the utility company is responsible for reinstating the waterproofing as part of any future work and this to be managed by virtue of the fact that all works on Charterhouse Street and West Smithfield should be notified to the City Corporation as both highways are designated the status of Special Engineering Difficulty (SED) as described by the New Roads and Street Works Act 1991.<br><br>The bridge on West Smithfield has service troughs in the footways. Some (possibly all) of the services on West Smithfield are being diverted as part of the new Museum of London works. On West Smithfield the current proposal is to install a new spray applied waterproofing system in the traditional manner, i.e. on the bridge deck itself. The new system shall also line the troughs in footways on both sides of the bridge.<br><br>4.3 The work from the railway entails various refurbishment, including repair to spalled concrete, cleaning and treating any corroding reinforcement and other metallic elements, replacing loss of pointing and brick repairs to masonry elements and in the case of West Smithfield, repairing cracked concrete cladding encasing iron girders. The condition of the girders within the encasing is not known.<br><br>Stakeholder Engagement<br><br>4.4 All works from the railway will require access platforms and agreement with Network Rail. This process has commenced however no definitive methodology has been |

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| | agreed as this will be completed in collaboration with the main contractor. |
| **5. Delivery team** | As reported previously and separately to Capital Buildings Committee, this scheme is to be incorporated into the contract of the new Museum of London's permanent works contractor, as a variation to that contract. Consequently, the proposed team are as follows:<br><br>5.1 Main Contractor: Dyer & Butler (appointed by the new Museum of London Relocation project team).<br><br>5.2 Project Management Consultant: Buro Four (appointed by the new Museum of London Relocation project team).<br><br>5.3 Designer: Arcadis (the City of London Corporation's incumbent contractor for engineering services).<br><br>There are numerous other members of the wider team that form part of the new Museum team however, the above are the core team for this project. |
| **6. Programme and key dates** | 6.1 Some of the works of this scheme have been programmed between March and April 2021 by the new Museum of London team. At the time of writing this report, this is the key date for the bridges covered by this report.<br><br>6.2 The date above is subject to other conditions and approvals by the museum team. As a result, the work proposed to the bridges in this report will be phased according to the logistical planning requirements of the museum project and may not be undertaken in one continuous standalone programme.<br><br>6.3 Appendix 3 is attached for information and shows (highlighted in blue) the proposed planned phasing of the highway structures work in relation to other ground level works that the new Museum of London team are undertaking over the railway and over the basement structures of the market. |
| **7. Risks** | 7.1 The largest risk to the project remains the potential financial impact of damage to railway infrastructure from the refurbishment work, either from above or to the soffits, resulting in disruption to the service on this section of railway. This same risk would also result in delays to the delivery of the project to programme. This risk is mitigated by the appointment of an experienced railway contractor who will carry that risk. The main contractor is also experienced on working on this specific section of railway on other projects (not related to this one). |

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| | 7.2 Other major risks involved with this scheme remain primarily from unknown plant and services buried in the highways as well as the potential extent of repairs, i.e. they could reveal a worse condition than expected when preparing for repair.<br><br>Costed Risk Provision Utilised at Last Gateway: **Zero**<br>Change in Costed Risk: **Increase of £80,000** to £150,000 from £70,000 in the G4 Issue Report of September 2019.<br><br>Further information available in the Risk Register (Appendix 4) and options appraisal matrix. |
| **8. Success criteria** | 8.1 To complete the works:<br>i) in accordance with the specification<br>ii) in collaborations with the adjacent works that are part of the new Museum of London from a logistical and design perspective as far as practically possible<br>iii) within the budget<br>iv) reduce the City of London Corporation's potential risk of litigation arising from third parties such as Network Rail. |
| **9. Progress reporting** | 9.1 Monthly progress report will be prepared via Project Vision and an Issue Report prepared for members should it be required. |

## Appendices

| | |
|---|---|
| **Appendix 1** | Project Coversheet |
| **Appendix 2** | Plan showing extent and location of Highway Structures |
| **Appendix 3** | Plan showing extent of Highway Structures (highlighted in blue) relative to other works of the museum. |
| **Appendix 4** | Risk Register |

## Contact

| | |
|---|---|
| **Report Author** | Jagdeep Bilkhu |
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| **Telephone Number** | 020 7332 1544 |

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# Project Coversheet

**[1] Ownership**

**Unique Project Identifier:** 12021
**Core Project Name:** West Smithfield and Charterhouse Street (Thameslink) Bridges Remedial Works
**Programme Affiliation** (if applicable):
**Project Manager:** Jagdeep Bilkhu
**Next Gateway to be passed:** GW5

**[2] Project Brief**

**Project Description:** Undertaking maintenance work mainly to the underside and waterproofing the structures, all of which are over the railway.
**Definition of need:** Refurbish/maintain to extend the life of existing structures and to mitigate the Corporation's risk from third party claims.
**Key measures of success:**

- Reduction of the Corporation's risks.
- Completion of works to minimise disruption (if possible) ahead of the opening of the newly relocated Museum of London.

**[3] Progress Status**

**Expected timeframe for the project delivery:** Expected to reach construction stage in 2020 or 2021, depending on available railway access and other construction works in the vicinity, e.g. MoL Relocation Project.
**Key Milestones:**
**Are we on track for completing the project against the expected timeframe for project delivery?** Y
**Has this project generated public or media impact and response which the City of London has needed to manage or is managing?**
No.

**[4] Finance and Costed Risk**

**Headline Financial, Scope and Design Changes:** Update relevant section post report approval. Add multiple entries to relevant box if issues reports are approved. Note this section is to tell the 'project story' of how we reached the current position outlined in the main report.

**Since G1-4 Report (PSC Approval on 12/09/2018):**

- Total Estimated Cost (excluding risk): £684,000
- Resources to reach next Gateway (excluding risk): £230,000
- Spend to date: £39,723.61
- Costed Risk Against the Project: £4,670,000 (post-mitigation)
- CRP Requested: £70,000
- CRP Drawn Down: Zero

*Scope/Design Change and Impact:*

**Since 'Authority to start Work' G5 report (PSC Approval xx/yy/zz):**

- Total Estimated Cost (excluding risk):

- Resources to reach next Gateway (excluding risk
- Spend to date:
- Costed Risk Against the Project:
- CRP Requested:
- CRP Drawn Down:

*Scope/Design Change and Impact:*

**Total anticipated on-going commitment post-delivery [£]:** Continuing with undertaking a programme of inspections and maintenance identified from these inspections.
**Programme Affiliation [£]:**<(If applicable) What is the estimated total programme cost including this project:>

**Top risk:** <threat that has not come to pass>

| | |
|---|---|
| *Risk description* | Undertaking and managing construction work above a railway without causing damage to, of affecting the running of trains. |

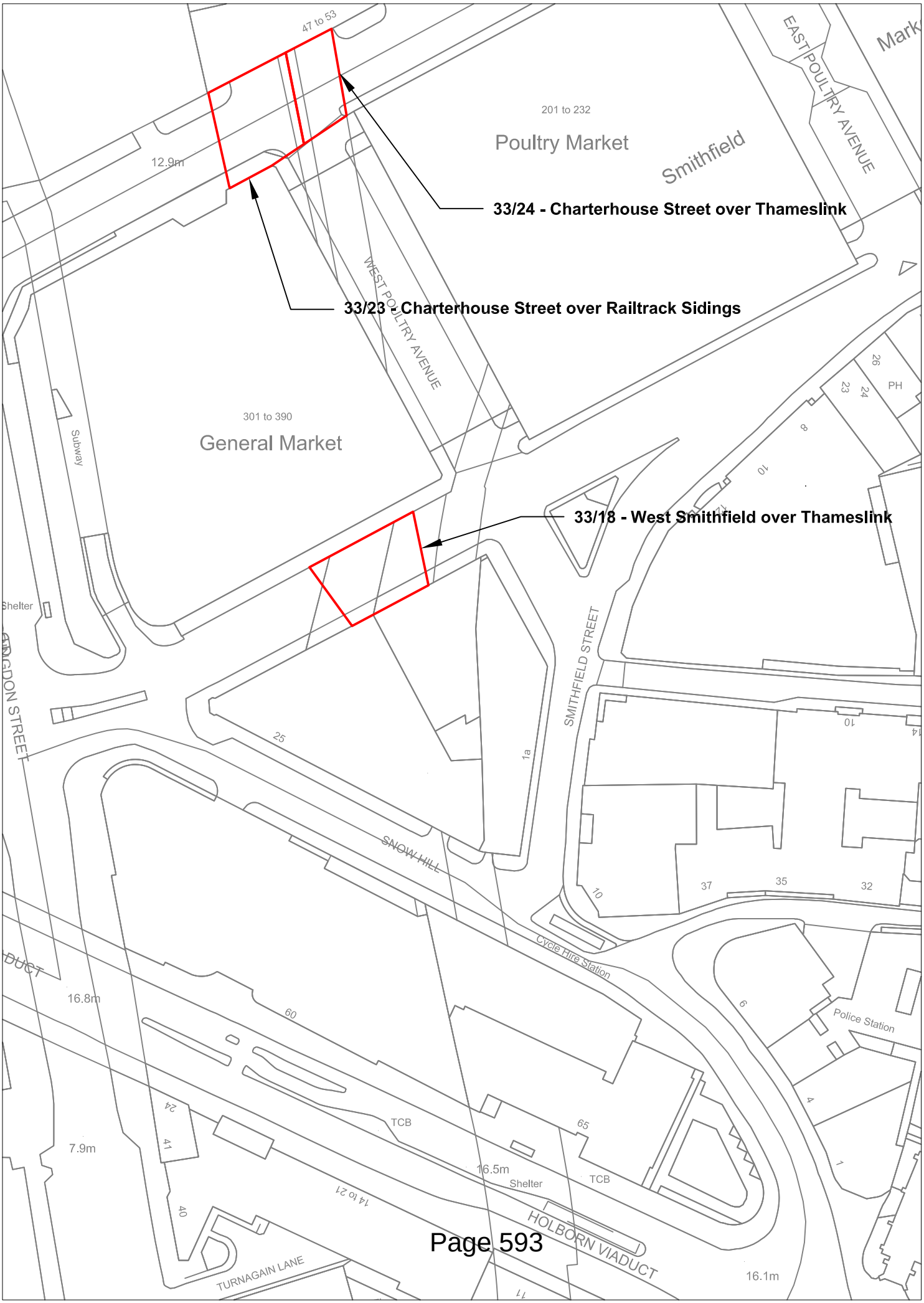
**Top issue realised** <risks which have come to pass:>

| *Issue Description* | Impact and action taken | *Realised Cost* |
|---|---|---|
| | | |

## [5} Member Decisions and Delegated Authority

<Key decisions taken in Service or other Committees relevant to this project's development and delivery (where decision is an addition or change from a gateway paper as presented at the time).> <Key decisions taken outside of Committee, since last report. (If applicable)>

# Appendix 2 - Plan showing extent and location of structures



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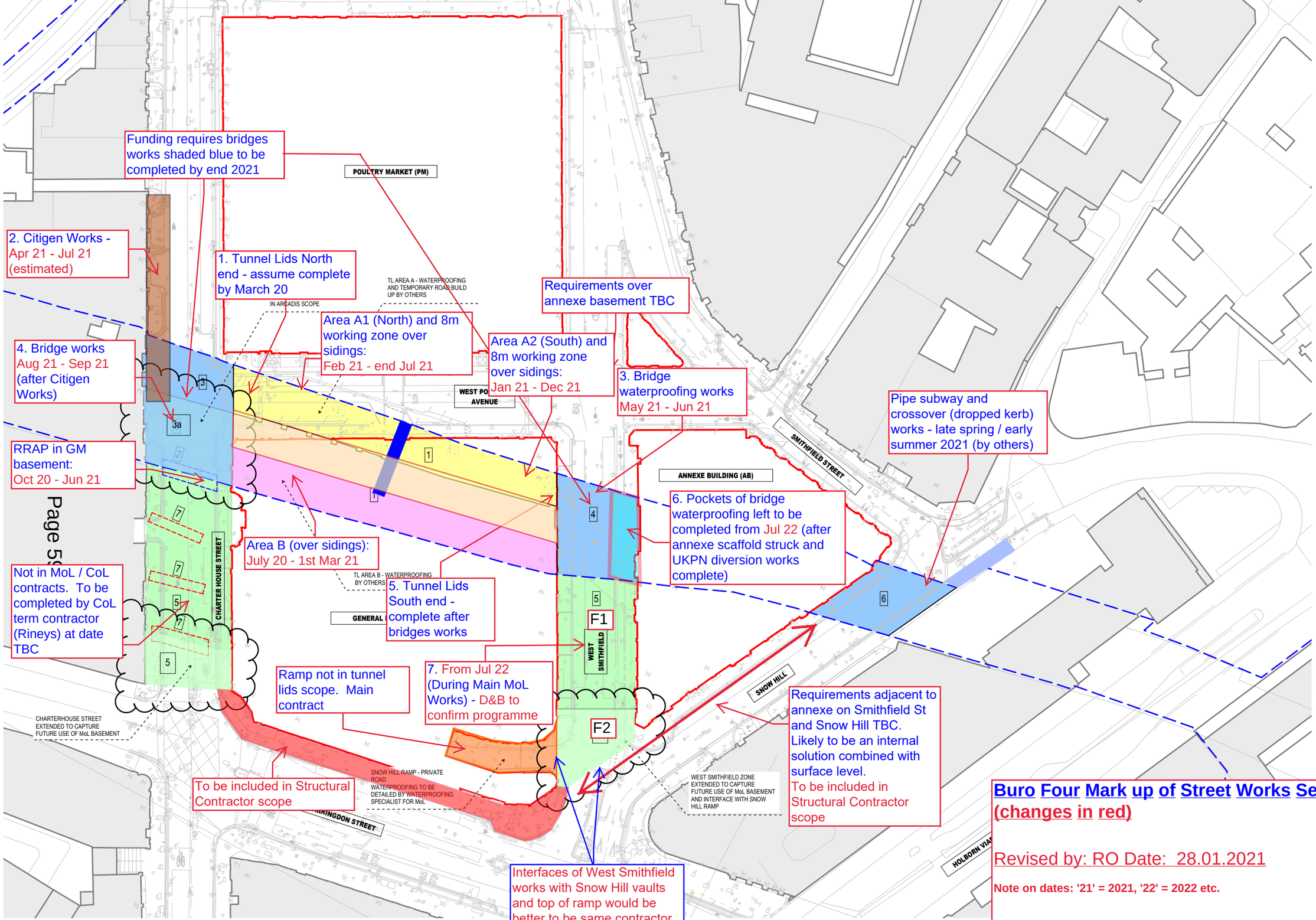


GENERAL NOTES

1. DO NOT SCALE FROM THIS DRAWING.
2. ALL DIMENSIONS ARE IN MILLIMETRES AND ALL LEVEL ARE IN METERS. FIGURES IN BRACKETS INDICATE THE IMPERIAL EQUIVALENT.
3. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ARCHITECTS AND ENGINEERS DRAWINGS AND SPECIFICATIONS.
4. THESE DRAWINGS ARE BASED ON HISTORIC RECORD DRAWINGS, VISUAL INSPECTIONS AND SURVEYS OF THE BUILDINGS. THIS INFORMATION IS SUBJECT TO CONFIRMATION AS THE SURVEYS ARE EXPANDED AND COMPLETED.
5. THIS DRAWING CANNOT BE CONSIDERED TO BE AN EXHAUSTIVE DESCRIPTION OF EXISTING STRUCTURAL ELEMENTS OR DEFECTS.
6. ANY DISCREPANCIES BETWEEN THIS DRAWING AND EXISTING SITE CONDITION SHOULD BE BROUGHT TO THE ATTENTION OF THE STRUCTURAL ENGINEER.

LEGEND

| | |
|---|---|
| 1 | AREA ABOVE NETWORK RAIL RUNNING TUNNELS (AREA A) |
| 1 | AREA ABOVE NETWORK RAIL SIDINGS (AREA B) |
| 2 | NEW NETWORK RAIL ACCESS WORKS IN BASEMENT |
| 3 | CHARTERHOUSE STREET BRIDGE |
| 4 | WEST SMITHFIELD BRIDGE |
| 5 | FURTHER WATERPROOFING AREAS |
| 6 | SNOW HILL BRIDGE |
| 7 | CHARTERHOUSE PLACE ACCESS RAMP WORKS IN BASEMENT |
| | NETWORK RAIL DEMISE LINE |

**Buro Four Mark up of Street Works Sequencing (changes in red)**

Revised by: RO Date: 28.01.2021

**Note on dates: '21' = 2021, '22' = 2022 etc.**

| REV | DATE | DESCRIPTION | BY | CHECKED |
|---|---|---|---|---|
| P1 | XX.XX.20XX | FOR INFORMATION | XXX | XXX |

akt II

| | | | |
|---|---|---|---|
| PROJECT | MUSEUM OF LONDON WEST SMITHFIELD | TITLE | TUNNEL LID - KEY PLAN |
| DATE | APRIL 2019 | SCALE | NTS |
| CAD FILENAME | - | STATUS | PRELIMINARY |
| DRAWN | VG | CHECKED | - |
| PROJECT No. | 3899 | DRAWING No. | 3899-S-HSK-TL-503 |
| REV | P1 | | |

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**City of London: Projects Procedure Corporate Risks Register**

**Project Name: West Smithfield and Charterhouse Street (Thameslink) Bridges Remedial Works**

**Unique project identifier:**

**Total budget estimate** £645,500.00

| | |
|---|---|
| **PM's Overall risk rating** | Medium |
| **Avg unmitigated risk** | 10.2 |
| **Avg mitigated risk score** | 5.6 |
| **Red risks (open)** | 2 |
| **Amber risks (open)** | 8 |
| **Green risks (open)** | 2 |

Corporate Risk Matrix score table

| | 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)** | £5,460,000.00 | 846% | % risk total against budget estimate |
| **Costed Pre-Mitigation (Live)** | £5,460,000.00 | 846% | " " |
| **Costed Risk Post-Mitigation (Live)** | £4,670,000.00 | 723% | " " |
| **CRP Requested** | £70,000.00 | 11% | " " |

| | Num Risks | Avg Score | Costed impact | Red | Amber | Green |
|---|---|---|---|---|---|---|
| (1) Service Delivery/ Performance | 7 | 9.4 | £2,850,000.00 | 1 | 5 | 1 |
| (2) Financial | 3 | 13.3 | £2,350,000.00 | 1 | 2 | 0 |
| (3) Reputation | 2 | 8.0 | £260,000.00 | 0 | 1 | 1 |

| | | Extreme | Major | Serious | Minor |
|---|---|---|---|---|---|
| **Issues (open)** | 1 | **Open Issues** | 0 | 0 | 0 | 1 |
| **All Issues** | 1 | **All Issues** | 0 | 0 | 0 | 1 |

**Cost to resolve all issues (on completion)** £0.00

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| | |
|---|---|
| **Committee(s):**<br>Licensing Committee – For Information<br><br>Planning & Transportation Committee – For Decision | **Dated:**<br>03 02 2021<br><br>16 02 2021 |
| **Subject:** Business and Planning Act 2020 – Alfresco Eating & Drinking Policy update | **Public** |
| **Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?** | 1, 2, 4, 5, 12 |
| **Does this proposal require extra revenue and/or capital spending?** | **N** |
| **If so, how much?** | **n/a** |
| **What is the source of Funding?** | **n/a** |
| **Has this Funding Source been agreed with the Chamberlain's Department?** | **n/a** |
| **Report of:** Jon Averns, Director of Markets and Consumer Protection | **For Information –** Licensing Committee<br>**For Decision –** Planning & Transportation Committee |
| **Report author:** Aggie Minas – Licensing Officer | |


## Summary

The Business and Planning Act 2020 (the Act) was given Royal Assent on 22 July 2020. The Act temporarily relaxes licensing and planning laws until 30 September 2021, making it easier for the hospitality sector to obtain permissions to seat and serve customers outdoors by creating a fast-track pavement licence application process.

At its meeting on 14 July 2020, the Planning and Transportation Committee approved the City of London Alfresco Eating and Drinking Policy (the Policy), which sets out the City Corporation's strategy aimed at facilitating the pavement licence application process whilst maintaining public safety during the COVID-19 pandemic. The policy was also noted by the Licensing Committee at its meeting on 15 July 2020.

This report provides both committees with a summary of pavement licences granted following the easing of lockdown 1 and outlines proposals to facilitate the pavement licence application process following the easing of current lockdown 3.


## Recommendation(s)

Members are asked to:

1. Agree the pavement licence duration period until 30 September 2021 as outlined in paragraph 11(a) of this report.

2. Agree a zero fee for all pavement licence applications received after 1 April 2021 as outlined in paragraph 11(b) of this report.

## Main Report

### Background

1. The Business and Planning Act 2020 (the Act) was given Royal Assent on 22 July 2020. The Act introduces a new temporary pavement licence application process making it easier for premises serving food and drink to apply for permission to place furniture on the highway for the purposes of seating and serving customers outdoors.

2. The Alfresco Eating and Drinking Policy (the 'Policy'), shown at Appendix 1, defines the application and determination process, the licence fee, duration, conditions and enforcement options where necessary.

3. The new statutory provisions in the Act for pavement licensing expire on 30 September 2021. Within that timeframe, a licence can be granted for between 3 months up until the licensing expiry date in 2021. The Policy states that a licence issued by the City Corporation will last for a period of 6 months with the potential to re-apply if safe and appropriate to do so.

4. The decision to set the licence period to a maximum length of 6 months was based on the fact that the City of London's streets are undertaking a period of change in terms of both pedestrian numbers and temporary highway changes. The 6-month licence period gives businesses the ability to trade whilst retaining maximum flexibility to adapt those changes and to ensure the safety of residents, workers and visitors as people gradually return to the City of London and footfall increases.

5. The Act allows the local authority to set a fee up to a maximum of £100. In doing everything possible to assist businesses bounce back from the pandemic, the City Corporation set the fee at zero for all applications received before 31 March 2021.

### Current Position

6. Since August 2020, the City Corporation has received 58 applications of which 40 have been granted. A list of licences granted is shown at Appendix 2.

7. Of the remaining 18 applications, 5 have been rejected due to missing information, 7 were refused due to inadequate unobstructed footway, 2 refused due to the proposed area being private land, and 4 were refused due to objections by the Police, Counter Terrorism Security Advisers or substantiated public objection.

8. The first batch of pavement licences issued to businesses in August 2020 will expire throughout February 2021 and those businesses will soon be seeking to re-apply for those licences. It is also expected that the Licensing Team will have an influx of new applications as soon as the government announces any easing of the current lockdown restrictions on the hospitality sector.

9. The hospitality sector has been one of the most financially affected by the COVID-19 pandemic, with very little trade permitted since April 2020. Based on current news reports, the hospitality sector is not likely to have restrictions eased on them before April or May 2021.

**Options**

10. The City Corporation has the discretion to set an application fee under the Act up to a maximum of £100 per application. It also has the discretion to set a licence duration period subject to a minimum 3-month period.

**Proposals**

11. In order to continue to facilitate hospitality sector business recovery in the Square Mile, it is proposed that the City Corporation

    a. issues any new licences until 30 September 2021 when the current temporary provisions expire. This may mean that some licences will be valid for a period of 7 months if issued in March 2021. If the Government extends the temporary provisions beyond 30 September 2021, the licensing team will revert to issuing licences for a period of 6 months in accordance with the Policy

    b. extends the zero fee to all applications received from 1 April 2021 until the current temporary provisions for pavement licences expire.

**Corporate & Strategic Implications**

12. The proposals within this report will help to meet one of the overriding aims contained within the Corporate Plan 2018-23 namely to ‘Contribute to a Flourishing Society’ by way of making people safe and feel safe.

**Financial Implications**

13. Based on 58 applications received, 5 of which were rejected as incomplete requiring no officer time, the remaining 53 applications would have generated an income of £5,300 if the maximum fee of £100 had been charged. The City Corporation has estimated a cost of £180 to process the applications meaning a net cost of £9,540 to the authority so far.

14. It is anticipated that all 40 licences issued will be applied for again upon expiry. The estimated cost of processing a second application is £140 per application so the net cost to the authority for those will be £5,600

15. It is not possible to gauge the number of new applications likely to be received post lockdown 3 and the effect, if any, on existing tables and chairs licences.

**Conclusion**

16. Outdoor eating and drinking space is vital for the recovery of the hospitality sector. The proposals set out in this report aim to support those businesses

in returning to work post lockdown 3 by facilitating the process to provide that space. This balances the business needs to operate within the confines of government guidance on social distancing whilst ensuring that City streets are safe for residents, workers and visitors to navigate without obstruction and maintain social distancing.

**Appendices**

**Appendix 1**
Al Fresco Eating and Drinking (Business and Planning Act 2020) Policy - CLICK HERE

**Appendix 2**
List of premises that have been issued a pavement licence

**Background Papers**
Planning and Transportation Report 14 July 2020 – 'Business and Planning Bill 2020'.

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**Appendix 2**

| Premises Name | Premises Address | Expires |
|---|---|---|
| Half Cup | 22-23 Bartholomew Close | 06-Feb-21 |
| Subway | 19 Holborn Viaduct | 09-Feb-21 |
| Le Bar | 59 West Smithfield | 12-Feb-21 |
| Epic Pies | 53-55 Carter Lane | 13-Feb-21 |
| Dion | 65 St Pauls Churchyard | 13-Feb-21 |
| Haz | 34 Foster Lane | 13-Feb-21 |
| Vinoteca | 21 Bloomberg Arcade | 16-Feb-21 |
| Farringdon Tap | 41 Farringdon Street | 20-Feb-21 |
| BrewDog | Unit 3, The Minster Building, Great Tower Street | 20-Feb-21 |
| Fortnum & Mason | Unit 4, Royal Exchange | 20-Feb-21 |
| Ping Pong | 9 Bread Street | 22-Feb-21 |
| Woodin Shades | 212 Bishopsgate | 23-Feb-21 |
| Mingzi | 2-5 Holborn Viaduct | 24-Feb-21 |
| Blacksheep Coffee | 2 Cheapside | 25-Feb-21 |
| Juno Rooms | 67-69 Watling Street | 26-Feb-21 |
| Railway | 15 Liverpool Street | 27-Feb-21 |
| Cheeky Chicos | 8-12 New Bridge Street | 28-Feb-21 |
| St Bart's Brewery | 64-66 West Smithfield | 28-Feb-21 |
| LINO | 90-92 Bartholomew Close | 01-Mar-21 |
| The Folly | 41 Gracechurch Street | 03-Mar-21 |
| Café Luca | 17 Devonshire Square | 15-Mar-21 |
| The Hydrant | 1 Monument Street | 20-Mar-21 |
| PURE | 3 St Bride Street, London EC4A 4AS | 05-Apr-21 |
| The Happenstance | 10 Paternoster Square, EC4M 7DX | 05-Apr-21 |
| Established Coffee Ltd. | 11 St Bride Street, London EC4A 4AS | 06-Apr-21 |
| The Hydrant | 1 Monument Street, London EC3R 8BG | 08-Apr-21 |
| Walrus & Carpenter | 45 Monument Street EC3R 8BU | 14-Apr-21 |
| The Sugar Loaf | 65 Cannon Street EC4N 5AA | 14-Apr-21 |
| The Globe | 83 Moorgate, London EC2M 6SA | 15-Apr-21 |
| Le Pain Quotidien | 42 Fish Street Hill London EC3R 6BR | 18-Apr-21 |
| Tower Suites Hotel | 100 Minories, London EC3N 1AP | 20-Apr-21 |
| Fortnum & Mason | Unit 4 Royal Exchange EC3V 3LQ | 22-Apr-21 |
| Rising Sun | 38 Cloth Fair | 26-Apr-21 |
| Stem & Glory | 60 Bartholomew Close | 27-Apr-21 |
| Pelt Trader | Unit 3 Cannon Street Station | 04-May-21 |
| The Hydrant | 1 Monument EC3R 8BG | 09-May-21 |
| The Oyster Shed | 5 Angel Lane EC4R 3AB | 11-May-21 |
| Dion | 65 St Pauls Churchyard | 12-May-21 |
| Old Change Bar& Kitchen | 2-3 Old Change Court EC4M 8EM | 19-May-21 |
| The Railway | 15 Liverpool Street | 03-Jun-21 |

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| **Committee(s)** | **Dated:** |
|---|---|
| Finance<br>Planning & Transportation<br>Streets and Walkways Sub<br>Court of Common Council | 16th February 2021<br>16th February 2021<br>18th February 2021<br>4th March 2021 |
| **Subject:**<br>Annual On-Street Parking Accounts 2019/20 and Related Funding of Highway Improvements and Schemes | **Public** |
| **Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?** | **n/a** |
| **Does this proposal require extra revenue and/or capital spending?** | **N** |
| **If so, how much?** | **n/a** |
| **What is the source of Funding?** | **n/a** |
| **Has this Funding Source been agreed with the Chamberlain's Department?** | **n/a** |
| **Report of:**<br>The Chamberlain | **For Information** |
| **Report author:**<br>Simon Owen, Chamberlain's Department | |


**Summary**

The City of London in common with other London authorities is required to report to the Mayor for London on action taken in respect of any deficit or surplus in its On-Street Parking Account for a particular financial year.

The purpose of this report is to inform Members that:

- the surplus arising from on-street parking activities in 2019/20 was £10.876m;
- a total of £5.005m, was applied in 2019/20 to fund approved projects; and
- the surplus remaining on the On-Street Parking Reserve at 31st March 2020 was £42.713m, which will be wholly allocated towards the funding of various highway improvements and other projects over the medium term.


**Recommendation**

Members are asked to:

- Note the contents of this report for their information before submission to the Mayor for London.

## Main Report

### Background

1. Section 55(3A) of the Road Traffic Regulation Act 1984 (as amended), requires the City of London in common with other London authorities (i.e. other London Borough Councils and Transport for London), to report to the Mayor for London on action taken in respect of any deficit or surplus in their On-Street Parking Account for a particular financial year.

2. Legislation provides that any surplus not applied in the financial year may be carried forward. If it is not to be carried forward, it may be applied by the City for one or more of the following purposes:

   a) making good to the City Fund any deficit charged to that Fund in the 4 years immediately preceding the financial year in question;

   b) meeting all or any part of the cost of the provision and maintenance by the City of off-street parking accommodation whether in the open or under cover;

   c) the making to other local authorities, or to other persons, of contributions towards the cost of the provision and maintenance by them, in the area of the local authority or elsewhere, of off-street parking accommodation whether in the open or under cover;

   d) if it appears to the City that the provision in the City of further off-street parking accommodation is for the time being unnecessary or undesirable, for the following purposes, namely:

      - meeting costs incurred, whether by the City or by some other person, in the provision or operation of, or of facilities for, public passenger transport services;

      - the purposes of a highway or road improvement project in the City;

      - meeting the costs incurred by the City in respect of the maintenance of roads at the public expense; and

      - for an “environmental improvement” in the City.

   e) meeting all or any part of the cost of the doing by the City in its area of anything which facilitates the implementation of the Mayor’s Transport Strategy, being specified in that strategy as a purpose for which a surplus can be applied; and

   f) making contributions to other authorities, i.e. the other London Borough Councils and Transport for London, towards the cost of their doing things upon which the City in its area could incur expenditure upon under (a)-(e) above.

3. In the various tables of this report, figures in brackets indicate expenditure, reductions in income or increased expenditure.

## 2019/20 Outturn

4. The overall financial position for the On-Street Parking Reserve in 2019/20 is summarised below:

| | £m |
|---|---|
| Surplus Balance brought forward at 1st April 2019 | 36.842 |
| Surplus arising during 2019/20 | 10.876 |
| Expenditure financed during the year | (5.005) |
| **Funds remaining at 31st March 2020, wholly allocated towards funding future projects** | **42.713** |

5. Total expenditure of £5.005m in 2019/20 was financed from the On-Street Parking Reserve, covering the following approved projects:

| **Revenue/SRP Expenditure:** | **£000** |
|---|---|
| Highway resurfacing, maintenance & enhancements | (2,484) |
| Off-Street car parking contribution from reserves | (554) |
| Concessionary fares & taxi card scheme | (498) |
| West Smithfield Area Public Realm & Transportation | (177) |
| Thames Court footbridge | (115) |
| Special needs transport | (85) |
| Minories car park structural building report | (83) |
| Holborn Viaduct & Snow Hill pipe-subways | (44) |
| Aldgate | (40) |
| City Wayfinding Signage/Legible London | (39) |
| HVM security team | (33) |
| Bank Junction experimental safety scheme | (32) |
| Other Schemes | (7) |
| **Total Revenue/SRP Expenditure** | **(4,191)** |
| | |
| **Capital Expenditure:** | |
| Street lighting project | (650) |
| City Wayfinding Signage/Legible London | (359) |
| HVM security bollards | (403) |
| Bank Junction experimental safety scheme | (152) |
| Barbican Podium waterproofing – phase 2 | (29) |
| Other Schemes | (10) |
| Aldgate – Highway Changes and Public Square | 789 |
| **Total Capital Expenditure** | **(814)** |
| | |
| **Total Expenditure Funded in 2019/20** | **(5,005)** |

6. The surplus on the On-Street Parking Reserve brought forward from 2018/19 was £36.842m. After expenditure of £5.005m funded in 2019/20, a surplus balance of £5.871m was carried forward to future years to give a closing balance at 31st March 2020 of £42.713m.

7. Currently total expenditure of some £96.6m is planned over the medium term from 2020/21 until 2024/25 (as detailed in Table 1), by which time it is anticipated that the existing surplus plus those estimated for future years will be fully utilised.

8. The total programme covers numerous major capital schemes including funding towards the Barbican podium waterproofing; West Smithfield area public realm & transportation project; Bank Junction permanent improvement scheme; Lindsey Street Bridge strengthening; Holborn Viaduct & Snow Hill pipe-subways repairs; London Wall car park waterproofing, joint replacement & concrete repairs; London Wall car park ventilation, electrics, lighting & fire alarms; Dominant House footbridge repairs; Fire safety at the car parks; Public Realm climate action initiatives; Embed climate resilience measures into Public Realm works; Temple Area traffic review; St Pauls gyratory.

9. The programme also covers ongoing funding of future revenue projects, the main ones being highway resurfacing, enhancements & road maintenance projects; concessionary fares & taxi cards; contributions to the costs of Off-Street car parks; and special needs transport. The progression of each individual scheme is, of course, subject to the City's normal evaluation criteria and Standing Orders.

10. A forecast summary of income and expenditure arising on the On-Street Parking Account and the corresponding contribution from or to the On-Street Parking surplus, over the medium-term financial planning period, is shown below:

| **Table 1**<br>**On-Street Parking Account Reserve Projections 2019/20 to 2024/25** | **2019/20**<br>**Actual**<br>**£m** | **2020/21**<br>**Forecast**<br>**£m** | **2021/22**<br>**Forecast**<br>**£m** | **2022/23**<br>**Forecast**<br>**£m** | **2023/24**<br>**Forecast**<br>**£m** | **2024/25**<br>**Forecast**<br>**£m** | **Total**<br>**£m** |
|---|---|---|---|---|---|---|---|
| Income | 16.6 | 15.5 | 16.8 | 17.0 | 14.2 | 13.9 | 94.0 |
| Expenditure (*Note 1*) | (5.7) | (4.6) | (4.8) | (4.7) | (4.7) | (4.7) | (29.2) |
| **Net Surplus arising in year** | **10.9** | **10.9** | **12.0** | **12.3** | **9.5** | **9.2** | **64.8** |
| Capital, SRP and Revenue Commitments | (5.0) | (7.3) | (28.2) | (30.9) | (21.0) | (9.2) | (101.6) |
| **Net in year contribution (from)/ to surplus** | **5.9** | **3.6** | **(16.2)** | **(18.6)** | **(11.5)** | **0.0** | **(36.8)** |
| (Deficit) / Surplus cfwd at 1st April | 36.8 | 42.7 | 46.3 | 30.1 | 11.5 | 0.0 | |
| **(Deficit) / Surplus cfwd at 31st March** | **42.7** | **46.3** | **30.1** | **11.5** | **0.0** | **0.0** | |

*Note 1: On-Street operating expenditure relates to direct staffing costs, repair & maintenance of pay & display machines, Saba enforcement contractor costs, fees & services (covering cash collection, pay by phone, postage & legal), IT software costs for enforcement systems, provision for bad debts for on-street income and central support recharges*.

11. A noticeable reduction in income is forecast from 2023/24 onwards, mainly relating to reduced income from traffic restriction enforcement through improved camera technology, including yellow box junctions and banned turns. Depending upon future motorist's compliance and return to normal business operating following COVID-19, these forecast future income streams may need further refining.

## Conclusion

12. So that we can meet our requirements under the Road Traffic Regulation Act 1984 (as amended), we ask that the Court of Common Council notes the contents of this report, which would then be submitted to the Mayor of London.

## Background Papers

13. Road Traffic Regulations Act 1984; Road Traffic Act 1991; GLA Act 1999 sect 282.

14. Final Accounts 2019/20.

**Report author**
**Simon Owen**
Chamberlain's Department
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E: *simon.owen@cityoflondon.gov.uk*

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| **Committee** | **Dated:** |
|---|---|
| Planning and Transportation Committee | 16/02/2021 |
| **Subject:**<br>Transport Strategy Update: Quarter 3 2020/21 | **Public** |
| **Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?** | 1 People are safe and feel safe<br>2 People enjoy good health and wellbeing<br>9 We are digitally and physically well-connected and responsive<br>11. We have clean air, land and water and a thriving and sustainable natural environment<br>12 Our spaces are secure, resilient and well-maintained |
| **Does this proposal require extra revenue and/or capital spending?** | N |
| **If so, how much?** | N/A |
| **What is the source of Funding?** | Various |
| **Has this Funding Source been agreed with the Chamberlain's Department?** | Y |
| **Report of:**<br>Director of the Department of the Built Environment | **For Information** |
| **Report author:**<br>Samantha Tharme/Andrea Larice, Strategic Transportation | |


**Summary**

Members have requested quarterly updates on progress with delivering the City of London Transport Strategy. This report covers Quarter 3 of 2020/21 (October – December 2020).

An update on Delivery Plan projects is provided in Appendix 1. While progress continues to be made, some projects and activities continue to be on hold due to suspension of external funding. As previously reported, most projects have experienced some delay due to COVID-19.

In November, Transport for London (TfL) were able to release some Local Implementation Plan (£368k) and Liveable Neighbourhood (£150k) funding for the remainder of 2020/21. This is approximately a third of the previously agreed Local Implementation Plan (LIP) programme for the year. LIP funding is a relatively small proportion of the overall Delivery Plan funding. Alternative funding sources have also been identified for some projects.

Progress with projects and activities to deliver Vision Zero and help mitigate the CR20 - Road Safety corporate risk continue and include:

- All Change at Bank: Detailed design development; commencing engagement with stakeholders in the immediate vicinity of the junction; and commissioning a landscape architect to work on public realm design.
- Delivering several cycle safety roadshows in partnership with City of London Police, the Cheapside Business Alliance, Chancery Lane Association and the Aldgate Business Improvement District.
- Securing committee support to introduce a “School Street” with the support of the London Borough of Islington on part of Charterhouse Square. The aim is to reduce road danger and support children walking and cycling to and from Charterhouse Square School.
- Securing Committee approval for the City Corporation Last Mile Logistics Hub at London Wall car park to facilitate deliveries by cargo cycles and pedestrian porters, removing delivery vehicles from City streets.

Additional activities in Quarter 3 included:

- West Smithfield Public Realm and Transportation Measures, Gateway 3 approval secured to progress options, to consider street measures and access restrictions.
- TfL have tendered for operators for the trial of rental e-scooter scheme; additional preparatory works are underway in the City area, including changes to Traffic Regulation Orders (TROs), engagement with City of London Police and preparation of an Equality Analysis.

## Recommendation

Members are asked to note the report.

## Main Report

### Background

1. The City of London Transport Strategy was adopted in May 2019. The Strategy sets the framework for the design and management of transport and streets in the Square Mile over the next 25 years.
2. The Transport Strategy is supported by a three-year Delivery Plan. This provides details of projects to deliver the Transport Strategy and will be updated on an annual basis. The 2020/21 – 2022/23 Delivery Plan has been prepared and was brought to this Committee in September.
3. Members have requested quarterly updates on progress with delivering the Transport Strategy. This report covers Quarter 3 of 2020/21 (October – December 2020).

### Q3 Update

4. The quarterly update on progress with Delivery Plan projects is provided in Appendix 1, which includes a RAG status. The RAG status assumes project

dates were reset after the Covid-19 lockdown period and work has resumed on most projects.

5. Progress during the third quarter of 2020/21 includes:

    - A landscape architect has been commissioned to the develop the public realm enhancements of All Change at Bank. In addition, engagement with stakeholders in the immediate vicinity of the junction has taken place to ensure that the detailed design considers any issues raised.
    - Approval for the City Corporation to set up a Last Mile Logistics Hub at London Wall Car park was secured in partnership with Amazon logistics.
    - Legible London installations are largely completed on street level and Barbican highwalks.
    - The Healthy Streets small scale interventions at Gresham St and Old Jewry are complete.
    - Secured committee approval for West Smithfield Public Realm and Transportation measures and next steps, which include transport modelling, design and public engagement relating to access.
    - On street temporary cycle parking completed to provide addition parking spaces for cyclists.
    - TfL have tendered for operators for the trial of rental e-scooter scheme; additional preparatory works are underway in the City area, including changes to TROs, engagement with City of London Police and preparation of an Equality Analysis.

6. The following projects have an amber RAG status, due to delays or suspension of TfL funding as a result of COVID-19, reasons are noted in appendix 1:

    - Moorgate - Crossrail integration
    - 100 Minories public realm improvements
    - Cycle route Quietway 11 Queen Street upgrade

7. Beech Street Zero Emission Street has an amber RAG status because the measurement of the impacts of the Experimental Traffic Order has been affected by the reduced traffic levels caused by Covid-19. A report is going to Streets and Walkways on the 18 February seeking a decision from Members whether to continue or conclude the experiment. This has an impact on decision for Barbican & Golden Lane Zero Emission Zone, as Beech Street runs through the middle of the area.

8. The Electric Vehicle (EV) infrastructure plan includes the provision of an EV charging hub being installed in partnership with TfL at Baynard House car park. TfL have now completed the work to install the chargepoints. Use of the charge points and formal go live is dependent on City Surveyors completing the installation of the new ventilation system. The new ventilation system installation is progressing through design and procurement stages, and tenders for the work were received in Q3. This therefore now has an amber RAG status.

9. Progress with projects and activities to deliver Vision Zero and help mitigate the CR20 - Road Safety corporate risk includes:

    - Completion of pavement widening at Bank junction.

- Delivering several cycle safety roadshows in partnership with City of London Police, the Cheapside Business Alliance, Chancery Lane Association and the Aldgate Business Improvement District.

10. Transport for London were required to pause all 2020/21 funding in order to prioritise spend on emergency Covid-19 response measures. A decision to release funds (£368k) for the remainder of 2020/21 has now been possible as TfL have secured a financial package with central government. This is approximately a third of the previously agreed programme for the year, this was reported in more detail in the last quarter report (Q2 link to report).
11. £150,000 of Liveable Neighbourhood funding has also been released for the City Cluster Area Programme.

**Corporate & Strategic Implications**

12. Delivery of the Transport Strategy supports the delivery of Corporate Plan outcomes 1, 3, 5, 8, 9, 11 and 12. It also indirectly supports the delivery of Corporate Plan outcomes 2 and 4.
13. Delivery of the Transport Strategy helps mitigate corporate risks CR20 – Road Safety and CR21 – Air Quality.
14. Delivery of the Transport Strategy supports sustainable growth and the delivery of the City Corporation's Climate Action Strategy.

**Conclusion**

15. Delivery of the Transport Strategy is progressing well, but several projects continue to be affected by COVID-19 through programme delays or suspension of TfL funding.

**Appendices**

- Appendix 1: Progress update on Transport Strategy Delivery Plan Q3 2020/21

**Background Papers**

- City of London Transport Strategy
- 2020/21 – 2022/23 Delivery Plan; 2020/21 Q2 Update (link to committee paper)

**Samantha Tharme**, Strategic Transportation

Department of the Built Environment

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## Appendix 1: Progress update on Transport Strategy Delivery Plan Q3 2020/21

Note: The project RAG status reflects updated programme dates that have been revised due to COVID-19, rather than original programme dates, on projects where this is applicable.

| **Major Projects Programme** | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **Bank Junction and surrounding streets**<br>'All Change at Bank' Walking and public realm improvements | 2013/14 | 2022/23 | G | Detailed design on the one option for the road closure/restrictions, approved in October, have been developed during Q3.<br>A Landscape Architect was commissioned and has been working on the development of the public realm enhancements for the proposals.<br>Engagement with stakeholders in the immediate vicinity of the junction has taken place to ensure that the detailed design considers any issues raised. Work is leading to a report in Q4 to agree the details of the proposals for public consultation to start. |
| **Moorgate Crossrail Integration**<br>Walking improvements to junction and surrounding public realm (in conjunction with Crossrail) | 2019/20 | 2025 | A | The scope of work is still being determined with TfL, following delays due to COVID-19. Discussions are ongoing and early design options will be explored within the coming months. It is expected an Issues Report will be submitted to Committee in February 2021. |
| **St Paul's gyratory removal**<br>**ON HOLD**<br>Traffic management measures removal of St Paul's gyratory system | 2013/14 | 2025 | - | Project on hold<br>Currently on hold awaiting further developments on Centre for Music corporate project – although project team has been liaising with developers of 81 Newgate Street regarding s278 opportunities in the southern portion of project area. |

| Major Projects Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| and Museum of London roundabout. | | | | |
| **Liverpool St Crossrail Integration**<br>Walking improvements to junction and surrounding public realm (in conjunction with Crossrail) and to streets connecting Liverpool Street Station | 2019/20 | Phase 1 – late 2020/21, Phase 2.1 - late 2021, Phase 2.2 - 2024/25 | G | The scope of Phase 2.1 is still being determined with TfL after Covid-related delays. Issue Report going to Committee in February 2021. |
| **Legible London**<br>pedestrian signing scheme | 2019/20 | 2020/21 | G | Street level and Barbican 'highwalks' installation largely completed, small number of outstanding installations and snagging expected to be completed by year end. |
| **Fleet Street Area Healthy Streets Plan**<br>Healthy Streets Plan traffic management study and improvement required for Fleet Street between Chancery Lane and Ludgate Circus<br>(scheme development only, implementation beyond Delivery Plan period – 2025-2040) | 2020/21 | 2021/22<br>(2025-2040) | G | Gateway 1 and 2 presented at S&W and Project Subs Committees and approved. Work has commenced on the required background research and the development of the Communications Strategy for the project. |

| Minor Schemes Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **Healthy Streets minor schemes** Small scale interventions at targeted locations to reduce road danger, improve accessibility, enhance the walking and cycling experience, and/or deliver bus priority, people walking. | 2019/20 | Ongoing | G | The works on Gresham St/Old Jewry are complete. Work to complete Gresham St/Wood Street and Creechurch Lane/Leadenhall St are scheduled to be completed by March 2021. Scope for Old Broad St by Pinner's Passage has changed because of the COVID temporary works and is also scheduled to be finished by March 2021. |
| **Puddle Dock Pedestrian route** safety and provision of new walking route (further scheme elements to be delivered by TfL on TLRN) | 2019/20 | 2021/22 | G | Highway works have been programmed to resume on 11 January 2021 and completed by 31 March 2021 |
| **Riverside Walkway Globe View section**. Reinstatement and improvement of Thames path for public access | 2019/20 | 2021/22 | G | Detailed design nearing completion. GW5 planned for Feb 2021 |
| **Mansion House Station Environs** walking and public realm improvements, including routes to rail stations | 2019/20 | 2021/22 | G | Design work to restart in Feb 2021 |

| Minor Schemes Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **Disabled parking bay adjustments** | 2019/20 | 2020/21 | G | Highways providing a programme and costs imminently with completion expected by the end of February 2021 |

| Strategic Transport Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **Future Transport Programme** | 2019/20 | Ongoing | G | Rental e-scooter trial procurement responses now being scored by TfL (after tender was published 20 Nov and closed 14 Dec) and additional preparatory works underway, including changes to TROs, engagement with CoLP and preparation of an EQIA. Dockless bike operators have provided more information on when they are restarting operations and expansion plans remain ongoing. GeoSence project has received EU funding as of Dec 2020 and will commence this year, looking at options for geofencing management of use. Additional partnerships are being explored. |
| **City Wide 15 mph speed limit** Schemed development; implementation and education programme | 2019/20 | 2021/22 | G | Report to the DfT completed and final review underway. Submission expected within current financial year. |
| **Sustainable logistics centre** Co-location major suppliers including, waste collection, courier services, (feasibility and scheme development; implementation to follow by 2030) | 2020/21 | 2030 | G | Developing scope for a feasibility study for Sustainable Logistics Centre. It is intended to set this up commercially if possible, so feasibility study will determine requirements. Feasibility study to complete in 2021/22 with recommendations for longer term project. |

| Strategic Transport Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **City of London Streets Accessibility Standard (CoLSAS)**<br>City of London Street Accessibility Standard and Audit, and plan for delivery | 2019/20 | 2020/21 | G | Interviews are underway and the team are confident to finish these by the end of February. On track to have the final report and pilot the standard tool in March 2021 |
| **Sustainable Servicing Programme** policy and guidance working with TfL | 2019/21 | 2020/21 | G | Project on hold<br>Pending action from TfL to develop a London wide policy. |
| **Shared use Review** for walking and cycling **-** Policy and design guide | 2019/20 | 2020/21 | G | The review has been delayed and will be restarted 2021/22. |
| **Last mile delivery hubs**<br>Two 'last mile' logistics hubs in underutilised City Corporation assets by 2022. A further three hubs by 2025 | 2019/20 | 2021/22 | G | The report was approved at December P&T and January CASC.<br>Now liaising with Amazon to progress the lease, planning application and EQIA. Target date for the hub to be up and running is summer 2021 |
| **Kerbside Review**<br>Comprehensive review of on-street parking and loading activity | 2019/20 | 2021/22 | G | Commencement of Action Plan, with agreed tasks being taken forward. Quick wins are already underway; identification of motorcycle bay locations where signage indicating close proximity of City Car Parks and early and high level discussions with neighbouring borough officers to determine views on permitted loading times |
| **EV Infrastructure Action Plan**<br>Assessed demand for infrastructure completed | 2019/20 | 2020/21 | A | Progress has been made to provide more residential charge points in residents car parks as grant funding has become available from Officer for Low Emission Vehicles (OLEV) |

| Strategic Transport Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| with a number of actions during 2020/21 to assist with delivering sufficient new charging capacity; including innovative projects | | | | Baynard House EV charge points have been installed, the new ventilation system installation is progressing through design stages and procurement stages, and tenders for the work were received in Q3. |

| Cycling Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **City Cycle Network Phase 1** scheme implementation:<br>Route 1: CS1 to Monument via Bank<br>(subject to funding confirmation from TfL)<br>Route 2: Aldgate to Blackfriars via Bank (including improvements at Mansion House junction with TfL) | 2019/20 | 2022/23 | G | No activity anticipated in period, project is on hold pending further decision on funding from TfL. |
| Cycle route Quietway 11 Queen Street upgrade | 2019/20 | 2021/22 | A | No activity in period, at least 12 month delay to programme now anticipated, project is on hold pending further decision on funding from TfL. |

| Cycling Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **City Cycle Network Phase 1** scheme development:<br>Route 3: Duke's Place to St Paul's Gyratory<br>Route 4: Bank to Holborn | 2021/22 | 2024/25 | N/A | |
| **Cycle Parking** implementation of additional space for standard and dockless cycles | 2020/21 | 2020/21 | G | On street temporary cycle parking completed. Off-street temporary cycle parking has been designed and works are being programmed, delivery is expected early 2021 |

| Public Realm Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **Moor Lane** – Meanwhile project followed by permanent public realm enhancements | 2021/22 | 2022/23 | G | Meanwhile project is being monitored and survey responses have been analysed.<br>The permanent project has been initiated and the design will be amended where necessary to adapt to constraints and the requirements of 21 Moorfields. |
| **Mark Lane area** – public realm and walking improvements | 2020/21 | 2020/21 | G | Site condition surveys in progress with expected March start for implementation phase. |
| **Barts Close public realm improvements** | 2017/18 | 2020/21 | G | Construction in progress. Expected completion April 2021. |

| Public Realm Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **55 Moorgate** – public realm and walking improvements | 2020/21 | 2020/21 | G | Substantive works have been delayed and expected to start again 1 February 2021 |
| **Creed Court** – public realm improvements | 2020/21 | 2021/22 | G | Detailed design work in progress, with Gateway 5 report to be submitted in April / May and start of implementation currently planned for Q4 2021. |
| **22 Bishopsgate public realm improvements** | 2020/21 | 2021/22 | G | Works scheduled to be completed before end of March 2021 |
| **150 Bishopsgate public realm improvements** | 2020/21 | 2021/22 | G | Main construction works commenced 4 January as planned. |
| **100 Minories** public realm enhancements | 2019/20 | 2021/22 | A | S278 scope agreed and to be finalised in Feb 2021. Issue report being submitted to Feb committees to set out actions required to start on site. Project risk status is amber as still pending signing with developer. |
| **Middlesex Street (Petticoat Lane Market)** Public realm improvements to support a rejuvenated market and increase pedestrian priority at key locations | 2020/21 | 2021/22 | G | Gateway 5 report being drafted. Final costs for security gate to be confirmed. |

| Public Realm Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **Public Realm SPD and Technical Manual update** | 2020/21 | 2021/22 | G | In progress, next committee update in April 2021. |

| City Cluster Area Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **City Cluster Area Programme**<br><br>A range of projects to deliver pedestrian priority, traffic reduction, public realm improvements, greenery and climate change resilience, and activation and engagement. Includes City Cluster Healthy Streets Plan and Zero Emission Zone. | 2019/20 | 2022/23 | G | Officers are progressing with Programme 2&3, to develop the detailed programme content and funding strategies. An update to committees is planned for April 2021.<br><br>Modelling work has recommenced on feasibility of traffic proposals within the Healthy Streets Plan. |

| Smithfield and Barbican Area Programme | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **West Smithfield Public Realm and Transportation measures**<br>Implementation of **public realm and transport measures** improvements to support Culture Mile and Museum relocation. Incorporates Smithfield section of Barbican & Smithfield - Healthy Streets Plan; | 2019/20 | 2026 | G | The Gateway 3 report was approved by Streets and Walkways and Projects Sub Committees at the end of 2020. The funding will be presented for approval at RASC on 4th February.<br>Once the funding is approved, Stage 3 design will commence.<br>Transport modelling to test possible closures and access only measures is being initiated through consultation with TfL. |
| **Beech Street Transport and Public Realm Improvements** air quality and public realm enhancements incorporates Barbican and Golden Lane section of Barbican & Smithfield - Healthy Streets Plan. | 2018/19 | 2023/24 | A | The measurement of the impacts of the Experimental Traffic Order has been affected by the reduced traffic levels caused by the pandemic. A report is going to Streets and Walkways on 18th February seeking a decision from Members whether to continue or conclude the experiment. |
| **Barbican & Golden Lane Zero Emission Zone** | 2020/2021 | 2021/22 | A | Scheme development linked to Beech Street decisions and discussions with Islington on Low Traffic Neighbourhoods Delivery of a Zero Emission Zone (ZEZ) is not certain given need to consider outcome on Beech Street scheme, which runs through the middle of this area. Traffic restrictions in Islington may have an impact on the decision to develop a ZEZ here. |

| Events and Campaigns | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **Sculpture in the City** annual programme<br>Temporary public art installations in the City Cluster area | 2019/20 | 2022/23 | G | Project on hold<br>The 10th edition exhibition will launch in early summer 2021, subject to government guidance at the time. |
| **Lunchtime Streets**<br>City Cluster and Chancery Lane<br>Further streets to be identified and funding beyond plan period | 2019/20 | Ongoing | G | Project on hold |
| **Road Danger Reduction Campaigns**<br>Behaviour change and community engagement, (including working with City of London Police) | 2019/20 | Ongoing | G | Ongoing delivery and support of cycle safety events with the City Police to promote safer cycles, safer speeds & safer behaviours. In December these were paused and will re-start when government guidelines permit.<br>Continuing to work with City of London Police on road danger reduction, communication and enforcement with the roads policing unit.<br>Adult cycle training has been paused by Transport for London, however, the team continue to engage with schools and are able to offer cycle training to children of key workers should the school wish. |

| Other projects | | | | |
|---|---|---|---|---|
| **Project description** | **Start date** | **End date** | **RAG** | **Progress Update Q3 2020/21** |
| **Street lighting upgrade main and side streets upgraded** | 2018/19 | 2020/21 | G | Closing outstanding issues on site, with completion still anticipated in Q4 20/21 |
| **Zero Emission Waste Collection** procurement of waste collection service with Zero Emission Vehicles | 2019/20 | Ongoing contract | G | The schedule of delivery from end of January 2021- March 2021 for the five Electric RCVs anticipated although pending confirmation. COVID and type approval have delayed delivery. |

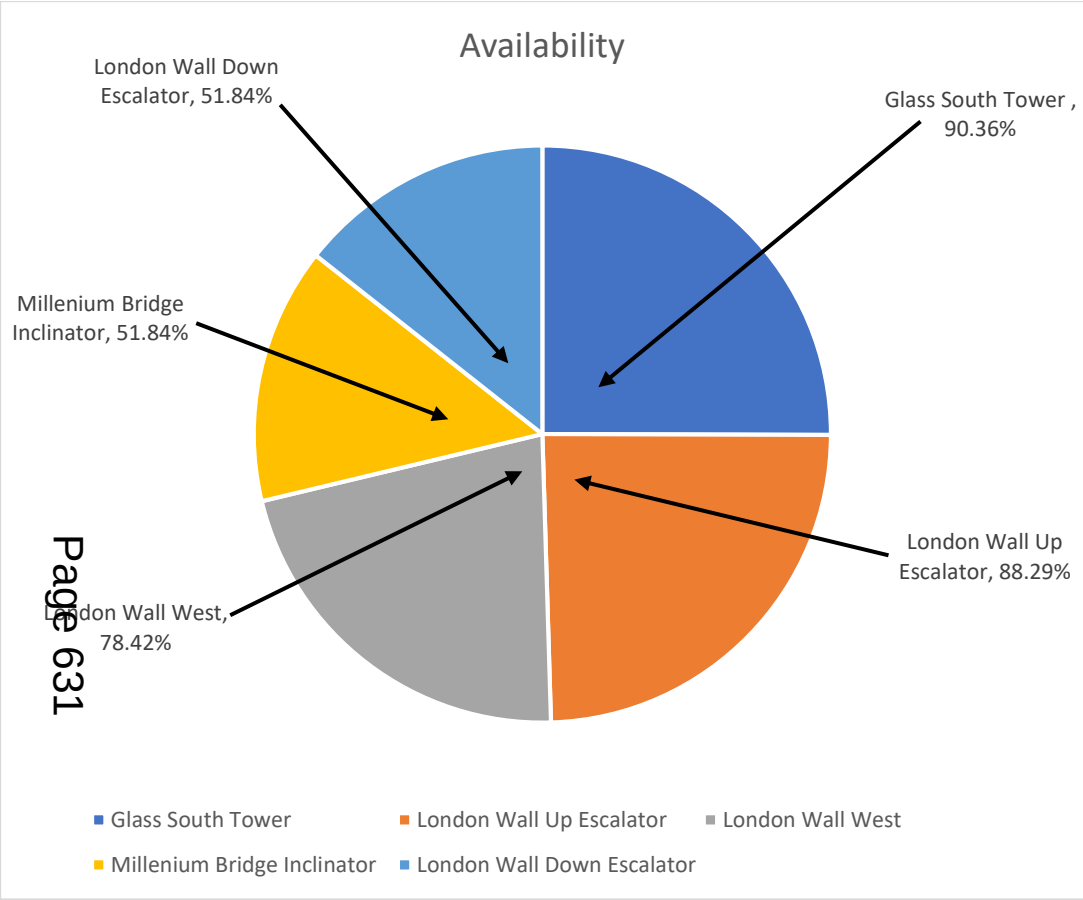
## PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

| Item | Date | Action/ Responsible Officer | Progress Update and Date to be progressed/completed |
|---|---|---|---|
| 1 | 18 March 2019<br>2 April 2019<br>30 April 2019<br>24 May 2019<br>18 June 2019<br>9 July 2019<br>30 July 2019<br>10 Sept 2019<br>1 Oct 2019<br>22 Oct 2019<br>5 Nov 2019<br>12 Dec 2019<br>28 Jan 2020<br>18 Feb 2020<br>6 March 2020<br>2 June 2020<br>23 June 2020<br>14 July 2020<br>8 Sept 2020<br>6 Oct 2020<br>27 Oct 2020<br>17 Nov 2020<br>15 Dec 2020<br>5 Jan 2021<br>26 Jan 2021 | **Daylight/Sunlight – Alternative Guidelines**<br><br>**Chief Planning Officer and Development Director**<br><br>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. | UPDATE: (27 Oct 2020) : Officers reported that British Standards had published guidance on this last year but that the BRE guidelines were still awaited. Officers were now set to meet with the BRE to understand their intended timeline for this and intended to align the City's work with this.<br><br>With regard to the associated Member Training request on this matter, Officers were now looking at the BRE webinars and how Officers could work with these and would update Members on this matter at the 15 December 2020 meeting of this Committee.<br><br>**To be completed: Target of February 2021.** |
| 2 | 18 June 2019<br>9 July 2019<br>30 July 2019 | **Construction Works** | UPDATE: (27 Oct 2020): Officers stated that it was very difficult for the planning system to control the start dates on construction sites, particularly in the |

| | | | |
|---|---|---|---|
| | 10 Sept 2019<br>1 Oct 2019<br>22 Oct 2019<br>5 Nov 2019<br>12 Dec 2019<br>28 Jan 2020<br>18 Feb 2020<br>6 March 2020<br>2 June 2020<br>23 June 2020<br>14 July 2020<br>8 Sept 2020<br>6 Oct 2020<br>27 Oct 2020<br>17 Nov 2020<br>15 Dec 2020<br>5 Jan 2021<br>26 Jan 2021 | **Chief Planning Officer and Development Director**<br><br>A Member referred to the many construction sites within her Ward that were causing noise/disturbance issues. She asked if officers 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.<br><br>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'. | current circumstances. There was, however, a Code of Construction which allowed Officers to deal with the cumulative impact of the number of construction sites due to come on stream and they would continue to manage any issues in this way. Members were also informed that a Development Liaison Manager had now been recruited and one of the key roles for the postholder was to provide an overview of forthcoming schemes with a view to coordinating these in terms of implementation.<br><br>**To be completed: Target of February 2021** |
| 3 | 6 March 2020<br>2 June 2020<br>23 June 2020<br>14 July 2020<br>8 Sept 2020<br>6 Oct 2020<br>27 Oct 2020<br>17 Nov 2020<br>15 Dec 2020<br>5 Jan 2021<br>26 Jan 2021 | **<u>Member Training</u>**<br><br>**Chief Planning Officer and Development Director / Director of the Built Environment**<br><br>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.<br><br>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also | UPDATE: (17 November 2020): Members were of the view that more formal training should be offered by the Department to any newly appointed members of the Committee in line with the principles of the Planning Protocol.<br><br>**To be completed: Training offering for new Members to be considered in early 2021 with a view to implementing this for the new municipal year.**<br><br>UPDATE (15 December 2021) – Officers to look at incorporating a demonstration of recently developed Virtual Reality (VR) Software into forthcoming Member training sessions. |

| | | | |
|---|---|---|---|
| | | 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 & Transportation Committee are expected to undertake regular training. | |
| 4 | 23 June 2020<br>14 July 2020<br>8 Sept 2020<br>6 Oct 2020<br>27 Oct 2020<br>17 Nov 2021<br>15 Dec 2021<br>5 Jan 2021<br>26 Jan 2021 | **Barbican and Golden Lane Conservation Area SPD**<br><br>**Interim Chief Planning Officer and Development Director**<br><br>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. | UPDATE: (17 Nov 2020): It was reported that the SPD would now be going to the next meetings of the Barbican Centre Board, the Barbican Residential Cttee and the Barbican Estate Residents Consultation Cttee for their input before coming to this Cttee in February 2021. Golden Lane and Tudor Rose Court residents would also be consulted on the document prior to it being presented to this Committee<br><br>**To be completed: SPD to Committee in February 2021.** |
| 5. | 15 Dec 2021<br>5 Jan 2021<br>26 Jan 2021 | **Anonymisation of Members in Committee Minutes**<br><br>**Town Clerk**<br><br>A Member requested that the minutes of this Committee should no longer anonymise Members and should, instead, record the names of those making comments and also record how individual Members had voted where rollcall votes were taken. | The Town Clerk undertook to provide the Committee with a report on the pros and cons of this suggestion and also to look into practice across other local authorities. It was also suggested that this matter would need to be brought to the attention of the Policy and Resources Committee in due course given that it went against the convention set down by them some time ago for all Corporation Committees.<br><br>**To be completed: Report to Committee by February 2021.** |

| | | | |
|---|---|---|---|
| 6. | 5 Jan 2021<br>26 Jan 2021 | **<u>Changes/access to Public Highways</u>**<br><br>**Interim Chief Planning Officer and Development Director**<br><br>A Member spoke to state that she felt that providing Members with a sense, graphically, of what cumulative changes had happened to public highways as a result of approved planning applications would be beneficial – particularly at a time when space for pedestrians was arguably more important than ever. | The Chair suggested that, as this was a hybrid of both highways and planning functions, Officers should give further consideration to the proposal and suggest how best it might be responded to.<br><br>**To be completed: Officers to look into this matter and update Committee in the first quarter of 2021.** |
| 7. | 5 Jan 2021<br>26 Jan 2021 | **<u>Whole Life Carbon Guidelines</u>**<br><br>**Interim Chief Planning Officer and Development Director**<br><br>A Member questioned whether consideration could be given to developing guidance on Whole Life Carbon that could be adopted as a planning advice note in the same way that guidance on Thermal Comfort had been developed. | The Chair asked that the Interim Chief Planning Officer and Development Director respond to the Member on this point and consider how best to bring the matter back to the Committee.<br><br>**To be completed: Officers to look into this matter and update Committee in the first quarter of 2021.** |




| Code | Name | Time OOS | Availability |
|---|---|---|---|
| 0924 | Duchess Walk Public Lift CL24 | 0 00:00 | 100% |
| 0931 | Baynard House Car Park SC6458796 | 0 00:00 | 100% |
| 0976 | Pilgrim Street SC6458969 | 0 00:00 | 100% |
| 0978 | Atlantic House SC6458966 | 0 00:00 | 100% |
| 7345 | Speed House Public Lift SC6459146 | 0 00:00 | 100% |
| 7921 | Little Britain SC6458967 | 0 00:00 | 100% |
| 7963 | London Wall East SC6458964 | 0 00:00 | 100% |
| 7997 | 33 King Williams Street SC6462850 | 0 00:00 | 100% |
| 7998 | Tower Place Public Lift SC6458962 | 0 00:00 | 100% |
| 7999 | Tower Place Scenic Lift SC6458963 | 0 00:00 | 100% |
| 7740 | Moor House SC6458968 | 0 05:52 | 98.84% |
| 7964 | Blackfriars Bridge SC6462771 | 0 20:08 | 96.01% |
| 0916 | Glass South Tower SC6459244 | 2 00:34 | 90.36% |
| 0945 | London Wall Up Escalator SC6458959 | 2 11:02 | 88.29% |
| 7960 | London Wall West SC6458965 | 4 12:46 | 78.42% |
| 0929 | Millennium Bridge Inclinator SC6459245 | 10 02:42 | 51.84% |
| 0944 | London Wall Down Escalator SC6458958 | 17 08:12 | 17.42% |





Points to Note:

- There are 17 Public Lifts/Escalators in the City of London estate. The report below contains details of the 5 - public escalator/lifts that were not available for 95% of the time or less.
- The report was created on 29th January 2021 and subsequently since this time the public lifts or escalators may have experienced further breakdowns which will be conveyed in the next report.

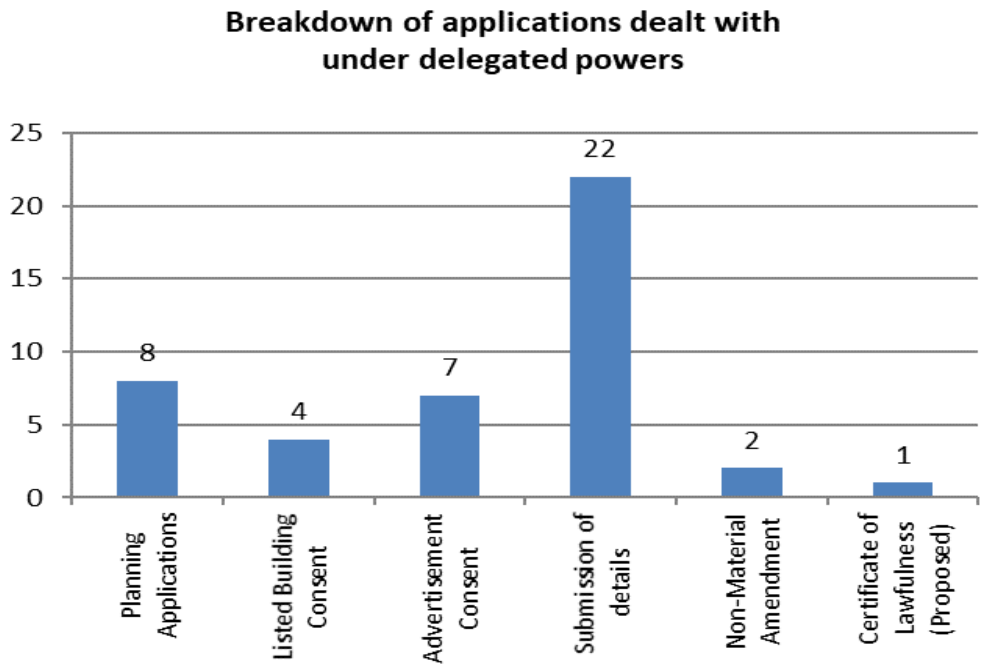
| Location | Status as of 29/01/2021 | % of time in service Between 09/01/2021 and 29/01/2021 | Number of times reported Between 09/01/2021 and 29/01/2021 | Period Not in Use Between 09/01/2021 and 29/01/2021 | Comments Where the service is less than 95% |
|---|---|---|---|---|---|
| London Wall (No.1) Escalator (UP) SC6458959 | In service | 88.29% | 1 | 51 hours | The escalator was taken out of service when the down escalator was undergoing the major repairs to allow for a two-way stair access to be provided. |
| London Wall (No.1) Escalator (Down) SC6458958 | In Service | 17.42% | 1 | 357 hours | The escalator has been out of service since the last reporting period due to a step and chain repair. Works to the escalated were completed on the 27th January 2021. |
| Glass South Tower SC6459244 | In Service | 90.36% | 1 | 42 hours | There are ongoing recurrent minor faults, a survey has been undertaken to identify the fault to ensure that it is repaired correctly in the line with their recommendations. |
| London Wall West SC6458965 | In Service | 78.42% | 1 | 93 hours | Fault found with the door safety edges which required parts. Once received the engineer returned to site and put the lift back in service. |
| Millennium Bridge Inclinator SC6459245 | Out of service | 51.84% | 1 | 208 hours | Engineer attended and found a fault with the control panel caused by vandalism, parts required and currently out of service whilst these are received and fitted. Expected to be returned to service week commencing the 8th February 2021. |

| Committee(s) | Dated: |
|---|---|
| Planning and Transportation | 16th February 2021 |
| **Subject:**<br>Delegated decisions of the Chief Planning Officer and Development Director | **Public** |
| **Report of:**<br>Chief Planning Officer and Development Director | **For Information** |


**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 Forty four (44) matters have been dealt with under delegated powers. Twenty Two (22) relate to conditions of previously approved schemes, Four (4) application for Listed Building Consent, and Seven (7) application for Advertisement Consent, including One (1) refusal, Two (2) relate to non-material amendments, and One (1) application for Thames Tideway Tunnel works. Eight (8) Full applications, including Two (2) Change of Use and 287 sq. m floorspace created.

Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk.

**Details of Decisions**

| Registered Plan Number & Ward | Address | Proposal | Decision & Date of Decision | Applicant/ Agent |
|---|---|---|---|---|
| 20/00885/LBC<br><br>Aldersgate | 520 Bunyan Court<br>Barbican<br>London<br>EC2Y 8DH | Internal refurbishment comprising: (i) replacement of existing internal doors and frames with full-height versions (ii) enlargement of the lower bedroom wardrobe (iii) installation of a suspended ceiling to the bathroom. | Approved<br><br>12.01.2021 | Mr Richard Jinman |
| 20/00222/ADVT<br><br>Aldgate | 8 Brown's Buildings<br>London<br>EC3A 8AL | Retention and display of (i) one fascia sign comprising internally illuminated neon lettering measuring 0.84m high, 1.65m wide, at a height of 2.3 m above ground; and (ii) three internally illuminated golf club signs measuring 1.65m high, 1.2m wide, at a height of 2.3 m above ground. | Approved<br><br>14.01.2021 | Swingers 1 Ltd |
| 20/00257/MDC<br><br>Bassishaw | Garrard House<br>31 Gresham Street<br>London<br>EC2V 7QA | (i) Details demonstrating that the level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. (ii) Details demonstrating that before any mechanical plant is used on the premises it will be mounted in a way | Approved<br><br>14.01.2021 | AFIAA London n1 AG |

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| | | which will minimise transmission of structure borne sound or vibration. (iii) Submission of an Air Quality Report. Details are submitted pursuant to conditions 18, 19 and 20 of Planning Permission 18/00669/FULL dated 11.12.18. | | |
| 20/00757/NMA<br><br>Bassishaw | Brewers' Hall Aldermanbury Square London EC2V 7HR | Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 19/00815/FULL dated 10th October 2019 to allow an increase in the number of openable windows. | Approved<br><br>26.01.2021 | The Worshipful Company of Brewers |
| 20/00864/FULL<br><br>Bassishaw | St Mary Staining Churchyard Staining Lane London EC2V 7DE | Installation of a new regraded path from the corner of Staining Lane and Oat Lane to provide level access to St Mary Staining Churchyard and the secondary entrance to Pewterers Hall, replacing the existing path and three steps, construction of low level retaining brickwork walls with integrated lighting. | Approved<br><br>19.01.2021 | PCC St Vedast alias Foster |
| 20/00835/LBC<br><br>Bishopsgate | Liverpool Street Railway Station Liverpool Street London EC2M 7PY | Installation of Access Points and Associated cabling and containment to support the deployment of WiFi within Liverpool Street Station. | Approved<br><br>28.01.2021 | Network Rail Infrastructure Limited |

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| 20/00859/FULL<br><br>Bishopsgate | 6 - 9 Eldon Street<br>London<br>EC2M 7LS | Temporary change of use of basement, part ground and first floor level from office (Class E) to use as construction welfare facilities (Sui Generis) and associated cycle parking facilities. | Approved<br><br>28.01.2021 | Broadgate Eldon Properties Limited |
| 20/00921/PODC<br><br>Bishopsgate | 150 Bishopsgate<br>London<br>EC2M 4AF | Submission of the Delivery and Servicing Plan pursuant to Schedule 1 Paragraph 16.1 of the Section 106 Agreement dated 01 February 2017 (Planning Application Reference 14/01151/FULL as amended by 17/00623/FULL). | Approved<br><br>12.01.2021 | UOL Group Ltd |
| 20/00938/ADVT<br><br>Bishopsgate | 100 Liverpool Street<br>London<br>EC2M 2RH | Installation of non-illuminated hoardings around fulcrum of 100 Liverpool Street and 8-12 Broadgate, for a maximum period of 5 years. Hoardings to be varying height and width, up to a maximum of 3m in height, and all at 0.15m in depth. | Approved<br><br>14.01.2021 | Bluebutton Properties (UK) Limited |
| 20/00939/ADVT<br><br>Bishopsgate | Exchange Square<br>London<br>EC2A 2BR | Proposed non-illuminated advertisements on existing hoardings around perimeter of Exchange Square for a temporary period of 1 year. Height of the hoardings to vary between 2.4m and 3m, and width to vary between 1.94m and 24.17m. Depth for all hoardings to be 0.15m | Approved<br><br>14.01.2021 | Bluebutton Properties (UK) Limited |

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| 20/00940/ADVT<br><br>Bishopsgate | 100 Liverpool Street<br>London<br>EC2M 2RH | Installation of a non-illuminated hoarding around Crossrail Station site adjacent to Liverpool Street station, for a maximum period of 5 years. Hoardings to be varying height and width, up to a maximum 2.6m in height, all at 0.15m depth. | Approved<br><br>14.01.2021 | Bluebutton Properties (UK) Limited |
| 20/00944/MDC<br><br>Bishopsgate | 1 - 2 Broadgate<br>London<br>EC2M 2QS | Submission of details of the removal, storage and reinstatement on the site, of the Fire Plaque pursuant to condition 39 of the planning permission dated 29 March 2019 (application number 20/00462/FULL). | Approved<br><br>28.01.2021 | Bluebutton Properties UK Ltd |
| 20/00955/MDC<br><br>Bishopsgate | 100 Liverpool Street & 8-12 Broadgate<br>London<br>EC2M 2RH | Details of the terrace planting on level 07 pursuant to condition 23 (h) (part) of planning permission 17/00276/FULL dated 5 June 2017. | Approved<br><br>21.01.2021 | Bluebutton Properties UK Ltd |
| 21/00027/NMA<br><br>Bishopsgate | 150 Bishopsgate<br>London<br>EC2M 4AF | Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 20/00392/FULL dated 05.11.2020 to allow for amendment to the location of short-stay cycle stands. | Approved<br><br>26.01.2021 | UOL |

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| 20/01007/MDC<br><br>Bread Street | 25 Cannon Street<br>London<br>EC4M 5TA | Submission of a Demolition and Construction Logistics Plan pursuant to condition 3 of Planning permission 19/01150/FULL dated the 16 April 2020. | Approved<br><br>28.01.2021 | 25 Cannon Street Limited |
| 20/00472/MDC<br><br>Bridge And Bridge Without | London Bridge<br>London<br>EC4 | Submission of a Long-Term Maintenance Plan pursuant to condition 14 of planning permission 18/000451/FULEIA dated 7th September 2018. | Approved<br><br>21.01.2021 | Illuminated River Foundation |
| 20/00569/MDC<br><br>Bridge And Bridge Without | 16 Eastcheap<br>London<br>EC3M 1BD | Submission of details of a lighting strategy, plant mountings, and cycle storage and facilities and pursuant to conditions 6, 10, 16, and 17 of planning permission dated 27/08/2019 (app. no. 19/00440/FULL). | Approved<br><br>14.01.2021 | Other 7RE London Limited |
| 20/00643/FULL<br><br>Bridge And Bridge Without | Talbot House<br>8 - 9 Talbot Court<br>London<br>EC3V 0BP | Change of use of the basement, ground, first, second and third floors from office (Use Class E) to a flexible Class E/F1a Use Class. | Approved<br><br>12.01.2021 | CGIS (Gracechurch Street) Limited |
| 20/00892/FULL<br><br>Bridge And Bridge Without | Peninsular House 30 - 36 Monument Street<br>London<br>EC3R 8LJ | Replacement of glazing to the ground floor level offices fronting Monument Street, from tinted to clear glass. | Approved<br><br>12.01.2021 | Royal London Asset Management |
| 20/00929/ADVT<br><br>Bridge And Bridge Without | 6 Eastcheap<br>London<br>EC3M 1AE | Installation of i) 2no. non-illuminated fascia signs, measuring 4.2m by 1.25m and 4m by 1.25m respectively; ii) 1no. internally | Approved<br><br>15.01.2021 | Tesco |

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| | | illuminated fascia sign measuring 4.15m by 1.25m; iii) 1no. internally illuminated projecting sign measuring 0.8m by 0.65m, 3.33m above the ground; iv) 1no. vinyl sign measuring 1.15m by 2m; v) 1no. vinyl sign measuring 1.5m by 1.3m; and vi) 2no. vinyl signs measuring 1.55m by 1.3m. | | |
| 20/00965/MDC<br><br>Broad Street | 41 Lothbury<br>London<br>EC2R 7HF | Details of a construction management plan pursuant to condition 3 of planning permission 19/01364/FULL dated 26th March 2020. | Approved<br><br>14.01.2021 | Pembroke Lothbury Holdings Ltd |
| 20/01019/MDC<br><br>Broad Street | 41 Lothbury<br>London<br>EC2R 7HF | Submission of details of Construction Logistics Plan pursuant to condition 2 of planning permission ref: 19/01364/FULL | Approved<br><br>28.01.2021 | Pembroke Lothbury Holdings Limited |
| 20/00641/MDC<br><br>Candlewick | 68 King William Street<br>London<br>EC4N 7HR | Submission of a Construction Logistics Plan pursuant to Condition 4 of planning permission reference: 19/01308/FULL, which was approved on 31 July 2020. | Approved<br><br>21.01.2021 | King William St Limited |
| 20/00664/MDC<br><br>Candlewick | 68 King William Street<br>London<br>EC4N 7HR | Submission of a Deconstruction Logistics Plan pursuant to Condition 3 of planning permission 19/01308/FULL dated 31 July 2020. | Approved<br><br>21.01.2021 | King William St Limited |

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| 20/00802/FULL<br><br>Candlewick | 68 King William Street London EC4N 7HR | Application under S.73 of the Town & Country Planning Act 1990 to amend planning permission 19/01308/FULL dated 30/07/2020 in respect of condition 13 (hours of operation) to extend the hours of use of the external terraces and condition 14 (noise limits) to allow amplified or other music on the external terraces within defined noise limits | Approved<br><br>28.01.2021 | King William St Limited |
| 20/00610/MDC<br><br>Castle Baynard | Mermaid Conference And Events Centre Puddle Dock London EC4V 3DB | (i) submission of details of the external facing materials of the proposed plant equipment (ii) submission of a Noise Report pursuant to conditions 2 and 3(b) of planning permission 18/00516/FULL dated 23.08.2018. | Approved<br><br>21.01.2021 | Mermaid Conference and Events Ltd |
| 20/00681/TTT<br><br>Castle Baynard | Tideway Working Area Blackfriars Bridge Foreshore Victoria Embankment London EC4Y 0DR | Partial discharge of Schedule 3 requirement relating to surface water drainage pursuant to BLABF 22 of the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended. | Approved<br><br>28.01.2021 | Bazalgette Tunnel Limited |
| 20/01000/MDC<br><br>Coleman Street | 3 Copthall Avenue London EC2R 7BH | Details of balustrade pursuant to condition 2 of planning permission 20/00268/FULL dated 21/05/2020. | Approved<br><br>28.01.2021 | KanAm Grund KVG MbH For of Funding Leading |

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| 20/00737/LBC<br><br>Cornhill | Royal Exchange<br>Cornhill<br>London<br>EC3V 3DG | Installation of 5 access hatches in the portico roof. | Approved<br><br>26.01.2021 | Tmd Building Consultancy |
| 20/00767/FULL<br><br>Cornhill | Royal Exchange<br>Cornhill<br>London<br>EC3V 3LR | Installation of 5 access hatches in the portico roof. | Approved<br><br>26.01.2021 | Royex Real Estate Investments Ltd |
| 20/00041/ADVT<br><br>Cordwainer | 10 - 15 Queen Street<br>London<br>EC4N 1TX | Installation and display of (i) one internally illuminated fascia sign measuring 1.35m high, 0.291m wide, at a height above ground of 1.698m; (ii) one internally illuminated fascia sign measuring 1.5m high, 0.327m wide, at a height above ground of 0.835m. | Refused<br><br>28.01.2021 | Stonegate Pub Company |
| 20/00481/FULL<br><br>Cordwainer | 3 Queen Victoria Street<br>London<br>EC4N 4TQ | Installation of benches and temporary installation of planters within the arcade for a 12-month period | Approved<br><br>28.01.2021 | DP9 Ltd |
| 20/00842/MDC<br><br>Cripplegate | Bernard Morgan House 43 Golden Lane<br>London<br>EC1Y 0RS | Submission of details of land levels pursuant to condition 35 of planning permission 16/00590/FULL dated 30th August 2017. | Approved<br><br>26.01.2021 | Taylor Wimpey UK Limited |
| 20/00922/PODC<br><br>Cripplegate | Bernard Morgan House 43 Golden Lane<br>London<br>EC1Y 0RS | Submission of the Second Television Interference Survey pursuant to Schedule 3 Paragraph 12.5 of the Section 106 Agreement dated 30 August 2017 (Planning Application Reference 16/00590/FULL). | Approved<br><br>12.01.2021 | Taylor Wimpey UK Limited |

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| 20/00988/MDC<br><br>Cripplegate | Great Arthur House Golden Lane Estate London EC1Y 0RE | Submission of a Noise, Vibration & Dust Mitigation Plan pursuant to condition 2 of planning permission dated 06/10/2020 (app. no. 20/00498/FULL). | Approved<br><br>26.01.2021 | Barbican Estate Office |
| 20/00469/MDC<br><br>Dowgate | Cannon Street Railway Bridge Cousin Lane London EC4 | Submission of a long-term maintenance plan pursuant to condition 14 of planning permission 18/000457/FULEIA dated 7th September 2018. | Approved<br><br>21.01.2021 | Illuminated River Foundation |
| 20/00893/MDC<br><br>Farringdon Without | 1&2 Garden Court Middle Temple London EC4Y 9BJ | Details of alterations to the west elevation of 1 and 2 Garden Court, including new openings, and details of all junctions with the link structure (pursuant to conditions 2a) , a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects (pursuant to condition 4) and a scheme and methodology for cleaning and repair of brickwork (pursuant to condition 5) in respect of the planning permission granted 22 January 2019 for external works at 1 & 2 Garden Court (18/01218/FULL). | Approved<br><br>12.01.2021 | The Honourable Society of The Middle Temple |

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| 20/00957/FULL<br><br>Farringdon Without | Atlantic House 50 Holborn Viaduct London EC1A 2FG | Retention of nine CCTV cameras installed including five cameras in new locations and the replacement of four cameras in existing locations. | Approved<br><br>26.01.2021 | Hogan Lovells |
| 20/00722/MDC<br><br>Lime Street | 6-8 Bishopsgate & 150 Leadenhall Street London EC3V 4QT | Submission of details of the integration of cleaning equipment, cradles and the garaging thereof pursuant to condition 23 (f) of planning permission dated 13th September 2018 (17/00447/FULEIA). | Approved<br><br>26.01.2021 | MEC London Property (General Partner) Limited |
| 20/00937/LBC<br><br>Lime Street | Hasilwood House 60 - 62 Bishopsgate London EC2N 4AW | Internal fit out of office suite on 7th floor including installation of new WC's, new wall finishes, traditional wood flooring and new lighting. | Approved<br><br>12.01.2021 | CLI-Dartriver Ltd |
| 20/00958/PODC<br><br>Lime Street | 22 Bishopsgate London EC2N 4BQ | Submission of the carbon dioxide emissions assessment of the completed development and calculation of the Carbon Offsetting contribution pursuant to Schedule 3 Paragraph 11 of the Section 106 Agreement dated 16 June 2016 (Planning Application Reference: 15/00764/FULEIA as amended by 16/00849/FULEIA). | Approved<br><br>12.01.2021 | 22 Bishopsgate Limited |

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| 20/00470/MDC<br><br>Queenhithe | Millennium Bridge<br>London<br>EC4V 4AG | Submission of a Long-Term Maintenance Plan pursuant to condition 14 of planning permission 18/000458/FULEIA dated 7th September 2018. | Approved<br><br>21.01.2021 | Illuminated River Foundation |
| 20/00949/ADVT<br><br>Tower | Retail Unit 3<br>Tower Place East<br>Tower Place<br>London<br>EC3R 5BT | Installation of two internally illuminated projecting signs, and four externally illuminated fascia signs. | Approved<br><br>19.01.2021 | Starbucks Coffee Company |
| 20/00471/MDC<br><br>Vintry | Southwark Bridge<br>London<br>EC4 | Submission of a Long-Term Maintenance Plan pursuant to condition 14 of planning permission 18/00453/FULEIA dated 7th September 2018. | Approved<br><br>21.01.2021 | Illuminated River Foundation |

| **Committee(s)** | **Dated:** |
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| Planning and Transportation | 16th February 2021 |
| **Subject:**<br>Valid planning applications received by Department of the Built Environment | **Public** |
| **Report of:**<br>Chief Planning Officer and Development Director | **For Information** |

**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.

**Details of Valid Applications**

| **Application Number & Ward** | **Address** | **Proposal** | **Date of Validation** | **Applicant / Agent** |
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| 20/00966/FULL<br>Aldersgate | 1 London Wall, London, EC2Y 5EA | Installation of external structures related to the creation of a new roof terrace at level 10 for the existing office use and associated works. | 04/01/2021 | Jump Trading |
| 20/00718/FULL<br>Aldgate | Flat 8, 27 - 31 Mitre Street, London, EC3A 5BZ | Replacement of windows to the front and rear elevation at fourth and fifth floor. | 08/01/2021 | Steve Bertenshaw |
| 21/00020/FULL<br>Bishopsgate | 17 St Helen's Place, London, EC3A 6DG | Minor alterations to existing elevations: i) installation of a dry riser to the front elevation, and ii) installation of a boiler flue to rear elevation. | 08/01/2021 | Ms S Harris |
| 20/01006/FULL<br>Bridge And Bridge Without | Fishmongers' Hall, 109 Upper Thames Street, London, EC4R 3TJ | Installation of new architectural lighting scheme to western abutment of London Bridge and the east and southern elevations of Fishmongers Hall | 14/01/2021 | The Worshipful Company of Fishmongers |

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| 20/01011/FULL Broad Street | 14 - 18 Copthall Avenue, London, EC2R 7BN | Application under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary conditions 8(f), 27 and 32 (drawings) of planning application 20/00400/FULL dated 25/08/2020 to enable minor material amendments including 1. Introduction of a secondary stair and associated rear elevation change to the facade line, its architectural treatment and fenestration, and associated changes to the north elevation including new access door and inset waste store; 2. Introduction of new crittall window to north elevation; 3. Amendments to the permitted lift arrangements and introduction of platform lift in the ground floor lobby; 4. Amendment to the permitted rooftop plant enclosure and roofplant layout. | 21/12/2020 | Digitalis Properties |
| 20/00997/FULEIA Castle Baynard | Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St, London, EC4Y | a) Demolition of existing buildings, comprising 69-71 Fleet Street, 72-78 Fleet Street (Chronicle House), 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, 35 Whitefriars Street (Hack and Hop public house), 36-38 Whitefriars Street, and 2-6 Salisbury Square (Fleetbank House); b) Part demolition of 2-7 Salisbury Court (Grade II) and carrying out of | 18/12/2020 | City of London Corporation |

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| | | works including remodelling at roof level, formation of new facade to south elevation, part new facade to west elevation and new core and part new floors. Part replacement fenestration, new plant and other works associated with change of use to drinking establishment with expanded food provision (sui generis); c) Erection of three new buildings:<br>1. A combined court building (Class F1)<br>2. A police headquarters building (sui generis); and<br>3. A commercial building including offices, retail and cycle hub (Class E)<br>d) Creation of shared basement for emergency response vehicles, parking, mechanical, electrical and plumbing (MEP), and ancillary functions associated with the three new buildings, with ingress and egress from Whitefriars Street;<br>e) Public realm and highway works, including enlarged Salisbury Square, landscaping, access and servicing arrangements, new pedestrian routes, hostile vehicle mitigation (HVM) measures, and bicycle and vehicle parking;<br>f) Dismantling, relocation and reconstruction of Grade II listed Waithman | | |

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| | | obelisk within Salisbury Square;<br>g) Other associated and ancillary works and structures.<br><br>This application has been submitted alongside two applications for listed building consent (20/00996/LBC and 20/00998/LBC).<br><br>This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from Edward Kitchen at Gerald Eve LLP at EKitchen@geraldeve.com.<br><br>The proposal involves a departure from one or more policies of the development plan in force in the area. | | |
| 20/01013/FULL<br>Castle Baynard | 10 Godliman Street, London, EC4V 5AJ | Installation of a new canopy to the entrance door fronting Carter Lane serving the sky bar entrance | 21/12/2020 | Jurys Management (UK) ltd |
| 21/00030/FULL<br>Castle Baynard | St Paul's Cathedral, St Paul's Churchyard, London, EC4M 8AD | Installation of the `People of London' Memorial in a new location in the South Churchyard of St Paul's Cathedral and associated works. | 13/01/2021 | Registrar, St Paul's Cathedral |

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| 21/00010/FULL Coleman Street | 3 Copthall Avenue, London, EC2R 7BH | Provision of new external doors at fifth floor level to provide access to external terraces and use of southern terrace created under planning permission 20/00268/FULL as an outdoor usable space. | 06/01/2021 | KamAm Grund KVG MbH For of Funding Leading |
| 21/00012/FULL Farringdon Without | Inner Temple Garden, Crown Office Row, London, EC4Y 7HL | To install six soakaways with associated underground pipework and collection gullies to alleviate flooding and puddles on the western and northern pathways in the Inner Temple Garden.<br><br>The six soakaways will all be 1200mm x 1200mm x 1600mm deep filled with 8 no soakaway crates to provide 2m3 overall. Each will be wrapped in a 'Terram' layer with a 20mm pea shingle topping and a minimum of 300mm topsoil - all to BRE Digest 365. | 07/01/2021 | The Inner Temple |
| 21/00056/FULL Farringdon Without | Weddel House, 13-21 West Smithfield, London, EC1A 9DW | Installation of new roof plant equipment with associated edge protection works; and 2no. postbox panels on ground floor front elevation to be replaced with opaque infill panels. | 26/01/2021 | Wellcome Trust |

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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