



Planning and Transportation Committee

Date: TUESDAY, 29 JUNE 2021

Time: 10.30 am

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

Deputy Alastair Moss (Chair)	Deputy Jamie Ingham Clark
Oliver Sells QC (Deputy Chairman)	Shravan Joshi
Randall Anderson	Alderman Alastair King
Douglas Barrow	Alderwoman Susan Langley
Peter Bennett	Oliver Lodge
Mark Bostock	Natasha Maria Cabrera Lloyd-Owen
Deputy Keith Bottomley	Alderman Bronek Masojada
Thomas Clementi	Andrew Mayer
Deputy Peter Dunphy	Deputy Brian Mooney (Chief Commoner)
John Edwards	Deputy Barbara Newman
Sophie Anne Fernandes	Graham Packham
John Fletcher	Susan Pearson
Marianne Fredericks	Judith Pleasance
Tracey Graham	Deputy Henry Pollard
Graeme Harrower	James de Sausmarez
Sheriff Christopher Hayward	William Upton QC
Christopher Hill	Alderman Sir David Wootton
Deputy Tom Hoffman	

Enquiries: Gemma Stokley
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Accessing the virtual public meeting

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

<https://youtu.be/0zWrHG5-HZQ>

This meeting will be a virtual meeting and therefore will not take place in a physical location. Any views reached by the Committee today will have to be considered by the Comptroller and City Solicitor or the Assistant Town Clerk after the meeting in accordance with the Court of Common Council's COVID Approval Procedure who will make a formal decision having considered all relevant matters. This process reflects the current position in respect of the holding of formal Local Authority meetings and the Court of Common Council's decision of 15th April 2021 to continue with virtual meetings and take formal decisions through a delegation to the Town Clerk and other officers nominated by him

after the informal meeting has taken place and the will of the Committee is known in open session. Details of all decisions taken under the COVID Approval Procedure will be available online via the City Corporation's webpages.

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 informal meeting held virtually on 8 June 2021.

For Decision
(Pages 7 - 30)
4. **CITY TOWER AND CITY PLACE HOUSE, 40-55 BASINGHALL STREET LONDON EC2V**
Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 31 - 206)
- 4A. **LBC - 65-65A BASINGHALL STREET LONDON EC2V 5DZ**
Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 207 - 214)
5. **PROTECT DUTY CONSULTATION RESPONSE**
Report of the Town Clerk & Chief Executive.

For Decision
(Pages 215 - 224)
6. **HEALTH IMPACT ASSESSMENT GUIDANCE NOTE**
Report of the Director of the Built Environment.

For Decision
(Pages 225 - 248)
7. **BIODIVERSITY ACTION PLAN CONSULTATION RESPONSE AND ADOPTION REPORT**
Report of the Director of Open Spaces.

For Decision
(Pages 249 - 340)

8. **RIVERSIDE STRATEGY FOR PUBLIC CONSULTATION**
Report of the Environmental Resilience Director.

For Decision
(Pages 341 - 400)
9. **DEPARTMENT OF THE BUILT ENVIRONMENT RISK MANAGEMENT - QUARTERLY REPORT**
Report of the Director of the Built Environment.

For Information
(Pages 401 - 424)
10. **STREETS AND WALKWAYS SUB-COMMITTEE - PUBLIC MINUTES**
To receive the *draft* public minutes of the Streets and Walkways Sub-Committee meeting held virtually on 29 April 2021.

For Information
(Pages 425 - 434)
11. **OUTSTANDING ACTIONS**
Report of the Town Clerk.

For Information
(Pages 435 - 440)
12. **PUBLIC LIFT REPORT**
Report of the City Surveyor.

For Information
(Pages 441 - 444)
13. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**
Report of the Chief Planning Officer and Development Director.

For Information
(Pages 445 - 468)
14. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**
Report of the Chief Planning Officer and Development Director.

For Information
(Pages 469 - 472)
15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
16. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

17. **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

18. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the informal meeting held virtually on 8 June 2021.

For Decision
(Pages 473 - 474)

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

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

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PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 8 June 2021

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.30 am

Present

Members:

Deputy Alastair Moss (Chair)	Shravan Joshi
Oliver Sells QC (Deputy Chairman)	Alderman Alastair King
Randall Anderson	Alderswoman Susan Langley
Douglas Barrow	Natasha Maria Cabrera Lloyd-Owen
Peter Bennett	Andrew Mayer
Mark Bostock	Deputy Brian Mooney (Chief Commoner)
Deputy Keith Bottomley	Deputy Barbara Newman
Thomas Clementi	Graham Packham
John Edwards	Susan Pearson
Sophie Anne Fernandes	Judith Pleasance
John Fletcher	Deputy Henry Pollard
Marianne Fredericks	James de Sausmarez
Graeme Harrower	William Upton QC
Deputy Tom Hoffman	Alderman Sir David Wootton
Deputy Jamie Ingham Clark	

Officers:

Angela Roach	- Assistant Town Clerk
Lorraine Brook	- Committee and Member Services Manager
Gemma Stokley	- Town Clerk's Department
John Cater	- Town Clerk's Department
Aqib Hussain	- Technology Support Partner
Shani Annand-Baron	- Media Officer
Deborah Cluett	- Comptroller and City Solicitor's Department
Simon Owen	- Chamberlain's Department
Dipti Patel	- Chamberlain's Department
Alison Bunn	- City Surveyor's Department
Gwyn Richards	- Chief Planning Officer and Development Director
Bruce McVean	- Department of the Built Environment
Neel Devlia	- Department of the Built Environment
Lucy Foreman	- Department of the Built Environment
Emmanuel Ojugo	- Department of the Built Environment
Averil Pittaway	- Department of the Built Environment
Giacomo Vecia	- Department of the Built Environment

Introductions

The Town Clerk opened the meeting by introducing herself.

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 Town Clerk also reminded Members, and any members of the public observing the meeting on-line, that this was an informal meeting and that any views reached by the Committee today would therefore have to be considered by the Director of Markets and Consumer Protection or those deputising for him after the meeting in accordance with the Court of Common Council's COVID Approval Procedure and that they would make a formal decision having considered all relevant matters. The Town Clerk highlighted that this process reflected the current position in respect of the holding of formal Local Authority meetings and the Court of Common Council's decision of 15th April 2021 to continue with virtual meetings and take formal decisions through a delegation to the Town Clerk and other officers nominated by him after the informal meeting has taken place and the will of the Committee was known in open session. Details of all decisions taken under the COVID Approval Procedure would be available online via the City Corporation's webpages.

1. **APOLOGIES**

Apologies for absence were received from Peter Dunphy, Sheriff Christopher Hayward and Alderman Bronek Masojada.

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 of the informal meeting held virtually on 12 May 2021 and approved them as a correct record.

4. **GOVERNANCE REVIEW: PLANNING PANEL ARRANGEMENTS**

The Committee considered a report of the Town Clerk concerning the Governance Review: Planning Panel Arrangements.

The Chair reminded the Committee of the context of this report which had emanated from the Lisvane recommendations which covered Panels and other matters in relation to Planning. The Chair highlighted that Planning was one area of work that had received advanced consideration over and above other matters raised by Lisvane and that this had been dealt with by the Resource Allocation Sub-Committee in February 2021 where the principle of Panels had been established and subsequently by the Policy and Resources Committee in March 2021 which had also endorsed this. Members were informed that the

purpose of the paper before this Committee today was two-fold (to debate and decide upon the course of action in terms of Panels and secondly to consider the petition presented to the Court by Mr Bostock and referred to this and the Policy and Resources Committee). The Chair underlined that the views of this Committee would be fed into the Policy and Resources Committee in July 2021 when they were due to consider this same paper and eventually to the Court of Common Council in the same month. The Chair invited any contributions that members of the Committee might have on this matter and highlighted that, thereafter, he intended to ask the Committee to vote on each matter set out within paragraph 43 of the report utilising the electronic voting links issued to them by the Town Clerk prior to the meeting.

A Member spoke to underline that whilst he was named as the presenter of the petition, he was one of seven sponsors with others including the Barbican Association and the Golden Lane Residents' Association. The Member went on to note that the report before the Committee only dealt with the matter of Panels which was only one of three points addressed by the petition which also concerned the eligibility of Members who have professional associations with the property development industry to sit on the Planning Committee. The Member stated that he believed that reducing the number of Members participating in planning decisions would inevitably reduce democratic responsibility which he felt was already weak within the City Corporation due to its unique business voting system. He stated that the Panel proposal before the Committee today had been decisively rejected in principle by the signatories of the petition which included 14 Common Councillors and at least half of whom were City residents who he felt formed the only truly engaged sector of the City Corporation's electorate. Other signatories were those who had an interest in preserving the City's heritage and the Member reported that signatories now stood at 1,322 as of this morning. The Member went on to state that 97% of all planning applications were currently delegated for decision to Officers and that he could therefore not see that there was a convincing case for changing the current arrangements for considering the remaining 3% - all of which were either major or controversial applications.

Another Member spoke to state that he supported the formation of Panels which was a very clear recommendation of Lord Lisvane's Governance Review. He underlined that he believed that Panels would transform the way in which the system operated for the better – firstly it would mean that the grand Committee would not get bogged down in large planning applications and would therefore have more time to focus on important, strategic matters and issues (as had been articulated in the past). Secondly, the Member added that he felt that smaller Panels would allow Members to deep-dive in much greater detail at a much earlier stage than would ever be possible in a full, grand Committee setting. This would put Members at the heart of the detail of planning applications. Thirdly, the Member highlighted that he was of the view that Panels were more democratic with Ward Members able to speak on an application within their Ward on a completely unfettered basis which he believed enhanced representation. The Member went on to recognise that, like any new policy, this would need to be proved. He noted that paragraph 38 of the report referred to an 18 month review period which he stated that he would

fully support. However, any meaningful review would have to be underpinned by the criteria against which it will be assessed/the evidence. The Member stated that, in his view, one such criteria would be the ability to demonstrate that a wider group of Members, beyond the Chair and Deputy Chair of this Committee, had been involved with applications at a much earlier stage. The Member went on to note that paragraph 11 of the report set out the Policy and Resources Committee's reasons and anticipated outcomes for the Panel system which should also form the basis to evaluate whether outcomes had been met. In addition to this, the Member felt that the administrative side of a Panel system should also be included within the review. This would include highlighting if there had been issues around fixing dates for Panel meetings, with Panel meetings being quorate or with Panel meetings getting through the business on the agenda for example as well as any resulting impacts on the timeliness of planning decisions. The Member underlined that this was absolutely not about being more pro-developer or less democratic – vitally, he felt that the Panels must not be small cliques of Members and that they would not be if the Town Clerk were to select these Panels independently and vary these. The Member noted that the Policy and Resources Committee had already debated and voted on there being no outright ban on members sitting on both the Property Investment Board and the Capital Buildings Committee as well as the Planning and Transportation Committee as well as on members with professional connections or a background/expertise in property serving on this Committee. The Member stressed that it was the responsibility of all elected Members to manage their interest in accordance with the Code of Conduct and underlined that there was no history of any impropriety that he was aware of. He underlined that the recent changes introduced to the Planning Protocol also managed the separation of roles with regard to planning applications following the recent Holocaust Memorial judgement. He therefore felt that all Members could demonstrate to all stakeholders, particularly those who had signed the petition, that the Panel arrangements for consideration of planning applications proposed here could work and, moreover, were good for enhanced accountability. He also clarified that he had many engaged stakeholders within his own Ward, both businesses and residents. The Member concluded by stating that he would like to see this system working in practice and noted that the Chair had considerable experience of making this work elsewhere. He underlined that he supported an 18 month review to assess the effectiveness of the Panel system which he believed was the right decision to make.

A Member stated that he respected the views of those who had signed the petition but did not agree with what it said – in particular, he stated that he did not respond well to a petition which appeared to express the view that City residents form the only truly engaged sector of the Corporation's electorate. On the principle, the Member stated that he was in favour of the establishment of Panels in terms of clarity as he felt that it had been clear for some time that there had not been adequate clarity about the role of Members on this Committee. He added that Members had two roles in terms of the planning process – one was making planning decisions according to planning criteria and the second was representing local communities and that to perform these two roles Members did not have to be on this Committee, only an opportunity to express their views and those of the local communities that they directly

represent. The Member stated that he was therefore in favour of the introduction of a Panel system which would help separate these two functions and allow Members representing Wards in which the applications were situated to speak and make representations in an entirely uninhibited way and, similarly, allow the decision makers to make the planning decisions in an uninhibited way. The Member went on to state that he felt that clarity was essential to the points made around democratic accountability and that he was of the view that Panels would enhance representation and improve the quality of decisions and that this was not about the number of Members taking a decision but about the clarity of the roles of those taking them. With regard to the composition of the proposed Panels, dealt with at paragraphs 21 and 22 of the report, the Member stated that there were four Aldermen on this Committee, each with one vote, and that he would favour Aldermen being included within Panel numbers. Of the options set out within paragraph 22, he underlined that he would encourage Aldermen to be included within Panel numbers but obviously not in contradiction to the Panel system and not being asked to consider applications within their own Wards.

Another Member spoke and highlighted that she was one of the sponsors of the petition and was therefore not in favour of the introduction of Panels. She added that the comparison with other local authorities, particularly at paragraph 16 of the report, and the comments from Officers within the report around the number of planning applications that are delegated and that, generally, only major and key applications are considered by the full Committee. The Member commented that the current situation was therefore that most applications were actually decided by Officers and questioned whether there would therefore be a sufficient workload for four different Panels. She went on to remark that she felt it was important that major/controversial applications were currently considered by the full Committee. She added that she was also concerned by the assumption that Members would have greater advocacy under a Panel system as she was of the view that it was important for Members to be able to debate applications and to hear and understand that debate. Without being involved in the debate and only being permitted to speak for a set period of time Members would be unable to rebut and discuss things. Finally, with reference to the Lisvane Governance Review, the Member noted that Lord Lisvane had stated that the City Corporation already had too many Committees and that this proposal would introduce another four.

A Member spoke to state that she was conscious that Members would be asked to take a lot of decisions and vote on various different matters today. She added that she felt that, for reasons of transparency and democratic accountability, it was important that the votes taken on these various different aspects were somehow visible publicly in terms of how people had voted and the consequences of this thereafter. The Member went on to highlight that the premise for the advance consideration of Planning from within the Governance Review more generally, was about being responsive to the concerns of members of the public and particularly residents around planning process. However, it seemed to her that none of this rationale/impetus was referred to within this report and that the approach that had been adopted had not really engaged with this in any meaningful way. It appeared to her that there had

been no proper opportunity (other than by the initiation of the petition) for there to be any engagement of consultation with City residents as to options and their views on this and she was of the view that this was regrettable given that residents were an important group of stakeholders. The Member went on to note that the recommendations within the report rejected the points raised on eligibility by the Transparency International report and, again, she felt that it was a real shame that there had been no efforts made to engage with them on this. With regard to the points already made around enhanced efficiency and set out within paragraph 11 of the report, the Member remarked that she was concerned that this could mean a lot more provisional decision making (or pre-disposal) at Panel stage or leading up to Panel by way of using more pre-Panel briefings, thereby making the process less transparent. The Member therefore felt that, if Panels were to be introduced, at the very least, the City Corporation should commit to recording these briefings and making them publicly available on the webpages alongside all other application documents. In relation to the issue of quorum, the Member added that she felt that one matter that had been overlooked was the timing of meetings and that evening meetings should be carefully considered to ensure maximum availability for working Members. In terms of Panel options, whilst the Member stressed that she was against both of these, the option set out within paragraph 6c and the suggestion of a minor size variation between Panels was not correct as the difference between 10 members on one Panel and six on another was almost double. She added that the best option of a bad bunch would therefore, in her opinion, be to achieve as close to parity as possible in terms of Panel memberships. With regard to residents, whilst it was true that they were not the only stakeholders, looking at other authorities, Members all had significant numbers of residents within their Wards who made up their electorate. Looking at the South Panel proposed here, it appeared that this would be made up of Wards with extremely few, if any, residents. With regard to major applications, the Member highlighted that she felt that it would be absolutely necessary to introduce trigger levels to refer applications to the grand Committee. However, as already highlighted by a previous speaker, the applications currently dealt with by the grand Committee were considered major. The Member commented that it was a shame that the report did not set out trigger levels in other local authorities. The Member noted that paragraph 28 specifically stated that a higher quorum ensured robust decision making. The Member concluded by summarising that she felt that this was a real missed opportunity in terms of wider engagement and that she did not think that what was being proposed was correct, particularly given that Lord Lisvane did not recommend the formation of constant Panels.

A Member spoke to say that he thought that the petition regarding Panels was contaminated with multiple assertions, including criticisms of previous planning decisions as well as implied predetermination of future decisions. As a member of this Committee he was therefore very keen to distance himself from this. With regard to the proposal of Panels itself, the Member stated that his view, as voiced during the informal engagement sessions with Members, was that this was a very complex way of addressing a problem which he did not believe existed. He underlined that he was of the view that it was perfectly possible for Members to vote on an application within their own Ward and not necessarily be swayed by the views of their own constituents as had been proved by

various Members over the past 12 months. He added that he felt that if this Committee's volume of work was to be reduced by 75% which was what was being implied here, they would become less efficient as he was of the view that the more often Members considered these major applications, the better they got at them and understanding the wider picture/London Plan. He clarified that he therefore felt that the introduction of Panels would lead to less efficiency in terms of scrutiny.

Another Member spoke to say that he was one of few Members who had supported the idea of Panels when it was first discussed several years ago and stated that he was still of the view that Panels could work for many of the reasons already articulated. However, he felt that the way that this paper proposed assembling these Panels made no sense and that, if forced to vote first on the principle of Panels before looking at how these would be constituted, he would therefore have to vote against the introduction of Panels. He suggested that he would prefer the Committee to be able to vote on the composition of Panels as a starting point. He went on to state that, fundamentally, it seemed to him that this paper did not address the concerns that the petitioners had expressed and that the proposal around geographic Panels simply made matters much worse. He went on to highlight that, under the proposed structure, he would form part of the Panel considering applications within the Eastern Cluster and he suspected that he and other Panel members may therefore become very popular with developers in the Eastern Cluster as a result. Alternatively, dependent on any trigger level introduced, this Panel may see very little work. Overall, he felt that having a much smaller group of people that applicants may seek to influence, was not the way to address the very reasonable concerns of petitioners. The Member went on to state that he also had an issue with geographical Panels because it created a fixed Panel structure that could and very likely would, cause differences in the interpretations of the City's policies to become fixed with, for example, one Panel believing that loss of office space should always be opposed and another finding it entirely reasonable to permit this. He added that, as an alternative, the obvious solution would be for Panels to be drawn up by rotas – a system which he felt would have a variety of advantages and would substantially address the concerns raised, avoid a divergence of the application of policies and also permit those appointed by rota to consider any engaged disclosable pecuniary interests that they might have and exclude themselves where necessary, allowing another Member to be appointed in their place and ensure that a quorum was achieved. A rota system would also address the appointment of Aldermen to Panels as they would be on the rota in the same way as all other Committee members. The Member commented that he would like the opportunity to move this as an amendment at the appropriate point in the discussion today. The Member also highlighted that rota systems were widely used in the Courts and not difficult to manage. The Member questioned whether the Chair would consider addressing the matter of Panel structure first, ahead of any vote on the principle of Panels.

A Member began by raising the comments set out within paragraph 10 of the report which she suggested were untrue. Comments suggesting that the grand Committee did not have adequate time to do a deep dive and properly

scrutinise planning applications was simply not true. The Member underlined that she had sent an email to the full Court having researched six years of Planning Committee data which demonstrated that just 3% of planning applications were actually dealt with by the Committee with less than 11 applications being considered in some years. The time spent in Committee deciding upon planning applications was therefore a tiny fraction of the Committee's work. The Member commented that no one had responded to or questioned the data which she had notified Members of in February 2021. The Member commented that the remainder of the Committee's work was strategic policy and transport and that she had suggested in the past that, if timing were an issue, separate meetings could be scheduled solely for the consideration of planning applications, in the evening for example when some may find it easier to attend. The Member went on to highlight that, in paragraph 16 of the report, the Planning Officer made it clear that the City Corporation was already in step with other local authorities where full Committees dealt with major planning applications. She reiterated that this Planning Committee only dealt with 3% of major planning applications at present and that the current system enabled all 35 members of the Committee the opportunity to attend scheduled meetings where they were able to do so which she believed allowed for better debate and scrutiny. Speaking further on debate, the Member added that she had been extremely concerned in recent months by some Members demanding that this be curtailed and that 'the question now be put' which she felt had no place in a Planning Committee where planning applications were being scrutinised. She added that it was the responsibility of the Chair to ensure that all Members had an equal, free and unfettered opportunity to contribute and make their points without being bullied or intimidated. The Member went on to state that the current proposal set out within the paper today and put forward by Policy and Resources was based upon false information as the Committee did not currently spend hours considering planning applications. The Member conceded that the present system was by no means perfect particularly given that there were members of this Committee who also served on the Property Investment Board which had not been the case prior to the 2014 review of the Protocol. The Member stated that, with 125 Common Councillors, it should be possible to fill both the Property Investment Board and the Planning and Transportation Committee with no crossover and felt that those with property expertise and working in the property industry closely alongside developers would perhaps be best suited to the Property Investment Board. She stressed that she felt that having members serve on both of these bodies created huge unease in terms of public perception and exuberated the reputational risk for the City Corporation particularly when considering multi-million pound developments. The Member continued to underline that, in the past, Ward members were able to speak at Planning Committee meetings and this was still set out within Standing Orders which outlined that any Members was able to attend any Committee meeting and, with the permission of the Chair, speak. This could be easily encouraged and promoted by amending the protocol and the Member felt that these proposals were therefore not offering Members anything, rather they were having things taken away whilst also exuberating reputational risks for the City Corporation. The Member went on to say that she was concerned to see that the new Panel system could potentially be introduced in the autumn when she was aware that there were some large

planning applications due to come forward at this time, particularly in the Eastern side of the City. She added that she had never felt conflicted when considering a planning application as a Ward member because she followed the City's policies, the London Plan and national Planning Policy when reaching any decision. In this respect, the Member stressed that she did not believe that Ward members considering applications for within their own Wards were conflicted. She did, however, believe that there were conflicts for Members who did work in the development world/profession and noted that the Chair himself had had to exclude himself from a number of meetings when he had become aware of a potential professional conflict fairly late in the day. Finally, the Member stated that the suggestion that a small Panel could get involved at the very beginning of a planning application and become involved with the design of a building was wrong as it was the role of Planning Officers to provide pre-application advice and not Members as this would run the risk of leading to serious conflict. The Member stated that the composition of Panels would also inevitably change as Members came and went and that if a false sense of hope or indication were to be given to a developer that their plans were acceptable and the Panel membership were to change and Members were to decide differently on the day there could be huge upset, disappointment and reputational damage. The Member concluded that she believed that applications should continue to be put to the full Committee alongside an Officers report and recommendations and that decisions should be based on policy. She added that she felt that organising Panels would be a bureaucratic nightmare and would lead to decisions taking longer and, inevitably, more applications being called in by the full Court.

A Member spoke to state that he was of the view that the real reason for the proposal that Panels be introduced was that the Corporation's leadership were keen to tighten their grip on the planning process. He stressed that he felt that the leadership evidently regarded the promotion of the Corporation's interests, and those of office developers, as articles of faith and wanted to treat this Committee as a rubber stamp for pursuing these. The Member commented that the criticism that this Committee had received internally and increasingly externally had seemingly concerned the leadership enough to propose the introduction of Panels in order to lessen this unwelcome scrutiny and the embarrassment caused by it. The Member went on to expand upon the comments of the initial speaker in this debate by highlighting that Panels were just one of three points raised by petitioners – the other two concerned the eligibility of members to sit on the Planning Committee whilst also sitting on the Corporation's property committees or they had professional associations with the development industry. The Member went on to state that it was obvious to almost everyone that Members responsible for the Corporation's extensive property portfolio within the Square Mile should not participate in planning decisions. Indeed, as already reported by the previous speaker, prior to 2014, Members of the Corporation's property committees were not eligible to sit on the Planning Committee. He noted that the Planning Protocol was amend last autumn to provide that Members involved in sponsoring an application for one of the Corporation's own properties could not then be involved in the planning decision and an elaborate process was devised to give effect to this including the creation of a special purpose Sub-Committee. He remarked that this

change had been made under the pretext of complying with a recent change in the law consistent with the judgement in the Holocaust Memorial case, although no legal commentator seemed to feel that this judgement had changed the law in any significant way. He went on to suggest that this amendment to the Protocol had not gone far enough because members of the Property Investment Board still could and did participate in planning decisions on developments where the Corporation was not the applicant but had an ownership interest in the property. He highlighted that this had happened last November in the case of 150 Aldersgate. Even where the Corporation was neither the applicant nor has an ownership interest in the property, it was still possible for a conflict to arise given that the Property Investment Board was a founding sponsor of the Eastern City Partnership whose other members were property developers. In spite of this, members of that Board could and did participate in planning decisions on the development put forward by these other members of the Eastern City Partnership as happened earlier this year in the case of the two controversial office developments at 55 and 70 Gracechurch Street. The Member remarked that the simple solution to these problems which had triggered a petition signed by over 1,330 people declaring no confidence in the City Corporation's planning process was to reintroduce the restriction that had existed up until 2014, preventing members of the Corporation's property committees from sitting on the Planning Committee. Finally, the Member dealt briefly with the third point raised in the petition and remarked that Transparency International (already referenced by a previous speaker) had criticised the City Corporation for allowing Members with professional associations with the property development industry to sit on its Planning Committee. Those who supported this claimed that adopting Transparency International's recommendations would deprive the Planning Committee of these Members' expertise. However, the member commented that only two members of the Committee had expertise that was genuinely relevant to planning – one as a retired architect and the other a planning barrister. Neither of these members fell within Transparency International's definition of 'professional association' which was aimed at those who were paid to promote developments. He added that it was disingenuous of those Members who were paid by developers to claim that public confidence could still be maintained in the City's planning process if they participate in decisions as long as they recuse themselves in cases where they have actually been involved in promoting a development. He questioned which of their potential clients would be keen to hire them if they were to have a record of voting against developments, however well-founded any vote against might be.

Another Member spoke to state that he did not find it acceptable or beneficial to either his electorate or to the Corporation for him to not be able to debate or vote upon applications within his own immediate area. He underlined that he represented a residential Ward and that residents within his Ward were not against development but were keen to ensure that any developments were the right ones. He emphasised that it was residents who knew better than anybody else, the effects that a new development would have on the ground. The Member recalled a number of times during his previous membership of this Committee where he was able to debate applications and highlight ways in which they could be improved upon before a decision was taken either by way

of deferral or the addition of certain conditions. He underlined that he felt that it was absolutely essential that Members living in or representing an area where it was proposed that a development take place could take part in the debate around this so as to ensure that all of the subtleties and nuances that they were aware of could be taken into account. He was of the view that this led to better quality decision making for all parties.

A Member remarked that the recommendations before the Committee today flowed from the Governance Review informal engagement sessions to which all Members of the Court were able to contribute. These had then been put to the Resource Allocation Sub-Committee and subsequently the Policy and Resources Committee and therefore reflected the majority view of what should happen going forwards. He felt that this Committee opposing these recommendations at this stage and preserving the ability of the grand Committee to decide upon all major applications could be perceived as members being self-interested and self-preserving. He highlighted that a Panel system operated very successfully for licensing applications. He rebuked the idea that these Panels would be additional Committees, stating that they would be ad-hoc groups that could come together and take decisions on behalf of the grand Committee as needed. The Member stated that this Committee had struggled with the number of meetings necessary to deal with these planning decisions. He was of the view that a Panel system would therefore be more time efficient and that continuing to call together 35 Members every three weeks to take these decisions, as happened at present, seemed non-sensical. Panels would, in his view, also allow the grand Committee to focus in more on strategy and its wider Planning and Transportation remit.

A Member spoke to state that he had looked at this matter in some detail and genuinely believed that a move to Panels would increase accountability for all as well as allowing for Member engagement and efficiency. He emphasised that what was being proposed was a trial and that he was of the view that he felt that this should be given a fair opportunity so that evidence could be gathered as to how effective the new system was before this debate was re-engaged with at the appropriate point. The Member underlined that all Common Councillors were democratically accountable to the totality of their electorate and that he did not subscribe to the fact that the electorate were divisible with any one group more important than another. He added that he was also absolutely clear on the requirement of all Members to consider their conflicts of interest robustly and effectively, especially in the light of the review of the Corporation's Standards regime. The Member reiterated the words of the previous speaker in highlighting that the Policy and Resources Committee had already considered recommendations on the Planning process and that he was happy to support their views on this which took into account the wider needs/views of the City Corporation as a whole.

Another Member stated that, whilst it was correct to state that residents were not the only stakeholders in the City, they were major stakeholders in the City and Members would therefore endanger their relationship with them at their peril. The Member went on to report that he had been a member of this Committee for 22 years now and that all that had been achieved in the City, in

terms of development, over these 22 years had emanated from the grand, Ward-based Committee in its current configuration. He was therefore of the view that this current format should not be tampered with and that the currently configured Committee should be very proud of all that it had achieved.

A Member stated that he too was concerned that today's paper did not fully address the concerns of the petition and that, whilst he was not intuitively against panels, he was also of the view that if something was not broke, why fix it. He went on to say that the proposals around geographic panels did not make sense to him and underlined that he did not have any problems considering applications within his own Ward which he considered on their merits whilst also bearing in mind the interests of constituents in his Ward in the round. In terms of potential or perceived conflicts for those sitting on City property Committees and those with professional associations with the property development industry, the Member suggested that some formal independent advice may be needed on this in order for Members to reach the right conclusion on this and e on much firmer ground.

Another Member recognised that there was no perfect solution here and that what was being proposed was an experimental way forward. He stressed that he could see both positives and negatives in terms of a Panel system. The Member stated that he felt that setting up fixed Panels would leave 6-8 exposed to lobbying from a particular industry and that he found the idea of Panels drawn up by rota a much stronger proposal, particularly if they also included the Alderman on the grand Committee. He added that there could still be a geographical element to rotas so that, for example, applications for the North of the City would be considered by members drawn from those Wards representing the East, West and South. This would mean that Panels were not immediately fixed and that any advance briefings on applications could be attended by all. The Member went on to say that he felt that there had been too many issues with Members being involved with applications from an early point in the past and that a more suitable way forward would be for the Chair and Deputy Chair to give an early steer on these - as was the case at present. The Member reflected on previous major/controversial applications considered by this Committee and questioned what the view of his constituents would have been if he had told them that he was able to appear before a meeting and speak to the application but not form part of the debate or vote on its outcome. With this in mind, the Member argued that it was important to introduce a 'trigger' that would still allow for full Committee consideration of certain applications.

A Member underlined that this was a Planning and Transportation Committee and that it was therefore their role to consider planning applications. It had already been clarified that 97% of applications were delegated to Officers and she stressed that, in her view, this Committee should therefore deal with the remainder. The Member added that she could recall a time when major applications had been debated by the full Court and that she would not necessarily be against this happening in the future. The Member also stated that comparisons with other local authorities was unhelpful given their very

different make up in terms of voters/residents and the very different types of applications that they had to consider.

Another Member spoke to state that, in principle, he had absolutely no objection to the formation of Sub-Committees if the main Committee was being unduly taxed by lots of detailed discussions about planning applications. However, as a new Member of this Committee, he noted that there seemed to be some disagreement as to whether this was actually the case. From reviewing the minutes of the last meeting he did, however, feel that things could perhaps be dealt with more efficiently. He went on to state that four Panels seemed, to him, to be overly engineered and could be quite difficult from an administrative point of view. In this respect, the Member stated that he would favour just one Panel drawn up on a rota basis. The Member added that he would also be in favour of setting a materiality threshold in terms of what applications ought to be considered by the full Committee - The Tulip being the most extreme example of this. The Member went on to state that he did not feel that the distinction between those who were able to decide and those merely able to represent was a valid one. He added that if he were to have a 15% equity stake in a property development company, he would and should recuse himself from taking a decision but he did not feel that he should be precluded from the decision making process merely because an application affected his Ward.

A Member spoke again to offer some clarity to members of the public viewing in terms of the informal engagement sessions held on the governance review proposals around planning. She stressed that these were sessions chaired by a Deputy Chair of Policy and Resources which all Members were invited to attend and the reason that planning had been expedited was because she had called for this on the basis of wanting to look more closely at conflicts for those members who sat on this and the Property Investment Board and those members with professional associations with the property development industry. The Member went on to state that, if a Members' job entailed working closely with developers and supporting them with applications, it was not a very good advert for their services to be seen to be refusing things and she therefore felt that these members should be excluded from sitting on the Committee in order to avoid them feeling conflicted. Returning again to the informal engagement sessions with Members, the Member reported that the Deputy Chair of Policy and Resources had made it very clear from the outset of every session that Members could share their views and that these would be listened to although not necessarily incorporated. She added that it was the Resource Allocation Sub-Committee that had taken the decision to implement Panels and that this had emanated from one of the first engagement sessions and the views of the Chair and Deputy Chair of this Committee. The Member stated that she believed that this was because virtual meetings were taking longer and that many Members were therefore dropping out at lunch time, making it crucially important for decisions to be taken before a quorum was lost. The Member emphasised that this could be resolved by holding a separate meeting of the grand Committee solely for the consideration of applications. With regard to comparisons between Planning and Licensing applications, the Member stressed that licensing was a very different regime. Both applicants and

objectors were able to appeal licensing decisions via the magistrate's court, no time limits were allocated to those addressing meetings and it therefore amounted to a rather informal discussion to try and bring two sides together.

MOTION - Another Member spoke again on the composition of the Panels which, after listening carefully to the debate today, he stated was clearly a very central question. He therefore moved that the Town Clerk be asked to select Panel members on a rota basis in consultation with the Chairs of the Panels themselves, favouring a more randomised approach and a means of addressing the concerns of a number of members of this Committee. Following a question from the Chair, the Member clarified that he would propose this system within the confines recommended by Lord Lisvane which prevented any member from considering a planning application from within their own Ward. The Motion was seconded.

The Chair spoke to remind Members that there were a number of points which required decision today as set out at paragraph 43 of the report – the first of these being whether the Committee wished to proceed with Panels and all subsequent points flowing from this. The second point then posed the question whether Members wanted to proceed on the basis of geographical panels or otherwise, as proposed by the previous speaker.

In response to questions, the Town Clerk reminded Members that this was an informal meeting and that any votes taken were therefore indicative only. That being said, some Members had already queried how the way in which they voted could be made transparent. The Town Clerk clarified that it was possible to record voting numbers within the minutes as currently happened with planning applications and that it was also possible to record the name of any Member dissenting from a majority view within the minutes in accordance with Standing Orders. Alternatively, and for absolute transparency in terms of who has voted which way, a roll call vote could be taken on each of the points set out within the report. The Chair went on to propose that, for those points that were binary, the Town Clerk undertake to record the names of those voting against within the minutes. He sought the Committee's views on this.

A Member suggested that the best way to proceed would be for the fundamental question regarding the principle of Panels to be undertaken by rollcall with any subsidiary points to be contacted by electronic vote via email. The Chair agreed with this way forward.

Another Member questioned whether electronic voting was anonymised or whether details of who had voted for what could subsequently be recorded in the minutes. The Town Clerk it was not common practice to record names of Members within the minutes but confirmed that it was possible for those Officers issuing the electronic voting forms to ascertain who had voted which way.

A Member underlined that the substance of this paper was concerned with the formation of geographic panels and that, given that it now appeared that many Members were in favour of the introduction of Panels appointed by rota instead,

it would be helpful to have a further report dealing with the detail of this. She also suggested that it would be helpful for the petitioners to have an opportunity to attend a meeting, should they wish to, ahead of a future paper returning to Committee to raise any points that they may have on Panels drawn by rota.

The Chair underlined that it was important to note that the petition itself rejected the idea of Panels entirely. In response to questions, the Town Clerk highlighted that this report had not been intended to address the other points raised within the petition. This report had been called for by the Policy and Resources Committee who had already worked through the various recommendations of Lord Lisvane pertaining to planning and had considered the points raised at the various Member engagements sessions before setting the parameters. Officers had therefore been tasked with progressing work around the principle of geographic Panels for the consideration of future planning applications, looking at the detail of this and presenting Members with a range of options therein. Subsequent to this, the petition had been received and this was therefore appended to and referenced within the report so that if Members now wished to rethink the proposed way forward in light of this, they were able to do so and send a resolution back to the Policy and Resources Committee to this effect.

Another Member agreed that, if what this Committee were now going to favour was Panels set up on a randomised, rota basis, then subsequent points on quorum and composition would need to be reconsidered as, at present, the options presented were predicated on geographical Panels.

A Member sought further clarity on the petition, noting that this was received by the Court before being referred on to this and the Policy and Resources Committee to consider. With this in mind, the Member stated that she had been expecting a report to this meeting addressing the petition but felt this report did not do this. The Member called for an initial vote as to whether or not this Committee supported the principle of Panels to be taken. She added that she felt that Members were being pressurised to take decisions on this matter and change the system and cautioned against making policy on the hoof. The Member added that, if there were to be any subsequent reports to the Committee on this matter, then it ought to also address the other points raised within the petition in terms of members who also serve on the Property Investment Board and those with professional associations with the development world sitting on this Committee.

The Chair highlighted that the report did set out the thinking of the Policy and Resources Committee on the wider points raised by the petition and noted that several members had also spoken at length on these matters today. He went on to suggest that the Town Clerk now conduct a rollcall vote on the principle of a Panel system before moving to a separate rollcall vote on the motion proposed and seconded with regard to Panels being drawn on a rota basis.

The Committee then proceeded to vote on whether or not they were in favour of proceeding with Panel arrangements for the consideration of future planning applications. The vote was conducted by rollcall led by the Town Clerk.

Votes were cast as follows: IN FAVOUR – 14 Votes
OPPOSED – 10 Votes*
There was one abstention.

**In accordance with Standing Order No. 38, those Members who had voted against the recommendation asked that their names be recorded in the minutes – they were Randall Anderson, Mark Bostock, John Edwards, John Fletcher, Marianne Fredericks, Graeme Harrower, Natasha Lloyd-Owen, Deputy Brian Mooney (Chief Commoner), Deputy Barbara Newman and Susan Pearson.*

The Chair now requested that the Committee vote on the motion proposed and seconded and the concept of Panels being appointed by rota from the body of the grand Committee (including Aldermen), excluding Members from considering applications for their own Ward.

A Member expressed concern at this as it seemed to be an attempt to make policy on the hoof. She reiterated that the detail of Panels drawn by rota would need to come back to this Committee should Members support this concept. Another Member endorsed this point and called for a future paper on this now that the principle of Panels had been supported.

The Town Clerk noted that the majority of the Committee had supported the principle of planning Panels. She added that this report was predicated on the option of geographic Panels, as directed by the Policy and Resources Committee. However, it was becoming increasingly apparent that this Committee disagreed with this way forward with an alternative proposal now put forward and seconded calling for Panels to be drawn by rota. The Town Clerk suggested that this proposal should now be formally voted on and, if supported by the Committee, this would be fed back to the Policy and Resources Committee. It would then be for the Policy and Resources Committee to look again at this and, if necessary, call for a future paper from Officers looking at options around things such as quorum and how members were to be selected for Panels and by whom. With regard to timescales for progression, the Town Clerk underlined that this was entirely in the hands of Members.

Members raised concerns around the motion as currently proposed which suggested that rotas might be selected by the Chairs of Panels and therefore negated the randomisation of this. The Chair agreed with this point. The motion was therefore withdrawn with the mover proposing that the Committee now simply vote to make it clear as to whether or not they supported Panels being geographically based to provide a clear steer on this to Officers and the Policy and Resources Committee. This was supported by other Members, noting that, should this Committee oppose geographic Panels, it would then be for Officers to provide alternative options and further details/implications of these. A Member asked if a future paper could consider representative panels which always included resident members, albeit not Members who were resident in the Ward concerned each time.

The Committee then proceeded to vote on whether or not they were content to proceed with Panels drawn on a geographical basis. The vote was conducted by rollcall led by the Town Clerk.

Votes were cast as follows: IN FAVOUR – 0 Votes
OPPOSED – 20 Votes
There were five abstentions.

RESOLVED – That the Planning and Transportation Committee:

- Support proceeding with Panel arrangements for the consideration of future planning applications;
- Oppose Panels being drawn on a geographical basis and ask the Policy and Resources Committee to reconsider their proposal on this with Officers asked to present a future paper on alternative options for the creation of Panels and how these might work.

5. **HIGHWAY REDUCTION AND GAIN THROUGH THE PLANNING PROCESS**

The Committee received a report of the Chief Planning Officer and Development Director setting out information on the number of stopping up orders and the changes to the public highway that have been approved through planning applications.

A Member commented that it was interesting to note how vigilant the Committee needed to be on these issues and therefore called for a real underlining of this aspect within the Officer report when applications which would involve a loss of public highway came forward in future.

Another Member questioned the figures in terms of public realm created at ground level and not on rooftops which was not necessarily accessible to all. Officers responded to state that the report referenced ground floor public realm gains only.

Another Member referenced Aldgate Square which he presumed had resulted in a loss of public highway but a very large increase in public realm and asked whether this was incorporated within this report. Officers clarified that this had not been included within the report given that it was not the subject of a planning application.

RESOLVED – That Members note the content of the report.

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.

6. **LONDON RENTAL E-SCOOTER TRIAL UPDATE**

The Committee received a report of the Director of the Built Environment updating Members on the London Rental E-Scooter trial.

A Member questioned why the London boroughs were able to get through this process and the City were not. In terms of the delay, Officers stated that, technically, the City could have slightly compressed the statutory consultation period for the Experimental Traffic Order to meet the specified deadline but chose not to do this as it was felt vital to give statutory consultees as much time as possible to respond on this. Officers went on to report that no objections had been received through the consultation. This had delayed the process for the City by one week and, as Members were already aware, the contractual arrangement with the operators was that a launch had to occur at the start of a trial period which happened every 28 days. Consequently, the City launch would therefore now take place on 5 July 2021.

Another Member requested an update on the electric bicycle scheme that was to be rolled out by Santander/TfL. She questioned whether these would be introduced in the City and, if so, what impact Officers thought that this extension of the Santander scheme would have on these operators. The Member also asked if Officers could ensure that, when these e-scooters were promoted, any promotional material depicted users wearing helmets. Officers responded to state that they did not yet have exact details of how TfL were intending to deploy the Santander electric cycle but were assuming that these would just be incorporated with the other Santander cycles, spread amongst the various existing docking stations accordingly. Officers reported that this was the approach taken in Paris which had offered a combination of electric and non-electric, docked hire cycles for a while now. Officers went on to state that they assumed that e-scooters might appeal to a slightly different demographic but noted that there was also likely to be a lot of crossover too in terms of bike and e-scooter hire. Officers clarified that part of the reasoning for this trial was to understand how the hire of these scooters related to other available hire services. Officers went on to state that they were very mindful of the importance of the comms around this project and were working alongside the City of London Police on this. Any comms/imagery would cover appropriate riding behaviours such as the wearing of helmets.

Another Member noted an increasing number of e-scooters in the City and elsewhere and questioned the legality of and enforcement powers around this. Officers clarified that private e-scooters remained illegal and that Officers would be working on appropriate messaging around this alongside TfL, the City of London Police and the Metropolitan Police around the launch of the trial. Members were informed that the Police were enforcing this and that there was likely to be further, focused enforcement at the start of the trial period. Members were encouraged to raise any areas where there were particular issues with e-scooters with the Police or Officers.

Another Member highlighted that parking provision for these scooters was important and was pleased to read that this would be provided for on the road as opposed to on the pavement. The Member noted that parking bays were to be situated at Golden Lane and questioned how the locations in the City had been chosen. The Member went on to question whether these scooters would be expected to use cycle lanes. With regard to parking, Officers reported that there were a number of dockless cycle parking areas around the City, many of

which were on pavements but did not obstruct the pavement, however, it was clarified that these would not be used for e-scooter parking or mapped in the apps used for e-scooter hire. It was hoped that this would reinforce the point that e-scooters should not be used on the pavement and was also an attempt to maximise the use or reallocation of carriageway for cycle or dockless vehicle parking in the future. Officers went on to state that part of the City's COVID-19 response had originally involved the provision of additional space for dockless cycles. However, it materialised that this was not really necessary with the onset of various lockdowns and restrictions. These locations were now therefore proposed to be used for e-scooter parking and Officers reported that the rationale behind the Golden Lane location was to enable those based here to be able to use and access the trial, noting that several of the City's neighbouring boroughs would also be joining the trial in due course. It was recognised that some residents here may have their own e-scooters although Officers stressed that they would not advise the use of these on public highway. It was reported that Golden Lane was also close to other destinations such as White Cross Street Market where people might want to use the service to travel to or from those.

A Member questioned there would be any way of identifying each scooter for the purpose of traffic offences for example. Officers confirmed that each e-scooter would have a unique identifier on it which would be visible from a few metres distance. This would identify both the operator as well as the individual scooter so that if there were any particular concerns or if enforcement officers needed to follow up on a particular incident it would be possible to follow up on that using this.

The Chair thanked Officers for their work on this and confirmed that he had been approached regarding the potential compression of the statutory consultation period but stated that his view on this was that it was not something that he was prepared to countenance. This therefore left the City within TfL's defined brackets for the launch of the trial which was London wide. The Chair also highlighted that there were many boroughs such as Westminster who had expressed an interest in this but were yet to launch the trial.

The Chair went on to report that he had been liaising with the Mayor's Walking and Cycling Commissioner and had received his assurance that, in relation to police enforcement, was that the Metropolitan Police (as well as the City of London Police as reported today) would be giving particular focus to this in the next few weeks as part of this campaign.

RESOLVED – That Members note the report.

7. OUTSTANDING ACTIONS

The Committee received a report of the Town Clerk detailing the list of Outstanding Actions.

RECEIVED.

8. **PUBLIC LIFT REPORT**

The Committee received a public lift report of the City Surveyor for the period 27/04/2021 – 21/05/2021.

A Member noted that another lift had been out of service for a very long period of time because of the emergency phone support and remarked that this seemed to happen with some frequency. He therefore questioned whether there was an alternative way for this to be provided to avoid this problem. Officers confirmed that they were able to utilise a remote monitoring system instead and that a programme to examine costs and roll this out to all of the City's lifts was now underway to avoid reliance on the BT line in future.

RECEIVED.

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

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

RESOLVED - That the report be noted.

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

The Committee received a report of the 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.

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

Member conduct in hybrid meetings

A Member stated that, whilst he hoped that a return to in-person meetings would be possible for all in the near future, he would like an assurance from the Chair that, if virtual meetings continued, he would not, as a general rule, pass comment on the facial expressions of meeting participants following comments made by him at the last meeting of this Committee. The Chair responded to clarify that he would challenge any participant where he felt that their behaviour was inappropriate or needed to be noted without fear of favour and clarified that he had since spoken separately with the individual concerned on this matter. The Member spoke again to request that the Chair be as tolerant/lenient as possible in this respect given that things such as facial expressions were often magnified in a virtual setting.

The Member concerned thanked the speaker for raising this point today and confirmed that she had now spoken further with the Chair on this matter. The Member reported that, during her conversation with the Chair, she had stated that she did not feel that he challenged others on the Committee for similar behaviour and had underlined that some Members found meetings intimidating due to the behaviour of other Members. The Chair had assured the Member that, going forward, he would ensure that Members were able to express their views without feeling intimidated, harassed or bullied. The Member stated that the reason she was speaking on this matter today was to thank those Members and members of the public that had contacted her to offer their support and underline that they did not think that this was acceptable, noting that they felt that she was frequently bullied, harassed and intimidated at this and other Corporation meetings. The Member added that she was speaking today to underline that it was not acceptable for anyone to feel harassed, intimidated or bullied by the behaviour of any Members. The Member reiterated that she did not feel that the Chair had always pulled up this kind of behaviour, referring specifically to comments made about her at the last meeting of this Committee which a number of others appeared to find amusing but which she had not heard at the time. The Member added that this kind of behaviour was not acceptable and undermined the City Corporation's policy around on inclusivity and diversity, on mental health support and depression and anxiety. The Member underlined that no one should feel ostracised or the butt of jokes as all Members were equally elected to serve their electorate and to speak/enter debate without fear of intimidation. The Member stated that she was aware that there were many Members who felt harassed and bullied and felt the need to maintain the status quo or risk losing votes on Committees or the ability to be elected as a Chairman or Deputy Chairman. She underlined that she had no ambitions in this regard and would therefore speak out on this matter as well as on behalf of all those who felt bullied and intimidated which had no place in society, politics or the Court of Common Council. The Member concluded by stating that she hoped that the Chair would intervene should Members demonstrate similar behaviour in future meetings of this Committee.

The Chair thanked the Member and stated that he had also asked that she and any other Member challenge any time where she did not feel that he had acted fairly and reiterated that, as Chair, he would challenge the behaviour of any Member or Officer that he felt was inappropriate or disrespectful without fear or favour. The Chair added that he hoped that today's meeting had demonstrated that it was possible to have a robust but successful and respectful debate in which there were many differing views expressed.

Another Member spoke to underline the depth of feeling on this matter and reported that he had emailed the Chair directly at the conclusion of the last meeting to underline this and was disappointed to have not yet received a response to this. The Chair apologised if this was the case as he thought that he had responded to over a further conversation on this matter but undertook to discuss this further with the Member at the conclusion of this meeting.

Panel Arrangements – wider consultation

A Member made a further request that, ahead of any future report on Panel arrangements and the possible options therein being presented to this Committee, those who wanted to feed into the process externally were encouraged to do so via email given that the petitioners were so many in number and their strength of feeling. Better still, would be the opportunity to have a short session where residents and other stakeholders could raise any questions or concerns around the intended approach. The Chair stated that he was sure that Officers would take this view on board when progressing the next steps.

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

There were no additional, urgent items of business for consideration.

13. **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.

<u>Item No(s)</u>	<u>Paragraph No(s)</u>
14	3
15	3, 5 & 7
16	3 & 7
17-18	-

14. **TRANSPORTATION AND PUBLIC REALM CONSULTANCY FRAMEWORK - AWARD REPORT**

The Committee considered and approved a report of the Director of the Built Environment setting out progress made to date in tendering for the Transportation and Public Realm Consultancy Framework for professional services.

15. **DEBT ARREARS - BUILT ENVIRONMENT (P&T COMMITTEE)**

The Committee received a report of the Director of the Built Environment informing Members of arrears of invoiced income as at 31st March 2021.

16. **REPORT OF ACTION TAKEN**

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

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

Questions regarding various follow-up matters to the Committee's sustainability training session were raised.

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

There was no additional, urgent business for consideration.

The meeting closed at 1.01 pm

Chair

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Agenda Item 4

Committee:	Date:
Planning and Transportation	29 June 2021
<p>Subject:</p> <p>City Tower And City Place House 40 - 55 Basinghall Street London EC2V</p> <p>Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a thirteen storey Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m).</p>	Public
Ward: Bassishaw	For Decision
Registered No: 21/00116/FULMAJ	Registered on: 25 March 2021
Conservation Area:	Listed Building: No

The following recommendation relates to the planning application. There is one separate recommendation before your Committee relating to one application for Listed Building Consent. Both applications are considered in this report.

Summary

The application site is located between London Wall and Basinghall Street. It comprises:

- City Place House, a Class E office building (24,387 sqm GIA).
- The podium of City Tower including the existing podium level terrace (4,989 sqm GIA). City Tower is a Class E office building.
- Part of the grade II listed 65/65a Basinghall Street and its associated bridge over Basinghall Street.
- The City owned Brewers' Hall gardens directly to the west of City Place House.

The site is not within a conservation area. It is within the setting of several listed buildings in the locality, including the grade I listed Guildhall. The Landmark Background Assessment Area of the Westminster Pier to St Paul's viewing corridor (LVMF 8A.1) diagonally crosses City Place House. The site is within the North of the City Key City Place as defined by the adopted Local Plan 2015.

Planning permission is sought for:

- The demolition of City Place House and its replacement with a new 13 storey class E building office building (43,272 sqm GIA) with some retail use at ground floor level.
- The partial demolition and reconfiguration of the City Tower podium to provide flexible commercial units (retail/restaurant/cafe/gym) and office use (including an affordable element) and a re-designed podium level terrace with landscaping, publicly accessible exercise equipment, seating and a publicly accessible lift between ground and podium level.
- Demolition of the existing bridge link over Basinghall Street and the installation of a replacement bridge link.
- The provision of a new pedestrian route between Basinghall Street and London Wall at ground floor level and the provision of a section of City Walkway between the Guildhall Plaza and London Wall.
- Enhancement of Brewers' Hall Gardens.

An accompanying application for listed building consent (ref. 21/00201/LBC) has been submitted for the alteration of 65/65a Basinghall Street to allow for the removal of the existing bridge and installation of a new City walkway bridge to be delivered as part of the redevelopment of City Place House and the reconfiguration of the City Tower podium. This report covers both applications.

Two rounds of consultation have been carried out in conjunction with the planning application. 13 objections have been received in response to the first round of consultation from Barbican residents along with objection from the Barbican Association and the Andrewes House Group on daylight/sunlight, sustainability and design grounds. Following receipt of further information from the applicant a second round of consultation was carried out, in response to which one letter of objection was received noting that the additional information

did not address previously raised concerns. One comment has been received in response to the consultation in conjunction with the listed building consent. The comment relates to securing the proposed City walkway.

The GLA have requested further details and clarification on points in respect of the proposal (transportation, sustainability and design matters) but are supportive of the scheme in principle.

It is considered that the proposal would transform this site delivering on aspirations for the North of the City Key Place area as defined by the Local Plan 2015 in that high quality architecture and sustainable development would be provided alongside significant enhancements to the public realm and the permeability of the locality namely through the provision of a new north/south pedestrian route, re-landscaping of the podium level terrace to include the provision of publicly accessible exercise equipment and enhancements to Brewers Hall gardens.

The proposed mix of uses comprising flexible office space with an affordable element (12 desk spaces) and the provision of supporting retail/restaurant/cafe/gym use would be appropriate for this part of the City. The supporting uses would activate and enliven the surrounding public realm, something which is lacking in the design of the current site. Provision of affordable workspace is particularly welcomed at this time given the impacts of the COVID-19 pandemic and as a mechanism to support smaller businesses and start-ups in line with the London Recharged report (London Recharged: Our Vision for London in 2025, City of London).

The scheme would deliver acceptable and policy compliant levels of cycle parking including short stay, appropriate pedestrian comfort levels, a consolidated servicing arrangement, would enhance permeability and would increase the amount of publicly accessible space within and around the site by approximately 998sqm (64%). The proposal would deliver City Walkway between the Guildhall Plaza and London Wall. The pedestrian route over the colonnade on London Wall, which is currently permissive path, would be removed. This loss would be offset by the overall gain of publicly accessible space of a higher quality and significant improvements to the permeability of the site. Some stopping up of highway is required but this would be offset by the dedication of public highway of a greater provision.

In terms circular economy principles, the applicant has provided sufficient information to demonstrate that the existing City Place House building would not lend itself to being transformed into a vibrant new sustainable development with public benefits. Notwithstanding, circular economy principles would be positively applied to the replacement office building to achieve a long term, low carbon, flexible and adaptable development.

Overall, the proposed sustainability strategy meets current and new London Plan and Local Plan policies. The development is on track to achieve an "excellent" BREEAM assessment rating. The proposals indicate that Whole Life-Cycle Carbon emissions could be significantly reduced in line with the

GLA's aspirational benchmark. The new building would achieve an appropriate degree of climate change mitigation through utilising heat provided by the Citigen network while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

The development would provide enhanced greening at the ground, podium and upper levels through public realm landscaping, green roofs and planted terraces. Three street trees would be lost on Basinghall Street due to it not being practicable to retain them throughout construction. The impact of the lost trees would be offset by replacement tree planting of a greater provision.

It is acknowledged that due to the increase in the height of the building the proposal would result in some less than substantial harm to the setting and significance of the grade I listed Guildhall and the Guildhall Conservation Area. In considering the paragraph 196 (NPPF) balancing exercise it is considered that, giving considerable importance to the desirability of preserving the setting of the listed buildings, and great weight to the conservation of the listed buildings and the conservation area, the harm would be outweighed by the public benefits of the scheme which include improvements to the public realm and the permeability of the area.

The proposal would be visible in the protected vista LVMF view 8A.1 of St Paul's Cathedral from Westminster Pier, however, the intrusion is not considered to impact on the ability to recognise and appreciate the dome, peristyle and south western tower of St Paul's Cathedral. It is considered the LVMF visual management guidance and the policies relating to strategic views are complied with.

The increase in the height of the building would also result in the requirement for some limited wind mitigation and it would impact on the daylight and sunlight level to two living rooms in Andrewes House. Three benches on the north and south sides of Aldermanbury would require some wind mitigation (secured through the S.106) in order to ensure that they are suitable for their intended purpose. The two daylight breaches would be marginally below the BRE guidance. Given that the windows in question would be VSC compliant, taking account of the scale of the breach and that the Local Plan acknowledges that ideal daylight and sunlight conditions may not be practicable in densely developed City locations, it is considered that living standards would be acceptable and relevant daylight policies would not be breached.

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

Recommendation

(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

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

(2) That you agree in principle that the land affected by the building which are currently public highway and land over which the public have right of access may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and making of a Stopping-up Order for the various areas under the delegation arrangements approved by the Court of Common Council.

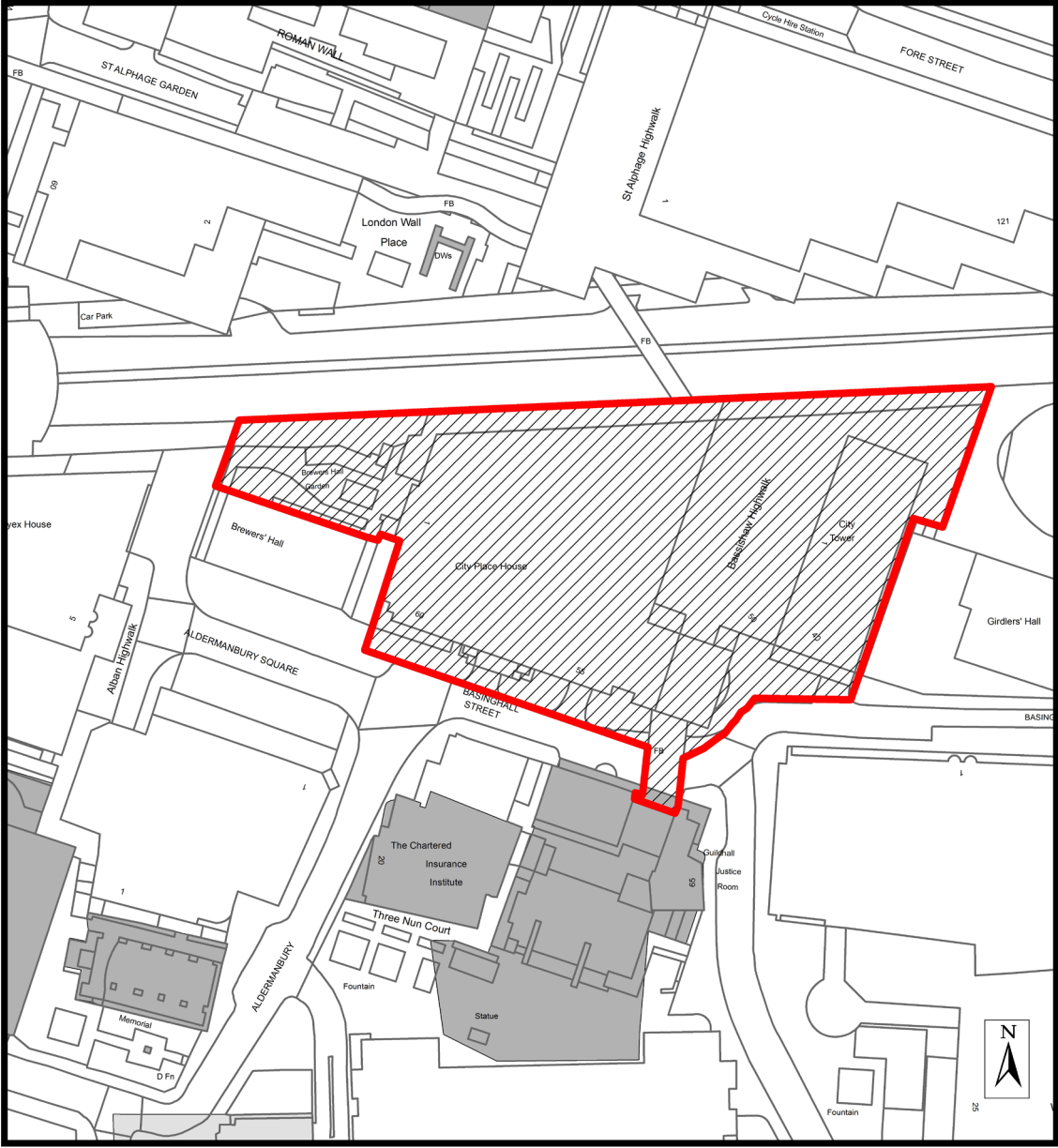
(3) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

(4) The Mayor of London be given 14 days to decide whether or not to direct the council to refuse planning permission (under Article 5)1)(a) of the Town and Country Planning (Mayor of London) Order 2008).

(5) Delegate authority to the Comptroller and City Solicitor and Planning and Development Director to negotiate a City walkway agreement for the proposed City walkway.

(6) That the accompanying application for listed building consent is granted (ref. 21/00201/LBC).





Site Location Plan



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ADDRESS:
 City Tower and City Place house
 40-45 & 65-65A Basinghall Street,
 London EC2V

CASE No.
 21/00116/FULMAJ & 21/00201/LBC

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



DEPARTMENT OF THE BUILT ENVIRONMENT



City Tower and City Place House looking west along London Wall



**Walkway Bridge between 65/65a Basinghall Street and City Place House
(looking west along Basinghall Street)**



City Place House on Basinghall Street, taken from the walkway bridge looking west



Existing podium level terrace, looking south towards 65/65a Basinghall Street

Main Report

Site and surroundings

1. The application site is located between London Wall (to the north) and Basinghall Street/Basinghall Avenue (to the south). It comprises:
 - **City Place House, 55 Basinghall Street (24,387 sqm GIA)** – A granite clad office building (Class E) built between 1988 and 1992 with two basements levels, a ground floor level and eight storeys plus plant (58.5m AOD to 65.3 m AOD). The building incorporates a pedestrian route (permissive path) at first floor level along its London Wall (north facing) frontage. The route provides a connection between podium level and London Wall (ground level) via a staircase that is integrated into the north western corner of the building. The building's main entrance and servicing access are off Basinghall Avenue/Basinghall Street.
 - **The podium level (ground and mezzanine floors) of City Tower, 40 Basinghall Street (4,989 sqm GIA)** – City Tower is a 21 storey office building (Class E) that dates from the 1960s (82.2) m AOD). It comprises a rectangular tower sitting above a podium level. The podium abuts City Place House, with an internal connection provided between the two buildings at basement level.
 - **City Tower podium level terrace** – The podium incorporates a landscaped terrace that is sited between City Tower and City Place House. It connects to the upper walkway bridges over London Wall and Basinghall Street and to the pedestrian route along the London Wall frontage of City Place House.
 - **65/65A Basinghall Street and associated City walkway bridge link over Basinghall Street** – The bridge links the City Tower podium level terrace with the grade II listed 65/65a Basinghall Street. 65/65A Basinghall Street was built in 1966-9 by Richard Gilbert Scott in a modern expressionist style.
 - **Brewers Hall Gardens** – City owned gardens to the west of the site containing the bronze gardener statue.
2. Ramped access to the London Wall car park (located below the carriageway between Noble Street to the west and Coleman Street to the east) is provided on the west side of City Place House. A pipe subway runs beneath the London Wall footway on the north side of the site. A disused Post Office Railway tunnel runs beneath the south side of the site in a southwest-northeast direction. Major utilities intakes are located beneath the site on London Wall and Basinghall Street.
3. The site is not within a conservation area. The northern boundary of the Guildhall Conservation Area is to the south of the site (adjacent to the Guildhall North Wing) and the Barbican and Golden Lane Conservation Area is to the north of the site (part of the southern boundary runs along Fore Street, Monkwell Square and a part of London Wall opposite Noble

- Street). The western boundary of the Bank Conservation Area lies on Coleman Street, a short distance to the east of the application site.
4. The site is within the immediate or wider setting of the following listed buildings 65-65A Basinghall Street (grade II), The Guildhall (grade I), Church of St Lawrence Jewry (grade I), 20 Aldermanbury (grade II), Remains of Tower of St Alphage Church (grade II), Former Guildhall Library and Museum (grade II*), 13-14 Basinghall Street (grade II), the Barbican Estate (grade II), Wood Street Police Station (grade II*), Salters' Hall (grade II), remains of the footings of former Church of St Mary the Virgin Love Lane (grade II), Monument to John Heminge and Henry Condell (grade II), 1 Cornhill (grade II), Bank of England (grade I), 1-6 Lombard Street (grade II), 1 King William Street (grade II), St Mary Woolnoth Church (grade I).
 5. The nearby Barbican Estate landscape is included on the Historic England "Register of Parks of special historic interest in England" and has grade II* listed status, designated in 2003.
 6. The Landmark Background Assessment Area of the Westminster Pier to St Paul's viewing corridor (LVMF 8A.1) diagonally crosses City Place House.
 7. The site is within the North of the City Key City Place as defined by the adopted Local Plan 2015 and abuts the boundary of the Smithfield and Barbican Key Area of Change as defined by the emerging City Plan 2036.
 8. The site is well connected by public transport links. Moorgate station is approximately 400 metres to the north east and Bank Station is within 500 metres. A new Elizabeth Line is due to be opened at Liverpool Street station with a ticket hall at Moorgate. There are several bus stops in close proximity to the site and Quietway 11 runs 150 metres to the west providing good access to the strategic cycle network.

Site History

9. On the 12th January 2012 planning permission (ref. 11/00630/FULL) was granted for the re-modelling of the City Place House and City Tower facades, refurbishment and re-modelling of the reception areas to the respective buildings and public realm improvements at ground and podium level. The scheme was subsequently amended under two amendment applications 12/00168/FULL and 12/00947/NMA to enable alterations to the design of the scheme.

Proposal

10. Planning permission is sought for:
 - Demolition of City Place House and its replacement with a new 13 storey Class E building comprising two basement levels, a ground floor level, 12 upper storeys and roof plant (43,272 sqm GIA, 61.4 m

AOD – 69.54 m AOD). It would incorporate office (43,272 sqm GIA) and retail uses (160 sqm GIA), cycle parking, landscaped areas and terraces for use by the occupiers of the building and would be serviced from Basinghall Street. Three trees on Basinghall Street would need to be removed in order to accommodate the new building. Replacement tree planting is proposed.

- The partial demolition and reconfiguration of the City Tower podium (Class E, 2,288 sqm GIA) to provide flexible commercial units (881 sqm GIA retail, restaurant, café, gym) and office use (1,407 sqm GIA) and a re-designed podium level terrace with landscaping, publicly accessible exercise equipment, seating and a publicly accessible lift access between podium and ground floor level.
- The provision of affordable office space within City Tower comprising 12 workstations with ancillary space whereby Great Portland Estates would fund up to 50% of the cost of the space.
- Demolition of the existing bridge link over Basinghall Street and the installation of a replacement bridge link.
- The provision of a new pedestrian route at street level with landscaping, between Basinghall Street and London Wall.
- Enhancement of Brewers' Hall Gardens through the provision a new landscaping scheme. The developer would provide £200k through a S106 agreement, towards the costs of this work which would be undertaken by the City.

11. An accompanying application for listed building consent (ref. 21/00201/LBC) has been submitted to cover the works to the grade II listed 65/65a Basinghall Street in respect of the removal of the existing bridge and the fixing of a replacement bridge. This report covers an assessment of the application for planning permission and the associated listed building consent.

12. The applicant's primary objectives for the development are to regenerate this key City site by:

- Providing high quality flexible office floorspace that contributes to the City's role as the world's leading business centre.
- Developing a building with exemplary sustainability credentials.
- Upgrading the public realm to include the provision of a new pedestrian route.
- Improving the City walkway and the planting and landscaping to the podium level terrace and Brewers Hall Gardens.
- Providing a retail and amenity offer at ground floor level which is currently lacking in the surrounding area.

Consultation

13. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders prior to the submission of

the applications. Given the impact of the COVID-19 pandemic remote engagement and consultation activities were undertaken comprising:

- Digital briefings with Bassishaw Ward Members, the Barbican Residents Association and the Brewers' Company.
- Delivery of 1,818 flyers to local residents and businesses advising them of the online consultation.
- An online consultation via a website. The website has remained live and been receiving feedback since the 30th November 2020.
- A live webinar
- Consultation letters

14. The views of relevant City of London departments have been sought and taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the section 106 agreement.

15. Following receipt of the applications for planning permission and listed building consent they have been consulted upon and advertised on site and in the press. As part of the assessment of the applications additional information was received in respect of several matters including circular economy principles, design amendments, the scheme's cultural offer and additional transportation information. As a result, neighbouring residential occupiers and the Barbican Association were further consulted on the application for 14 days.

16. Copies of relevant correspondence making representations are attached in full and appended to this report. A summary of the representations received, and the internal and external consultation responses are set out in the tables below. This includes the receipt of 13 objections from neighbouring residential occupiers to the first round of consultation in conjunction with the planning application and, one letter of objection in response to the second round of consultation. One comment (neither objecting to nor supporting the proposal) was received in conjunction with the consultation on the application for listed building consent.

Consultation Responses	
Greater London Authority	<p>The proposal is supported in principle, notwithstanding, the application does not currently comply with the London Plan for the reasons set out below:</p> <p>Land use principles: The proposed intensification of the site for office led development with retail functions at lower floors is considered consistent with the CAZ and acceptable in principle subject to further consideration of flexible and affordable workspace.</p>

	<p>Urban Design/LVMF: The overall design approach is complementary to local context and is acceptable subject to some clarification on the materiality on the upper floors of the proposed office building. The public realm is much improved and there is negligible impact to the protected views of Westminster Pier to St Paul.</p> <p>Heritage: There is some small scale, less than substantial harm identified to the Guildhall, however on balance the public benefits of the scheme with the much enhanced public realm and local pedestrian connectivity could be considered to outweigh the less than substantial harm identified to the significance of the Grade I listed Guildhall. This harm could be further diminished by confirmation of a more neutral colour pallet to backdrop of the Guildhall spire. GLA officers will conclude the balancing exercise once the final package of public benefits is confirmed at Stage II.</p> <p>Transport: the proposed development broadly complies with the London plan subject to:</p> <ol style="list-style-type: none"> 1. Clarification over cycle parking/facilities. 2. A pedestrian comfort level assessment of the new walkway given that it would be narrower than existing. 3. Contributions towards wayfinding and the strategic cycle network being secured. 4. Provision of a construction logistics plan and road safety audit given the close proximity of Quietway 11 to the site. 5. Electric charging points, a Cycling Promotion Plan and Delivery and Servicing Plan being secured by condition. 6. Clarification on whether the new north/south pedestrian route would be a shared space for walking and cycling subject to further re-design and a Stage 1 Road Safety Audit and Designer's Response prior to determination. <p>Sustainable Development: Further information is required to ensure the development is consistent with the objectives of the London Plan with regards to Energy, Whole Life Carbon Cycle, Circular Economy/Waste, Urban Greening, Biodiversity, Drainage and Air Quality.</p> <p>Regarding sustainable development further information is required to address the following strategic areas:</p> <ol style="list-style-type: none"> 1. Update required to the refurbished baseline.
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	<ol style="list-style-type: none"> 2. Further energy efficiency measures should be considered and proposed to the refurbished element. 3. Further information required on the proposed Citigen district heating connection and should also reconsider the potential to utilise cooling. The heat loads connected to the network should be maximised. 4. Further information required on the PV potential. 5. Confirm the carbon offset approach with the borough. 6. Address the Whole Life-cycle Carbon and Be Seen policies. 7. A circular economy statement should be submitted. 8. The UGF calculation should be based on the total site area. 9. The applicant should provide evidence that the development secures a net biodiversity gain. 10. An Air Quality Assessment should be made available for review.
<p>Officers Comments</p>	<p>Provision of affordable and flexible workspaces is addressed in the economy and office use section of the report. Affordable office space would be provided as part of the proposal in the form of 12 desk spaces within City Tower. This would be secured through the S.106 agreement.</p> <p>Design and heritage matters are addressed in the design and heritage sections of the report. Since the submission of the application the applicant has further worked on the design, materiality and colour palette of the building in order to limit impact on local views, the Guildhall Conservation Area and the setting of the grade I listed Guildhall.</p> <p>Transportation issues are addressed in the transport sections of the report a summary of which is as set out below (the numerical ordering corresponds with the order of issues as set out above):</p> <ol style="list-style-type: none"> 1. The proposed levels of cycle parking are policy compliant. Final details of the arrangement and complementary facilities e.g. bike charging, showers, lockers etc would be secured by condition. 2. Regarding pedestrian comfort officers are satisfied that sufficient information has been provided by the applicant. The applicant has shown through a PCL

assessment that the existing level of use of the elevated walkway is low. Therefore there would be ample spare capacity on the narrowed walkway to support any uplift in pedestrians that would arise as part of this scheme.

3. A contribution towards wayfinding would be secured through the S.106. The GLA's suggestions for improvements to the cycle network have been taken into consideration. The applicant has agreed to enter into a section 278 agreement to enable improvements to the cycling infrastructure along London Wall.

4. A construction logistics plan, to include a road safety audit would be secured by condition.

5. Electric charging points, a Cycling Promotion Plan and Delivery and Servicing Plan would be secured by condition or through the S.106 agreement.

6. A safety audit would be carried out for the proposed pedestrian route to determine whether it could be used by cyclists and pedestrians as requested.

Sustainability issues are addressed in the sustainable development sections of the report. The applicant has provided further information in order to address the matters that have been raised (the numerical ordering below corresponds with the numbering of the issues set out above):

1 and 2 - The applicant's energy and sustainability consultants have submitted further information containing figures for the refurbished element of the scheme and details of the energy efficiency measures to the refurbished element which include upgrading the building services, thermal elements and replacement of the windows.

3. The cooling and ventilation strategy includes Air Source Heat pumps and Air Source Chillers, and the space heating would be provided via rejected heat from the cooling process in combination with a connection to Citigen. The Citigen connection would account for a further 20.1% of carbon emission savings. The use of a District cooling connection was considered, however Citigen has confirmed that this is inadequate cooling capacity to serve the new office building.

	<p>4. A roof mounted PV installation of 122 panels that are 1.8sqm each is proposed. It is anticipated that the PV panels would have an annual electricity output of 35,900 kWh/yr. They would meet the landlord energy demand of the building, such as for energy input to heat pumps, lighting of communal areas and lifts.</p> <p>5. A S.106 clause would be included requiring reconfirmation of the energy strategy approach at completion stage and a carbon offsetting contribution to account for any shortfall against London Plan targets.</p> <p>6. A S.106 clause would be included to confirm the applicant's commitments set out in the submitted Metering, Monitoring and Billing Strategy in accordance with the GLA's "Be Seen" Energy Monitoring Guidance.</p> <p>7. The applicant has submitted a circular economy statement which sets out the reasons why it would not be feasible to retain City Place House and details of how the new office building would conform to circular economy principles.</p> <p>8. The applicant's have carried out a UGF calculation based on the site area and a UGF calculation based on omission of certain areas of the site (the calculation that gives a UGF of 0.3). Officers have requested that Brewer's Hall Gardens is not considered in the calculations as details of the planting to this area is to be confirmed at a later stage. City Tower and a section of footway was also not included in the latter calculation as physical works would not take place to these areas and therefore, they have no scope for greening. Officers consider that this is a satisfactory approach and that the scheme would significantly enhance the greening to this area of the City.</p> <p>9. A biodiversity net gain calculation has been carried out and it is predicted that the proposal would result in a net percentage change of 348.63% using green roofs, tree planting and flower rich perennial planting.</p> <p>10. An Air Quality assessment has been submitted which demonstrates that the scheme would meet the GLA's air quality neutral benchmarks for transport and building emissions.</p>
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<p>Barbican Association</p>	<p>Objection on the following grounds:</p> <p>Circular Economy - Given the City of London’s Climate Action Strategy concern is raised that a relatively new building is to be demolished and replaced with a larger building. The demolition would create pollution and give rise to an increase in carbon emissions.</p> <p>Unwarranted increase in height and mass – we are aware that the proposed building would be higher. The consultation process failed to supply residents with precise information about the proposed height with approximations of 10m – 11m given by the developers yet the Statement of Community Involvement quotes a height increase of 30m. There is an escalation in building height around the Barbican which is creating a “canyonisation” of this listed Estate. The proposed increase in building size would result in a doubling of the number of workers.</p> <p>Loss of Daylight/Sunlight – The increase in height and bulk is unwarranted and will lead to diminution of residential amenity contrary to policies DE8 and HS3 of the Draft Local Plan 2036. We disagree with the Daylight Sunlight survey which states that the scheme would have little or no adverse impact on daylight/sunlight levels to residential properties. The proposal will lead to loss of daylight and sunlight levels in neighbouring properties including Andrewes House, Willoughby House and Roman House. The applicant has not considered the cumulative impact of individual developments on the amenity of existing residents which is required by Draft Local Plan Policy H3. The VSC and ASPH do not account for the fixed balconies on the residential dwellings, thereby under representing the true impact on residents. The decision to exaggerate the height of the walls surrounding the north west plant room have been taken without proper regard as to how this would impact on the daylight and sunlight received in affected flats.</p> <p>Way forward – The applicants should maintain the height of the building at its existing level. The Highwalk between London Wall and the Guildhall should be accessible for as long a period as possible while the works are carried out.</p>
<p>Officers Comments</p>	<p>The comments regarding circular economy principles and the retention of the existing building are addressed in the sustainability sections of the report. The applicant has submitted a detailed Circular Economy statement which outlines the reasons why it</p>

	<p>would not be feasible to retain City Place House and provides details on how the proposed office building would be designed to adhere to circular economy principles.</p> <p>Comments regarding design and impact on the Barbican are addressed in the design and heritage sections of the report. It is not considered that the proposal would adversely affect the setting and the contribution that the setting makes to the significance of the listed Barbican Estate and the proposal would not harm the significance or setting of the Barbican and Golden Lane Conservation Area. The proposed height of the building is considered appropriate for this part of the City, outside of a conservation area. The height would be in keeping with the scale of development in the area and would not detract from townscape.</p> <p>Concerns over daylight/sunlight are addressed in the daylight/sunlight section of the report. The balconies on Andrewes House were taken into account in the calculation of the figures and the cumulative effect of the proposal has been considered. It is acknowledged there are two living rooms within Andrewes House that would not be BRE compliant in respect of the daylight distribution test as a result of the proposal. Although there would be a breach of the BRE guidelines, it is the view of officers that daylight would not be reduced to unacceptable levels as there is no beach of VSC guidelines and the breach of daylight distribution is only marginally below the 0.8 guideline.</p> <p>With regard to concerns about information presented by the applicant during the consultation stage of the application, the applicant has advised that the reference to a height increase of 30 m was a typographical error and was corrected with concerned residents notified of the correction – that the building would be ground plus 12 storeys and that the height difference would mainly be 10 m.</p>
Thames Water	<p>No objection with regard to combined waste water network infrastructure capacity. Informatives and conditions recommended in order to ensure no damage to sewers, water mains or waste water assets.</p> <p>It has been identified that there is an inability of the existing water network infrastructure to accommodate the</p>

	<p>needs of this development. Liaison is needed with the developer in order to address this. A condition is recommended to specify that the development could not be occupied until confirmation has been provided that all water network upgrades required to accommodate the additional flows to serve the development have been completed or that an infrastructure phasing plan is agreed with Thames Water.</p>
Officers Comments	The recommended conditions and informatives have been included, see the conditions schedule.
Andrewes House Group	<p>The height increase would restrict access to daylight and sunlight.</p> <p>The pedestrian access to Basinghall Street and the new lift access are welcomed.</p> <p>It is disappointing that the highwalk will be removed again albeit for a temporary period. Is it possible to impose a planning condition to limit the time that the highwalk would be unavailable for residents?</p> <p>Concern that the building is only 25-30 years old and is due to be demolished with all the pollution associated with demolition and construction and the increase in carbon emissions during this period.</p> <p>Planning conditions should require full implementation of the recommendations of the ecological survey to ensure that the building complies with the requirements for a greener, cleaner more bio diverse City.</p>
Officers Comments	<p>Concerns regarding daylight and sunlight are addressed in the daylight and sunlight section of the report. It is acknowledged there are two living rooms within Andrewes House that would not be BRE compliant in respect of the daylight distribution test as a result of the proposal. Although there would be a breach of the BRE guidelines, it is the view of officers that daylight would not be reduced to unacceptable levels as there is no beach of VSC guidelines and the breach of daylight distribution is only marginally below the 0.8 guideline.</p> <p>Comments regarding the highwalk are addressed in the City walkway section of the report. A City Walkway agreement would be secured through the S.106 in order to minimise the duration of closure of</p>

	<p>the highwalk during construction and to ensure that alternative walking routes are provided.</p> <p>Concerns regarding the demolition of the existing building are addressed in the circular economy section of the report. The applicant has submitted a detailed circular economy report which presents the reasons why the existing building cannot be retained and details how the design of the proposed office building would adhere to circular economy principles.</p> <p>Planning conditions are recommended requiring further details of the landscaping, green walls, planting and tree planting in accordance with the recommendations in the submitted ecological survey.</p>
London Borough of Tower Hamlets	No objection to the proposal.
City of Westminster	No comments on the proposal.
Twentieth Century Society	Confirmed that they do not wish to comment on the application.
Natural England	No comments on the proposal.
Lead Local Flood Authority	Recommends two SUDS conditions should the development be approved.
Officers Comments	The recommended conditions are included in the conditions schedule.
Environmental Health (including Air Quality)	Recommends conditions covering noise, odour, air quality, non-road mobile machinery and a scheme of protective works.
Officers Comments	The recommended conditions are included in the conditions schedule.
Access Officer	Access related comments were submitted to the applicants and they responded on the matters raised. The following text sets out the comments that were raised and the response from the applicant:

	<ul style="list-style-type: none">- A platform lift should be provided, and not seasame steps as proposed, between the office lobby and café on the ground floor of the new office building. The applicant has agreed to explore the potential for a platform lift at detailed design staged. A condition is recommended requiring details of the access between the office lobby and the café, noting that it is preferable that a platform lift is provided.- The layout of the north-western wheelchair accessible WC on the ground floor of the office building would not be part M compliant. The applicant has provided evidence to confirm that compliant layout could be achieved, and this would be secured by condition to be dealt with at detailed design stage.- Left and right hand transfer wheelchair accessible WC facilities should be provided at ground and first floor level. The applicant has confirmed that it would be possible to achieve this. Details would be secured by condition.- The wheelchair accessible facilities in the new office building should have outward opening doors as opposed to inward as proposed. The applicant agrees but notes that inward may be possible if sufficient space is provided in the facility or if there was a mechanism that allowed them to be outward opening in the case of an emergency. Further details of the opening mechanisms would be secured by condition.- Step free access should be considered between the ground and mezzanine level of the commercial units in the City Tower podium. Since the proposal was originally submitted the mezzanine level of the commercial units has been removed by the applicant and therefore step free access is no longer an issue.- It is disappointing that stepped access is proposed to the ground floor lounge and meeting room. The applicant has confirmed that the step has now been removed.- A single step is proposed to the City Tower podium basement shower and changing facilities which is disappointing. The applicant has confirmed that a ramped alternative is being investigated. Further details would be secured by condition.- There is concern that the angled columns to the new office building could constitute a hazard and would not be detectable at ground level by a white cane user. The
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	<p>applicant has advised that protection would be provided where the headroom would be less than 2.5 metres in the form of landscaping and short stay cycle parking, further details of which would be provided at detailed design stage and would be secured by condition.</p> <ul style="list-style-type: none">- The existing Basinghall Street and London Wall bridges have permeability that allows views for wheelchair users. It is disappointing the proposed Basinghall Street bridge would have a solid construction. The applicant has advised that the bridge has been designed as such due to the required height and span. Notwithstanding, this matter will be taken into consideration as detailed designs for the bridge are worked up. Further details of the bridge would be secured by condition.- It is noted that one disabled persons parking bay would be retained in City Tower. However, there would be no off street provision for the new office building. It is queried whether an assessment of on street provision has been carried out in order to establish whether there is capacity in the locality. The applicant has advised that there is one on street bay outside of the building's western entrance and there is another bay on Aldermanbury within 50 m from the entrance. There is a dedicated disabled bay on Basinghall Street circa 100 m from the site which falls within the 150m maximum distance recommended for a wheelchair user. The applicant has advised that no formal monitoring has been undertaken of the usage of these facilities as demand for disabled parking in central London offices tends to be low given many stations and all bus services offer step free access.- 5% of the proposed cycle parking spaces would benefit people who are unable to use tow -tier or semi-upright racks. 5% of spaces should be capable of accommodating a larger cycle which can be up to 1.2 metres wide. For the new office building only 1% of spaces would be 800 mm or wider and for City Tower only 2% of spaces would be 800 mm or wider. The applicant has advised that 5% of the non-standard spaces would include a mix of spaces of differing widths to accommodate different types of cycles. Signage would be added to the spaces to secure their correct uses. The accessible cycle parking spaces would be secured by condition as part of details of the cycle parking for the development.
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Officers Comments	The matters raised are addressed through the conditions schedule.
City of London Open Spaces	<p>The proposals to remove and replace the three street trees on Basinghall Street are satisfactory. The proposed trees would be overhung by the building but the proposed soffit height would be sufficient for an appropriately selected species. The exact tree planting position and species would need to be approved through condition or a S278 agreement.</p> <p>The Brewers' Hall Garden site is shown indicatively in the application as being replanted and with an increase to the area of planting. Improvements to the appearance to the existing structures and additional seating are also proposed. The existing trees are to be retained here. The Developer is to provide £200k through a S106 agreement, towards the costs of this work which will be undertaken by the City. This will allow the details of the design to be developed by the City. The amount is not envisaged to allow for any significant reordering of the vents and underground structures associated with the underlying electricity substation, etc. There is potentially the opportunity to redesign this garden in conjunction with the emerging public realm project associated with St Paul's / Museum Gyrary area project, which extends along London Wall.</p> <p>We welcome the general improvements to the public realm and increased permeability of the site from London Wall through to Basinghall Street and beyond. I understand the detailed design of the City Tower Podium will take into consideration public safety and allow for passive surveillance of the residual public realm landscaping, particularly to the east of City Tower.</p>
Officers comments	Further information regarding the trees is provided in the greening section of the report. Relevant obligations regarding replacement tree planting and Brewers' Hall Gardens are covered by conditions and within the financial contributions section of the report.

Objection from Neighbouring Residential Occupiers	
Grounds of Objection first round of consultation	Number of times objection raised
Daylight and Sunlight Impact	11

<ul style="list-style-type: none"> • Increase to the height of the building would restrict access to daylight and sunlight for residents and surrounding streets. The loss will be substantial to some residents – a 20% loss seems like a conservative estimate. The impact of the scheme on residential properties has not been treated as a priority. • The VSC and APSH do not take account of the oversailing fixed balconies/fire escapes in the Barbican residences and in doing so they under represent the real effect of the north elevation on residents. • The impact of this development should not be considered in isolation as residents suffer from incremental erosion with each successive development 1 and 2 London Wall Place had a detrimental impact and the City should limit the height of new development so as not to further erode visibility of the skyline and light. <p>Officer Comments: The impact of the proposal on daylight and sunlight is fully detailed in the daylight and sunlight section of the report. The balconies on Andrewes House were taken into account in the calculation of the figures and the cumulative effect of the proposal has been considered. It is acknowledged there are two living rooms within Andrewes House that would not be BRE compliant in respect of the daylight distribution test as a result of the proposal. Although there would be a breach of the BRE guidelines, it is the view of officers that daylight would not be reduced to unacceptable levels as there is no breach of VSC guidelines and the breach of daylight distribution is only marginally below the 0.8 guideline.</p>	
Design, Heritage and Views	
<ul style="list-style-type: none"> • Views of the Shard would be lost from my apartment. 	2
<ul style="list-style-type: none"> • The height of the building is not in keeping with neighbouring buildings. The height should be reduced to the same height as the existing City Place House. 	4
<ul style="list-style-type: none"> • The building would give off light in the night which affects residents and wildlife. 	1
<ul style="list-style-type: none"> • The design of the building is awful and this is an example of the Barbican being boxed in. The top two floors should be set back in order to reduce the impact of the oppressive effect. 	5

<p>Officer comments: Concerns regarding the height of the building and the impact of the proposed development on the setting of the Barbican are addressed in the Design and Heritage sections of the report. It is not considered that the proposal would adversely affect the setting and the contribution that the setting makes to the significance of the listed Barbican Estate and the proposal would not harm the significance or setting of the Barbican and Golden Lane Conservation Area. The proposed height of the building is considered appropriate for this part of the City, outside of a conservation area. The height would be in keeping with the scale of development in the area and would not detract from townscape. The proposal is considered to constitute high quality architecture that would be appropriate for this area of the City.</p> <p>Regarding light spillage a condition is recommended requiring details of a full lighting strategy to include details of controls for the internal lighting.</p> <p>Loss of view from a residential dwelling is not a material consideration in the determination of planning applications.</p>	
<p>No requirement for further office space in the City</p> <ul style="list-style-type: none"> • It is most likely that the offices would be empty and we don't need more office space in the City. <p>Demand for office space is addressed in the economic development and office space sections of the report. 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.</p>	2
<p>Impact on the walkways</p> <ul style="list-style-type: none"> • It is disappointing that the scheme would remove, albeit for a temporary period, the highwalk over London Wall and the access to the Guildhall North Wing. • It is important that the amount of time between the closure of the existing walkway and the opening of the new one is minimised, and that the Corporation secures step in rights and funding by 	3

<p>way of bond to enable it to secure the completion/opening of the new walkway in the event of the developer but not completing the redevelopment scheme.</p> <p>The impact of the proposal on the walkway is addressed in the City walkway section of the report. A City Walkway agreement would be secured through the S.106 in order to minimise the duration of closure of the highwalk during construction and to ensure that alternative walking routes are provided.</p>	
<p>Circular Economy</p> <ul style="list-style-type: none"> • It is concerning that a building which is 25-30 years old is to be demolished and rebuilt by another building that is likely to have a 20 year life span given the pollution associated with demolition and the substantial increase in carbon emissions. This is not good for the environment. <p>Options around the re-use of the building are addressed in the circular economy sections of the report. The applicant has submitted a detailed Circular Economy report which sets out the reasons as to why it would not be feasible to retain the existing building and details how the proposed new office building would adhere to circular economy principles.</p>	3
<p>Inadequacies in the pre-submission consultation and the planning submission</p> <ul style="list-style-type: none"> • The consultation exercise lacked information about the height of the proposed building. Inaccurate figures and approximate response were given. • Long sections are absent from the planning submission and the building sections that are supplied are through the lower parts of the building. This and the misleading VSC information make proper judgement impossible. <p>Officers have raised the concerns about the pre-submission consultation period with the applicant. The applicant advised that one of the figures presented regarding the height of the proposed building was an error. The applicant advised that the error was corrected, and concerned Barbican residents were notified that the building would be ground plus 12 storeys and that the height increase would be approximately 10 metres.</p>	2

Officers consider that sufficient information has been provided in the plans and suite of supporting documentation to detail the proposed development and enable a full assessment of its impacts.	
Comments in support The proposal to create a pedestrian access to Basinghall Street and the activation of London Wall is welcomed.	2
Grounds of Objection second round of consultation	Number of times objection raised
The additional information that had been submitted has not removed or improved the adverse unacceptable impact on residential properties north of London Wall – no attempt had been made to reduce the height of the building and impact it has on daylight sunlight, the daylight and sunlight calculations still do not reflect the actual situation in terms of balconies and fire escapes and no long sections of the scheme have been provided making a proper judgement of the proposal impossible. Officer comments: The additional information provided further details on elements of the proposal including culture, air quality and sustainability and revisions to the design in order to minimise impact on the setting of the grade I listed Guildhall. Concerns over daylight and sunlight and long sections are addressed in the officer comments responding to matters raised in the first round of consultation (see above).	1

Policy Context

17. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
18. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020 and January 2021. The draft City Plan 2036 has been published for consultation under Regulation 19 of the

Town and Country Planning (Local Planning) (England) Regulations 2012. As such, it is a material consideration in the determination of applications, although limited weight can be given to the policies at this stage in the plan's preparation.

19. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2019 and the Planning Practice Guidance (PPG) which is amended from time to time.
20. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure (GLA May 2015), Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.
21. Relevant City of London Guidance and SPDs comprise Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, July 2014). Open Space Strategy (COL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Culture Mile Strategy (2018); Cultural Strategy 2018 – 2022 (CoL 2020), and relevant Conservation Area Summaries.

Considerations

Relevant Statutory Duties

22. 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, local finance considerations 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).
23. In considering whether to grant planning permission for development which affects a listed building or its setting, the Corporation shall 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).

24. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall 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.

NPPF

25. The NPPF states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
26. Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
- a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - c) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed;
 - d) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
27. 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)

28. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
29. Paragraph 80 of the NPPF states that “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth in productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
30. Chapter 8 of the NPPF states that planning decisions should aim to achieve healthy, inclusive and safe places. Paragraph 92 seeks to ensure that planning decisions plan positively for the provision and use of shared spaces, community facilities, including public houses and other local services to enhance the sustainability of communities.
31. 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”.
32. 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”.
33. 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”.
34. 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.
35. 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.

36. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 190 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
37. Paragraph 193 states "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."
38. Paragraph 194 states that any harm to, or loss of, significance of a designated heritage asset (from its alteration or destruction or from development within its setting) should require clear and convincing justification.
39. Paragraph 196 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."
40. 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."

Other Guidance

41. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets and Note 2 Managing Significance in Decision-Taking in the Historic Environment.

Considerations in this case

42. In considering this planning application and listed building consent account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
43. 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 to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

44. The principal over-arching issues in considering this application are:

- The extent to which the proposals comply with the relevant policies of the Development Plan.
- The extent to which the proposals comply with Government guidance (NPPF).
- The application of the duty, when considering whether to grant planning permission, to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses when determining the planning application and the duty 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 when considering whether to grant listed building consent.

45. The principal site specific issues in considering this application (in accordance with the over-arching issues above) are:

- Whether the proposal would comply with the aspirations for the North of the City Key City Place.
- Economic development and the provision of additional office accommodation.
- The introduction of potential retail and leisure uses on the site.
- The acceptability of the scheme in design and heritage terms including impact on heritage assets and an assessment of the proposed public realm alterations and consideration as to whether fire safety has been taken into account in the design.
- The impact of the proposal on any archaeology beneath the site.
- The accessibility and inclusivity of the development.
- The impact of the proposal in highway and transportation terms including an assessment of the acceptability of the City walkway proposals.
- The impact of the proposal in terms of environmental sustainability.
- The microclimatic impacts of the proposal.
- The impact of the proposal on air quality.
- The impact of the proposal in daylight and sunlight terms.
- The results of the Health Impact Assessment.
- The requirement for financial contributions

Aspirations for the North of the City Key Place

46. The site is identified as being within a rejuvenation area in the North of the City Key Place as defined by the Local Plan 2015 and therefore

policy CS5 needs to be taken into consideration in the assessment of the application.

47. The north of the City is an area where the construction and operation of Crossrail will bring major benefits to the City. It is recognised that the completion of Crossrail will increase the area's attractiveness to new development and would result in more pedestrians moving to and from Crossrail stations through surrounding areas. Policy CS5 requires improvements to pedestrian and cycle routes in this area to maintain effective and efficient pedestrian and cycle flows, including for disabled people. It also seeks to ensure the retention and improvement of pedestrian permeability and connectivity at ground and high walk level through large sites including the Barbican.
48. Whilst sustainability issues are relevant across the City, this area is envisaged as leading the way as an 'eco design' district where development should capitalise on opportunities for improved cycle infrastructure and access to the combined cooling heat and power network in the area. Policy CS5 makes specific reference to developments incorporating SuDs strategies and requiring innovate design solutions to mitigate and adapt to the impacts of climate change.
49. This area has the City's largest residential population and therefore residents' needs should be identified and met including protection of residential amenity, community facilities and open space.
50. Policy CS5 seeks to promote the further improvement of the Barbican area as a cultural quarter of national and international significance.
51. In the emerging City Plan 2036 the North of the City Key Place becomes the Smithfield and Barbican Key Area of Change and the site is no longer within but abuts the boundary of this area designation. It is envisaged that a vibrant, mixed use area would be created. This includes the formation of the cultural quarter known as the Culture Mile which is focused on the Barbican and Museum of London.
52. It is considered that the proposal would fulfil the aspirations for the North of the City in accordance with policy CS5 of the Local Plan and would complement the aspirations for the Smithfield and Barbican Key Area of Change given its location on the periphery of this area.
53. The proposed new pedestrian route linking Basinghall Street with London Wall has been designed to improve the permeability of the area and provide further potential linkage with the Moorgate Crossrail entrance to the north. Proposed improvements to the high walk and the provision of a step free access between ground and high walk level would further improve permeability and the variety of routes in the area.

54. Improved amenity spaces would be provided for use by the public, including residents through the provision of the re-landscaped terrace and proposals for improvements to Brewers' Hall gardens.
55. The impact of the proposal on residents would be given careful consideration. A Scheme of Protective works would be required by condition in order limit the impacts of the construction of the development in terms of noise, dust and vibration. The impact of the development on the daylight and sunlight available to neighbouring residential occupiers is set out in the daylight and sunlight section of this report. It would be ensured that alternative walking routes are available while areas of the high walk would be closed during construction, further details of which would be provided by the S.106 agreement as part of details of the City Walkway works.
56. The proposal would be of a high quality design and would embody excellent sustainability credentials. It would incorporate a connection to Citigen, measures to adapt to the impacts of climate change and a SuDs strategy as set out in more detail in the sustainability section of this report.
57. The proposal recognises the role that culture will play in the north of the City. In line with policy S6 of the emerging City Plan 2036 a Cultural Plan has been submitted in conjunction with the proposal. This sets out how areas of enhanced public realm provided by the proposal including the City Tower podium garden could be used as flexible spaces for art installations, performances or group classes. The applicant would commission an artist to deliver high quality art interventions within the public realm and building fabric. It is envisaged that the building's soffits would provide a suitable opportunity for the incorporation of artwork. Further details of the artwork and its location would be secured through the S.106 agreement. The proposed enhancements to the public realm, including the high walk and the formation of the new pedestrian route would enhance pedestrian routes leading to the Culture Mile.

Economic Development and the Provision of Office Accommodation

58. 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 £69 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.

59. 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.
60. 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 a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to enter and flourish in the City.
61. Planning policy supports economic growth. 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.
62. 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.
63. The London Plan 2021 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 SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

64. The London Plan projects future employment growth across London, projecting an increase in City employment. 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.
65. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
66. 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 flexible and adaptable 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.
67. 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.
68. One letter of objection contested whether more office space is needed in the City. 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.

Proposed Office (Class E) Provision

69. The application site currently accommodates 24,387 sqm (GIA) of office space on the City Place House site and 4,989 sqm (GIA) of office space within the City Tower podium. The application proposal would deliver 43,112 sq.m (GIA) of office space on the City Place House site and 1,407 sq.m (GIA) of office space in the newly configured podium of City Tower (the quantum of office space in City Tower would remain unchanged as a result of the proposal).
70. There would be a loss of 3,582 sqm (GIA) of office space within the City Tower podium, however this would be offset by an uplift in office space

of 18,725 sqm (GIA) on the City Place House site. It is proposed that the application scheme would provide a total office floorspace of 44,519 sq.m (GIA) (excluding the office space in City Tower) compared to 29,376 sqm (GIA) as existing, this equates to a total uplift in office space across the site of 15,143 sqm (GIA).

71. Office space would be provided at lower ground and levels 1 to 12 of the new building on the City Place House site. Across levels 1 to 12 the office floorspace would be orientated around a central core. The floorplates have been designed to have good daylight conditions, consistent floor depths and allow for a flexible multi tenancy arrangement. The multiple entrances proposed at ground floor level would further support the flexible use of the building. Balconies and the roof level terrace would provide amenity space and fresh air for future occupiers.
72. Within the City Tower podium, it is proposed that an extended business lounge would be provided along with new meeting rooms in order to support the commercial offer of the building. The basement areas would be reconfigured to incorporate supporting facilities for the building including cycle parking, shower facilities and new plant.
73. The GLA stage 1 letter queried whether any affordable office space would be provided as part of the scheme. Affordable office workspace would be provided within City Tower in the form of 12 workspaces. The level of provision was derived from the proportions of affordable workspace secured through schemes at 22 Bishopsgate and 2 Finsbury Avenue. The exact terms of the workspace and location within City Tower would be secured through the S.106 agreement. Notwithstanding the applicant has provided an indicative floorplan of a desk layout. It is anticipated that the affordable work stations would be located within a wider business centre/co-working space operated within City Tower with the owner funding up to 50% of the cost of the units.
74. This would provide further flexibility for occupiers in terms of the site's offer and would accord with policy S4 of the draft City Plan 2036 which encourages the provision of affordable office workspace in the City. The office space within City Tower is of a high quality. Provision within the retained tower is also welcomed when compared to provision in the new office building on the City Place House site. This is given that the space could be made available and utilised relatively quickly after consent has been granted without the need to wait for the space to be constructed. This would contribute towards providing the conditions for start-ups and smaller sized businesses to thrive following the impacts of the Covid 19 pandemic.
75. It is considered that the proposal would provide high quality flexible office space in accordance with the economic aspirations for the City and the CAZ in accordance with policies CS1 and DM1.3 of the Local

Plan 2015, policies OF1 and S4 of the emerging City Plan 2036 and London Plan policy E1 and strategic objective 1.

Provision of flexible retail/restaurant/café/gym (Class E)

76. The proposal would incorporate ground/basement level units that would enable a range of retail/restaurant/café and gym uses to come forward (160 sqm (GIA) on the City Place House site and 881 sqm GIA within the City Tower Podium). The site is not located in a Principal Shopping Centre (PSC) or Retail Link as defined by the Local Plan.
77. The introduction of these flexible units is welcomed as they would provide active frontages to enliven and bring vibrancy the public realm surrounding the site and they would provide services for workers and residents. A condition is recommended to ensure that the spaces are used for retail/restaurant/café and gym use and are not changed to any other use within Class E.
78. It is considered that this provision would accord with Local Plan 2015 policies CS20, DM1.5 and DM20.4 and draft City Plan policies S5, RE2 and OF1 which seek to ensure that a complimentary mix of uses is provided in conjunction with office space along with provision of services for workers and residents.

Design

Existing Built Form

79. Designed by Swanke Hayden Connell, City Place House is a postmodern office building with vague references to Art Deco. The solidity to the lower levels of the building and the lack of active frontage results in a built form that contributes very little to the locality by way of vibrancy and enlivenment. The lower level of the north facing frontage over sails London Wall at first floor level to form a colonnade. This provides a dark, enclosed and uninviting environment for pedestrians along this section of footway. A similar environment is provided for the pedestrian gallery that is integrated into the length of the London Wall façade at first floor level. It is not considered that City Place House constitutes a non-designated heritage asset.
80. The City Tower podium has a somewhat dated appearance and despite the expanse of windows along the London Wall frontage, it similarly contributes very little to the locality by way of activation and visual interest and is not considered to constitute a non-designated heritage asset. Where the podium abuts City Tower it results in a conglomeration of built form and an impenetrable urban block at ground floor level along London Wall and Basinghall Street. At the upper levels of the podium, the garden area has been redesigned in recent years. Notwithstanding, the use of the space is limited by ventilation equipment and rooflights associated with the adjacent built form. The walkway links at podium level provide a valuable connection from the Guildhall through to London Wall Place and the Barbican beyond.

81. The demolition of City Place House and the partial demolition of the City Tower podium is considered to be acceptable from a design and heritage perspective. (The acceptability of demolition from a circular economy perspective is addressed in the sustainability section of the report).

The Proposed Development

82. The proposed new office building is conceived as an urban block, supported on tall columns, with four facades. Its large footprint would be characteristic of buildings in this part of the City flanking London Wall.

83. The proposed massing would be broken down into well-proportioned forms by carving out recessed slots from level 4 to the top, featuring greened balconies. The contrast and shadow, provided by the deep cut outs, would visually soften and break up the mass of the building in townscape views, by modulating the roofline silhouette. The vertical greening to the balconies would provide an attractive and architecturally distinctive contrast of soft and hard materiality, colour, depth and texture as well as environmental benefits.

84. Local residents have expressed concerns about the height of the proposed building. When comparing the highest points of City Place House (65.3 m AOD) and the proposed office building (69.5 m AOD), there would be 4.2 metres AOD difference. Notwithstanding, the main bulk of the existing City Place House development has a height of 58.5 metres AOD or below and the main bulk of the proposed office building would have a height of 69.5 metres AOD which equates to a height increase of approximately 11 metres AOD. The proposed office building would be significantly lower than the retained City Tower, which remains unchanged as part of the proposal and rises to 19 storeys, 82.197 metres AOD.

85. The proposed height and massing is considered appropriate for this part of the City, outside of a conservation area. The site is surrounded on the north, east and west by taller buildings. The proposed height would be in keeping with the general scale of recent development in the immediate area, such as 5 Aldermanbury and London Wall Place and would not detract from the townscape.

86. In terms of the design approach, each of the four sides of the proposed building is characterised by tall slender columns at the base which support the soffit, a finely detailed rectangular façade screen and recessed balcony bay.

87. The proposed façade treatment is of high quality in terms of architecture and sustainability. It comprises of a curtain wall system of glass and aluminium spandrels, covered with a veil of external shading elements. Expressed aluminium framing, horizontal fins and folded metal, ochre

- petals, arranged vertically, would provide visual interest as well as efficient solar shading.
88. The aluminium petals open up and become progressively larger and elongated towards the top of the building to increase the solar control where the building is most exposed to solar heat gain. This creates a pleasing rhythmic verticality within the overall rectilinearity of the screen. The veil is designed with varying layers, which create depth, tone and shadow to the facades. This arrangement would provide a hierarchy and richness to the facades and further helps to break down the bulk of the building.
 89. The soffits of the building would oversail the footways and be a prominent feature when viewed from the ground and high walk levels of the building. Notwithstanding the soffit details shown in the application submission, the applicant has committed to ensuring that an artist designs the soffits as part of the site's cultural offer. Further details of the soffits and artistic approach would be required through the S.106 agreement. As part of the design it would be ensured that the soffit is appropriately lit in accordance with the City's Lighting Strategy.
 90. The soffit height along London wall would be 10.9 metres high compared to 5.3 metres for the height of the existing colonnade. This height along with the setting back of the of the north facing façade at ground to second level would increase the quantum and quality of the public realm and enhance the pedestrian experience along London Wall.
 91. A series of columns are proposed around the perimeter of the building in order to support the soffits. Along the London Wall frontage the columns would splay out and create a visually dynamic relationship with the existing metal footbridge over London Wall. Short stay cycle parking would be provided at the base of the building between the columns. The relationship between the proposed columns and the public highway is covered further in the transportation section of the report.
 92. The spacing of the columns would allow clear views through to the base of the buildings which has been designed to be visually permeable with glazing around its perimeter, apart from the service areas. This would serve to enliven and activate the surrounding streets, which is lacking with the current development on the site.
 93. Regarding the reconfiguration of the City Tower podium new facades would be provided on its west and south facing sides plus a replacement façade along London Wall. The façade design would comprise a full height clear glass curtain wall system with a continuous louvred panel above and a decorative band of vertical fins applied over. The band of fins extend down to the ground at edges where the new facade meets the existing façade. The decorative fins would sit proud

of the glazed curtain wall to conceal technical louvres and they would extend vertically to form the balusters of the guarding to the podium level terrace creating a unified appearance. The extent of the glazing would contribute towards activating and enlivening the public realm.

94. The proposed scheme has been designed to achieve the highest standards of fire safety in accordance with policy D12 of the London Plan. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Additionally, London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. A condition is recommended requiring details of the final location of the evacuation lift, together with a management strategy for the evacuation of disabled people.
95. Overall it is considered that the detailed design of the proposed development is of an excellent standard and the building would make a positive contribution to the local area. The bulk and massing responds appropriately to the local context and 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 the surrounding buildings and spaces.

Public Realm

96. Alterations and enhancements are proposed to the public realm, both on public and private land, at ground and high walk level. The scheme would transform the public realm around the site through the provision of a new pedestrian route, a re-landscaped podium level public terrace, enhanced pedestrian experience through the redesign of walkways and public terrace (covered further in a separate section of the report below and in the transportation section of the report), the formation of a new connection between ground and high walk level and the re-landscaping of Brewers' Hall Gardens. The land designation of the public realm areas is covered in the transportation section of the report.
97. The scheme would result in the loss of three trees that are currently located along the public highway on Basinghall Street. Replacement tree planting of a greater quantum is proposed. The loss of the trees and details of the replacement trees, including maintenance is covered in more detail in the greening section of the report.
98. The new publicly accessible route would be generously proportioned measuring 5m high from ground level to the underside of the oversailing soffit and 2.5 m up to 5.8 m wide, flanked by active frontages and greening in landscaped planters. This would be a significant public benefit of the scheme, creating new north/south linkages and improving

permeability which is desirable in this location given the site's proximity to the Moorgate Crossrail entrance.

99. A new public lift and stairs, to be maintained by the applicant, would link the ground level route to the replacement highwalk and podium garden. Both ground and upper pedestrian routes would be partially covered with a feature soffit, providing shelter and creative lighting (as set out above further details of the artistic design of the soffit would be required through the S.106 agreement).
100. The podium level publicly accessible roof garden would be re-landscaped and enhanced with new wildlife attracting planting, seating and high quality materials of stone and timber to provide an enhanced and accessible open space. The applicant is also open to the possibility of siting outdoor exercise equipment on this area. Further details of the design of this area, including the exercise equipment would be required by condition. The quality of the space would be an improvement on the existing whereby the usability of the space is constrained by roof lights and ventilation equipment serving the adjacent building. The provision of an improved terrace area is considered to be another public benefit of the scheme and would accord with local Plan policy DM10.3 and draft City Plan 2036 policies S8, S14 and DE5 which seek to secure the delivery of high quality, publicly accessible roof gardens and terraces.
101. 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.
102. The scheme would deliver a significantly enhanced pedestrian experience along London Wall through the arrangement of the lower levels of the building and the re-landscaping of Brewers' Hall gardens. The existing oppressive 5.3m high colonnade along London Wall, would be replaced with a generous 10.9m high colonnade and enlarged footway width to increase the amount of public realm and improve pedestrian comfort. The indicative details of the potential re-landscaping of Brewers' Hall gardens show how this area would be revived and made more inviting. The addition of more greening along London Wall would result in a complementary relationship between this site and the landscaping on the opposite London Wall place development.
103. The exact details of the re-landscaping of Brewers Hall gardens would be secured through the S.106 agreement with the enhancements and final design to be carried out by the City. The gardens are City owned and the applicant has agreed to provide £200,000 towards enhancements. This figure has been derived from a feasibility study that has been carried out by the applicant's landscape architects. It accounts for the area being constrained by ventilation equipment which serves the car park/a substation below ground. A separate report

would need to go to the City's Open Spaces committee in order to authorise these works.

Walkway Bridge over Basinghall Street

104. The existing walkway bridge that spans from listed 65/65a Basinghall Street to City Place House would be demolished and replaced with a new footbridge. The existing footbridge is clad (bottom and sides) in glass-fibre reinforced cladding panels. The existing structure comprises 5 no. parallel steel beams, spanning circa 16m north-to-south, that support a concrete deck and asphalt walking surface of 6m wide.
105. The proposed City Walkway footbridge would be in the same position as the existing bridge. It would comprise deep steel beams that span circa 20.5m. The increased span (16m to 20.5m) is necessary as the proposed office building (structure), on which the bridge is supported, is set further back from the public highway than the existing building.
106. The bridge would be supported at 65/65a Basinghall Street by the same shelf as the existing bridge, and by a proposed building column integrated into the design of the new office building. These beams would also function as balustrades. Transverse spanning steel beams/ribs at close centres would support a light-weight deck (relative to the existing) and walking surface. The new bridge would be narrower than the existing but would splay outwards towards 65 Basinghall Street, facilitating greater pedestrian movements around the vaults' columns.
107. The weathered steel and vertical ribs would provide an attractive appearance to the bridge which would be in keeping with the materiality of the existing bridge over London Wall, connecting the application site both physically and visually to London Wall Place. Windows to the proposed office development and the new podium level terrace would enliven the route between the two sites.

Views

London View Management Framework Impact (LVMF)

108. The London View Management Framework (LVMF) provides a London wide policy framework to protect and manage strategically important views of London and its major landmarks.
109. Much of the existing City Place House and the whole of City Tower lie within the Background Wider Setting Consultation Area of the protected vista LVMF View 8A.1 of St Paul's Cathedral from Westminster Pier. The consultation threshold plane rises from 63.00m to 64.98m from south west to north east across the site. For the City Place House element of the site, the threshold plane rises from 63.00m to 64.49m.

110. The Townscape, Heritage and Visual Assessment provided by the applicant includes verified view images indicating that there would be a small intrusion into the background of the protected vista from this development. This intrusion is not considered to impact on the viewer's ability to recognise and appreciate the dome, peristyle and south western tower of St Paul's Cathedral.
111. The roof plan for the new build element on the site of City Place House indicates a height rising from 64.39m to 69.54m. However, within the Background Wider Setting Consultation Area to View 8A.1, a very small part of the skyline silhouette of the proposed building, at a height of 65.67m AOD would be above the consultation threshold by 2.17m, which would be marginally visible in the distance, 2.2km away, in the gap to the left of the south west clock tower of the Cathedral, when trees are not in foliage, although this is not considered to be harmful to the characteristics and composition of the view. The proposal would otherwise be concealed in the view and is considered to have no material impact on the views.
112. In the background of the cumulative view, consented 21 Moorfields is under construction. As such, the new office building on the City Place House site would be seen against the backdrop of 21 Moorfields and not against the sky.
113. In accordance with paragraphs 168 – 170 of the Visual Management Guidance in the LVMF, the development would preserve the viewer's ability to recognise and appreciate the dome, peristyle and south-west tower of St. Paul's Cathedral, ensuring these elements remain within a backdrop of clear sky. It is considered the visual management guidance is complied with. The development does not harm the characteristics and composition of the view and the protected vista and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13 which seek to protect strategic views.
114. No other LVMF views would be affected by the proposal

Local Townscape Views

115. The Townscape, Heritage and Visual Impact Assessment (THVIA) includes a comprehensive assessment of the impacts of the proposal on a range of strategic and local townscape views. This assessment concludes that the impact on local views is either negligible or minor or a beneficial impact with the exception of two views of the Guildhall from King Street.
116. It should be noted that since the submission of the application further work has been carried out to refine the appearance of the 'petals' on the office building in the local townscape views. The application submission originally showed orange petals in the backdrop

to the Guildhall. The colouration has since been refined and new renderings have been submitted to show that the petals now appear more neutral and recessive. The views assessment has been made on the basis of the revised design. The revised renderings would be shared with the GLA as part of the stage II process given that in their comments they note a desire to ensure that the materiality of the upper levels of the proposal would not impact on the setting of the Guildhall.

View of and Approach to Guildhall from King Street and Queen Street

117. The proposed development would be particularly visible in townscape views from Queen Street and King Street, appearing above and behind the Guildhall.
118. Although in some views the development would provide a calm, neutral and coherent background to the Guildhall, replacing a variety of buildings of varying heights, mass and impact, it would intrude on the open sky behind the Guildhall particularly in some views from King Street (views 6 (eastern pavement on King Street at its southern end close to Cheapside) and 8 (eastern pavement of King Street outside 9 King Street) of the TVIA). The impact of this change on the setting of the Guildhall and the Guildhall Conservation Area is set out in the heritage section below.
119. Notwithstanding the above, this view would be transitory, fleeting and not representative of the whole, kinetic viewing experience in the approach to Guildhall. While it is considered that there would be some diminishment in the quality of views 6 and 8, overall the proposal would not detract from the local townscape views along King Street and Queen Street, looking towards the Guildhall, due to the existing views featuring buildings in the backdrop of the Guildhall.
120. In assessing the impact of the proposal on this view careful consideration has been given to the impact of lighting in night time views. The facade would incorporate blades to prevent the internal lighting from being unduly prominent at night in order to ensure that these impacts are acceptable in night time views. Further details of the proposed materials and their ability to limit light spillage would be required by condition.

View from King William Street

121. In views north along King William Street, the proposal would be glimpsed over the roof tops, in the backdrop of the collection of 20th century bank buildings around Bank Junction. By reason of its light grey cladding and stepped massing, the appearance would sit comfortably with the scale and proportions of the townscape.

View from Aldermanbury

122. The proposal would be seen in the context of the listed Chartered Insurance Institute at 20 Aldermanbury. The new building would appear taller than the existing building in this view. The additional massing would not detract from the view, which is characterised by a range of large scale buildings and styles. The proposed architectural treatment of the facades, with a layered veil, use of colour and enhanced greening to the building and public realm would enhance the view.

View from London Wall

123. The proposal would enhance the views along London Wall by reason of its high quality architecture, greening and dramatic columns. The use of colour in the petals would enliven the view.

Other Strategic Views (Local)

Cheapside and Gresham Street: The Processional Approach to St Paul's Cathedral

124. The processional route passes along Gresham Street and Cheapside but does not travel along King Street. The proposal would be seen fleetingly from Cheapside, at the junction with King Street, where it would appear in the backdrop of the Guildhall. The proposal would not be visible from any other points along Cheapside or from Gresham Street or within Guildhall Yard. As such it is considered that the kinetic townscape experience of the processional route would not be harmed by the proposal, 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

125. 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 building would be seen to the right of the Barbican towers and in the foreground of City Cluster tall buildings. It would not obscure or detract from a City skyline landmark. It is considered it would preserve the composition and character of these views in accordance with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

Heritage

Designated Heritage Assets (Direct and In-direct Impact)

126. This section of the report assesses the impact of the proposals on the significance of designated heritage assets in the locality.

65 and 65A Basinghall Street (Grade II)

127. The listed building was built in 1966-9 and designed by Richard Gilbert Scott (son of Giles Gilbert Scott) in a modern expressionist style. The concrete framed building is clad in polished white cement, framed in an irregular pattern. Its most architecturally significant feature is the vaulted element of pre-cast concrete canopies which hang over the top storeys with windows and glazed openings below. This theme is carried on in the series of concrete shell vaulting, segmental arches and slender piers. The building is integrated into the City Highwalk which is framed by the vaulted portico.
128. The building is of architectural significance for its creative composition of plane, form, interconnected masses, use of materials and the distinctive vaulted canopies. It is of historic significance as a work by the Gilbert Scott dynasty of architects. The setting of the listed building is characterised by a mixture of large modern office buildings, 20th century civic buildings, historic listed buildings and a network of public realm walkways and vertical circulation. The High Walk links the listed building to 55 Basinghall Street via the High Walk Bridge.
129. The building plays a significant role within the public realm and movement of people around the area. It connects ground level routes to the raised walkways and bridges at first floor level which link it across Basinghall Street and to London Wall and the Barbican beyond. The public realm setting of the listed building contributes to the overall understanding and architectural significance of the listed building.
130. As part of the development proposals, listed building consent is sought for minor alterations to the north side of the listed building in connection with the replacement of the abutting City Highwalk footbridge (not listed).
131. Construction of the existing bridge took place after 65 and 65A Basinghall Street was built. The preparation and making-good of 65 Basinghall Street and lifting of steel beams, took place around the existing vaults. The existing concrete bridge structure is not integral to 65 Basinghall Street. Primary steel beams of the bridge bear onto the existing listed structure with holding-down bolts to stabilise the connection.
132. Archive details suggest that mass concrete, dowelled into the original listed building, was used to infill parts of the 65 Basinghall Street abutment either side of the bridge deck, providing a surface on which to mount cladding panels of the walkway bridge.
133. Two columns supporting the vaulted roof of 65 Basinghall Street are located (asymmetrically) at the bridge threshold. The existing concrete deck is recessed around these columns, with a movement joint provided at this interface to ensure that the two structures remain independent.

134. The replacement footbridge would abut the listed building in the same location. It would comprise two deep steel beams that span circa 20.5m. The beams would also function as balustrades. Transverse spanning steel beams / ribs at close centres would support a light-weight deck (relative to the existing) and walking surface.
135. The new bridge would be supported at 65 Basinghall Street by the same shelf as the existing bridge at +18.88m AOD and by a proposed building column at 55 Basinghall Street. There would be sufficient space at the 65 Basinghall Street abutment to provide this support within the volume already 'carved out' by the existing (retrofitted) bridge.
136. The new column support at 55 Basinghall Street would be designed to withstand the necessary jacking forces etc. required for future bridge maintenance, and to accommodate thermal movements. The bridge would be simply supported, minimising loading to the supporting buildings. The materiality of the new walkway would give the existing concrete panel structure more integrity, marking where 65 and 65a Basinghall Street ends and the walkways north begin.
137. The elevated public route would be retained, and the materiality and structural integrity of the listed building would not be harmed in the process of demolition and construction of the replacement walkway. The proposed new balustrade and bridge platform would not detract from its appearance. The special architectural and historic interest and significance of the listed building would be preserved.
138. Overall, the townscape setting of 65 and 65a Basinghall Street is of mixed character and quality, with large scale and large grain buildings set within public realm. City Place House, City Tower and the Highwalk footbridge over Basinghall Street form the immediate setting of the listed building. As such the setting is characterised by large commercial buildings and public realm. The proposed redevelopment would respect that character and would enhance the immediate setting of the listed building through public realm enhancements, greening and high quality architecture.
139. The significance of the listed building, and its setting would not be harmed by the proposed new developments at 55 and 40 Basinghall Street.

The Guildhall (Grade I)

140. Dating from the 15th Century, but much restored, the Guildhall is faced in squared rubble with ashlar dressings. The roof was rebuilt to a new design by Sir Giles Gilbert Scott. It is covered in stone slates and has a central louvre / fleche. The south porch has an elevation in Portland stone in a semi-gothic style, by Dance, the younger, 1788.

141. As an early 15th century building with high quality alterations and additions, the Guildhall has exceptional special architectural and historic interest as well as notable communal value. The fleche of the Guildhall is the building's most prominent feature and is read in axial views from the south along King and Queen Street within the contemporary context of the developments along these routes and London Wall Place beyond. The setting of the Guildhall is characterised by long approach roads from the river, flanked by historic buildings, which enable the Guildhall's landmark roof and fleche to be appreciated in long views from the south. The setting contributes positively to the understanding and architectural and historic significance of the listed building.
142. The setting of the Guildhall makes a significant contribution to its significance and an appreciation of it, in particular its architectural and historic significance. The setting of the Guildhall is characterised by the enclave of historic buildings from a mix of eras, in a variety of styles and materials that all complement each other. Visible from the south, in the back drop of the Guildhall are more recent commercial developments of London Wall Place, City Tower and City Place House. These contemporary forms and materials on the skyline are part of the wider setting of the Guildhall.
143. Viewing the Guildhall from within the Guildhall Yard is where the enclave of historic buildings are appreciated in an enclosed setting with minimal views out of it. The fleche of the Guildhall is clearly visible against the sky and seen in the context of the surrounding historic buildings of architectural note. The proposed development would not be visible from within Guildhall Yard and the immediate setting of the Guildhall would not be harmed.
144. In views 6 and 8 of the THVIA Street (views 6 (eastern pavement on King Street at its southern end close to Cheapside) and 8 (eastern pavement of King Street outside 9 King Street), the proposals would be clearly visible above the Guildhall roof and its iconic fleche where at present it is seen against a backdrop of clear sky as set out in the views section above. The erosion of the silhouette and prominence on this important historic approach would cause lower level less than substantial harm to the significance of the Guildhall. The simple, elegant form and appearance of the proposed office building would however provide a calm and restrained backdrop which mitigates the impact to some degree. It should also be noted that this view is transitory and fleeting in the context of the whole kinetic view along Queen Street and King Street. It is not representative of the general wider setting of the Guildhall, which predominantly features a fragmented backdrop of modern office buildings protruding into view above the roofline of the Guildhall, in views north along King Street and Queen Street.

145. In the majority of views identified in the THVIA, the impact of the proposal would be beneficial and would enhance the setting of the Guildhall. The existing jumbled backdrop would be replaced with a calmer, neutral backdrop enabling the Guildhall roof and fleche to appear distinct and prominent in townscape views. The high architectural quality of the proposed building would be an appropriate backdrop and would not detract from the wider setting of the Guildhall.
146. It is considered that, overall, the harm is slight, at the lower end of less than substantial.

20 Aldermanbury (Grade II)

147. The Chartered Insurers Institute is a seven storey, Portland Stone livery hall built in 1934, designed by M.E and O.H. Collins in a Tudorbethan style. It features a large gable over three window wide bays onto Aldermanbury. The building is of architectural, artistic and historic significance. Its setting is characterised by large scale buildings, including the 1950's Guildhall North Wing, 15 storey 5 Aldermanbury to the west and 9 storey City Place House to the north. The setting makes a low contribution to the significance of the listed building.
148. The proposal would be seen in the context of the listed Chartered Insurance Institute at 20 Aldermanbury. The new building would appear taller than the existing building in this view. However, the additional massing would not detract from the setting of the listed building, which is characterised by a range of large scale buildings and styles. The proposed architectural treatment of the facades, with a layered veil, use of colour and enhanced greening to the building and public realm would enhance the view.
149. The proposed development would reinforce the characteristics of the setting and would not result in harm to the setting, significance or views of 20 Aldermanbury. The setting and the contribution it makes to the significance of the listed building, would not be adversely affected by the proposals.

Other Listed Buildings

150. 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 Church of St Lawrence Jewry, Former Guildhall Library and Museum, 13-14 Basinghall Street, the Barbican Estate, Wood Street Police Station, Salters' Hall, footings of former Church of St Mary the Virgin Love Lane, Monument to John Heminge and Henry Condell, remains of the tower of St Alphage Church, 1 Cornhill, Bank of England, 1-6 Lombard Street, 1 King William Street and St Mary Woolnoth Church.

151. 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 significance or setting of these listed buildings.

Conservation Areas

Guildhall Conservation Area

152. The site lies to the north of the Guildhall Conservation Area. The setting of the conservation area is characterised by a mixed scale and density of development. It features several large modern commercial developments that contrast with the historic character and more intimate scale of the Guildhall Conservation Area. The contrast in scale is characteristic of the setting. The Guildhall is a focal point of the conservation area and is appreciated in long views, approaching from the south. The fleche on the Guildhall roof is a distinctive landmark feature in views into and through the conservation area.
153. Modern tall buildings, including London Wall Place and 40 Basinghall Street are visible beyond the Guildhall roof which fragment the backdrop setting in many of the existing views. The proposal would appear above the roof of the Guildhall in long views across the Conservation Area from Queen Street and King Street. The proposed architectural treatment would impact by creating a calmer, neutral and more unified backdrop setting to the Guildhall in many views, which would enhance the setting. However, in some limited views from King Street, the proposal would result in the fleche being no longer viewed against a silhouette of sky, (THVIA views 6 and 8) which would diminish its prominence and result in a slight, lower end of less than substantial harm to the setting and significance of the Guildhall Conservation Area.
154. The top floors of the building incorporate angled vertical blades (further details required by condition) to create the appearance of solidity. This is designed to prevent light emissions from being visible in night time views from the south in the context of the Guildhall. As such the fleche and roof of the guildhall would remain prominent in the views from the south at night.
155. It is considered that the proposal would result in some slight, less than substantial harm to the significance of the Guildhall Conservation Area as a result of the change in its setting.

Barbican and Golden Lane Conservation Area

156. The Barbican and Golden Lane Conservation Area lies to the north of the application site. The setting to the south and east is characterised by large scale modern developments flanking London

Wall. Due to the density and scale of development in between the site and the conservation area, there would be almost no visibility of the development proposals from the Barbican and Golden Lane Conservation Area. The top of the new building would be partially glimpsed from the Barbican Concert Hall Terrace in views looking south east, in the back drop setting to the conservation area. The change in the view would however be barely perceptible. A slither of the proposed building would be visible fleetingly in the gap between the Salters' Hall and London Wall Place from Fore Street and Andrewes Highwalk on the southern edge of the conservation area. The proposals would not harm the significance or the setting of the Barbican and Golden Lane Conservation Area.

Bank Conservation Area

157. The western boundary of the Bank Conservation Area lies on Coleman Street, a short distance to the east of the application site. The proposal would be visible looking west from Coleman Street, along Basinghall Avenue. It would appear obliquely and fleetingly in the context of surrounding large buildings. The impact is not considered harmful.
158. From King William Street looking north west a slither of the proposed development would be visible in the far distance over the rooftops. It would be barely discernible and would not detract from the view.
159. The setting of the Bank Conservation Area is as varied and diverse as the overarching character of the City. The wider setting of the Conservation Area is characterised by a backdrop of large buildings and strong juxtapositions between old and new. The proposal would not harm the significance or the setting of the conservation area.

Other Conservation Areas

160. Overall, the proposal would result in some minor change to the wider backdrop setting of other Conservation Areas such as Bow Lane and Queen Street, but not in a manner which would harm their significance or settings, which would be preserved. Large buildings and the dramatic change in scale is part of the characteristic backdrop to many conservation areas, which would be preserved and unharmed.

Barbican Registered Historic Park and Garden (Grade II*)

161. The registered park and garden comprise a group of public communal and domestic gardens, squares and connecting routes which are integral to the estate designed by Chamberlain, Powell and Bon. The significance of this part of the landscape is its use as an elevated walkway linking places and spaces within the Barbican complex and the wider network of the City. The Barbican is the only

surviving part of the planned City Walkway Network. The walkway is characterful of the design intent to elevate pedestrian movement from vehicular below. They provide an elevated view at Podium level and visual connection to the public realm and street below and can be currently appreciated from the public walkway. Due to the distance between the Barbican and the application site and the presence of existing large buildings in between, the proposed development would be glimpsed fleetingly from limited viewpoints at podium and highwalk level. The proposal would not appear prominent or overbearing. There would be no harm to the significance of the Barbican Estate as a registered historic park and garden. The proposals would result in improvements to a section of the public City High Walk which connects to the Barbican walkway.

Conclusion on Heritage

162. It is considered the proposal would preserve the special interest, significance and setting of listed buildings in the vicinity including 65-65A Basinghall Street, 20 Aldermanbury, Church of St Lawrence Jewry, Former Guildhall Library and Museum, 13-14 Basinghall Street, the Barbican Estate, Wood Street Police Station, Salters' Hall, footings of former Church of St Mary the Virgin Love Lane, Monument to John Heminge and Henry Condell, remains of the tower of St Alphage Church, 1 Cornhill, Bank of England, 1-6 Lombard Street, 1 King William Street and St Mary Woolnoth Church. It is considered it would preserve and result in a minor enhancement to the special interest/significance and setting of 65-65A Basinghall Street.
163. There would be no harm to the significance of the Barbican Estate as a registered historic park and garden. The proposals would result in improvements to a section of the public High Walk which ultimately connects to the Barbican walkway.
164. It is considered that the proposal would result in some slight less than substantial harm to the significance of the Guildhall Conservation Area as a result of the change in its setting, in views looking from Queen Street and King Street.
165. It is considered that the significance of Bank Conservation Area and Barbican and Golden Lane Conservation Area would be unharmed as a result of the proposed changes in their settings.
166. The proposal would however, as a result of its height and bulk, fail to preserve and would result in harm to the special interest and heritage significance of the listed Guildhall, as a result of change in its setting. It is considered that, overall, the harm is at the lower end of less than substantial.
167. It is considered that the proposals would not accord with Local Plan Policy CS12 and London Plan Policy HC1 as the proposal would cause some slight harm to designated heritage assets, and as those

policies do not incorporate the heritage balancing exercise contained in paragraph 196 of the NPPF. For the same reason draft City Plan 2036 Policies S11 and HE1 would not be complied with.

168. The proposal would preserve the special architectural and historic interest/significance and setting of strategic, landmark designated heritage assets, including St Paul's Cathedral.
169. It would not detract from LVMF protected views. Local townscape views would not be adversely affected, apart from Guildhall Conservation Area views, 6 and 8 of the THVIA, from King Street which are through and out of the Guildhall Conservation Area.

Conclusion on Listed Building Consent 21/00201/LBC – 65-65A Basinghall Street

170. The proposals would result in a minor alteration to the listed building where it abuts the replacement pedestrian bridge structure. The junction would be made good and the integrity of the structure would be preserved. The works would not result in any harm to the special interest/heritage significance.
171. It is considered that the high quality architecture of the new building, public realm enhancements, greening, tree planting, new pedestrian route and Highwalk bridge would result in a minor enhancement to the listed 65 and 65A Basinghall Street, its setting and its contribution to the significance of the listed building.
172. The proposals would preserve and enhance the special architectural and historic interest and heritage significance of the listed building and its setting, subject to details reserved by condition, in accordance with Local Plan Policies CS 12, DM 12.1 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC 1 and Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Archaeology

173. The site is in an area of archaeological importance, located inside the Roman and medieval City Wall and partly on the line of the east wall of the Roman Fort.
174. Archaeological excavation and recording were carried out on the site prior to construction of the existing building and it is considered that no archaeological remains would survive within the building footprint.
175. An informative is recommended to cover consideration of the archaeological impact if additional groundworks outside the building footprint, such as new drainage or service connections are proposed.

Accessibility and Inclusivity

176. 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, S8 and HL1 of the draft City Plan 2036 and policy D5 of the London Plan. The Mayor's Equality, Diversity and Inclusion Strategy aims to create a truly inclusive London.
177. The applicant has submitted an Equality Statement and an Access Statement. The Equality Statement assesses the proposal in respect of the protected characteristics as defined by the Equality Act 2010 (age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and the schemes potential impact on:
- Community facilities and places of worship
 - Accessibility, inclusivity and active travel
 - Amenity impacts (air quality, daylight, noise)
 - Employment and skills
178. It concludes that subject to mitigation the proposal would have no negative equality effects.
179. Mitigation should include the requirement for a scheme of protective works should be secured in order to ensure that there would be no undue impacts of construction with particular regard to noise, dust and disruption. (Relevant to age, pregnancy and maternity and disability).
180. A temporary replacement walkway should be provided during the construction work so as not to have a detrimental impact on accessibility and active travel. (Relevant to age, race and disability). The provision of temporary alternative walking routes for use during construction would be secured through the S.106 agreement via a City Walkway Agreement.
181. The development should be implemented in accordance with the details set out in the supporting reports in order to ensure no undue impact on the air quality, noise and daylight and sunlight during the operational phase of the development. (Relevant to age, pregnancy and maternity and disability).
182. The statement identifies that it is positive that the building and public realm would be designed to be accessible to all and that the development would create employment opportunities which could benefit several protected characteristics. Employment and skills pledges would be secured through the S.106.

183. The Access statement sets out how the scheme has been designed to be accessible and inclusive to all through the provision of:
- Accessible routes to all connections with local pedestrian routes.
 - Safe external spaces and routes for pedestrians and cyclists, segregated from vehicular traffic.
 - Inclusion of accessible cycle parking in the new office building and on the City Tower site.
 - Provision of one accessible vehicle parking space in City Tower.
 - Wheelchair accessible sanitary facilities alongside cycling facilities and at new reception areas.
 - Step free access to all parts of the new office building including terraces; and
 - Use of evacuation lift for evacuation from the office building.
184. Overall the Access Officer welcomes the inclusive access to and within the building. This is subject to further details of certain elements of the detailed design including the cycle parking, building layout, car parking and the columns being provided by condition (see the consultation response section of this report for the Access Officers comments).
185. Subject to the imposition of conditions and subject to the applicant entering into a planning obligation to secure mitigation measures officers agree with the conclusion of the Equality Statement that the proposal would have no negative equality impacts, and that the public sector equality duty would be fulfilled.
186. The proposal would meet the requirements of policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1, S8 and HL1 of the draft City Plan 2036 and policy D5 of the London Plan. Conditions and s.106 clauses are recommended in order to ensure that there would be no negative impact on the protected characteristics as identified by the Equality Act 2010.

Transportation

Cycling

187. The London Plan Policy T5 (Cycling) requires cycle parking to be provided at least in accordance with the minimum requirements published in the plan. Policy T5 (Cycling) 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.
188. The proposed level of cycle parking exceeds the London Plan, as is shown in the table below.

	London Plan long stay cycle parking	Proposed long stay cycle parking	London Plan short stay cycle parking	Proposed short stay cycle parking
City Place House	611	611	27	27
City Tower	27	220	59	61

189. Technically cycle parking is only required for the part of City Tower that the application relates to i.e. the podium. However, the applicant has agreed to provide cycle parking for the whole development which is why the table above has such differing numbers. The level of provision is welcomed and would be in line with the London Plan.

190. The long stay cycle parking for the new office building would be accessed from the south east corner of the proposed new pedestrian route. The long stay cycle parking for City Tower would be accessed via an existing ramp from Basinghall Avenue. Most of the short stay cycle parking would be located on private land within the public realm, however 12 short stay cycle parking spaces associated with the office use at City Tower would be located in the basement for visitors to the building.

191. 5% of the cycle parking spaces are accessible for adapted cycles. The arrangement of the cycle parking and complimentary facilities (e.g. e-bike charging, showers, lockers) would be secured by planning condition in line with the London Plan Policy T5 (Cycling), the London Cycling Design Standards 8.2.1, and the draft City Plan 2036.

192. The proposals include 74 showers, and 730 lockers in the new office building and 23 showers, and 218 lockers in City Tower. The London Plan Policy 10.5.7 recommends a minimum of 2 lockers per 3 long-stay spaces, and at least 1 shower per 10 long-stay spaces. The proposals far exceed the London Plan requirements in this respect.

193. The applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required through a Section 106 obligation to produce a Cycling Promotion Plan, which would be a cycling focused Travel Plan. The Cycling Promotion Plan would include details of how visitors to City Tower can access internal short stay cycle parking. It would be submitted to the City for approval in line with London Plan Policy T4 (Assessing and mitigating transport impacts) and as requested in the GLA's Stage 1 letter.

Vehicular access

194. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2036 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.
195. The development would be car free with the exception of 1 blue badge car parking space that would be provided at the basement level of City Tower, accessed via a ramp of Basinghall Street. The users of the new office building would have access to this parking space.
196. The proposed development would be policy compliant in respect of the proposed car parking arrangement and would represent an improvement on current circumstances whereby the existing motorcycle parking and car parking (22 spaces) within the basement of City Tower would be removed.

Servicing and deliveries

197. Policy DM16.5 of the Local Plan 2015 and the draft City Plan 2036 Policy VT2 require developments to be designed to allow for on-site servicing. London Plan Policy T7 (Deliveries, servicing and construction) 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. As per the existing situation the development would be serviced from two locations for each part of the development (City Tower and the proposed office building), the information for each part is set out separately below.
198. The servicing of the new office building would take place off-street accessed off Basinghall Street. Vehicles would be able to enter and exit the servicing area in forward gear. The servicing area would accommodate 2 vehicles up to 8m in size, and two electric vehicle charging points would be secured by condition, in line with GLA requirements and London Plan Policy T6 (Car parking).
199. The servicing of City Tower would take place off-highway on a private street accessed from London Wall, which is as existing. Vehicles would be able to enter and exit the servicing area from London Wall in forward gear.
200. The draft City Plan 2036 Policy VT2 requires major commercial development to provide for freight consolidation. London Plan Policy T1 (Strategic approach to transport) requires development 'to minimise freight trips on the road network including through consolidation'. Proposal 38 in the City of London Transport Strategy is to 'Reduce the number of freight vehicles in the Square Mile'. The City of London Transport Strategy defines freight consolidation as 'routing deliveries to a business, building or area via a warehouse where they are grouped together prior to final delivery.' The City of London Freight and Servicing SPD, point 63, requires suppliers to use consolidation centres in

suitable locations within Greater London to minimise the number of trips required to service developments.

201. The applicant is proposing to use an off-site consolidation centre in order to reduce the number of deliveries to the development per day. The applicant has agreed to a cap per day for the whole development of 52 deliveries and to use consolidation for the whole of the site, including City Tower – which is a benefit of the scheme and significant improvement on the existing scenario. The existing developments are predicted to receive around 80 deliveries per day without using consolidation, so there is reduction in the number of vehicles on the road of almost 30 per day. These caps would be secured in the Section 106 agreement.
202. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy for both parts of the development.
203. The applicant would be required to produce a delivery and servicing plan for both parts of the development, and this would be secured in the Section 106 agreement. The delivery and servicing plan would include measures to encourage and facilitate cargo cycling deliveries to the development.

Public Transport

204. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site is located close to Moorgate and Bank underground stations and Farringdon and Moorgate national rail stations. The site is close to several bus routes running close by on London Wall and Moorgate.

Pedestrian Comfort and Trip Generation

205. Transport for London's Pedestrian Comfort Guidance recommends a minimum Pedestrian Comfort Level (PCL) of B+, and the aim in the City of London Transport Strategy is that all pavements would have a minimum PCL of B+.
206. A pedestrian assessment has been conducted for the site. The pedestrian and cycle data was collected in July 2019. The analysis shows that the streets in the vicinity of the development generally experience moderate pedestrian flows. Given the footway widths, this is considered comfortable. Basinghall Avenue and Coleman Street have higher flows, however the footway widths are wide enough to currently maintain a PCL of B. The proposed new pedestrian route would relieve pressure on the surrounding streets, improving the PCLs to at least a

level B+. The elevated walkway was also assessed for context – less than 100 people per hour were counted; this is considered very low. With an enhanced design, improvements to the surroundings, and upgraded step free access, more people are likely to use the elevated walkway – taking further pressure off the surrounding streets at ground level.

207. The applicant has proposed a new city walkway from the Guildhall Plaza, over Basinghall Street and across the podium to meet the London Wall Place city walkway. It is proposed to be narrower in some places than the existing route. The GLA raised concern that the narrower proposed city walkway should be subject to a PCL assessment. The applicant has shown through a PCL assessment that the existing level of the elevated walkway is low (PCL A). Therefore, the reduction in the width of the walkway is considered acceptable. There is ample spare pedestrian capacity on the walkway within the PCL A category to support any uplift in pedestrians expected as part of this scheme and future expected uplift. In addition, an alternative ground floor route is being provided and trips may naturally reassign to the new ground floor route.
208. The existing walkway (formerly Bassishaw Highwalk, further details of which are set out in the City Walkway section of this report) – which runs over the pavement colonnade on the south side of London Wall is proposed to be removed through the demolition of City Place House. Pedestrian analysis has been carried out and the removal of this route is considered acceptable. The pedestrian analysis showed that on average less than 100 people per hour use this part of the walkway. There is ample capacity on London Wall's footways and the proposed City Walkway to provide for any redistribution of pedestrians which may take place.
209. The submitted transport assessment indicates that the overall increase in trips across all modes would have an acceptable impact on the surrounding highway and public transport network capacities. In addition, the new public route through the development, and proposed Section 278 agreement would lead to all footways in the vicinity of the site being a PCL A, with the exception of Basinghall Avenue which is anticipated to be a B+.
210. A trip generation for the development has been conducted. Overall there is a net increase in trips for the whole development (the new office building at 55 Basinghall Street and City Tower) of approximately 896 and 830 office trips in the AM and PM peaks respectively. This increase is considered small, and the increase in public realm in the vicinity of the development would comfortably accommodate the relatively small increase in trips.

City Walkway and Public Access

211. Parts of the Bassishaw Highwalk City Walkway, which ran from the Guildhall Plaza, over Basinghall Street and across the podium to

London Wall, and over the colonnade on the southern London Wall footway, were discontinued on 2 October 2012 to enable works to be carried out to City Tower and City Place House (ref. 12/00167/FUL and 12/00947/NMA).

212. A Section 106 Agreement was secured from the developer at City Tower to re-provide this route and facilitate the declaration of a replacement City Walkway once works at City Tower were completed. The public route was re-provided. However, the redeclaration of the Bassishaw Highwalk City Walkway did not proceed after the works at City Tower were completed, due to the ongoing works for London Wall Place and the reconfiguration of the City Walkway associated with this development.
213. Consequently, the routes from the Guildhall Plaza, over Basinghall Street and across the podium to London Wall, and over the colonnade on the southern London Wall footway, are currently permissive path.
214. The implementation of the application proposal would be an opportunity to consolidate the long term intentions of all parties that have already committed to declaring the City Walkway. The proposals included in this application seek to re-provide part of the former City Walkway route from the Guildhall Plaza to London Wall (the route would be constructed to City Walkway standards). The wider podium area would remain as permissive path. Compared to the existing route the walkway would be realigned, the bridge over Basinghall Street would be of an improved design, the podium level garden would be enhanced, and the design of the new walkway is proposed to match the London Wall Place development.
215. Officers requested that the whole podium area (626sqm) be dedicated as City Walkway. However, the applicant is in favour of retaining rather than redeveloping the relevant part of the podium. The retained podium would not meet City Walkway loading requirements of 5kN/sqm. The proposed City Walkway route between the Guildhall Plaza and London Wall would be new structure and therefore can be built to the City's loading standards and declared as city walkway.

It should be noted that the City's loading requirement is applied to ensure health and safety standards in the event of crowding on a City Walkway structure, for example in the event of large gatherings. Although the retained podium would not meet the 5kN/sqm standard, it is not considered that it would be capable of accommodating crowds due to the planting and seating. The permissive path arrangements would enable the owners to control crowding should any risk of overloading arise.

216. For clarity, the proposed public space offering is set out in the table below.

	Existing	Proposed	Difference
City walkway	0 sqm	392 sqm	+392 sqm
Public Highway	754 sqm	845 sqm	+91 sqm
Public realm with public access 24/7	803 sqm	1,318 sqm	+ 515 sqm
Total area	1,557 sqm	2,555 sqm	+998 sqm

217. Overall there is an gain in public space; the overall gain in space for use by the public is 998sqm, which is a 64% increase of public space on site, and this would be an opportunity to provide a route with city walkway status, previously secured in the Section 106 agreement.

218. A City walkway agreement would be required as part of the Section 106 agreement. This would include temporary access measures and measures to ensure that the duration of walkway closure is minimised during construction. It would require the developer to dedicate and maintain the proposed city walkway to City of London standards. It would also include commuted sums required to cover additional costs incurred by the City of London associated with the new city walkway layout. A separate report would need to be brought to your committee to cover the dedication of the new City Walkway.

219. The proposed city walkway through this development also includes a city walkway bridge. The city walkway bridge has been discussed with the City's district surveyors at an early stage to ensure the proposals would meet our City walkway requirements. The city walkway bridge is proposed in approximately the same position as the existing bridge. The proposed replacement city walkway would be a minimum 3.5m in width, which meets our requirements. It should be noted that the existing route is wider than 3.5m in places, however the proposed city walkway is of an enhanced design and would complement the city walkway over London Wall provided as part of the London Wall place development. Therefore, the proposals are acceptable in principle.

220. A new stair and a lift are proposed to allow for a step-free access to the walkway. This would be a private lift and therefore would be maintained by the applicant. An obligation to this end would be agreed in the Section 106 agreement. The city walkway works would be secured via a city walkway obligation in the Section 106 agreement.

221. A new ground floor pedestrian route is being provided between London Wall and Basinghall Street, which constitutes a significant benefit of the scheme, particularly as a new Crossrail entrance is to be provided on Moorgate. The width of the proposed new route varies from 2.5m at its narrowest to 5.8m. The new pedestrian route (692sqm) would be permissive path, and there would be a Section 106 agreement to secure public access 24/7.
222. The proposed office building would oversail the new route at around 5m – below the CoL highway standard of 5.7m – therefore dedicating the through route as public highway was discounted for technical reasons. Due to the requirement to use vehicles to clean the building, declaring the route as City walkway was also discarded.
223. Minor stopping up is proposed to rationalise the highway boundary on Basinghall Street, which is currently not straight and is proposed to be oversailed by the building columns. Overall there would be a gain of approximately 102sqm of public highway as a result of the development, and a greater amount of public.
224. The minor stopping up would be a strip of approximately 54.9sqm running parallel to the southern façade of the new office building. The proposed dedication of highway will comprise the private areas currently associated with the existing colonnade on London Wall and the existing private land in front of City Tower. This would be approximately 150sqm, but final details of the exact areas to be stopped up and dedicated will be decided as part of the Section 278 package of works.

Public Realm, Security and Hostile Vehicle Mitigation (HVM)

225. The proposed development would oversail footways surrounding the development. This would provide shade and shelter and is in line with the Healthy Streets Indicators which TfL use to assess the impact of developments. The oversails would require Technical Approval, and this has been discussed with the City's Technical Approval body at pre-application stage.
226. The applicant has proposed to improve Brewers Hall Gardens as part of the public realm works. This would be subject to agreement at Open Spaces Committee, and if approved would be a further benefit of the development.
227. Local Plan 2015 Policy DM3.2, the draft City Plan 2036 Strategic Policy S2 (Safe and Secure City), and Policy SA3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development. Policy D11 (Safety, security and resilience to emergency) of the London Plan states development proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.

228. 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.

229. Sympathetically placed HVM would be provided at either end of the new public route. Trees are also proposed surrounding the development which serve a dual purpose. They would enhance the environment and provide a visual deterrent to hostile vehicles. HVM may be incorporated into street furniture to reduce the requirement for bollards, but this would be agreed at detailed design stage, and the design would be secured by condition.

230. A Section 106 obligation has been agreed for a contribution to the Legible London signage. This would help wayfinding through the new public realm easier. This accords with GLA's request for a contribution to Legible London.

Construction

231. A Construction Logistics Plan would be secured by planning condition. The GLA have requested a Road Safety Audit (RSA) is done as part of the Construction Logistics Plan.

Section 278 Agreement

232. The GLA requested fully segregated cycle paths as part of a S278 agreement on London Wall, however due to the complex structures under the road on London Wall, including utility tunnels and the car park, full segregation would not be achievable. The GLA also requested an assessment of Quietway 11 by the applicant – which has been done. The City of London have considered the requests from the GLA when negotiating the scope of the S278.

233. The applicant has agreed that a Section 278 agreement would be entered into. The Section 278 agreement would comprise walking and cycling improvements to London Wall including pavement relaying, mastic footways to be replaced with York stone, and the introduction of cycling infrastructure on London Wall to mirror the north side. The redesign of the whole junction of Basinghall Avenue (including safety audits) where the new route meets the highway, and other works to integrate the new pedestrian route would also be required. A safety audit for the proposed pedestrian route would determine whether it could be used by cyclists and pedestrians as requested by the GLA.

234. Section 278 works would 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. The section 278 would be secured through the Section 106 agreement.

Transportation Conclusion

235. The proposal would accord with the relevant transportation related policies including London Plan policies T5 cycle parking, T6 car parking, T7 deliveries, servicing and construction, and D11 Safety, security and resilience to emergency. It accords with the Local Plan 2015 Policies DM3.2 and DM16.5, and the draft City Plan 2036 Policies AT1 – 5, SA3, VT2, and VT3.
236. The proposal would promote active travel through the excellent provision of the cycle parking and would deliver significant public realm improvements particularly through the introduction of a new north/south route.

Sustainability

Circular Economy and Waste

237. 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. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.
238. Several of the objection letters that have been received query why City Place House cannot be retained and re-used in line with circular economy principles.
239. The submitted Draft Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. A number of options for a scheme that retains, refurbishes and alters the existing building (City Place House) have been considered over a period of 8 years but were not found technically feasible given the structural limitations of the existing steel frame designed with setbacks in the elevations and at roof level, and a lack of potentials to provide the required quality and quantity of floorspace for a modern, sought after office development.
240. The structure of City Place House was not designed with future flexibility in mind. Extending the existing steel frame to provide additional internal area is complicated by the limitations of the steel structure and the foundations, combined with the complexity of strengthening works required to fill in the setbacks of the floors in the London Wall elevation and at roof level. These constraints render typical approaches to increasing internal area (i.e. building out and building up) disproportionately costly, inefficient and carbon intensive. With regard to new foundations – a raft foundation was identified as the appropriate alternative to foundation reuse that would generate equivalent embodied carbon emissions but provide a more durable basement compared to a hybrid of new and existing element, and

would serve as a more flexible foundation for future modifications to the building, or indeed as foundations for a new building if the site were ever redeveloped.

241. The existing building's facade design life has come to an end and in order to achieve the modern standards of fire and thermal performance it would require a considerable refurbishment and replacement.
242. In addition, the need to modernise and replace the mechanical and electrical services as well as a full facade refurbishment, it became increasingly unviable to maintain the existing building as it would be very hard to achieve the project high aspiration for operational energy performance which requires excellent performance façade and MEP systems.
243. Notwithstanding the above, some of the basement retaining walls would be retained.
244. A new build provides the opportunity to make significant enhancement to the public realm by increasing the landscape offer, improve north to south pedestrian connectivity, providing an accessible connection between ground and podium level and to offer a more vibrant and active ground floor helping to further regenerate and enliven the area.
245. The applicants are committed to achieve a low impact new building by committing to:
- Prioritising flexibility and adaptability in the building design to facilitate a variation of uses to maximise the building's lifecycle and potential reuse of building elements
 - Optimising the structural design to minimise quantity of materials
 - Identifying opportunities for reuse through pre-demolition audit
 - Preferencing materials with high recycled content, confirmed by a Sustainable Procurement Plan, such as aluminium with 50% recycled content), cement replacements in concrete, 97-100% recycled content for steel enforcement bars, recycled steelwork and using recyclable mineral wool insulation.
 - Rationalising the grid structure to promote pre-fabrication and modularisation
 - Designing for ease of disassembly
 - Energy efficient design and incorporation of low carbon technologies
 - Reducing water consumption

- Using refurbished raised access flooring
- Managing excavation waste, construction waste and municipal waste responsibly, including aiming for a 95% diversion of construction and demolition waste from landfill.

246. A Detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved have been requested by conditions. The detailed assessment would be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Energy and operational CO2 emissions

New development at 55 Basinghall Street:

247. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 49.7% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

248. The proposed energy demand reduction measures include the use of passive design measures in the building envelope with additional external shading elements, balancing the reduction of heat loss and solar gains, and maximising daylight access. The energy demand reduction measures would amount to a 19.8% reduction of carbon emissions savings compared to the Building Regulations compliant building.

249. Passive ventilation as part of a mixed mode system is not proposed in this instance, by reason of the polluted local context and the deep floorplan of the development that would not achieve a reasonable balance between extent of naturally and mechanically ventilated areas in combination with user controlled versus automatically controlled ventilation openings. Natural ventilation could be introduced in the future when the replacement or adaptation of building services and façade components would be required, and pollution levels have decreased.

250. The GLA require further information on the proposed Citigen district heating connection. They note that the potential to utilise cooling should also be considered and that the heat loads connected to the network should be maximised. The cooling and ventilation strategy includes Air Source Heat Pumps and Air Source Chillers, and the space heating would be provided via rejected heat from the cooling process in combination with a connection into the local district heating network (Citigen) in accordance with policies DM2.1 of the Local Plan and IN1 of the emerging City Plan 2036. The district heating network connection would account for further 20.1% of carbon emissions savings. Hot water for the showers would be provided by Water Source Heat Pumps. For the cooling process, low GWP (Global Warming

Potential) refrigerants would be used and efficient leakage control would be incorporated which would achieve the relevant pollution credit in the BREEAM assessment. The use of a District cooling connection was considered, however Citigen has confirmed that there is inadequate cooling capacity to serve the new office building.

251. The submitted strategy includes an assessment of unregulated energy use which refers to “plug loads” such as lifts, escalators, appliances, computers, printers etc. This is not considered under the Building Regulations but accounts nevertheless for a large proportion of the total energy consumption of a building. A low energy culture would be promoted, to include the provision of energy efficient equipment, encouraging the use of stairs and training of operators and facility managers.
252. In addition to the heat pumps, a roof mounted PV installation of 122 panels, 1.8sqm each with an anticipated annual electricity output of 35,900 kWh/yr are proposed to meet the landlord energy demand of the building, such as for the energy input to the heat pumps, lighting of communal areas and lifts. Detailed roof plans have been submitted to show that the PV area has been maximised. These details are considered to address the GLA’s requirement for further information on the PV potential.

Reconfiguration and refurbishment of the 40 Basinghall Street podium:

253. The GLA require an update to the refurbished baseline and note that further energy efficiency measures should be considered and proposed to the refurbished element. The applicant’s energy and sustainability consultants have submitted further information containing figures for the refurbished element of the scheme and details of the energy efficiency measures to the refurbished element.
254. The refurbishment works would result in 44.1% of carbon emissions savings compared to the Building Regulations Part L2B compliant building. 2.5% of these would be achieved through the use of high efficiency Air Source Heat Pumps as renewable technology. These would produce heat through heat recovery from the mechanical cooling process. The other primary heat source for space heating and hot water would remain as the existing, recently upgraded boiler. The proposed energy efficiency measures include upgrading of the building services and thermal elements as well as replacing the windows.
255. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 clause would be included requiring reconfirmation of this energy strategy approach at completion stage and the carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. This confirms the City’s carbon offset approach as required by the GLA stage 1 letter. To ensure that planning commitments are being

delivered, the London Plan requires major developments to monitor and report on operational energy performance and to identify good practice. A S106 clause is included to reconfirm the applicant's commitments set out in the submitted Metering, Monitoring and Billing Strategy in accordance with GLA's "Be Seen" Energy Monitoring Guidance.

BREEAM

256. A BREEAM New Construction 2018 "shell and core" pre-assessment has been carried out for the new part of the development. The pre-assessment targets a rating of "excellent" with a score of 79.84 %.
257. The development's scores in the City's four priority categories of Energy, Materials, Water and Pollution are acceptable. Further credits could be targeted in the detailed design phase and after full fit-out of the development. The post construction BREEAM assessment requested by condition should be carried out after the full fit-out of the floorspaces.
258. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1.
259. For the podium works, a bespoke sustainability plan has been provided that commits to improvements in the categories of a BREEAM assessment relevant to the refurbishment measures. A post construction Sustainability Assessment of the refurbished element is requested by condition.

Whole Life-Cycle carbon emissions (Operational and Embodied Carbon)

260. New London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle 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 end of 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-

carbon city target. The GLA's stage 1 letter notes that the proposal should address Whole Life Cycle Carbon policy.

261. An early stage Whole Life-Cycle carbon assessment for the modules A1-A5 (up to practical completion) has been carried out with the finding that the key impact areas of the development in terms of carbon emission are the building structure, in particular the steel frame and floor slabs, the facade, finishes and building services. The applicants will therefore focus their attention on reducing carbon impacts in those areas during the detailed design stages. These will include:

- Materials efficiency exercises to identify opportunities for using less
- The use of cement replacements and reinforcement bars with a minimum 97% recycled content in reinforced concrete
- Sourcing materials locally
- Minimising embodied carbon through the use of rolled structural steelwork in the most efficient configuration
- Use of sustainable raised access flooring, including recycled and reused components
- Use of façade aluminium with high recycled content and manufactured more sustainably.

262. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage demonstrate emissions in line with the Greater London Authority's benchmark emissions target. It is anticipated that during the detailed design stage further improvements can be achieved for the phases up to completion, reaching the GLA's aspirational benchmark. A strategy to optimise the results for the proposal's Whole Life-Cycle carbon emissions through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

Urban Greening and Biodiversity

263. Local Plan Policy DM19.2 promotes urban greening and biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.

264. The new development offers a variety of opportunities to enhance urban greening and biodiversity at ground level, podium level and upper levels. These include

- A landscaped public realm around the new building with planters, trees and rain gardens
- a podium with green spaces and routes through
- a biosolar green roof at roof level

- and small planted terraces at levels 4-12.
265. These would mainly provide amenity benefits and some visual softening to the built density, however, the proposed planting scheme would also initiate biodiversity benefits. A biodiversity net gain calculation has been carried out by the applicant and it is predicted that the proposal would result in a net percentage change of 348.63% using green roofs, tree planting and flower rich perennial planting. The proposal therefore meets the net gain requirement of at least 10% in biodiversity value required by the draft Environmental Bill.
266. Details of the quality and maintenance of the proposed urban greening are required by conditions.
267. Policy OS2 of the emerging City Plan 2036 requires major developments to include an Urban Greening Factor (UGF) calculation demonstrating how the development would meet the City's target UGF score of 0.3 as a minimum. The applicant has scored the proposed greening in order to provide a UGF for the scheme.
268. The existing site has a UGF of 0.08. Guidance requires the proposed UGF to be calculated based on the total site area. There are areas in the site where it would not be feasible to provide additional greening for example City Tower as no physical works are being undertaken to this element and footway along London Wall. Officers have also requested that the greening to Brewers Hall gardens is not included in the calculation as the exact details of this element of the scheme are to be decided at a later date.
269. Therefore, taking account of the area of the site where development would feasibly take place (the City Place House site and surrounding footways, Basinghall Street bridge and the City Tower podium), which is considered by Officers to be a logical approach in this instance and it comprises the majority of the site area, the proposed level of greening would achieve a UGF of 0.3 in accordance with policy OS2 of the emerging City Plan 2036. If the site area is taken as a whole a UGF of 0.24 would be achieved, which would still represent a significant improvement on the existing figure of 0.08.
270. The proposal would involve the loss of three trees on Basinghall Street. The existing trees could not be accommodated alongside the development given the construction work that would need to undertake to form the overhang of the proposed office building.
271. Policy CS19 of the Local Plan 2015 seeks to protect the amenity value of trees retaining and planting more trees wherever practicable and policy DM19.2 states that developments should promote biodiversity and contribute to urban greening. Local Plan paragraph 3.19.17 states that "Where existing green infrastructure is disturbed, removed or damaged as a result of development, it must be replaced with good quality urban greening. There should be no net loss of green

infrastructure. Existing trees should be replaced with trees of an equivalent size and quality.” Policy OS4 of the emerging City Plan 2036 seeks to increase the number of trees and their overall canopy cover through a number of measures including “Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed requiring their replacement with trees that can attain an equivalent value.”

272. The trees that would be removed comprise 1 category B ash tree, 1 category C lime tree and 1 category B oak tree. The submitted trees survey provides the definitions of the different categories. Category B is defined as “Trees of moderate quality with an estimated remaining life expectancy of at least 20 years”. Category C is defined as “Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm”.
273. As part of the proposal nine trees would be provided at ground floor level. Three replacement trees would be planted on Basinghall Street and six trees would be planted in the landscaped planters to the south east of the new office building. The proposed trees on Basinghall Street would be located under the soffit of the building which would be approximately 12 metres above ground level. The City’s Open Spaces team are satisfied that this is considered to provide enough height in order to allow the selected species to develop. As the trees would be on the south side of the building there would be enough light to allow for the growth of the trees.
274. It should be noted that a further 11 trees would be planted at podium level and 14 trees at roof terrace level.
275. In considering the loss of the trees in relation to policy, policy CS19 requires the amenity value of trees to be protected and the retaining and planting of more trees wherever practicable. It is not considered that it would be practicable to construct the overhang of the proposed building and retain the trees in this instance. In line with policy CS19 and DM19.2 of the Local Plan a greater level of tree planting is proposed. A condition is recommended to require further details of the trees in order to ensure that they would be of an equivalent quality and size to the existing trees. Policy OS4 states that other than in exceptional circumstances only permitting the removal of trees which are dead, dying or dangerous. The proposed circumstances are considered exceptional with regard to the loss of the tree in that a development is being secured that would revitalise this part of the City and deliver significant public realm benefits. Taking into consideration the quality of the existing trees, the circumstances of the development and that a greater level of tree planting would be delivered it is considered that the policy tests of CS19 and DM19.3 of the Local Plan and policy OS4 of the emerging City Plan have been complied with regarding the loss of the trees.

Flood Risk, Sustainable Urban Drainage

276. Local Plan 2015 policy CS18 seeks to “reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network”. The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2036.
277. The Flood Risk Assessment and Drainage Strategy Report prepared by Arup shows that this development is in the Environment Agency’s Flood Zone 1 (an area of very low flood risk) therefore the proposed commercial uses are appropriate in this location under the sequential test.
278. The site is not within the City Flood Risk Area and is at low risk of surface water/ sewer surcharge flooding.
279. The City of London SFRA shows that this part of the city is at risk of groundwater flooding. This will be mitigated through waterproof lining of the basements to reduce the risk of water ingress.
280. Regarding the SUDS strategy blue, green/brown roofs and sub surface Geocellular storage is proposed. At detailed design stage opportunities would be explored to utilise rainwater harvesting, rills/canals, bio-retention systems/rain gardens and permeable paving. Conditions are recommended to cover submission of the final SUDS strategy.
281. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan and policy CR3 of the emerging City Plan 2036.

Climate Change Resilience

282. Policies DM 15.5 of the Local Plan and DE1 of the emerging City Plan requires developers to demonstrate through Sustainability Statements that major developments are resilient to the predicted climate conditions during the building’s lifetime.
283. In accordance with policy the applicant has provided evidence that the building would be designed for thermal comfort using future climate scenarios. Design features would be incorporated to minimise energy demand and improve thermal comfort to the occupants including:
- Glazing ratio derived for detailed façade optimization for managing solar gains and daylight penetration.
 - Light-coloured finishes to reflect solar gains back and daylight into the spaces.

- Setbacks to the ground floor, first and second floor elevations and sheltering from adjacent buildings act as means of shading to the highly glazed retail areas on the lower levels.
- External shading elements that respond to the solar exposure on each orientation are present in the office areas to control peak solar heat gains.
- Creating an identity for the building based on environmental design principles, such as with the use of the passive solar shading vertical “petals” that open-up at the upper floor levels of the building. The higher floor levels are more exposed to total solar gain due to the surrounding buildings shading parts of the lower floor levels.
- Consideration of overshadowing from surrounding buildings.

Conclusion

284. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing.

285. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy overall meets current and new London Plan policies as well as Local Plan policies, and it is on track to achieve an “excellent” BREEAM assessment rating.

286. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced in line with the GLA’s aspirational benchmark. The existing building has been assessed and found to be unsuitable to be transformed into a new, attractive and sustainable development with public benefits. However, Circular Economy principles can be positively applied to achieve a long term, low carbon, flexible and adaptable development. The building would achieve an appropriate degree of climate change mitigation through utilising heat provided by the Citigen heat network while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

287. The proposal would accord with the relevant sustainability and environmental related policies of the Local Plan 2015: DM2.1, CS15, DM19.2, DM10.2, DM10.3, CS18, CS19, DM15.5, emerging City Plan 2036: SI6, IN1, DE1, OS2, OS4, CR3 and London Plan S17, S12.

Microclimatic Impacts

Wind

288. 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. CFD simulation and analysis has also been carried out in accordance with the City's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
289. 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 Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting/occasional sitting/standing/walking/Uncomfortable.
290. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
291. Assessments have been carried out for both the windiest season and the summer season across the following scenarios:
- Configuration 1: Existing site with existing surrounding buildings
 - Configuration 2: Proposed development with existing surrounding buildings
 - Configuration 3: Proposed development with cumulative surrounding buildings
 - Configuration 4: Proposed development with existing surrounding buildings, proposed/existing landscaping
292. The results of the CFD and wind tunnel tests are largely consistent with each other. The results of the assessment by RWDI are set out in the proceeding sections of the report.
293. In the Baseline scenario (Configuration 1), wind conditions would range from suitable for frequent sitting to standing use during the windiest season. During the summer season, wind conditions would be generally one category calmer and a larger area of the Site would fulfil the frequent sitting and occasional sitting use criteria.
294. With the Proposed Development built out (Configuration 2), the majority of wind conditions would remain similar to those in Configuration 1, during the windiest season. Localised areas to the south-west of the Site would be two categories windier than in the baseline (either standing or walking), however, would remain suitable for the intended use. In addition, thoroughfares to the south and south west of the site and the entrance to 5 Aldermanbury would be one category windier (standing or occasional sitting) than the baseline scenario, however, would remain suitable for the intended use.

295. During the summer season, amenity spaces at ground level to the south-west of the Site would be one category windier than suitable at seating benches on the north and south sides of Aldermanbury. Mitigation is recommended in these areas in the form of planters with the planting to be of a sufficient height to provide shelter for the benches.
296. The highest private balcony on the south-western elevation of the proposed office development would be one category windier than suitable and would also require wind mitigation measures.
297. All other amenity spaces including podium level, roof terraces and Brewers' Hall Gardens would be suitable for the intended use.
298. This shows that the increase in height to Brewers Hall would provide additional shelter from south-westerly winds. This would partly improve conditions in Brewers' Hall gardens so that they are similar to the baseline scenario and would improve conditions at the proposed north west entrance to the new office building during the summer season. All other locations within the development would be similar to the scenario where the scheme is tested with existing surrounding buildings.
299. The inclusion of proposed landscaping within the testing (configuration 4) would provide additional shelter along the northern elevation at ground level and on the southern pavement of London Wall during the summer season compared to Configuration 2. In addition, seating benches at roof terraces would improve to be suitable for frequent sitting use during the summer season. Wind conditions at all other locations would be similar to Configuration 2.
300. No instances of strong winds would occur in any of the tested configurations.

Wind Conclusion

301. There would be fluctuations in wind levels around the site as a result of the proposed development. The majority of thoroughfares, entrances and amenity spaces would remain suitable for their intended use. Mitigation would be required for selected benches on the north and south sides of Aldermanbury and a high level terrace with the office building. Subject to the mitigation measures being secured through the s.106 agreement it is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy 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.

Thermal Comfort

302. London Plan Policy D8 seeks to ensure that consideration is given to the local microclimate created by buildings. Policy S8 of the emerging City Plan 2036 intends to secure development which optimises micro-climatic wind conditions and thermal comfort. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 and sets out how the thermal comfort assessment should be carried out.
303. The applicant has submitted a thermal comfort assessment. The technique involves merging wind, sunlight, temperature and humidity microclimate data at a seasonal level to gain a holistic understanding of thermal comfort and how microclimatic character of a place actually feels to the public. The Universal Thermal Climate Index (UTCI) metric is utilised for predicting thermal comfort. This sets out usage categories for thermal comfort and defines the categorisation of a given location.
304. The assessment shows that 90% of the area surrounding the site at ground level would have comfort conditions appropriate for year-round occupant use. Some areas to the west of the site are expected to drop one or two categories to have seasonal or short term use, these areas correspond to the areas where increased windiness and shading is expected. Notwithstanding, despite the drop in category these areas still meet the criteria required for their intended purpose. The podium area would also be suitable for outdoor seating for most of the year with only a small area in the south west corner suitable for seasonal use.
305. It is therefore considered that although the proposed development is expected to have an impact on thermal comfort in the surrounding urban realm, the change would be limited and no areas would have their thermal comfort category reduced to a point that it would be incompatible with their use. The proposal would accord with policy D8 of the London Plan, policy S8 of the emerging City Plan and the guidance within the Thermal Comfort Guidelines 2020.

Air Quality

306. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral, developers 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 S11 of the London Plan.

307. An air quality assessment has been submitted in conjunction with the proposal. The assessment considers the impact of the proposed development on air quality as a result of the construction and operational phases of the development.
308. During demolition and construction dust emissions would increase and would need to be controlled in order to avoid significant impacts. Mitigation measures and dust control measures would need to be put in place on the construction site. Details of the dust control measures would be required by condition prior to the commencement of development as part of a scheme of protective works.
309. For the completed development, the building would not generate any significant emissions as the proposed energy strategy comprises a heating and cooling strategy to be achieved through air-sourced heat pumps and air sourced chillers. There would be no on-site energy generation or combustion.
310. The development would be car free. Additional vehicle trips would be generated from servicing and delivery vehicles notwithstanding they would be at a level that would be below the Transport Emissions Benchmark for the development.
311. The proposed development would meet the GLA's air quality neutral benchmark for both the transport and building emissions.
312. The City's Air Quality Officer has no objections to the proposal and recommends that conditions are applied requiring the submission of an Air Quality Report to demonstrate how the finished development would minimise emissions and exposure to air pollution during its operational phase, and that the developer/contractor signs up to the Non-Road Mobile Machinery Register.
313. Subject to the 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 SI1 of the London Plan which all seek to improve air quality.

Daylight and Sunlight

Daylight and Sunlight

Assessment Context

314. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces, has been submitted in conjunction with the proposed development. The effects of the development are assessed having regard to the recommendations in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (second edition, 2011).

315. Regarding daylighting, the vertical sky component (VSC) and daylight distribution tests have been applied. The VSC test measures the amount of skylight available at the centre of a window on the external plane of the window wall. The BRE guidelines state that a window which achieves a VSC of 27% or more is considered to provide good levels of light. If with the proposed development in place the figures is both less than 27% and reduced by 20% (0.8 times its former value) or more from the existing level, the loss would be noticeable.
316. As the VSC calculation does not account for the size of the window being tested, the size of the room that it lights or whether there are multiple windows serving a room, the BRE guidelines recommend that a second test should be applied -daylight distribution. The daylight distribution text calculates the area of the working plane inside a room that will have a direct view of the sky. The BRE guidelines state that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% (0.8 times its former value) or more, the loss would be noticeable.
317. The BRE guidelines indicate that if either the VSC or daylight distribution guidelines are not met, an adverse impact is likely to result.
318. Regarding sunlight, the BRE guidance recommends that all main living rooms of dwellings should be checked if they have a window facing within 90 degrees of due south. The available sunlight is measured in terms of the percentage of annual probable sunlight hours (APSH) at the centre point of the window. Probable sunlight hours is defined as “the long-term average of the total number of hours during a year in which direct sunlight reaches the unobstructed ground (when clouds are taken into account)”. Sun lighting of a dwelling may be adversely affected if the centre of the window:
- Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
 - Receives less than 0.8 times its former sunlight hours during either period and
 - Has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours?
319. To clarify, all three of the above criteria need to be met for there to be an adverse impact in sunlight terms.
320. In terms of the policy context, policy DM10.7 of the Local Plan seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the BRE guidelines. Policy DE8 of the emerging City Plan 2036 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings

and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.

321. The BRE guidance advises that numerical values are not to be applied too rigidly. This is acknowledged in the supporting text to policy DM10.7 of the Local Plan 2015 which states that “The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments. The City Corporation will apply these methods, consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations”.
322. Residents have raised concerns regarding the impact of the proposal on daylight and sunlight levels to their residential dwellings. They have expressed concerns that the figures do not take account of the oversailing fixed balconies/fire escapes in the Barbican residences and in doing so they underrepresent the real effect of the proposed development on residents. The supporting text to policy DM10.7 of the Local Plan states “Where appropriate, the City Corporation will take into account unusual existing circumstances...the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive”. Officers have sought further clarity on the submitted figures from the applicant’s daylight and sunlight consultants who confirmed that the balconies/fire escapes were included in the submitted daylight and sunlight calculations.
323. The development has been assessed in terms of its impact on the daylight and sunlight levels to relevant residential rooms in Andrewes House, Willoughby House and Roman House, which are all to the North of the site. The results of the assessment are set out below.
324. It should be noted that the Beadle’s Flat in Brewers’ Hall and the Beadle’s Flat and Master’s Flat in Girdlers Hall are in close proximity to the application site but have been scoped out of the assessment. The Beadle’s Flat in Brewers’ Hall is located at third floor level in the south western corner of the building with all windows serving habitable rooms facing away from the development site. As an aside, application reference 18/01198/FULL which permitted works to the Brewers’ Hall and is currently under construction, seeks to remove this residential element.
325. The Beadle’s Flat and Master’s Flat in Girdlers Hall are located at second floor level. The flat is on the eastern side of the building with City Tower blocking the proposed new office building.
326. Local Plan Strategic Policy CS10 seeks to ensure that the bulk, height, scale, massing, quality of materials and detailed design of 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. 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 Results

327. The proposal would result in small VSC changes to some windows in the residential blocks that have been assessed, however the changes would be such that they would be within limits that are considered acceptable in the BRE guidelines. All windows assessed for VSC in Andrewes House, Willoughby House and Roman House comply with the BRE's guideline values in that, the area of the working plane within the assessed rooms that can receive direct skylight, would not be reduced to less than 0.8 times its former value.
328. All assessed rooms within Roman House and Willoughby House would be compliant in respect of the BRE's guidelines for daylight distribution. Within Andrewes House 56 (97%) of the 58 rooms that were assessed would be compliant in respect of the BRE's guidelines for daylight distribution. The remaining two rooms (living rooms) would achieve a factor of former values of 0.72 and 0.79. The daylight distribution diagrams show that the proposed development would potentially impact on light available towards the backs of the rooms.

Sunlight Results

329. The proposal would result in reductions to the amount of sunlight available to some residential properties. Notwithstanding, the changes are within limits that would not be considered to have an adverse impact on residential occupiers. All tested windows are BRE compliant in respect of sunlight as none of the tested windows meet all three of the following conditions, which is when the BRE guidelines consider there to be an adverse impact (as set out above and reiterated again below for clarity):

- Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
- Receives less than 0.8 times its former sunlight hours during either period and
- Has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours?

330. In Andrewes House all of the 82 windows and in Willoughby House all of the 18 windows assessed achieve the BRE's guideline values by retaining greater than 0.8 times their former value on both an annual and winter basis. In Roman House all 94 windows assessed achieve the BRE's guideline values by either retaining greater than 0.8 times former value for both an annual and winter basis or having a reduction in sunlight over the whole year of less than 4% APSH.

Cumulative Impact

331. Objections have been raised by local residents regarding the cumulative impact of development on the daylight and sunlight of neighbouring residential dwellings. They state that the impact of the development should not be considered in isolation as residents suffer from incremental erosion with each successive development for example 1 and 2 London Wall Place had a detrimental impact and the City should further limit the height of new development.

332. The supporting text to policy DM10.7 of the Local Plan states that "When considering proposed changes to existing lighting levels, the City Corporation will take account the cumulative effect of development proposals". Cumulative effect is taken to refer to future proposals and not to past schemes which have already been implemented. As such, in this instance the daylight and sunlight available to neighbouring residential occupiers prior to the construction of 1 – 2 London Wall Place would not be considered. The impact of this development is taken into consideration through existing lighting levels to neighbouring residential occupiers.

333. Regarding cumulative impact the applicant has considered the impact of the Brewers' Hall extension and 21 Moorfields. By virtue of the size of the Brewers' Hall extension and its separation distance to neighbouring residential occupiers, its inclusion in the daylight and sunlight assessment would not have any bearing on the results. 21 Moorfields would sit to the east of Willoughby House and would not be visible to the south-west facing residential windows that have been included in the daylight and sunlight assessment.

334. It is not therefore considered that the daylight and sunlight results would change as a result of considering the cumulative impact of the application proposal and development schemes in the locality.

Daylight and Sunlight Conclusions

335. The proposals would result in changes to the daylight and sunlight available to neighbouring residential occupiers, however with regard to daylighting in most instances the fluctuation in the figures would be less than 20% (0.8 times its former value) and therefore the actual impact on daylight would be unlikely to be noticeable to the occupiers and the results are BRE compliant. All windows tested for sunlight would be BRE compliant.

336. Notwithstanding the above, there are two living rooms within Andrewes House that would not be BRE compliant in respect of the daylight distribution test. The rooms would have figures of 0.72 and 0.79, which is only marginally below the BRE guidance of 0.8 which is the baseline figure for noticeable impact. The BRE guidelines advise that an adverse effect will occur if either the daylight distribution or VSC tests are failed. The windows serving the rooms in question would be VSC compliant but would not satisfy the daylight distribution criteria and therefore there would be in breach of the BRE guidelines. The test set out in policy DM10.7 is whether development would reduce noticeably daylight to nearby dwellings to unacceptable levels taking account of the BRE guidelines. Although there would be a breach of the BRE guidelines, it is the view of officers that daylight would not be reduced to unacceptable levels as there is no breach of the VSC guideline and as the breach of the daylight distribution guideline is marginally below the 0.8 guideline. Accordingly, policy DM10.7 is complied with. It is also the view of officers that the living standards will be acceptable, and that the proposal complies with policy DE8 in the emerging City Plan 2036.

Health Impact Assessment

337. Policy HL9 of the draft City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities.

338. The applicants have submitted a Health Impact Assessment, based on the NHS Healthy Urban Development Unit's criteria and toolkit to assess the possible impacts on the health and well-being of the City's communities.

339. The proposed development was satisfactorily assessed against 51 criteria relevant to the City of London. The assessment concluded that there would be a positive impact for 25 of the criteria, a neutral impact for 26 of the criteria and no negative impacts. The provision of exercise equipment on the podium would be welcomed in accordance with the promotion of healthy lifestyles.

Assessment of Public benefits and the paragraph 196 NPPF balancing exercise

340. Paragraph 196 of the NPPF states “where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental as described in the NPPF (para 8). They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to the genuine public benefits.
341. Paragraph 193 of the NPPF states that 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).
342. Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 196 NPPF balancing exercise. When considering the listed building consent application, the duty imposed by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies.
343. As a result when carrying out the paragraph 196 NPPF balancing exercise in in relation to the less than substantial harm caused to the setting and significance of the Guildhall (listed Grade I), considerable importance and weight must be given to the desirability of preserving the listed building and its setting. In addition, great weight must be given to the asset’s conservation.
344. When carrying out the balancing exercise in relation to the less than substantial harm to the Guildhall Conservation Area great weight must be given to the asset’s conservation.
345. The key public benefits of the proposal include the significant improvements in the public realm at both ground floor level at Brewer’s hall gardens, London Wall and the creation of a new through route from London Wall to Basinghall Street and at podium level also between the 40 and 55 Basinghall Street with inclusive public access to the raised walkway and enhanced podium public space. These are accorded significant weight as public benefits which would revitalise the area and

further enhance connectivity and legibility including improving access to and appreciation of the Guildhall and surrounding listed buildings.

346. Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'excellent', reduce carbon emissions, and reduce waste and use of resources through the adoption of circular economy principles. This is a benefit that would attract moderate weight.
347. Townscape and heritage benefits arising from a high quality addition to the townscape, resulting in slight enhancements to the setting and significance of the Guildhall Conservation Area. This is a benefit which would be afforded moderate weight.
348. The proposal would provide affordable workspace and create jobs. This is a benefit which would be afforded moderate weight.
349. When applying the policy in paragraph 196 of the NPPF those public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report, in particular:
- The less than substantial (at the lower end of the scale) harm to the significance of the listed Guildhall
- The less than substantial harm (at the lower end of the scale) to the significance of the Guildhall Conservation Area
350. The Guildhall is a Grade I listed building and of considerable importance as a heritage asset. Great weight should be given to the conservation of the Guildhall Conservation Area and therefore to the harm that would be caused to its significance. Considerable importance and weight should be given to the desirability of preserving the Guildhall (listed building) and its setting and therefore to the harm that would be caused to its significance. In addition great weight should be given to the conservation of the Guildhall listed building.
351. The proposal would cause some less than substantial harm and some slight enhancement to the significance of the Guildhall Conservation Area. The slight enhancement should be taken into account as a public benefit in the balancing exercise. For the purpose of the paragraph 196 NPPF balancing exercise the harm to the significance of the conservation area, as a result of change in its setting when viewed from King Street, must be taken into account, and great weight should be given to the asset's conservation.
352. For the purpose of the paragraph 196 balancing exercise the lower level less than substantial harm to the significance of Guildhall by virtue of impacts on its setting must be taken into account and afforded considerable importance and weight.

353. It is the view of officers that the public benefits should be given the weight described above, and that giving great weight to the less than substantial harm to the significance of designated heritage assets and considerable importance and weight to the desirability of preserving the setting of the listed buildings and giving great weight to the conservation of the listed building and the consideration area, the public benefits of the proposal outweigh the less than substantial harm to the significance of the Guildhall and the Guildhall Conservation Area as identified in this report.

CIL and Planning Obligations

354. 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 address impacts and secure compliance with policies. 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.

355. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

356. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

357. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£3,003,219	£2,883,090	£120,129

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£1,213,800	£1,153,110	£60,690
<u>City Planning Obligations</u>			
Affordable Housing	£323,680	£320,443	£3,237
Local, Training, Skills and Job Brokerage	£48,552	£48,066	£486
Carbon Reduction Shortfall (<i>as designed</i>) <i>Not indexed</i>	£0	£0	£0
Section 278 (Evaluation and Design) <i>Not indexed</i>	£100,000	£100,000	£0
S106 Monitoring Charge	£4,750	£0	£4,750
Total liability in accordance with the City of London's policies	£1,690,782	£1,621,619	£69,163

City's Planning Obligations

358. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations
- (incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc)
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction)
- Delivery and Servicing Management Plan (including Consolidation)
- Cycling Promotion Plan
- Construction Monitoring Costs
- Cultural Plan
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement
- Public Route - between London Wall and Basinghall Street (Specification & Access)
- Public Lift and Staircase (Specification, Access & Management Plan)
- Podium Gardens (Specification & Access)
- Public Realm (Specification & Access)
- Brewers' Hall Garden Works (Subject to Open Spaces & City Gardens Committee approval)
- City walkway Works Agreement and declaration of City Walkway
- Legible London Contribution (£40,000)
- Cultural Offer
- Provision of affordable workspace
- Wind mitigation
- Commitment to the details in the applicants Metering, Monitoring and Billing Strategy in accordance with the GLA's "Be Seen" Energy Monitoring Guidance.

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

360. The scope of the s278 agreement may include, but is not limited to, walking and cycling improvements to London Wall (such as pavement relaying, mastic footways replaced with York stone, and the introduction of cycling infrastructure on London Wall to mirror north side), redesign of Basinghall Avenue to integrate the highway with the new pedestrian route, and planting of street trees.

Monitoring and Administrative Costs

361. 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.
362. 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

363. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the wider area. However, in some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are yet to be fully scoped.

Conclusion

364. The proposal would transform the existing section of townscape between London Wall and Basinghall Street delivering on aspirations for the North of the City Key Place area as defined by the Local Plan 2015. High quality architecture would be provided alongside significant enhancements to the public realm including the formation of a new north/south pedestrian route, a re-designed podium level terrace, provision of a City Walkway route, a new public lift/stair access between ground and podium level and an improved pedestrian environment along London Wall.
365. The proposed mix of uses comprising flexible office space with an affordable element and the provision of supporting retail/restaurant/café/gym use would be appropriate for this part of the City. The supporting uses would active and enliven the surrounding public realm, something which is lacking in the design of the current site. Provision of affordable workspace is particularly welcomed at this time given the impacts of the COVID-19 pandemic and as a mechanism to support smaller businesses and start-ups in line with the London Recharged report.
366. The scheme would deliver acceptable levels of cycle parking including short stay, appropriate pedestrian comfort levels, a consolidated servicing arrangement, would enhance permeability and would increase the amount of publicly accessible space within and around the site by approximately 998sqm (64%). The proposal would deliver City Walkway between the Guildhall Plaza and London Wall. The pedestrian route over the colonnade on London Wall, which is currently permissive path, would be removed. This loss would be offset by the overall gain of publicly accessible space of a higher quality and

significant improvements to the permeability of the site. Some stopping up of highway is required but this would be offset by the dedication of public highway of a greater provision.

367. Overall, the proposed sustainability strategy meets current and new London Plan and Local Plan policies. The development is on track to achieve an “excellent” BREEAM assessment rating. The proposals indicate that Whole Life-Cycle Carbon emissions could be significantly reduced in line with the GLA’s aspirational benchmark. The new building would achieve an appropriate degree of climate change mitigation through utilising heat provided by the Citigen network while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.
368. The development would provide enhanced greening at the ground, podium and upper levels through public realm landscaping, green roofs and planted terraces. Three street trees would be lost on Basinghall Street due to it not being practicable to retain them throughout construction. The impact of the lost trees would be offset by replacement tree planting of a greater provision.
369. It is acknowledged that due to the increase in the height of the building the proposal would result in some less than substantial harm to the significance and setting of the grade I listed Guildhall and the Guildhall Conservation Area. In considering the paragraph 196 (NPPF) balancing exercise, and giving considerable importance and weight to the desirability of preserving the listed building and its setting and giving great weight to the conservation of the listed building and the conservation area, it is considered that the less than substantial harm to the significance of the designated heritage assets would be outweighed by the public benefits of the scheme. The proposal would result in a slight breach of the protected vista LVMF view 8A.1 of St Paul’s Cathedral from Westminster Pier, however, the intrusion is not considered to impact on the ability to recognise and appreciate the dome, peristyle and south-west tower of St Paul’s Cathedral.
370. The increase in the height of the building would also result in the requirement for some limited wind mitigation and it would impact on the daylight level to two living rooms in Andrewes House. Three benches on the north and south sides of Aldermanbury would require some wind mitigation (secured through the S.106) in order to ensure that they are suitable for their intended purpose. The two daylight breaches would be marginally below the BRE guidance. Given that the windows in question would be VSC compliant, taking account of the scale of the breach and that the Local Plan acknowledges that ideal daylight and sunlight conditions may not be practicable in densely developed City locations, it is considered that the development would not reduce the daylight levels to unacceptable levels and that policy DM10.7 of the Local Plan is complied with.

371. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted. It is acknowledged that there is a breach of heritage related policy through the less than substantial harm to the setting of the Guildhall and the Guildhall Conservation. Notwithstanding, it is considered that the proposal complies with the development plan when considered as a whole and other material considerations indicate that planning permission should be granted.

Conclusion for Listed Building Consent 65/65a Basinghall Street

372. The proposals would result in a minor alteration to the listed building where it abuts the replacement pedestrian bridge structure. The junction would be made good and the integrity of the structure would be preserved. The works would not result in any harm to the special interest/heritage significance.

373. It is considered that the high quality architecture of the new building, public realm enhancements, greening, tree planting, new pedestrian route and Highwalk bridge would result in a minor enhancement to the listed 65 and 65A Basinghall Street, its setting and its contribution to the significance of the listed building.

374. The proposals would preserve and enhance the special architectural and historic interest and heritage significance of the listed building and its setting, subject to details reserved by condition, in accordance with Local Plan Policies CS 12, DM 12.1 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC 1 and Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Appendix A

Background Papers

Energy and Sustainability Statement, Sweco UK, 12 February 2021

Basinghall Street outline city walkway bridge replacement strategy, ARUP, 10 February 2021

Design and access Statement, Allies and Morrison, 12 February 2021

Townscape, heritage and visual impact assessment, Tavernor Consultancy and Miller Hare, 12 February 2021

Delivery and servicing plan, Transport Planning Practice, February 2021

Transport assessment, Transport Planning Practice, February 2021

Acoustic report, Sweco UK, 12 February 2021

Arboricultural impact assessment, Tim Moya Associates, 3 February 2021

Daylight and sunlight, Wirth Research Ltd., 3 February 2021

Statement of community involvement, Concilio, February 2021

Wind microclimate, RWDI, February 2021

Health impact assessment, 9 February 2021

Flood risk assessment and drainage strategy report, ARUP, 3 February 2021

Fire statement, ARUP, 11 February 2021

Preliminary ecological appraisal, The Ecology Consultancy, 3 February 2021

Daylight and sunlight report, Anstey Horne, 29 January 2021

Geotechnical desk study report, ARUP, 19 September 2019

Equality statement, Knighton Estates Limited, May 2021

Cultural offer, Allies and Morrison, 11 May 2021

Air quality assessment, Sweco UK, 12 February 2021

Planning statement, DP9, March 2021

Cover letter, DP9, 22 March 2021

Design and access statement addendum, Allies and Morrison, 11 May 2021

Response to highways comments, Transport Planning Practice, May 2021

Plans

898_02_05_001 P1 Location plan

898_02_05_002 P1 Existing - Site plan

898_02_05_003 P1 Proposed - Site plan
898_04_05_102 P1 City Walkway Bridge – Plans
898_04_05_103 P1 City Walkway Bridge – Elevations

Existing plans

898_02_05_098 Basement plan P1
898_02_05_099 Lower ground plan P1
898_02_05_100 Ground floor plan P1
898_02_05_100M City Tower Mezzanine plan P1
898_02_05_101 First floor plan P1
898_02_05_102 Second floor plan P1
898_02_05_103 Third to Sixth floor plan P1
898_02_05_107 Seventh floor plan P1
898_02_05_108 Eighth floor plan P1
898_02_05_109 Roof floor plan P1
898_02_05_200 North elevation P1
898_02_05_201 South elevation P1
898_02_05_202 West elevation P1
898_02_05_203 East elevation P1
898_02_05_300 Section P1

14.06.2021 Objection David Bass
01.06.2021 Letter Greater London Authority
28.05.2021 Email City of London Open Spaces
18.05.2021 Email Jane Smith (Barbican Association)
09.05.2021 Email Vivienne Littlechild
18.05.2021 Objection Chris Young
18.05.2021 Objection N Olivier
12.05.2021 Objection David Menkin
12.05.2021 Objection Dimitri Varsamis
11.05.2021 Objection Gareth Owen
11.05.2021 Objection Andrew Hope

08.05.2021	Objection	Nigel Pilkington
09.05.2021	Objection	James Durcan (Chair Andrewes House Residents Group)
12.05.2021	Objection	David Bass
08.05.2021	Objection	L Goldberg
08.05.2021	Objection	Anita Strymowicz
11.05.2021	Email	Thames Water
08.05.2021	Objection	Charles-Etienne Lawrence
08.05.2021	Objection	Hamish Pollock Fraser
22.05.2021	Comment	Roger Hepher
29.04.2021	Email	London Borough of Tower Hamlets
29.04.2021	Email	City of London Access Officer
27.04.2021	Email	City of Westminster
26.04.2021	Email	London Borough of Islington
21.04.2021	Email	Natural England
19.04.2021	Memo	Department of Markets and Consumer Protection

Appendix B

Relevant 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 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).
- Bank Conservation Area Character Summary and Management Strategy SPD2012

Relevant Local Plan Policies

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.

DM16.5 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.

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).

DM17.1 Provision for waste

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

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.

DM20.3 Retail uses elsewhere

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

CS1 Provide additional offices

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

CS3 Ensure security from crime/terrorism

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

CS4 Seek planning contributions

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

CS5 Meet challenges facing North of City

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

CS10 Promote high quality environment

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

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;

- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.

- 2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.5 Shopfronts

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

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;

- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

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

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.

DM12.1 Change affecting heritage assets

- 1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

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

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

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.

DM15.4 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.

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.

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.

SCHEDULE

APPLICATION: 21/00116/FULMAJ

City Tower And City Place House 40 - 55 Basinghall Street London

Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a thirteen storey Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of existing walkways; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m).

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of five 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 reused 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 Plan: London Plan ; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction 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, providing 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, to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details.

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 Plan: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

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

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: Publication London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM

15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be

able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

- 5 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.

- 6 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.

- 7 Provision must be made within the development for City Walkways to be constructed in accordance with specifications to be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development hereby permitted, such specifications to include the positions, widths, levels and finishes of the City Walkway.

REASON: To ensure that facilities are provided for the City Walkway in accordance with the following policy of the Local Plan: DM16.2. 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.

- 8 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The plan shall include a road safety audit given the proximity of the site to Quietway 11. The details 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. No demolition or construction shall be carried out other than in accordance with the approved details and methods.
REASON: To ensure that demolition and 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 demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.
- 9 Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.
REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
- 10 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. REASON: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you

need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk.

- 11 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.
- 12 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.
- 13 No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

REASON: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

- 14 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: rainwater harvesting systems, attenuation systems (including blue roofs), rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates from the site shall be restricted to no greater than 2 litres per second, provision should be made for an attenuation volume capacity capable of achieving this;
 - (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
 - (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
- 15 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.
- 16 The development shall incorporate such measures as are necessary within the site to resist structural damage 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 and the development shall not be carried out otherwise than in accordance with the approved details.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 17 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
 - (b) details of the proposed new facade(s) (new office building and City Tower Podium) including typical details of the fenestration and entrances (ground and podium level);
 - (c) details of a typical bay of the development;
 - (d) details of soffits, hand rails and balustrades;
 - (e) details of the columns and their protection measures;
 - (f) details of the design of the short stay cycle parking stands;
 - (g) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at
 - (h) details of plant and ductwork to serve the retail, restaurant, cafe or gym use;
 - (i) details of external surfaces within the site boundary including hard and soft landscaping;
 - (j) measures to be taken during the period of demolition and construction for the protection of the trees to be retained (Brewers Hall Gardens, Basinghall Street and Basinghall Avenue) and details of any pruning of the trees;
 - (k) details of the access between the office lobby and cafe on the ground floor of the new office building. The use of a platform lift should be explored and would be the preferred solution.
 - (l) details of the layout of the north western wheelchair accessible WC on the ground floor of the office building (the WC pan should be located on the shortest wall).
 - (m) details of left and right hand transfer wheelchair accessible WC facilities at ground and first floor level in the new office building.
 - (n) details of the opening mechanism to the wheelchair accessible WC facilities in the new office building.
 - (o) details of step free access to the shower and changing facilities in the basement of the City Tower podium.
 - (p) details of the exercise equipment and maintenance regime at podium level.
 - (q) details of the plant equipment and screening at roof level.
 - (r) details of the two electric charging points in the delivery and servicing area.

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, CS19 and policy T6 of the London Plan.

- 18 Details of the position and size of any green and blue roofs, the type of planting and the contribution of the green and blue roofs 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.

- 19 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.

- 20 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, unless otherwise approved in writing by the local planning authority.

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.

- 21 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.

- 22 Provision must be made within the development for a walkway bridge to be constructed in positions, at levels and to dimensions all in accordance with specifications to be submitted to and approved in writing by the Local Planning Authority prior to any works thereby affected being begun.

REASON: To ensure satisfactory access to City Walkways by all users in accordance with the following policy of the Local Plan: DM16.2.

- 23 Provision must be made within the development for the lighting and drainage of City Walkways together with a lockable service cupboard and cleansing facilities in accordance with specifications to be submitted to and approved in writing by the Local Planning Authority prior to any works thereby affected being begun.

REASON: To ensure that City Walkways may be used in safety at all times and in all weathers in accordance with the following policy of the Local Plan: DM16.2.

- 24 All City Walkways within the development shall be constructed in accordance with specifications to be submitted to and approved in writing by the Local Planning Authority prior to any works thereby affected being begun, which shall include details of surface finishes, handrails, balustrades and parapets.

REASON: In the interests of public safety and to ensure uniformity of design treatment of all City Walkways in accordance with the following policy of the Local Plan: DM16.2.

- 25 Before any works affected thereby are begun, details of one car parking spaces suitable for use by people with disabilities to be provided on the premises shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with those details, and such parking spaces shall be maintained throughout the life of the building and be readily

available for use by disabled occupiers and visitors without charge to the individual end users of the parking.

REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.

- 26 All unbuilt surfaces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. The scheme shall include details of the design of the planters, pedestrian routes, the replacement trees on Basinghall Street, rain gardens, plant species and details of irrigation and maintenance regimes for the planting. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

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

- 27 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.

- 28 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class E use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class E use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

- 29 (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.
- 30 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.
- 31 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.
Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the Publication London Plan.
- 32 A post construction full fit-out Sustainability Plan for the City Tower podium works, demonstrating that the identified targets in the planning stage Sustainability Plan have been achieved shall be submitted after

full fit-out and occupation of the podium space.. The details shall thereafter be retained.

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.

- 33 A post construction full fit out BREEAM assessment for the new office building demonstrating that a target rating of 'Outstanding' has been achieved (or, if first agreed by the local planning authority a minimum rating of 'Excellent' has been achieved) shall be submitted as soon as practicable after practical completion. In the event that the local planning authority is asked to agree a minimum rating of "Excellent" it must be first demonstrated to the satisfaction of the local planning authority that all reasonable endeavours have been used to achieve an "Outstanding' rating. The details shall thereafter be retained.
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.
- 34 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 35 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion Circular Economy report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the Publication London Plan.
- 36 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 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.

- 37 Provision must be made within the development for continuing structural support for the City Walkway(s) in pursuance of Section 10 of the City of London (Various Powers) Act 1967.
REASON: To ensure the integrity of the City Walkway in accordance with the following policy of the Local Plan: DM16.2.
- 38 After the City Walkway(s) incorporated in the planning permission have been constructed, certified and declared by the City of London Corporation to be City Walkways in pursuance of Sections 5 and 6 of the City of London (Various Powers) Act 1967, any person may have access thereto on foot and may pass and re-pass thereon on foot as of right, but subject nevertheless to any restrictions which may legitimately from time be imposed in relation thereto.
REASON: To ensure the public has access over the City Walkway on this site in accordance with the following policy of the Local Plan: DM16.2.
- 39 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas 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.
- 40 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.
- 41 The threshold of the new pedestrian route shall be at the same level as the rear of the adjoining footway.
To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 42 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 43 The threshold of all vehicular 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.

- 44 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 611 long stay and 27 short stay pedal cycles in conjunction with the redevelopment of 55 Basinghall Street. 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.
- 45 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 220 long stay and 61 short stay pedal cycles in conjunction with the City Tower works. 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.
- 46 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.
- 47 1,041 sq m (GIA) of floorspace shall not be used other than for the Commercial, Business and Service (Class E) floorspace hereby approved to be provided at ground and basement level shall be used for purposes within Class E (a), (b), (d) under Schedule 2 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 amending or revoking and re-enacting that Order with or without modification.
REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2
- 48 A minimum of 2 electric charging points within the delivery and servicing area must be provided prior to the first occupation of the development.

REASON: to further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS 16 and draft Local Plan 2036 Policy VT2.

- 49 No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.

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

- 50 The terraces on levels 4 to 12 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

- 51 No amplified or other music shall be played on the 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.

- 52 The development shall provide:

- 47,395 sqm (GEA) of office floorspace (Class E); and
- 1,154 sqm (GEA) flexible retail, restaurant, cafe, gym floorspace (Class E)

REASON: To ensure the development is carried out in accordance with the approved plans.

- 53 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:

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

- 898_02_05_598 Basement plan P1
- 898_02_05_599 Lower ground plan P1
- 898_02_05_500 Ground floor plan P1
- 898_02_05_500M City Tower Mezzanine plan P1
- 898_02_05_501 First floor plan P1
- 898_02_05_502 Second floor plan P1
- 898_02_05_503 Third to Sixth floor plan P1
- 898_02_05_507 Seventh floor plan P1
- 898_02_05_508 Eighth floor plan P1
- 898_02_05_509 Roof floor plan P1
- 898_02_07_098 Basement plan P1

898_02_07_099 Lower ground plan P1
 898_02_07_100 Ground floor plan P2
 898_02_07_100M City Tower Mezzanine plan P2
 898_02_07_101 First floor plan P2
 898_02_07_102 Second floor plan P2
 898_02_07_103 Third floor plan P1
 898_02_07_104 Forth floor plan P1
 898_02_07_105 Fifth floor plan P1
 898_02_07_106 Sixth floor plan P1
 898_02_07_107 Seventh floor plan P1
 898_02_07_108 Eighth floor plan P1
 898_02_07_109 Nineth floor plan P1
 898_02_07_110 Tenth floor plan P1
 898_02_07_111 Eleventh floor plan P1
 898_02_07_112 Twelfth floor plan P1
 898_02_07_113 Thirteenth floor plan P1
 898_02_07_200 North elevation P1
 898_02_07_201 South elevation P1
 898_02_07_202 West elevation P1
 898_02_07_203 East elevation P1
 898_02_07_300 Section AA P1
 898_02_07_301 Section BB P1
 898_02_07_400 Façade bay studies - Ground level - Second level P2

898_02_07_401 facade bay studies - Upper typical P2
 898_02_07_402 façade bay studies - Mid terrace P2
 898_02B_07_501 P1 Proposed - First Floor Plan_Public Realm, Allies and Morrison, 27 May 2021
 898_02_07_500 P2 Proposed - Ground Floor Plan_Public Realm, Allies and Morrison, 10 June 2021
 898_02_07_503 P4 Proposed - Ground Floor Plan_Stopping Up Allies and Morrison, 15 June 2021

INFORMATIVES

- 1 There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-ourpipes&data=04%7C01%7C%7C18d05a41fb854b9b549408d9145d9165%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C63756321>

4368286204%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwM
DAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C1000&
amp;sdata=d7FfYZN5Kc7n6qEXNm4ZqXlpDuEKPTCZQ%2FU5vDJ1T
yg%3D&reserved=0.

- 2 The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-ourpipes&data=04%7C01%7C%7C18d05a41fb854b9b549408d9145d9165%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637563214368296203%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C1000&data=XF1X8no3RoN6hg7lzt7Vel8ngLeGTA4ZYdqNZNloo%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk
- 3 There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-ourpipes&data=04%7C01%7C%7C18d05a41fb854b9b549408d9145d9165%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637563214368296203%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C1000&data=XF1X8no3RoN6hg7lzt7Vel8ngLeGTA4ZYdqNZNloo%3D&reserved=0>
- 4 The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line

with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-ourpipes&data=04%7C01%7C%7C18d05a41fb854b9b549408d9145d9165%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637563214368286204%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6Ik1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=d7FfYZN5Kc7n6qEXNm4ZqXlpDuEKPTCZQ%2FU5vDJ1Tyg%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

- 5 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.

- 6 Where groundworks not shown on the approved drawings are to take place outside or below the level of the existing structure (including works for underpinning, new lift pits, foundations, lowering of floor levels, new or replacement drainage, provision of services or similar) prior notification should be given in writing to the Department of the Built Environment in order to determine whether further consents are required and if the proposed works have archaeological implications.

From: [Devcon Team](#)
To: [Pln - CC - Development Dc](#)
Subject: 21/00116/FULMAJ - CITY TOWER AND CITY PLACE HOUSE, 40-55 BASINGHALL STREET, LONDON, EC2V 7HR
Date: 20 April 2021 11:31:48

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 69229 Your Ref: 21/00116/FULMAJ
20 April 2021

Dear Sir/Madam

Re: CITY TOWER AND CITY PLACE HOUSE, 40-55 BASINGHALL STREET, LONDON, EC2V 7HR

Waste Comments

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed 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" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk

Visit us online www.thameswater.co.uk , follow us on twitter [www.twitter.com/thameswater](https://twitter.com/thameswater) or find us on www.facebook.com/thameswater. We're happy to help you 24/7.

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From: [Delves, Gemma](#)
To: [Devlia, Neel](#)
Subject: FW: City Place House- Application Ref 21/00116/FULMAJ
Date: 17 June 2021 17:04:45

From: Hegarty, Patrick <Patrick.Hegarty@cityoflondon.gov.uk>
Sent: 28 May 2021 18:08
To: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>
Subject: RE: City Place House- Application Ref 21/00116/FULMAJ

Gemma,

The proposals to remove and replace the three trees on Basinghall Street are satisfactory. The trees will be overhung by the building but the soffit height is approximately 12 m above the ground which will allow enough height for appropriately selected species to develop and as this is the south side of the building there will be enough light for the proper growth of the trees. The exact tree planting positions, species selection and detailed design, will need to be approved either through a Condition or be dealt with through a S278 agreement.

The Brewers' Hall Garden site is shown indicatively in the application as being replanted and with an increase to the area of planting. Improvements to the appearance to the existing structures and additional seating are also proposed. The existing trees are to be retained here. The Developer is to provide £200k through a S106 agreement, towards the costs of this work which will be undertaken by the City. This will allow the details of the design to be developed by the City. The amount is not envisaged to allow for any significant reordering of the vents and underground structures associated with the underlying electricity substation, etc. There is potentially the opportunity to redesign this garden in conjunction with the emerging public realm project associated with St Paul's / Museum Gyratory area project, which extends along London Wall.

We welcome the general improvements to the public realm and increased permeability of the site from London Wall through to Basinghall Street and beyond. I understand the detailed design of the City Tower Podium will take into consideration public safety and allow for passive surveillance of the residual public realm landscaping, particularly to the east of City Tower.

Regards
Patrick

Patrick Hegarty
Technical Manager
Open Spaces Department
City of London Corporation
Tel: 07956 435 811
Email: patrick.hegarty@cityoflondon.gov.uk
Address PO Box 270, Guildhall, London, EC2P 2EJ

GREATER **LONDON** AUTHORITY
Good Growth

Gemma Delves
City of London
By Email

Our ref: 2021/0473/S1
Your ref: 21/00116/FULMAJ
Date: 01 June 2021

Dear Gemma Delves

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Local Planning Authority reference: 21/00116/FULMAJ

I refer to the copy of the above planning application, which was received from you on 22 April 2021. On 1st June the Mayor considered a report on this proposal, reference 2021/0473/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

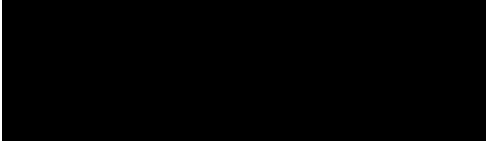
The Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 97 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

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

If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council may therefore proceed to determine the application without further referral to the Mayor. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, email: gavinmclaughlin@tfl.gov.uk, telephone: 07792643608

Yours sincerely



John Finlayson

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL
Mike Worthington, Agent, DP9

City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Local Planning Authority: City of London

local planning authority reference: 21/00116/FULMAJ

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

Demolition of the existing building and structures at 55 Basinghall Street and the erection of a Class E building comprising commercial, business and service uses; creation of a new pedestrian route through the site; landscaping works, including alterations to the public highway; part demolition of basement, lower ground, ground and mezzanine floors of 40 Basinghall Street with creation of Class E ground floor units and associated minor connection works to 65/65a Basinghall Street associated with the removal and re-instatement of the City Walkway

The applicant

The applicant is **Knighon Estates Limited** and the architect is **Morrison and Allies**

Strategic issues summary

Land use principles: The proposed intensification of the site for office led development with retail functions at lower floors is consistent with the CAZ and acceptable in principle subject to further consideration of flexible and affordable workspace. (paras. 18-25)

Urban Design/LVMF: The overall design approach is complementary to local context and is acceptable subject to some clarification on the materiality on the upper floors of the proposed 2 Aldermanbury Square building. The public realm is much improved and there is negligible impact to the protected views of Westminster Pier to St Paul. (paras. 26 - 46)

Heritage: There is some small scale, less than substantial harm identified to the Guildhall, however on balance the public benefits of the scheme with the much enhanced public realm and local pedestrian connectivity could be considered to outweigh the less than substantial harm identified to the significance of the Grade I listed Guildhall. This harm could be further diminished by confirmation of a more neutral colour pallet to backdrop of the Guildhall spire. GLA officers will conclude the balancing exercise once the final package of public benefits is confirmed at Stage II (paras. 47 - 54)

Transport: The proposed development broadly complies with the London Plan subject to clarification over cycle parking/facilities, a pedestrian comfort level assessment, contributions towards wayfinding and strategic cycle network and provision of construction logistics plan and road safety audit (paras. 55 - 76)

Sustainable Development: Further information is required to ensure the development is consistent with the objectives of the London Plan with regards to Energy, Whole Life Carbon Cycle, Circular Economy/Waste, Urban Greening, Biodiversity, Drainage and Air Quality. (paras. 77 - 93)

Recommendation

That City of London Corporation be advised that whilst the proposal is supported in principle, the application does not currently comply with the London Plan for the reasons set out in paragraph 98. Where the associated concerns within this report are addressed, the application may comply with the London Plan / become acceptable in strategic planning terms.

Context

1. On 22 April 2021 the Mayor of London received documents from 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 Corporation 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 Category/categories of the Schedule to the Order 2008:
 - 4 "*Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO. (Development within a London View Management Framework Area)*"
3. Once 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; or, allow the Corporation to determine it itself. In this case, the Corporation need not refer the application back to the Mayor if it resolves to refuse permission.
4. The Mayor of London's statement on this case will be made available on the City Hall website: www.london.gov.uk.

Site description

5. The site consists of two office blocks in the City of London, 55 Basinghall Street (City Place House) and 40 Basinghall Street (City Tower), between Basinghall Hall Street to the south and London Wall to the north. The site is bound at ground and podium level with Brewers' Hall and Aldermanbury Square neighbouring the site the west and Girdlers' Hall neighbouring to the east. To the immediate north of London Wall, is the recently developed London Wall Place development. The Site is 0.6 hectares (ha) in area.
6. Locally designated open space Brewers Hall garden lies to the east of the site, the elevated Basinghall high walk is locally designated open space within the site and a further designated open space is immediately to the east of City tower.
7. The site is not within a conservation area. However, there are a number of listed properties in the vicinity. Immediately to the south of the site is the Grade II listed 65/65a Basinghall Street to which the development wishes to redevelop an existing elevated walkway and immediately to the southwest is Grade II listed 20 Aldermanbury with the Grade I listed Guildhall further south. To the north lies Grade II listed remains of the former Church St Alphage. The neighbouring Brewers' Hall and Girdlers' Hall are not listed but the Brewers Hall does benefit from a Certificate of Immunity.
8. Overall the site benefits from a Public Transport Access Level (PTAL) of 6b, the best available on a scale ranging from 1 to 6b. The nearest station is Moorgate station which is approximately 400 metres to the north east of the site and provides

access to a number of Underground and National Rail services. Bank station is located within 500 metres and provides access to both Underground and National Rail services. A new Elizabeth Line station is to be opened at Liverpool Street, with entrances and ticket halls at both Moorgate and Liverpool Street. There are a number of bus stops located close to the Site, with several bus services operating 24-hour services. The nearest stops N and A are located directly on London Wall and are approximately 130m away. Quietway 11 runs 150 metres to the west providing good access to the strategic cycle network.

Details of this proposal

9. It is proposed to demolish the existing building at 55 Basinghall Street (City Place House) and replace this with a new 12 storey building (69.5 metres AOD) to be known as 2 Aldermanbury Square, comprising commercial, business and service uses. In addition, the partial demolition of the basement, lower ground and ground floors of 40 Basinghall Street (City Tower) is proposed to facilitate the creation of commercial, business and service uses. The quantum of development proposed is set out below:

2 Aldermanbury Square (55 Basinghall Street)

Use Class	Floor Level	NIA (sq m)	GIA (sq m)	GEA (Sq m)
Commercial, Business & Service Use (Class E)	G	139	160	175
Offices (Class E)	L01-L12 B1,B2	29,641	43,112	45,704
TOTAL		29,780	43,272	45,879

40 Basinghall Street

Use Class	Floor Level	NIA (sq m)	GIA (sq m)	GEA (Sq m)
Commercial, Business & Service Use (Class E)	G, L01	875	1,406	1,549
Offices (Class E)	B2, B1, G, L01	121	1,407	1,549
TOTAL		996	2,813	3,240

10. The proposals would create net gain of 18,565 sqm of office space.
11. A new route connecting London Wall with Basinghall Street will be created by demolishing an element of the existing podium. At ground floor and mezzanine level new flexible commercial units under Class E will be introduced (currently labelled retail on floorplans). An element of existing office use is also retained.
12. It is proposed to enhance the open spaces and public realm in and around the development with improved landscaping and accessibility.
13. The development would provide long term cycle parking for the users of the buildings and some short term on street visitor cycle parking.

Case history

14. No previous case history. However, in addition to this application, a separate listed building consent application is submitted to the LPA which relates to the connection

of the raised walkway on the south side of Basinghall Street into the grade II listed 65/65a Basinghall Street. Listed building consent is sought for: '*Partial demolition of and associated works to 65/65a Basinghall Street to allow for the removal of the existing City Walkway bridge and installation of new City Walkway bridge to be delivered as part of the redevelopment of 55 Basinghall/40 Basinghall Street.*'

Strategic planning issues and relevant policies and guidance

15. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan (2015); and, the London Plan 2021.
16. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - Draft City Plan 2036 (reg 19 Consultation March 19th – 10th May 2021)
 - City of London SPGs/SPDs
17. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good Growth London Plan;
 - World City role London Plan;
 - Economic development *London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;*
 - Central Activities Zone *London Plan;*
 - Retail / Office *London Plan;*
 - Urban design *London Plan; Character and Context SPG; Public London Charter draft LPG;*
 - Strategic views *London Plan, London View Management Framework SPG;*
 - Heritage *London Plan; World Heritage Sites SPG;*
 - Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG*
 - Sustainable development *London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; Mayor's Environment Strategy;*
 - Air quality *London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG;*
 - Ambient noise *London Plan; the Mayor's Environment Strategy;*
 - Transport and parking *London Plan; the Mayor's Transport Strategy;*
 - Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail Funding SPG; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG;*
 - Equality *London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;*

Land uses principle

18. The site is located within the Central Activities Zone (CAZ), where the Mayor encourages the increase of office floorspace as part of a mix of uses, as set out in London Plan Policy SD4. The London Plan 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.
19. London Plan Policy SD4 'The Central Activities Zone' states that the vitality, viability, adaptation and diversification of CAZ retail clusters, including locally orientated retail and related uses should be supported.
20. London Plan Policy SD5 Plan seeks to give greater weight to office and other commercial CAZ functions.
21. London Plan Policy E1 seeks improvements to the competitiveness and quality of office space through new office provision and mixed-use developments, with increases to the current stock of offices to be supported specifically within the CAZ in addition to improvements to walking, cycling and public transport connectivity.
22. London Plan Policy E2 supports the provision of a range of Use Class B (now within use class E) business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises (particularly where more than 2,500 sqm of Use Class B floorspace is proposed). A range of commercial sized units would be provided on ground floor although predominantly to be retail use in function. The Corporation should ensure there is range of spaces to support businesses of various sizes.
23. There is limited information accompanying the submission in regard the requirements of London Pan Policy E2 D for affordable workspace.
24. London Plan Policy D3 seeks to optimise delivery through the design-led approach, making the best use of land
25. The proposed land uses are acceptable subject to further work that shows consideration that the provision of a range of office spaces and affordable workspace has been considered consistent with the requirements of London Plan Policies E2 and E3.

Urban design

26. Policies D1 and D2 of the London Plan seek to ensure that new developments are well-designed and compatible with the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhance the historic environment.

Optimising development capacity

27. London Plan 2021 Policy D3 also seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The site has good accessibility to public transport and the location within CAZ. In this instance, the higher density office-led mixed use scheme is considered appropriate for the locality and is supported.

Development layout

28. The development would provide active frontage along ground floor elevations and improved legibility and accessibility through the development and public right of way and open spaces. The layout is acceptable.
29. The Corporation must be satisfied that the layout and servicing of the commercial units can be achieved in a practical manner that does not impede upon highway activities.

Scale and massing

30. London Plan policy D9 states that development plans should define what is considered a tall building for specific localities (although not less than 6 storeys or 18 metres) and identify suitable locations; and identify any such locations and appropriate tall building heights on maps in Development Plans.
31. The City Plan defines tall buildings as, "*those which significantly exceed the height of their general surroundings*" (Paragraph 3.1.4.1). Strategic Policy S12 of the draft City Plan relates to tall buildings and tall buildings in the City are defined as 75m AOD. The proposed development would not increase the height of the existing City Tower and the redeveloped 55 Basinghall would be 69.5m AOD (under 75m in height and not significantly taller than the surrounding context) therefore the proposals do not constitute tall buildings within the meaning of London Plan Policy D9.
32. With regards to overall height and massing this is considered appropriate to this city location context with good use of recessed balconies which help break up the apparent mass of the development. The use of struts underpinning the upper storeys and widening of footpath increases sense of spaciousness at pedestrian level compared to the more overbearing form of development currently.
33. The TVIA / LVMF analysis submitted in support of the application suggests that building will sit comfortably in its surroundings. The general layout and massing approach is supported and the proposals improve on the quality of existing public realm and local permeability which is welcomed.

Public realm

34. London Plan Policy GG1 seeks to ensure streets and public spaces can be enhanced and enjoyed safely. The proposals offer significant public improvements in the legibility and accessibility of the site with improvement works to the locally designated open spaces improving the character and appearance of the area.
35. The majority of the ground floor public realm will be covered by building overhangs although this is recognised as a characteristic of the site's immediate context, such as the covered high level walkways linking London Wall with the Barbican, nonetheless this represents a substantial improvement given the lack of linkage between London Wall and Basinghall Street and nature of the existing pedestrian routes along London Wall which are much enclosed and uninviting spaces. The podium and Brewers all gardens public space is much enhanced with planting and seating areas.
36. Improvements to the public realm should be secured through appropriate s106/s278 agreements.

Healthy Streets

37. In accordance with Policy T2 (Healthy Streets), the proposals include new public realm and highway works which would improve the site and surrounding area against the Healthy Streets indicators, primarily through new greening, active frontages and widened footways.
38. A new, direct street level link between Basinghall Street and London Wall is proposed within the site, which is strongly supported. Flexible commercial units are proposed at the ground floor of both new buildings, which would introduce new active frontages along London Wall to the north.
39. The footway along the south side of London Wall is proposed to be widened to over 5 metres, improving its PCL.
40. New pedestrian routes are proposed at both ground and elevated levels, and a new public garden at podium level, able to host cultural events and connected to ground level by a new public lift and staircase. The new elevated route proposed across London Wall would be step-free, whereas the current City Walkway can only be accessed by stairs.
41. The applicant should clarify whether cyclists will be able to access the new elevated walkway using the lift with their bikes. The new north-south pedestrian route proposed should become a shared space for walking and cycling, subject to further redesign and a Stage 1 Road Safety Audit (RSA) and Designer's Response prior to determination. This should be shared with TfL officers for approval. The applicant should also clarify how all new public realm will remain publicly available, through adoption as highway or section 106 as applicable.

Architectural quality

42. The architectural quality is considered to respond well to this predominantly office location context. The architecture has been developed in close collaboration with City of London Corporation officers, with emphasis placed on quality of materials and detailing which is welcomed, there are no strategic concerns in this regard.

Fire safety

43. In line with Policy D11 and D12 of the London Plan, development proposals must achieve the highest standards of fire safety. As such, development proposals should be accompanied by a fire statement (prepared by a suitably qualified third party assessor) demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Additionally, London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings. A fire statement in line with the above requirements should be secured by planning condition prior to any Stage II referral.

Inclusive access

44. The proposal intends to respond positively to Policy D5 of the London Plan. In line with London Plan Policy D5, inclusive design and access shall be incorporated into the communal podium courtyard gardens, roof terrace areas, cycle and refuse store

areas to be secured by condition by the Corporation. Improved accessibility is provided with a public lift between the high walk/podium garden and the street level.

London View Management Framework (LVMF)

45. The Mayor has identified a list of strategic views London Plan policy HC3, which include significant buildings or urban landscapes which help to define London at a strategic level. Policy HC4 of the London Plan seeks to protect these strategic views and require proposals to make a positive contribution to the composition of the views and their landmark elements.
46. The site is located within the Landmark Background Assessment Area of the Westminster Pier to St Paul's viewing corridor (LVMF 8A.1). The submitted view impact assessment shows the building would marginally appear to the left hand side of St Paul's (when viewed from Westminster Pier). The proposed development would not create additional height or mass within the strategic view given the silhouette of development created by 21 Moorfields. The proposals would have negligible impact on the strategic view does not compromise the strategic aims of the London View Management Framework.

Heritage

47. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions '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' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the character or appearance of that area'.
48. The NPPF states that when considering the impact of the proposal 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. 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.
49. 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. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
50. The impact of the proposals on the settings of the listed buildings and their significance, identified in the THVIA have been fully assessed and taken into consideration. These include:
 - The Guildhall, Grade I - List entry 1064675

- Church of St Lawrence Jewry, Grade I - List entry 1064673
 - 65-65A Basinghall Street, Grade II - List entry 1454179
 - 20 Aldermanbury, Grade II, List entry 1428998
 - Remains of Tower of St Alphage Church, Grade II - List entry 1193558
 - Former Guildhall Library and Museum, Grade II* - List entry 1064744
 - 13-14 Basinghall Street, Grade II - List entry 1287060
 - the Barbican Estate, Grade II* (Park and Garden) – list entry 1001668
 - Wood Street Police Station, Grade II* - List entry 1323699
 - Salters' Hall, Grade II – list entry 1396374
 - remains of the footings of former Church of St Mary the Virgin Love Lane, Grade II - List entry 1359121
 - Monument to John Hemminge and Henry Condell, Grade II – List entry 1064772
 - 1 Cornhill, Grade II - List entry 1286711
 - Bank of England, Grade I – List entry 1079134
 - 1-6 Lombard Street, Grade II – List entry 1286139
 - 1 King William Street, Grade II – List entry 1252015
 - St Mary Woolnoth Church, Grade I – List entry 1064620
 - Brewers Hall, Certificate of Immunity – List entry 1439550
51. Whilst there are multiple other heritage assets in the broader locality their relationship with the site gives no rise to harm to their heritage significance.
52. Having regard to their setting and significance the proposals are considered to have a neutral impact upon the identified heritage assets with the exception of the Guildhall.
53. The proposed development would create an appreciable backdrop above the established roofline of the Guildhall in key approaches along King and Queen Street. The spire of this building forms an important architectural and historical interest and appreciation of the significance building. The TVIA / LVMF analysis suggests that building will sit comfortably in its surroundings with the most notable heritage impact being on axial views of the Guildhall spire. While there is no particular concern given the recessive, background nature of the view, full renderings should be provided to ensure that the materiality of the upper levels of the proposal do not impact on the setting of the spire. Given the currently clear backdrop to the spire the proposals represent some small scale, less than substantial harm to the significance of the Guildhall caused through the change to its setting. It is acknowledged that as you progress closer to the Guildhall at a pedestrian level the perception of harm diminishes.
54. The harm identified is small scale and less than substantial nonetheless there should be public benefits which outweigh the scale of the harm identified with regards to the significance of the heritage asset. The proposed improvements in the public realm at both ground floor level at Brewer's hall gardens, London Wall and new through route from London Wall to Basinghall Street and at podium level also between the 40 and 55 Basinghall Street with inclusive public access to the raised walkway and podium public space are a significant public benefit which will further enhance connectivity and legibility including improving access to and appreciation of the Guildhall and surrounding listed buildings. The public benefits associated with the scheme will be weighed against the minor, less than substantial harm to the significance of the Guildhall (only vaguely appreciable in longer held views of the Guildhall on the southern approaches) once the scheme is referred back at Stage II

and the final details (especially those regarding office spaces and affordable workspace) confirmed.

Transport

Transport assessment (TA)

55. The application proposes alteration to areas of City Walkway, an existing elevated pedestrian route connecting various office buildings. These proposed alterations are the subject of a parallel non-referable application for partial demolition, removal and replacement of the City Walkway (local ref: 21/00201/LBC) which will be determined jointly by the City Corporation.
56. Although the walkway alterations proposed are acceptable in principle, the new walkway proposed would be narrower than the current one. The design should therefore be supported by a Pedestrian Comfort Levels (PCLs) assessment following the Pedestrian Comfort Guidance for London.
57. This assessment should cover all new elements of the new walkway, including the lift, and use projected future baseline pedestrian flows in the TA. This is necessary to ensure compliance with London Plan Policy T4 (Assessing and mitigating transport impacts), specifically part E on cumulative impacts.

Wayfinding

58. The City Corporation should secure £35,000 to help deliver Legible London signage on site in line with Policy T4 part C and D5 (Inclusive design) of the London Plan.

Cycling

59. As the proposed development would create a new cycling access directly into the site from London Wall, via the new north-south pedestrian route proposed, the City Corporation should consider how this development can facilitate the widening and full segregation of the cycle lanes between London Wall's Rotunda roundabout junction and the A501 Moorgate / A1211 London Wall junction approximately 250 metres west of the site. This part of London Wall could then be formally designated as part of the London-wide TfL Cycleways network.
60. The route between the site and Quietway 11 should also be assessed prior to determination using the TfL Cycle route quality criteria. This assessment will identify any highway works necessary to link the proposed development to Quietway 11 and enable a new link route along Aldermanbury Square and Love Lane to also become a Cycleway.
61. After the assessment, the TfL Cycleways signage guidance and London Cycling Design Standards (LCDS) should be used to design and cost appropriate signage for London Wall and the new link route to Quietway 11, and any highway works necessary to ensure cyclist safety and comfort along them.
62. Any cycling improvement measures identified should then be funded by the applicant and implemented via S278 in accordance with London Plan Policies T3 (Transport capacity, connectivity and safeguarding) part B, Policy T4 part C and T5 (Cycling) part A of the London Plan.

Cycle Parking

63. The application is largely compliant with Policy T5 and Table 10.2 of the London Plan on minimum cycle parking standards, the amount of short stay cycle parking for the retail uses should be increased to achieve greater London Plan compliance.
64. 611 long stay cycle parking spaces are proposed in the basement of the new 55 Basinghall Street building and three short stay cycle parking spaces at ground floor level for visitors. This includes only four short stay cycle parking spaces for the ground floor retail proposed when the London Plan minimum standard for retail that should be applied requires nine spaces.
65. A total of 206 long stay spaces are proposed at basement level for the refurbished 40 Basinghall Street building, along with 20 spaces also in the basement but proposed for use as short stay cycle parking. Ten long stay cycle parking spaces are proposed for the flexible retail units, located within the units themselves. These amounts exceed London Plan standards for the refurbished floorspace which is welcome.
66. The LCDS recommends that short stay cycle parking should always be located in the public realm. All cycle parking design should comply with the LCDS and at least 5% of all long stay cycle parking should therefore cater to larger and adapted bikes.
67. End of journey facilities to encourage cycling should be provided prior to occupation for all uses to encourage active travel. Showers and lockers must also be provided within the flexible ground floor retail units, which has not yet been demonstrated.
68. Facilities for charging e-bikes and to accommodate cargo bike deliveries are also recommended, in both the servicing areas and adjacent to the main pedestrian entrances.
69. The City Corporation is encouraging planning applicants to produce Cycling Promotion Plans rather than Travel Plans, which is supported due to the unique local travel context. This is welcome in accordance with London Plan policy T4 part B. However the Cycling Promotion Plan should be provided to TfL officers for further comment prior to determination and secured by pre-occupation condition.

Car Parking

70. The development is proposed to be car-free except for one disabled car parking space proposed in the basement of 40 Basinghall Street. This complies with London Plan policy T6.2 (Office parking) which is welcome.
71. A total of 22 car parking spaces and a motorcycle parking area currently in the basement of 40 Basinghall Street are proposed to be removed. The location and accessibility of the single disabled car parking space should be clarified prior to determination.
72. The two new delivery and servicing bays proposed at basement level beneath 55 Basinghall Street should be provided with active Electric Vehicle Charging Points (EVCPs) from the outset in accordance with Policy T6 (Car parking) of the London Plan. This should be secured by condition.

Delivery & Servicing

73. Delivery and servicing areas to serve the development are proposed off-street to reduce road danger, which is supported in line with London Plan policy T4 part F. A framework Delivery and Servicing Plan (DSP) has been provided which is acceptable in principle and a full DSP should be secured by condition in line with Policy T7 (Deliveries, servicing and construction) of the London Plan. Facilities for

cargo bikes would also be strongly supported. The City Corporation should consider restricting service vehicle movement during the cycle and pedestrian network peak periods. Use of an off-site freight consolidation centre is also proposed for both sites to minimise highway capacity impacts. This is supported in line with London Plan Policy T7 part E.

Construction

74. The proposals are not currently supported by a Construction Logistics Plan (CLP). This is required in accordance with London Plan Policies T4 and T7. An outline CLP must therefore be produced in accordance with TfL guidance and submitted to support the application prior to determination.
75. Construction logistics planning and traffic management are essential to ensuring Vision Zero, the Mayor's target to eliminate death and serious injury from London's transport networks by 2041.
76. Given the close proximity of Quietway 11, a full Road Safety Audit (RSA) and Designer's Response should be secured for all eventual final construction access proposals.

Sustainable development

Energy strategy

77. The applicant has submitted an energy assessment in accordance with London Plan Policy SI2. However, further information is required to address the following strategic areas:
 - Update required to the refurbished baseline.
 - Further energy efficiency measures should be considered and proposed to the refurbished element.
 - Further information required on the proposed Citigen district heating connection and should also reconsider the potential to utilise cooling. The heat loads connected to the network should be maximised.
 - Further information required on the PV potential.
 - Confirm the carbon offset approach with the borough.
 - Address the Whole Life-cycle Carbon and Be Seen policies.
78. This information is required before the expected carbon dioxide reductions and overall savings can be confirmed. Full details of the outstanding issues associated with energy have been provided directly to the applicant and Corporation.

Circular Economy

79. The promotion of a more circular economy that achieves improved resource efficiency and innovation in order to maintain products and materials at their highest use for as long as possible is one of the objectives of Policy SI7 of the London Plan. London Plan SI7 requires development applications that are referable to the Mayor of London submit a Circular Economy Statement, in addition London Plan policy D3 requires development proposals to integrate circular economy principles as part of the design process, therefore the applicant should submit a circular economy statement.

Whole Life Carbon Cycle

80. In accordance with London Plan Policy S112 the applicant is required to submit a calculation and measures to reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint.
81. Whilst the energy assessment and sustainability statement document demonstrates that WLC has been taken into account and that a WLC assessment has been completed, all applicants are expected to submit a completed WLC assessment template (as an Excel document, not a PDF) and follow the GLA WLC guidance; both of which are available here: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/whole-life-cycle-carbon-assessments-guidance-consultation-draft>
82. The applicant should submit a WLC assessment template in full. This is important to allow results to be recorded and tracked through to the post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made. As per the GLA 'Whole Life-cycle Carbon Assessment – draft for consultation – guidance document' this assessment should comply with EN 15978 and cover all building elements.
83. Two assessments are required to be submitted through the GLA WLC template – one that does not account for decarbonisation of the grid (Assessment 1) and another that does account for decarbonisation to both operational and embodied carbon (Assessment 2). Carbon emissions during lifecycle modules A1-A5 and B1 of Assessment 2 should not include the decarbonised figures. Reference should be made to the GLA WLC guidance documents and RICS PS for more details.

Urban greening

84. Policy G5 of the London Plan emphasises the importance of urban greening in development. Acceptable urban greening features include new planting in the public realm, green roofs, green walls and nature-based sustainable drainage.
85. The applicant has submitted the scheme's UGF (page 235 of the DAS). The calculation table shows a UGF of 0.3 (compliant with the target for commercial development set by Policy G5 of the London Plan); however, the supporting text explains that this is not based on the total site area. Instead, areas of the site where urban greening is not considered to be feasible have been removed. When the total site area is used to calculate the UGF the scheme achieves a score of 0.24.
86. As set out in Policy G5, and in the supporting guidance (available: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/urban-greening-factor-ugf-guidance-pre-consultation-draft>) the calculation should be based on the total site area. The scheme's UGF is therefore 0.24. Acknowledging that there may be site constraints, the applicant should review the urban greening proposed, seeking to improve the quality or quantity, to increase the application's UGF. Features for consideration may include: expanding the area of the proposed green roof, including a green wall across sections of the building façade, introduce further planting at the ground level or expansion of greening on the proposed terraces.
87. The review should be submitted, with a re-calculated UGF and supporting text explaining the improvements considered. Should the scheme be short of the target following the review, robust justification should be submitted.

Biodiversity

88. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain.
89. It is recommended the applicant should provide evidence the proposed development secures a net biodiversity gain in accordance with Policy G6(D) of the London Plan.

Sustainable drainage, flood risk and water efficiency

90. The London Plan Policy SI12 and SI13 seek to mitigate flood risk. The site is in Flood Zone 1 and a critical drainage area. Flood Risk Assessment (FRA) provided for the proposed development generally complies with the London Plan Policy SI.12, however, indicative groundwater levels should be provided to confirm the level of risk at the site.
91. The surface water drainage strategy for the proposed development does not comply with London Plan Policy SI.13, as it does not give appropriate regard to Sustainable Drainage Systems (SuDS). Further commitment to provide green roofs, rainwater harvesting, rain gardens, and permeable paving needs to be provided. A drainage strategy plan needs to be provided which should show all the proposed SuDS measures. More detailed attenuation calculations need to be provided to confirm the required attenuation volume. Finally, an assessment of exceedance flood flow routes above the 100 year event plus 40% climate change needs to be provided.
92. The proposed development generally meets the requirements of London Plan Policy SI.5 which seeks to limit water consumption. The Applicant should also consider water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.

Air quality

93. London Plan Policy SI1 requires major applications to be accompanied by an air quality assessment, which demonstrates how the development would not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits (or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits) or create unacceptable risk of high levels of exposure to poor air quality. The application is supported by a Health Impact assessment which suggests an air quality assessment has been undertaken however does not appear to be available for review. The LPA must ensure through appropriate conditions that the development would be air quality neutral and not create unacceptable risk of exposure to poor air quality. Impacts from construction dust effects should be mitigated against also.

Local planning authority's position

94. City of London Corporation planning officers are currently assessing the application.

Legal considerations

95. 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 Corporation 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 Corporation under Article 6 of the Order to refuse the application. In this case, the Corporation need not refer the application back to the Mayor if it resolves to refuse permission. There is no obligation at this 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.

Financial considerations

96. There are no financial considerations at this stage.

Conclusion

97. London Plan policies on offices, retail, central activity zones, affordable workspace, urban design, London view management framework, heritage, transport and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land use principles:** The proposed intensification of the site for office led development with retail functions at lower floors is considered consistent with the CAZ and acceptable in principle subject to further consideration of flexible and affordable workspace. (paras. 18-25)
- **Urban Design/LVMF:** The overall design approach is complementary to local context and is acceptable subject to some clarification on the materiality on the upper floors of the proposed 2 Aldermanbury Square building. The public realm is much improved and there is negligible impact to the protected views of Westminster Pier to St Paul. (paras. 26 - 46)
- **Heritage:** There is some small scale, less than substantial harm identified to the Guildhall, however on balance the public benefits of the scheme with the much enhanced public realm and local pedestrian connectivity could be considered to outweigh the less than substantial harm identified to the significance of the Grade I listed Guildhall. This harm could be further diminished by confirmation of a more neutral colour pallet to backdrop of the Guildhall spire. GLA officers will conclude the balancing exercise once the final package of public benefits is confirmed at Stage II (paras. 47 - 54)
- **Transport:** the proposed development broadly complies with the London plan subject to clarification over cycle parking/facilities, a pedestrian comfort level assessment, contributions towards wayfinding and strategic cycle network and provision of construction logistics plan and road safety audit (paras. 55 - 76)
- **Sustainable Development:** Further information is required to ensure the development is consistent with the objectives of the London Plan with regards to Energy, Whole Life Carbon Cycle, Circular Economy/Waste, Urban Greening, Biodiversity, Drainage and Air Quality. (paras. 77 - 93)

For further information, contact GLA Planning Unit (Development Management Team):

Patrick Doyle, Senior Strategic Planner (case officer)

email: patrick.doyle@london.gov.uk

Matt Christie, Team Leader – Development Management

email: matt.christie@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Ms anita strymowicz

Address: 509 Mountjoy House barbican london

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposed building is due to be higher than the existing one by quite a few floors! This is purely driven by financial greed. What about the people that live here? What about our right to fresh air, being able to see blue sky, the light?

Why would we benefit from another tall building that will also give off light in the night which affects our sleep and the causes the birds to sing throughout the night rather than to sleep?

The only person that would benefit from this is the greedy landowner and the corporation - they benefit financially. We don't need more office space, taller buildings, we need more light, more air, more view. We need a better quality of life. You will be taking this from us and creating another planning precedent.

For once, you need to stop and think about quality of life of those that live here. Especially after a year of pandemic. It's the right and moral thing to do.

Do NOT build higher than what is originally here - there is NO need for it, just the landowners' financial greed benefits. No-one else.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Charles-Etienne Lawrence

Address: Flat 53, Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I object to this development which will further reduce the amount of sunlight/daylight and visible sky for residents, in particular at Andrewes House.

It is not appropriate to consider the impact of this development in isolation as residents suffer from incremental erosion of the daylight/sunlight they benefit from with each successive development being allowed by the City. Consider the detrimental impact that the London Wall Place (1&2) development has had on residents the City should limit the height of new developments/redevelopments so as not to further erode the visibility of the skyline and the light residents benefit from.

If the City is serious with its plan to increase the residential population it should also be serious about preserving the quality of the stock it currently has instead of allowing office developers to

blight our living environment.

Furthermore, the height of the proposed building is not in keeping with many of the neighbouring buildings, including the Guildhall.

There are positive aspects to the proposals such as the activation of ground level with retail and making the London Wall elevation/frontage more active.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Hamish Pollock Fraser

Address: Flat 23 Cromwell Tower Barbican

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposed building expands on the footprint of the existing site in a way that is insensitive to neighbouring buildings, especially residents in the Barbican.

The building height has increased to 69metres from 65 (the existing spire) and 58m for the main body of the existing building. The proposed building's presence will reduce light to the residents, block views of the sky and over towards the shard and contribute to a claustrophobic streetscape in the city. I would urge CoL to ask the proposed building to fit within the existing volume of the existing building.

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Case Officer: Gemma Delves

Customer Details

Name: Ms L Goldberg

Address: FLAT 129, ANDREWES HOUSE BARBICAN London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I note in your planning documentation that there is a due consideration for loss of light with regards to the Barbican neighbours living directly opposite the proposed new building (with its addition of 5 floors) However, I could not find any consideration for 'loss of sky' to a broader range of residents, as a result of the carving out of the real estate in the sky in the addition of these 5 floors.

Barbican residents have been subjected to a relentless reduction of their access to the sky (a shared natural resource) through the many recent developments adjacent to the complex, having the effect of increased claustrophobic living.

I would urge the City to reconsider its approval of the addition of 5 floors, with yet another debilitating encroachment on the sky in the immediate vicinity of its City residential domiciles in the Barbican Estate. The integrity of the Estate lies not just in its structures but in the breathable

spaces in and around it, designed in part to maintain the delicate balance between residential and business needs.

Sadly, it would appear the City no longer cares to maintain this post-war vision. Instead, we see a focus on building out every possible square inch of the City Mile, both vertically and horizontally.

On a separate note, it would have been helpful to those wanting to make comments to include a major change, such as the addition of the 5 floors to the summary description, not just the features which would be considered advantageous to both residents and businesses.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Nigel Pilkington

Address: 59 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I write to object to the height of the proposed development, which seeks to demolish City Place House, and replace it with an office block which is 5 floors higher.

Being directly south of my flat, I rely on the direct sunlight not only to light my flat, but to heat it in winter (as the heating system and lack of insulation particular to the Barbican Estate's top-floor flats means any heat provided soon leaves through the roof).

The City deems it acceptable if 20% of a flat's sunlight is impinged by a new development. Accordingly, this new development has strategically maxed out its light reduction to the highest allowed level....20%.

Aside from the loss of light in winter months, is it acceptable that yet another development raises

its height, adding to the problem of boxing in the listed Barbican Estate. At what point will the City accept that it must stop allowing taller and taller buildings around the entire perimeter of the Estate?

If the proposed development were to match the current height of City Place House, then I would be happy to withdraw my objection.

Yours faithfully
Nigel Pilkington

Comments for Planning Application 21/00116/FULMAJ

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Case Officer: Gemma Delves

Customer Details

Name: Mr James Durcan

Address: Flat 48 Andrewes House, Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:As Chair of the Andrewes House Residents' Group I am writing to express residents' opinion on the proposed demolition and re-development at 40-55 Basinghall Street. At a recent meeting residents expressed their opposition to the proposed increase in the height of the building as this would restrict their access to daylight and to sunshine. Increasing the height of the building by five floors is a very substantial change and will have a very substantial and negative impact of Andrewes House residents. Residents would prefer that the building is no higher than the current structure.

Other parts of the proposed scheme were welcomed. The proposal to create a pedestrian access to Basinghall Street by re-configuring City Tower was welcomed.

There was serious disappointment that the proposed scheme would remove - albeit for a limited period - the highwalk over London Wall and the access the Guildhall North Wing. Would it be possible to lay down a planning condition that every effort should be made to minimize the length

of time that the highwalk will - again - be unavailable to residents. The proposal to improve access from the highwalk to street level via a new lift was welcomed.

Concern was expressed that a building that was only 25 - 30 years old was to be demolished and rebuilt with all the pollution associated with the demolition and construction and the substantial increase in carbon emissions during this process. Can the Planning Committee not insist that buildings should have substantially longer life spans as part of its Climate Action Strategy.

Residents also hoped that planning conditions would require full implementation of the recommendations of the ecological survey and ensure that the buildings complied with or exceeded the requirements for a greener, cleaner more bio-diverse City.

From: [Delves, Gemma](#)
To: [DBE - PLN Support](#)
Subject: FW: City Tower & City Place House 40 - 55 Basinghall Street EC2V
Date: 27 May 2021 20:48:32

Please can the objection below be registered against application 21/00116/FULMAJ.

Thank you

Gemma

From: Littlechild JP, Vivienne [REDACTED]
Sent: Sunday, May 9, 2021 12:06 pm
To: Richards, Gwyn
Subject: City Tower & City Place House 40 - 55 Basinghall Street EC2V

Dear Mr. Richards,

I am writing to oppose the above for its application to increase the height of the building with 5 additional floors.

I attended the online discussion with the developers who admitted that their proposal will increase the loss of light that we have suffered in Andrewes House, Barbican. The developer has shown scant interest in the residents of the Barbican and Andrewes House in particular with this proposal. I do not oppose the redevelopment within its current footprint, but 5 Aldermanbury has made our winter afternoons dark, London Wall Place has caused additional loss of light to a large section of AH and the tower to Wallside. We are now completely boxed in and although our "views" are not a planning consideration, but time and again decisions are taken that only suit the developer. We have been living with constant development at this end of the estate for what will be at least 10 years once the Moorfields structure is complete.

This proposal is too tall - please limit the height of the proposal to its current level. Their claim that the lower levels, with some sort of commercial space is not an asset as they claim. It is off the beaten track and the additional height only gives great benefit to the developer. The damage to residents will be yet more loss.

Vivienne Littlechild MBE JP CC

Chair, Guildhall School of Music & Drama

Chair, Sculpture in the City

Elected Member for the Ward of Cripplegate

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Case Officer: Gemma Delves

Customer Details

Name: Mr Andrew Hope

Address: Flat 107 Breton House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment:I object to the development based on:

Residential amenity - it is unreasonable to increase the height of this building. It will cause loss of light to the surrounding streets and negatively impact Barbican residents.

Highways - closure of the highwalk for four years is excessive and will make it much more inconvenient for residents to cross from the Barbican estate to the south of London wall.

Environmental grounds - the demolition of a building that is only 25 to 30 years old is clearly not going to help achieve the various environmental targets the City is supposed to be pursuing.

Comments for Planning Application 21/00116/FULMAJ

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Case Officer: Gemma Delves

Customer Details

Name: Mr Gareth Owen

Address: 19 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:We object to the height of the building as it will significantly limit the amount of daylight in Andrewes House and neighbouring blocks.

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Fwd: 21/00116/FULMAJ comments
Date: 12 May 2021 16:39:40

Dear Sir/Madam

21/00116/FULMAJ

"The proposal has an adverse and unacceptable impact on many residential properties north of London Wall:

a) the decision to exaggerate the height of the walls surrounding the northwest plant room was taken on purely formalistic grounds (DAS 4.3) and without regard to how greatly this would reduce daylight and sunlight in affected flats;

b) the VSC and APSH calculations do not take account of oversailing fixed balconies / fire-escapes in Grade II listed Barbican residences nearby, and in doing so they under-represent the real effect on residents caused by the over-tall north elevation (Anstey Horne 4.10, 4.11);

iii) the impact of the design on residential properties has not been treated as a priority (evident from DAS 3.3 fig 22; mention of the Barbican is absent from DP9's Planning Statement). The resulting north elevation is an oppressively high slab, blocking light and sky, and canyonising London Wall;

iv) during the consultation exercise, factual information about the proposal's height was lacking, inaccurate figures and approximate responses were given on request, and no long sections by which residents could assess the proposal's relationship with their homes were supplied (not reported in Concilio 4.7, reported in DAS 3.4.1);

v) long sections are still absent from the planning submission, and the building sections supplied are taken through the lowest parts of the building - this, together with misleading information about VSC and APSH, makes proper judgment about the proposal impossible.

The following measures would, I suggest, resolve the damaging aspects of an otherwise outstanding scheme, and might remove the accusation that it puts profits before people:

a) step the top 2 or 3 floors back from the building line along the north elevation to reduce its oppressive effect;

b) reduce the height of the northwest plant room enclosure."

David Bass
13 Andrewes House, Barbican, London EC2Y 8AX

Comments for Planning Application 21/00116/FULMAJ

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Case Officer: Gemma Delves

Customer Details

Name: Mr David Menkin

Address: 161 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I object to the 5 floor increase, as the loss of light will be substantial to someone like me, who lives on the 4th floor of Andrewes House. A 20% loss seems like a conservative estimate.

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Dr Dimitri Varsamis

Address: Apartment 83, Roman House, Wood Street, London EC2Y 5AG

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: Myself, and the residents of another 45 apartments of Roman House that face London Wall and the building in question, will have a significant amount of direct sunlight for part of the year stolen from us, due to the significantly taller building that will replace the current.

I appreciate a report claims that we will not lose significant light and sun, but when I look out of the window, the majority of the sky that I see is near exclusively above the building in question, now that London Wall Place 2 is there. So alongside sun and light, you should consider the impact on sky real estate.

We will also lose view of the Shard, which we can currently see, and has offered us joy in its lighting show to mark the seasons and in particular Christmas and New Year.

Finally, 3 years worth of demolishing and construction for yet another office block with an estimate life of 20-odd years is not good for the environment, or the health of the local residents.

PS. the design of the building is awful.

Begum, Shupi

From: Jane Smith [REDACTED]
Sent: 18 May 2021 10:18
To: PLN - Comments
Cc: [REDACTED] Jane Smith
Subject: Objection to 21/00116/FULMAJ

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

17th May 2021

For the attention of Ms Gemma Delves, Planning Officer

Dear Ms Delves,

Objection to application 21/00116/FULMAJ: 55 Basinghall Street (known as City Place House)

-
We are writing on behalf of the Barbican Association, representing residents of the Barbican Estate, to **object** to the above application relating to the site at 55 Basinghall Street on the grounds of loss of residential amenity. Given the City of London's Climate Action Strategy, we would also like to express our concern that such a relatively new building is to be demolished and another significantly larger one put up in its place. Inevitably the demolition and construction process will create high levels of pollution and give rise to a substantial increase in carbon emissions during this process.

Unwarranted increase in height and mass

We are aware that the new building is planned to be 4 storeys higher than the existing structure. It is disappointing to note however that the consultation process failed to supply residents with precise information about the proposed increase in height, with approximations of 10m-11m given by the developers.

However, this conflicts markedly with the Statement of Community Involvement which, in answer to the question "How have you been able to double the existing size?", gives the answer "The existing building has high floor ceiling level which we have reduced and we will also be going **30m taller** with a slight increase in the width". Residents were already concerned about an increase of 10-11m, as told to them, but an increase of 30 metres will definitely adversely impact the levels of light and skyscape available to residents in the near vicinity. We are also dismayed that we were misled.

We have previously voiced our concerns about the steady escalation in building height around the Barbican which is creating a "canyonisation" of this Grade II and II* listed Estate. At the South and East side of the Estate this is clearly evidenced by the recent developments at London Wall Place, 21 Moorfields, Tenter House and Moorgate Exchange and this proposed redevelopment of the City Place House site will merely perpetuate this trend.

The Statement of Community Involvement goes on to state that "The existing building is 175,000 sq ft which can accommodate 1,750 workers. The proposals will increase the building size to 320,000 sq ft and also incorporates more intensive and efficient servicing which will put the maximum number of workers at 4,000". That means an increase in building size of a massive 83%, able to accommodate a more than doubling of worker numbers.

-

-

Loss of Daylight/Sunlight

In our opinion, the proposed increase in the height and bulk of the building is unwarranted and will lead to a significant diminution of residential amenity contrary to Policies DE8 and HS3 of the Draft Local Plan 2036. Whilst the Daylight & Sunlight Report states, as such reports always do, that the development will have little or no adverse impact on daylight and sunlight levels on neighbouring properties, we disagree. The proposed increase in height will inevitably cause loss of daylight and sunlight levels in many neighbouring properties – particularly those in Andrewes House, Willoughby House and Roman House. It also appears clear that the applicant has not taken the cumulative impact of individual developments on the amenity of existing residents into consideration as required by the Draft Local Plan 2036 Policy H3.

The VSC and APSH calculations provided by the applicants do not take account of the fixed balconies, thereby under-representing the true effect on residents caused by the much taller North elevation. How can balconies on part of a Grade II listed building, which was completed in May 1974 and in a conservation area, be at fault for the loss of light caused by the proposed increase in height of the proposed building? The decision by the applicant to exaggerate the height of the walls surrounding the northwest plant room appears to have been taken without proper regard to how greatly this would reduce the levels of daylight and sunlight received in affected flats.

Summary

In summary, whilst we do not disagree with the concept of the development of the site per se, it is the inappropriate height and mass of the current design and its unacceptable impact on residential amenity which we object to. We would therefore request that this application be rejected in its current form and that the height of the proposed development be maintained at its present level. A simple solution to achieve this would be to step back the top 3 floors on the North elevation to reduce its dominating effect and to reduce the height of the Northwest plant enclosure room. This marginal scaling back in a scheme that is applying for an 80%+ increase in mass would surely be relatively insignificant in terms of loss of space for the developers but a very significant improvement indeed for nearby residents.

We would also like to request that the Highwalk between London Wall and the Guildhall be accessible for as long a period as possible while the works are carried out.

Yours sincerely,

Jane Smith Chair, Barbican Association Planning & Licensing Sub-Committee
c/o 307 Seddon House, Barbican, EC2Y 8BX

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Mr Chris Young

Address: Flat 127 Andrewes House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment:I am opposed to the proposed increase in the height of the building as this would restrict our access to daylight and to sunshine.

Increasing the height of the building by five floors is a substantial change and will have a significant negative impact on Andrewes House residents.

On the other hand, the proposal to create a pedestrian access to Basinghall Street by re-configuring City Tower is welcomed.

I would be disappointed that the proposed scheme would remove - albeit for a limited period - the highwalk over London Wall and the access the Guildhall North Wing.

I am concerned that a building that is only 25 - 30 years old is to be demolished and rebuilt with all the pollution associated with the demolition and construction and the substantial increase in carbon emissions during this process.

Overall, I strongly opposed due the adverse impact the new height will have on neighbours, many being residents.

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Mr Olivier N

Address: Mountjoy house London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The new project will greatly reduced the daylight for residents and is another example of the Barbican being walled in, but mostly empty office like 200 aldersgate st

Comments for Planning Application 21/00201/LBC

Application Summary

Application Number: 21/00201/LBC

Address: 65 - 65A Basinghall Street London EC2V 5DZ

Proposal: Partial demolition of and associated works to 65/65a Basinghall Street to allow for the removal of the existing City Walkway bridge and installation of new City Walkway bridge to be delivered as part of the redevelopment of 55 Basinghall/40 Basinghall Street (associated reference 21/00116/FULMAJ).

Case Officer: Gemma Delves

Customer Details

Name: Mr Roger Hepher

Address: 105 Andrewes House, Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I do not object to the replacement of this section of elevated walkway, but it is important that the amount of time between the closure of the existing walkway and the opening of the new one is minimised, and that the Corporation secures step in rights and funding by way of bond to enable it to secure the completion/opening of the new walkway in the event of the developer commencing but not completing the redevelopment scheme.

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a thirteen storey Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m).

[cr]*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.[cr][cr]RE CONSULTATION: Revised drawings received (revisions to cycle parking and City Tower podium mezzanine) in addition to a Design and Access Statement addendum, further circular economy details, an Air Quality Assessment, additional public realm details, Equalities Statement, Cultural Statement, daylight and sunlight window maps and further detail on highway matters.

Case Officer: Gemma Delves

Customer Details

Name: Mr David Bass

Address: 13 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The revised documents and addenda submitted in support of this application do not in any way remove or even improve the adverse and unacceptable impact it has on many residential properties north of London Wall (please refer to my objection of 12 May 2021):

a) no alteration has been made to the unnecessarily exaggerated height of the walls surrounding the northwest plant room (DAS 4.3), which will greatly reduce daylight and sunlight in nearby flats;

b) Vertical Sky Component and Annual Probable Sunlight Hours calculations have not been re-

done to take account of the oversailing fixed balconies / fire-escapes in Grade II listed Barbican residences nearby; the calculations supplied are still misleading, do not reflect the reality of the situation, and do not show the real harm that the North elevation inflicts on residents (Anstey Horne 4.1, 4.11);

iii) no reduction or alteration has been made to the height of the greedily oversized north elevation which blocks light and sky for many residents. While DAS addendum 1 devotes 8 pages to reconsidering the colour of the facade petals to add "strenght (sic) to the identity of the building" while providing a neutral backdrop to distant views of the Guildhall, no thought has been given to the effect of this giant slab on people actually living nearby;

iv & v) no long sections have been made to show the proposal's oppressive relationship with the residential context, and no new "unfavourable" sections through taller parts of the building have been made. These shortcomings in the submission, together with idealised VSC and APSH calculations, make fair and proper judgment about the proposal impossible.

It is a great shame that an otherwise intelligent scheme is blighted by a lack of consideration for the people who would have to live in its very long shadow. None of the amendments recently made to the submission address this fundamental flaw. For this reason, I still object to this proposal.

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Committee:	Date:
Planning and Transportation	29 June 2021
Subject: 65 - 65A Basinghall Street London EC2V 5DZ Alteration of 65/65a Basinghall Street to allow for the removal of the existing walkway bridge over Basinghall Street and the installation of new City Walkway bridge to be delivered as part of the redevelopment of 55 Basinghall/40 Basinghall Street (associated reference 21/00116/FULMAJ).	Public
Ward: Bassishaw	For Decision
Registered No: 21/00201/LBC	Registered on: 18 March 2021
Conservation Area:	Listed Building: NO

Summary

This application relates to the grade II listed 65/65a Basinghall Street, designed by Richard Gilbert Scott (son of Giles Gilbert Scott) in a modern expressionist style. It is architecturally significant for its distinctive vaulted pre-cast concrete canopies, form, interconnected masses and use of materials and historically significant as work by the Gilbert Scott dynasty of architects.

The building plays a significant role within the public realm as it connects ground level routes to the City Walkway bridges across Basinghall Street and London Wall beyond. The connection that the north facing elevation of the listed building has with the bridge over Basinghall Street is the subject of this application.

It is proposed that the bridge over Basinghall Street would be demolished as part of the redevelopment of City Place House (55 Basinghall Street) and the reconfiguration of the City Tower Podium (40 Basinghall Street), these works are being considered in an accompanying report (ref. 21/00116/FULMAJ).

Construction of the existing bridge took place after 65 and 65A Basinghall Street was built. The preparation and making-good of 65 Basinghall Street and lifting of steel beams, took place around the existing vaults. The existing concrete

bridge structure is not integral to 65 Basinghall Street. Primary steel beams of the bridge bear onto the existing listed structure with holding-down bolts to stabilise the connection.

The replacement bridge would be of high architectural quality and its fixing would require minor alteration to the listed building. The replacement footbridge would abut the listed building in the same location as existing. It would comprise two deep steel beams that span circa 20.5m. The beams would also function as balustrades. Transverse spanning steel beams / ribs at close centres would support a light-weight deck (relative to the existing) and walking surface.

The new bridge would be supported at 65 Basinghall Street by the same shelf as the existing bridge at +18.88m AOD and by a proposed building column at 55 Basinghall Street. The junction would be made good and the integrity of the structure would be preserved.

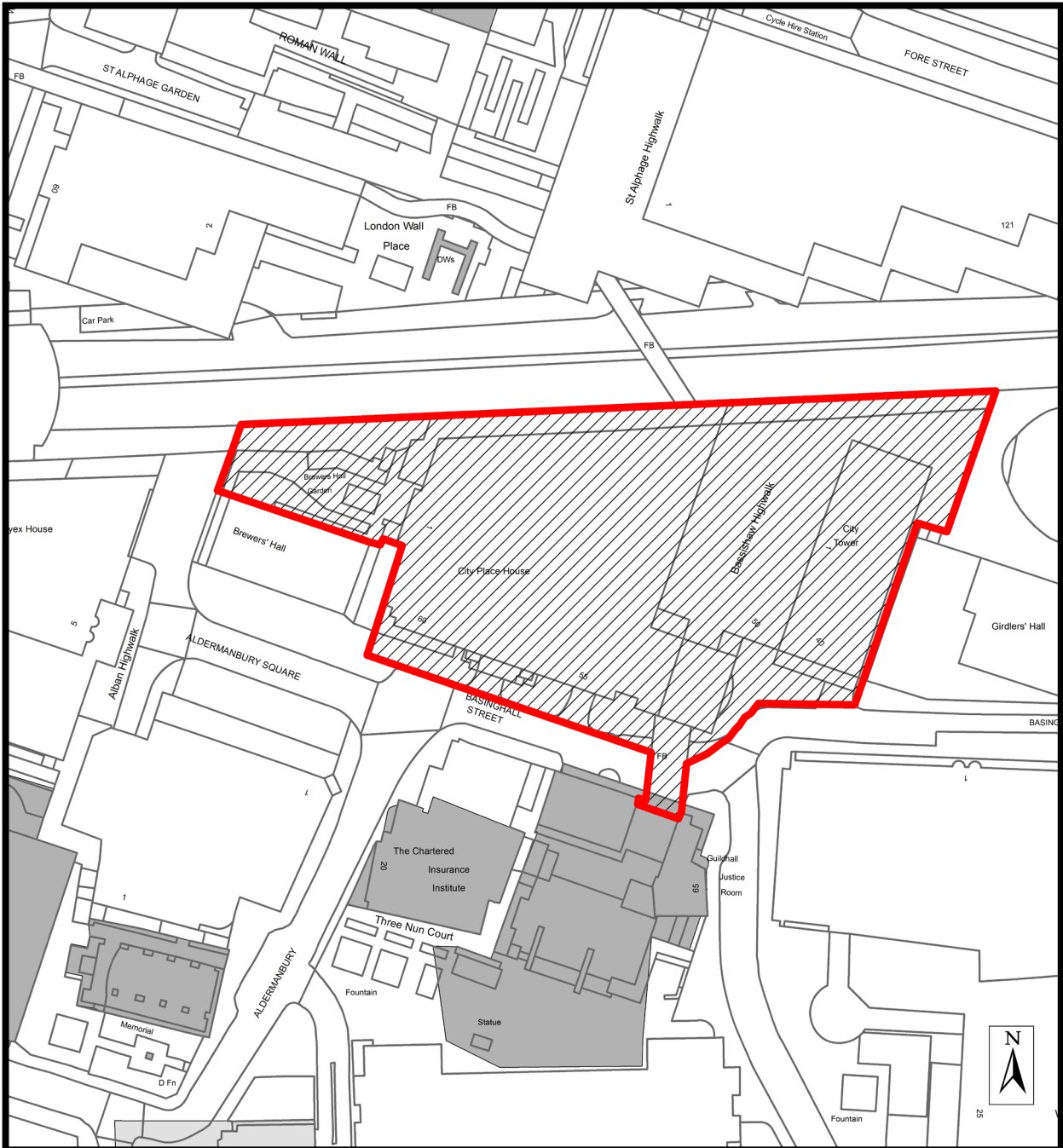
One comment has been received in conjunction with the application stating that it is important that the amount of time between closure of the existing walkway and the opening of the new one is minimised and that it is important the Corporation secures step in rights and funding by way of bond to enable it to secure the completion/opening of the new walkway in the event of the developer commencing but not completing the redevelopment scheme. The terms of the new walkway would be secured in the S.106 agreement attached to accompanying application 21/00116/FULMAJ.

The proposal would preserve and enhance the special architectural and historic interest and heritage significance of the listed building and its setting, subject to a condition requiring precise details of the junction between the new bridge and the listed building to be submitted for approval at detailed design stage, in accordance Local Plan Policies CS 12, DM 12.1 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC 1 and Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Recommendation

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

Site Location Plan







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ADDRESS:

City Tower and City Place house
 40-45 & 65-65A Basinghall Street,
 London EC2V

CASE No.
 21/00116/FULMAJ & 21/00201/LBC

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



DEPARTMENT OF THE BUILT ENVIRONMENT



**Walkway Bridge between 65/65a Basinghall Street and City Place House
(looking west along Basinghall Street)**

Main Report

Members should refer to the report on application reference 21/00116/FULMAJ which includes an analysis of this listed building consent application and the reasons for supporting the recommendation in this report.

Relevant Local Plan Policies

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.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

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

SCHEDULE

APPLICATION: 21/00201/LBC

65 - 65A Basinghall Street London EC2V 5DZ

Alteration of 65/65a Basinghall Street to allow for the removal of the existing walkway bridge over Basinghall Street and the installation of new City Walkway bridge to be delivered as part of the redevelopment of 55 Basinghall/40 Basinghall Street (associated reference 21/00116/FULMAJ).

CONDITIONS

- 1 The works hereby permitted must be begun before the expiration of five years from the date of this consent.
REASON: To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details:
 - a) particulars and samples of the materials to be used on all faces of the bridge;
 - b) details of the junction between 65/65a Basinghall Street and the proposed new walkway bridge.REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 3 All works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.
REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 4 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: 898_04_05_001_REV01; 898_04_05_102_REV01; 898_04_05_103_REV01.
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

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Agenda Item 5

Committee(s)	Dated:
Policy & Resources Committee – For Decision Planning & Transportation Committee – For Decision	3 June 2021 29 June 2021
Subject: Protect Duty Consultation Response	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1
Does this proposal require extra revenue and/or capital spending?	No
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: Town Clerk & Chief Executive	For Decision
Report authors: Ian Hughes (Deputy Director), Transportation & Public Realm	

Summary

In the context of the high and continuing threat from terrorism in the UK towards publicly accessible crowded spaces, the Government are undertaking a public consultation towards a Protect Duty that would better define, guide & regulate the role of owners, operators and responsible bodies protecting crowded spaces from terrorist attack.

Alongside the broad objective of creating an improved culture of security awareness, the consultation is largely focused on considering how to ensure venues consider and manage the risk to their premises, and how those responsible for public spaces can better work together to address the threat of terrorist attack.

The City Corporation is well placed as a venue operator in its own right and as Highway Authority for most of the Square Mile to respond positively towards the consultation. Given the significant work done since 2017 to review & refine the way it approaches counter terrorism, the City will be able to provide examples of best practice covering structural governance, how to create a security-minded culture and the steps necessary to make physical security improvements to the public realm.

Using that experience as well as the City’s role as health & safety regulator, the City will also seek to raise concerns as to how such a Duty can remain proportionate in terms of resources, cost & risk management and how it could be enforced.

The consultation ends on 2 July, so to enable officers to finalise a response with an appropriate degree of Member oversight, it is recommended that Members delegate the City Corporation’s final response to the Comptroller & City Solicitor in consultation with your respective Chairmen & Deputy Chairmen.

Recommendation(s)

Members are recommended to:

- Note the consultation objectives and City Corporation responses outlined in this report;
- Delegate the detailed consultation response to the Comptroller & City Solicitor in consultation with the Chairmen & Deputy Chairmen of the Policy & Resources and Planning & Transportation Committees.

Main Report

Background

1. Recent years have seen an increase in terrorist attacks in publicly accessible locations across the UK and Europe, with the City of London itself being the target of terrorist planning & attack on more than one occasion.
2. In its 2019 manifesto, the Government committed itself to improving the safety and security of public venues in the context of counter terrorism, and in February this year, the Home Office launched a public consultation regarding a new 'Protect Duty' addressing roles & responsibilities for protective security & preparedness at publicly accessible locations across the UK.
3. This was against the background of recent inquests relating to terrorist attacks in London and Manchester, as well as calls for new legislation to make it a legal requirement for those responsible for such locations to consider the risk of a terrorist attack and to take appropriate steps to protect the public.
4. It is clearly appropriate for the City Corporation to respond to that consultation in its capacity as venue operator and highway authority, and for Members to have sight of, and approve, that response.
5. The closing date for this consultation is 2 July, but given the timelines for Committee and the need to approve the response from an officer perspective through the Senior Security Board, this report seeks to provide Members with a background understanding of the issues and the City Corporation's outline position. It then recommends the final response to the consultation be delegated to the Comptroller & City Solicitor in consultation with your Chairmen & Deputy Chairmen.
6. Otherwise, to note that the City Police provide both the City Corporation and the wider City community with professional support and advice via their Counter Terrorism Security Advisors (CTSAs). As such the City Police will be undertaking their own consultation response, with officers from both organisations liaising accordingly to ensure their respective responses are aligned.

Consultation Objectives

7. The consultation is intended to consider how the various responsible bodies can work together to develop proportionate measures to improve public security, and how such bodies are ready & prepared to take appropriate action were a terrorist attack to happen.
8. The Government appreciates that some organisations already implement security plans, training & awareness for staff and simple physical countermeasures. However, in the absence of existing legislation to clearly define some of these roles & responsibilities, the Government is concerned there is a lack certainty as to whether security considerations are being undertaken or addressed by all the appropriate bodies.
9. The consultation therefore seeks to consider what could be done to improve this position through 'reasonable and not overly burdensome security measures'. It is mindful of the impact legislative change can have, but the consultation stresses this should be balanced against the need to ensure that public safety & security is effectively considered.
10. As a result, the consultation seeks to consider four themes:
 - To whom (or where) should the legislation apply?
 - What should be the requirements?
 - How should compliance work?
 - How should government best support and work with partners?
11. The consultation also contains three specific proposals related to the potential introduction of a Protect Duty:
 - The Duty should apply to large organisations (employing 250 staff or more) that operate at publicly accessible locations
 - The Duty should apply to owners / operators of publicly accessible venues with a capacity of 100 persons or more
 - A Protect Duty should be used to improve security considerations and outcomes at public spaces

Consultation Response

12. The consultation is targeted at organisations, businesses, local authorities and public bodies who own or operate publicly accessible locations, including sporting, entertainment & meeting venues, high streets, schools & universities, medical centres, places of worship, government offices, transport hubs, parks, public squares and other open spaces.
13. Given its wide operational remit in the Square Mile and beyond, the City Corporation has a direct responsibility or partnership role in regulating or licensing a considerable number of such locations. It also directly manages a range of facilities likely within scope of the Duty, from schools, tourist attractions and open spaces to corporate buildings and markets, but for the

purposes of the response to the consultation, it is intended to focus on two areas, namely the City Corporation as venue owner / operator and the City Corporation as highway authority.

Security Culture

14. For large organisations, the consultation suggests organisational structures should be in place to enable the delivery of policy, planning & operational processes aligned with business needs and the legislative requirements. As part of this it specifically highlights the need for staff training & awareness, with the need for ongoing professional development for those in specialist security roles.
15. More broadly, the consultation also seeks to consider whether the Duty should include requirements for partnership working between responsible parties to ensure better public protection and organisational preparedness. It also seeks to identify ways to improve guidance and support to those who might be required to hold aspects of the new Duty.
16. The City is well placed to respond to this aspect of the consultation having learned lessons from past terrorist incidents in the Square Mile and beyond. In 2017, the City undertook a major review of its governance and culture around how it considered and sought to mitigate the risk from terrorist attack, and as a result, several new security focused cross-department multi-agency boards were introduced.
17. These boards are coordinated to deliver a collaborative approach across the organisation, embedding a better understanding of threat & risk management and enhancing our existing working partnerships with the City Police and other key stakeholders such as Transport for London.
18. Five such Boards now work together to deliver this approach (see Appendix 1), namely:
 - Senior Security Board to provide strategic governance & oversight
 - Public Realm Security Advisory Board to consider terrorist threat, risk and mitigation as it relates to public highway areas in the Square Mile
 - Security Advisory Board to undertake the same role for City-managed premises
 - HR Advisory Board to consider the City's obligations towards its staff in the context of security eg Action Counters Terrorism e-learning
 - Digital Security Board to consider cyber threats to the organisation
19. This integrated approach has delivered a security-aware culture across the organisation with a greater understanding and acceptance of responsibilities, requirements and priorities. Combining a joined-up approach with a robustness of process has delivered key improvements to the way the City addresses the risk of terrorism towards its staff, its venues and the public at large.
20. Part of that process has been to strengthen its partnership working with the City Police, Transport for London, key City commercial & cultural stakeholders

and the security services to draw in additional expertise at a strategic, tactical and operational level.

21. As a result, the Coroner for the Inquest into the London Bridge terrorist attack recognised the City's improved structure & governance, noting in particular the creation of the Public Realm Security Advisory Board with TfL and the City Police as key members.
22. However, in acknowledging the steps the City Corporation had taken, he was unsure as to what extent this had been mirrored across the country. This is addressed within the current consultation as there remains a concern that for those authorities not previously confronted by such issues, the appreciation and management of these risks is not well understood.

Venues

23. In terms of venues, the consultation suggests that counter terrorism responsibilities should adopt a similar approach to fire safety, namely that owners & operators have clear responsibilities for the control and ownership of their venues and can use appropriate systems & processes to mitigate risk. Similarly, the capacity of the venue could be used as an indicator of the level of legislative obligation, once again similar to existing fire safety legislation.
24. Given that most large venues already have various measures in place for anti-social behaviour reasons, the consultation envisages that for many organisations & venues, such requirements would simply require changes to existing systems & processes at nil or low cost.
25. There is however a degree of difference between measures necessary to address anti-social behaviour and those necessary to prevent harm from individuals motivated towards direct violence to others, and this is likely to be a significant consideration in understanding the additional measures necessary to proportionately address this risk.
26. Nevertheless, the City intends to support such proposals as a realistic and appropriate extension of the current legislative responsibilities for venue management, provided risk assessments & mitigation measures remain proportionate to the venue, its environment and the nature of the terrorist threat at the time.
27. The City intends to suggest that the recommendations could go further to consider the needs for coordination and agreement of security measures between duty-holders at events. The Fishmongers Hall inquest has highlighted how lack of communication and information sharing between a venue and event organisers can present vulnerabilities at venues.

Public Highway

28. The current terrorist threat can often appear random in nature given the increase in the number of attacks in public spaces that have no clear boundaries or well-defined entrance or exit points.

29. Such locations are often vulnerable to low sophistication methodologies such as knife attacks or the use of vehicles as weapons, and although difficult to combat, the Government wants to consider how it can do more to work with responsible parties to consider & achieve appropriate security measures in these types of public spaces.
30. The consultation points out that any publicly accessible location is a potential target, and seeks to consider:
 - How responsibilities for public spaces could be established
 - What would be reasonable & appropriate to expect of those responsible for public spaces to improve security
 - The potential role of legislation in addressing these issues.
31. As it stands, roles & responsibilities for counter terrorist protection in such spaces are unclear, particularly with regards to public highway. Highway Authorities have certain responsibilities to maintain these areas for road safety, slips, trips & falls etc, and must also be mindful of the need to consider crime, disorder and counter terrorism in the discharge of their statutory duties.
32. However, there is no clear and direct legal obligation for any one particular organisation to address the risk of terrorist attack, which implicitly acknowledges the difficulty in taking on such an obligation for areas that cannot be managed like a venue. Safety Advisory Groups exist for the purpose of providing oversight to the arrangements to manage major events on the highway, but responsibility for the day to day protection of the public on our streets is far less clear.
33. That is not to say Highway Authorities fail to address this issue, but as noted earlier in the context of the Inquest to the London Bridge attack, the extent to which these issues are understood & considered across the UK is highly variable. Equally an expectation to consider, assess and mitigate risk against every type of terrorist attack for every busy street and crowded space in the UK is unlikely to be realistic.
34. This issue is further complicated by the multi-agency jigsaw of local government. Any change to existing legislation would need to clarify the respective obligations towards local authorities, highway authorities, private landowners and two-tier authorities outside London.
35. Nevertheless, the City Corporation fully supports the ambition of raising awareness of the need to take into account counter terrorism measures when considering public realm design. The success of the Public Realm Board in delivering an innovative, joined up & holistic approach with the support of key stakeholders has been integral to the City's strategy. It has delivered a series of proportionate, buildable and affordable solutions that better protect the public without overwhelming the 'look & feel' of the City's public realm.
36. However, implicit behind the need for such a Board was the recognition of a gap in approach that had not been addressed through the use of other forums such as Community Safety Partnerships, Business Improvement Districts, Local Resilience Forums etc.

37. In taking this step to proactively consider the City's crowded spaces, the City Corporation also recognised the public's expectation that it needed to do all it reasonably could to keep the public safe, particularly in a part of the UK uniquely at risk given its role in the UK economy. This will be a key piece of learning the City will be including in its response to the consultation.

Regulation & Enforcement

38. The consultation suggests compliance with the above requirements would be demonstrated by providing assurance that the various threat & risk impacts have been considered and appropriate mitigations taken forward. It foresees a light touch inspection & enforcement model with compliance assessed remotely and / or through an appropriate third-party agency.
39. It also suggests that a new offence would be created for non-compliance, with organisations fined for persistently failing to take reasonable steps to reduce the potential impact of attack.
40. However, the consultation lacks clarity on who will take responsibility for ensuring compliance with these requirements. It is our understanding that the City Police would not be sufficiently resourced to undertake this duty for all potential risk owners, particularly as they expect a significant increase in demand for their CTSA guidance as a result of the Protect Duty in any case.
41. If a wider enforcement agency is envisaged, the same resourcing concerns would apply and it would need sufficient technical competencies to determine enforcement outcomes, but based on experience of similar Health & Safety legislation by the City's Commercial Environmental Health team, the value of inspection typically demands a local context in order to make robust, defensible and proportionate decisions.
42. The consultation also fails to address how an offence under the Protect Duty might sit alongside a legal failure or criminal sanction in the event of a terrorist incident, and given that some organisations such as leisure venue chains can exist across diverse geographical locations, there needs to be clarity on how those organisations can receive consistent advice and inspection.

Strategic Implications

43. A key objective of the Protect Duty is to drive forward an improved culture of security, where owners / operators can undertake informed security considerations and implement reasonable & proportionate security measures to deliver broader improved security outcomes.
44. As noted earlier, the steps the City Corporation has taken in the last four years to address these issues in the Square Mile would suggest it is well placed to respond to any change to Government legislation in this area. This aligns to the City's Corporate Plan of ensuring the public are safe and feel safe, with the City being able to positively support the Home Office and other

government agencies in terms of shaping the Protect Duty to ensure it's effective in meeting this objective.

45. Alongside sharing the positive outcomes, the City is also well placed to balance this with concerns regarding the ability of local government in particular to meet the financial implications of the Protect Duty should these be significant without additional central government support.
46. In addition, as trustee of Bridge House Estate, the City Corporation's proposed response would seek to clarify that responsibility for assessing public highway areas is a matter for the appropriate public body rather than the owner of a private structure below that highway.

Financial & Resource implications

47. The consultation seems to suggest that most of these legislative obligations could be met at little or no cost. However it does accept that some security measures would require more significant mitigation requirements such as implementing appropriate access control or reducing the risk of 'vehicle as a weapon' attack.
48. As the City has found through its recent Cross-Cutting Programme to protect its key buildings and the on-going Public Realm Security Programme to protect on-street crowded spaces, significant funding is typically needed to plan, design and implement some of these measures.
49. The City identified funding to deliver these measures via a combination of its City Cash reserves, CIL and the on-street parking reserve, but identifying further funding from these sources would need to be considered in the context of the City's wider funding position and its resource allocation process.
50. On the wider front, such sources of funding may not be available to other organisations across the UK, and concerns regarding the additional financial burden of any new obligations have been raised with the Government during the consultation engagement so far. The consultation itself is silent on whether additional government funding would be made available for this purpose, but the City intends to raise this issue in its response.

Legal & Risk implications

51. The City Corporation would clearly seek to comply with whatever additional responsibilities might arise from the consultation and any subsequent legislative changes. Adapting existing fire risk management approaches towards security seems proportionate in terms of venues, but establishing a Protect Duty for all public highway throughout the UK when any location can potentially be subject to an attack is clearly more challenging and would represent a step change in governance of such spaces.
52. In that context, the City has already taken reasonably practicable and proportionate measures to deliver enhanced security protection to its priority

crowded places under its existing governance, process and funding. However, not every street can be protected from every type of terrorist threat, which makes the identification and prioritisation of locations in conjunction with advice from the City Police crucial to managing & mitigating these risks.

Equalities & Climate Implications

53. None.

Proposal

54. In summary, it is proposed to respond to the consultation along the following lines based on the City's recent experience:

- The City is supportive of measures to create and enhance the security culture of organisations across the UK and is able to share examples of Best Practice to assist in that process.
- The City is supportive of the proposals to include proportionate counter terrorism obligations for venue owners / operators above a certain size.
- The City is supportive of Government seeking to clarify roles & responsibilities for protecting outdoor crowded spaces and is able to share examples of Best Practice of how to facilitate a coordinated and holistic approach to such a challenge.
- The City will reiterate that the impact & outcome of the proposed Protect Duty should be proportionate, and that it should be mindful of the potential additional cost burden on those likely to take on additional responsibilities.
- The City will also raise concerns regarding the need for clarity on the regulation & enforcement process based on its parallel experience of current Health & Safety legislation.

Conclusion

55. The City is well placed to respond to the Government's consultation on the Protect Duty. Given its position at the heart of London and the UK's economy, the City Corporation has had to address the threat of terrorist attack throughout much of its recent history, allowing it to place the current threat in the context of its continuing commitment to keep those who live, work and visit the City safe from harm.

Appendices

- Appendix 1 – City Corporation Security Governance

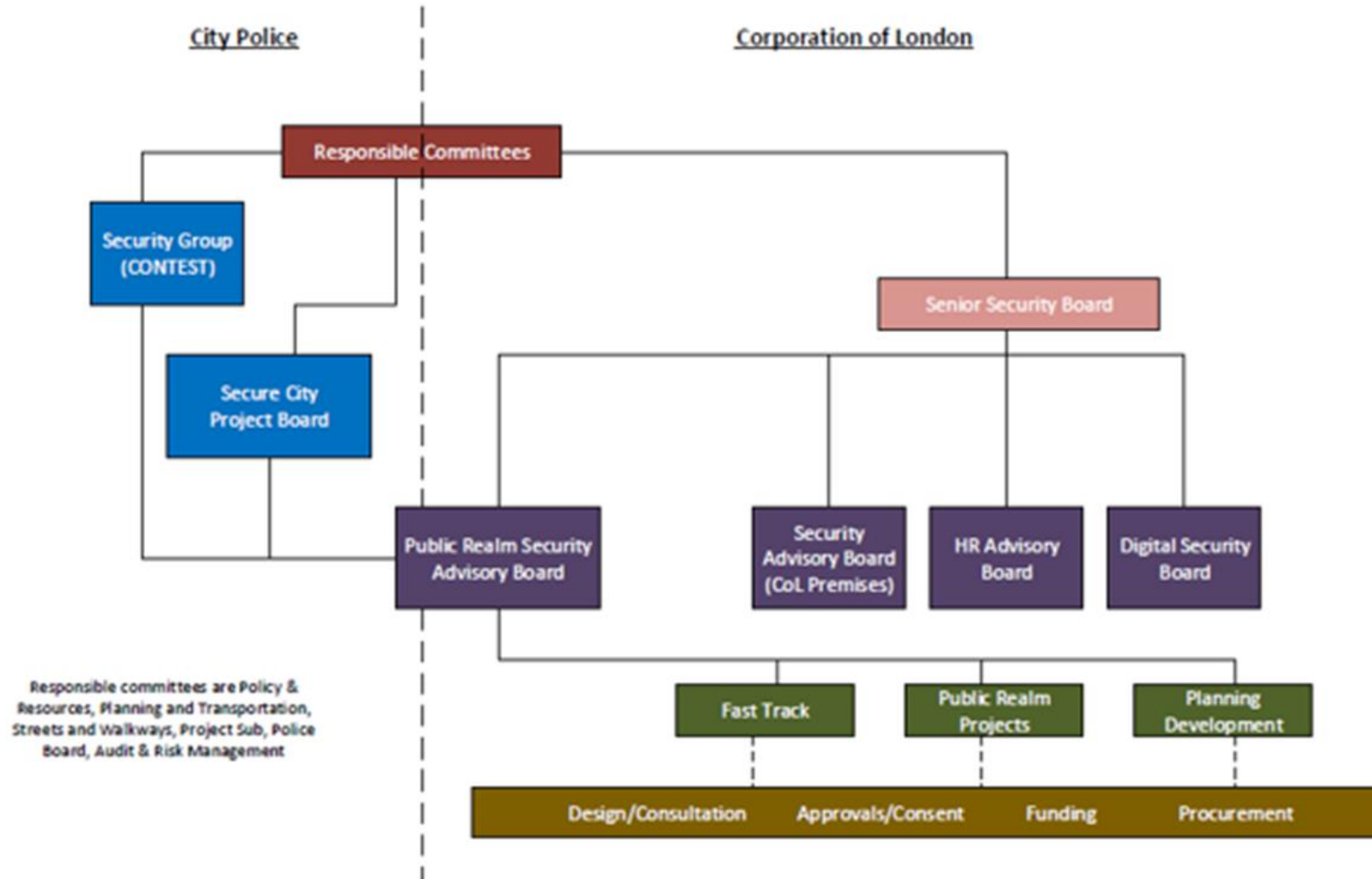
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Appendix 1 – City Corporation Security Governance



Committee(s)	Dated:
Planning and Transportation	29 June 2021
Subject: Health Impact Assessment Guidance Note	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1,2,3,4,5,6,11,12
Does this proposal require extra revenue and/or capital spending?	No
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: Lisa Russell, Department of the Built Environment	

Summary

The London Plan 2021 encourages the use of Health Impact Assessments to assess the potential impacts of development on the social, psychological and physical health of communities. The Proposed Submission Draft City Plan 2036 requires Health Impact Assessments to be undertaken on major development. This report presents for approval a guidance note advising developers how to carry out these Health Impact Assessments on developments within planning applications.

Recommendation(s)

Members are recommended to:

- Approve the Health Impact Assessment Guidance Note (Appendix 1).

Main Report

Background

1. There is an increasingly widespread view in society that more has to be done to improve health and wellbeing and reduce health inequalities through tackling the root causes of illness and health inequality. This means addressing many issues like poverty, social exclusion, crime and disorder, transport and air pollution, issues which are beyond the control of health services. Many aspects of planning can have a significant impact on health. In particular: good quality

housing; a well-designed public realm, sustainable transport; employment and training opportunities; and access to leisure, cultural activities and green space.

2. Health Impacts Assessments (HIAs) provide a systematic approach for assessing the potential impacts of development on the social, psychological and physical health of communities. Ensuring issues are considered at an early stage in developing planning proposals can lead to improvements in both the physical and mental health of the population. HIAs are designed to consider whether a development proposal might reinforce health inequalities and inadvertently damage people's health, or actually have positive health outcomes for the local community.
3. The London Plan 2021, Objective GG3: Creating a healthy city encourages the use of HIAs as a means of assessing the potential impact of development on the mental and physical health and well-being of communities. The Proposed Submission Draft City Plan 2036, which contains policies guiding decisions on land use in the City, has a policy which requires HIAs to be carried out on larger developments.

Policy HL9: Health Impact Assessment (HIA)

The City Corporation will require development to deliver health benefits to the City's communities and mitigate any negative impacts by:

1. ***requiring all major development, and developments where potential health issues are likely to arise, to submit a Healthy City Planning Checklist;***
2. ***requiring a Rapid or Full HIA to be submitted for larger-scale development proposals.***

The scope of any HIA should be agreed with the City Corporation and be informed by City Corporation guidance on HIA. The assessment should be undertaken as early as possible in the development process so that potential health gains can be maximised, and any negative impacts can be mitigated.

4. The purpose of this guidance is to establish a clear and transparent process for screening a development proposal's possible impacts and identify where a full Health Impact Assessment may be required for major developments. The checklist in Appendix 1 of this guidance is based on the NHS London Healthy Urban Development Unit's (HUDUs) HIA methodology but has been adapted to address City specific issues.

Corporate & Strategic Implications

5. **Strategic implications-**This Guidance Note will support the delivery of the Corporate Plan by ensuring that land-use decisions fully incorporate measures to improve the health of the City's communities through the planning system (Corporate Plan, Outcome 2: People enjoy good health and wellbeing).
6. **Financial implications-** There are no financial implications arising from this report.
7. **Resource implication-** There are no resource implications arising from this report.
8. **Equalities implications-** Health Impact Guidance will contribute to the delivery of the City Corporation's Public Sector Equality Duty 2010 by improving health and wellbeing outcomes for all people who are protected by existing equalities legislation.
9. **Climate implications-** Health Impact Guidance will contribute to the delivery and success of the City's Climate Action Strategy.
10. **Legal implications-**There are no legal implications arising from this report.
11. **Risk implications -** There are no additional new risks arising from this report.
12. **Security implications -** There are no security implications arising from this report.

Conclusion

13. The London Plan 2021 and the proposed Submission Draft City Plan 2036 both encourage the use of Health Impact Assessments as a tool to consider the impacts of development on the mental and physical health and well-being of communities. Guidance on how HIAs should be carried out has been prepared to support planning policy. This report presents the draft Health Impact Assessment Guidance Note for approval.

Appendices

- Appendix 1- Health Impact Assessment Guidance Note.

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Health Impact Assessment (HIA) Guidance Note

June 2021



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Introduction

1. There is an increasingly widespread view in society that more has to be done to improve health and wellbeing and reduce health inequalities through tackling the root causes of illness and poor health. This means addressing many issues like poverty, social exclusion, crime and disorder, transport and air pollution; issues which are beyond the control of health services. Many aspects of planning can have a significant impact on health. In particular, good quality housing; a well-designed public realm, sustainable transport; employment and training opportunities; and access to leisure, cultural activities and green space. These factors are known as the “wider determinants of health”. In addition, the quality of the built environment can be a powerful factor in influencing positive health and wellbeing outcomes across a population.
2. Health Impact Assessments (HIAs) provide a systematic framework for assessing the potential impacts of development on the social and physical health of communities. Ensuring relevant issues are considered at an early stage in developing planning proposals can lead to improvements in both the physical and mental health of the population. HIAs are designed to consider whether a development proposal might reinforce health inequalities and inadvertently damage people's health or deliver positive health outcomes for the local community. For the City of London, the local community includes residents, workers, and visitors from a range of socioeconomic and ethnic backgrounds.
3. HIAs should outline how a development could positively or negatively impact on the wider determinants of health and should identify actions to enhance the positive impacts and mitigate the negative impacts. The outcome of these actions should be clearly identifiable within the planning application.
4. The purpose of this guidance is to establish a clear and transparent process for screening a development proposal's possible impacts and to identify where a full Health Impact Assessment may be required for major developments. The Healthy City Planning Checklist in Appendix 1 of this guidance is based on the NHS London Healthy Urban Development Unit's (HUDUs) HIA checklist and methodology but has been adapted to address City specific issues. It supports Policy HL9: Health Impact Assessment (HIA) in the City's emerging Local Plan (City Plan 2036).

Policy Context

5. National policy:

National planning policy is set out in the National Planning Policy Framework (NPPF), which is published by the government to guide decisions regarding land use in England. All local planning authorities must take this guidance into account when developing local planning policies. Paragraph 91 of the NPPF (Feb 2019) in “Section 8: Promoting Healthy and Safe Communities” requires:

“Planning policies and decisions to aim to achieve healthy, inclusive and safe places which promote social interaction, that are safe and accessible, and enable and support healthy lifestyles, especially where this would address identified local health and well-being needs”.

6. Regional policy:

The Mayor of London produces the London Plan, which is a strategic plan to guide decisions regarding land use in London. The 33 London Boroughs, the City Corporation and the Mayor’s Urban Development Corporations must take the London Plan into account when formulating planning policies that guide land-use decisions in their local area. The London Plan forms part of the statutory development plan for the City of London, along with the City’s Local Plan.

The London Plan (March 2021) advises in “Good Growth Objective GG3; Creating a Healthy City” that:

“Those involved in planning and development must assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments”.

7. The Mayor of London has also published planning documents which offer further guidance on the development of HIAs;

- Mayor of London’s Social Infrastructure SPG; 2015
- The London Health Inequalities Strategy; 2018

8. Local policy:

Each local planning authority must produce a Local Plan which sets out policies determining planning decisions on land use. The City’s emerging Local Plan (City Plan 2036) recognises that health underlies all policies in the Plan and contains a range of strategic and local policies on health and well-being as follows in Figure 1:

Policy	Topic
S1	Healthy and inclusive City
HL1	Inclusive buildings and spaces
HL2	Air quality
HL3	Noise and light pollution
HL4	Contaminated land and water quality
HL5	Location and protection of social and community facilities
HL6	Public toilets
HL7	Sport and recreation
HL8	Play areas and facilities
HL9	Health impact assessment
S2	Safe and Secure City
SA1	Crowded places
SA2	Dispersal routes
HS3	Residential environment
HS4	Housing quality standards
S8	Design
DE4	Pedestrian permeability
DE8	Daylight and sunlight
S9	Vehicular transport and servicing
S10	Active travel and healthy streets
AT1	Pedestrian movement
AT2	Active travel and cycling
AT3	Cycle parking
S14	Open spaces and green infrastructure
OS1	Protection and provision of open spaces
OS2	City greening
OS3	Biodiversity
OS4	Trees
CR2	Flood risk

Figure 1: Policies related to health and well-being: City of London Proposed Submission Draft Plan 2036.

9. Policies in the Local Plan on health and well-being are informed by the City of London Joint Health and Well-being Strategy which prioritises good mental health, a healthy urban environment, health and social integration and health behaviours in the City's communities, as well as a commitment to reducing health inequalities.
10. Appendix 2 lists relevant Corporation strategies that inform policy formulation in the Local Plan and decision making on planning proposals and applications. It also includes a link to examples of HIA good practise/case studies in the City of London.

11. The Proposed Submission Draft City Plan 2036 contains a specific policy on HIAs as follows:

Policy HL9: Health Impact Assessment (HIA)
The City Corporation will require development to deliver health benefits to the City's communities and mitigate any negative impacts by:

- 1. requiring all major development, and developments where potential health issues are likely to arise, to submit a Healthy City Planning Checklist;*
- 2. requiring a Rapid or Full HIA to be submitted for larger-scale development proposals.*

The scope of any HIA should be agreed with the City Corporation and be informed by City Corporation guidance on HIA. The assessment should be undertaken as early as possible in the development process so that potential health gains can be maximised, and any negative impacts can be mitigated.

12. Figure 2 below demonstrates the complex interrelationship between the social determinants of health and other policy areas which are addressed in the Proposed Submission Draft City Plan 2036.

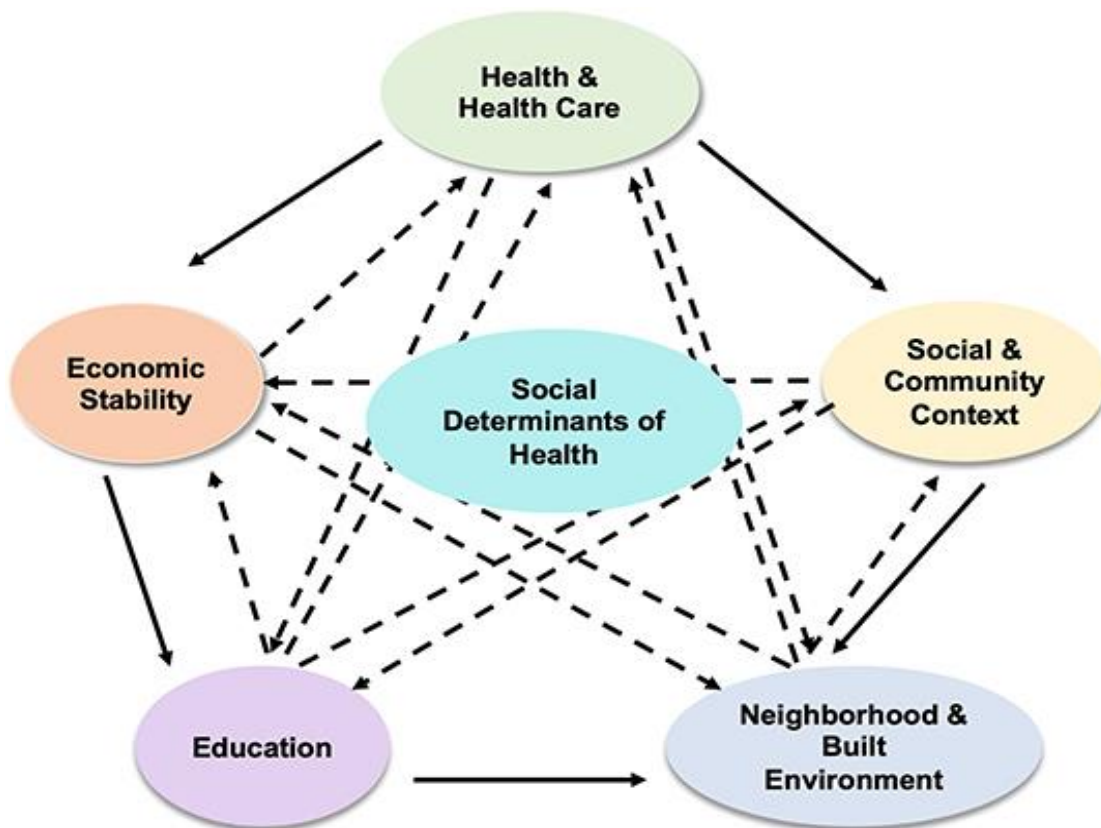


Figure 2: Social determinants of health.

The HIA process

13. The City of London is a densely built up central urban location. The scale of development, the busy and congested streets and pavements, limited open space and large numbers of workers can impact on the physical and mental health of those living, working, studying, and visiting the City.
14. Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, cycling and public transport, the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets.
15. HIAs provide a systematic framework to identify the potential impacts of a development proposal on the health and well-being of the population and highlight any health inequalities that may arise. HIAs can highlight mitigation measures that may be appropriate to enable developments to maximise the health of communities. The Covid-19 pandemic has highlighted the important role that health impact assessments can play in enabling developers to understand and plan for potential risks to health and wellbeing.
16. Developers will be expected to identify potential impacts on health resulting from all major developments in the City. In line with the Mayor of London's Social Infrastructure SPG, the level of HIA required will depend upon the scale and impact of the development.

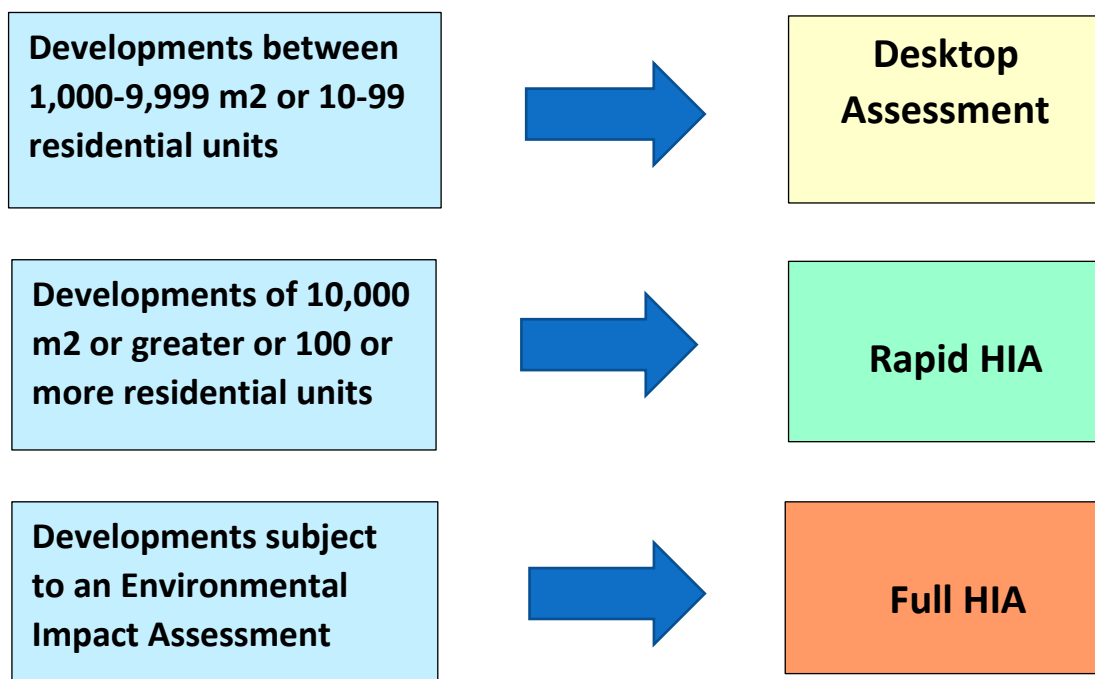


Figure 3: Scale of development requiring HIA.

Desktop assessment

17. This draws on existing knowledge and evidence using published checklists which provide a broad overview of potential health impacts. The City Corporation has prepared a checklist for this purpose in Appendix 1.
18. The Healthy City Planning Checklist should be given consideration and submitted with planning applications for developments of between 10 and 99 dwellings or between 1,000m² – 9,999m² of commercial floorspace. It will also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent.
19. If the desktop assessment flags up potential adverse impacts arising from the proposed development, amendments should be made which address the identified adverse impacts.

Rapid HIA

20. This would require a more focused investigation of health impacts, using the Healthy City Planning Checklist as a guide, and would normally recommend mitigation and/or enhancement measures. Rapid HIAs should be used for developments of 10,000m² or greater commercial floorspace or 100 or more residential units.

Full HIA

21. This involves comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base and community engagement. The Healthy City Planning Checklist indicates which issues should be considered when carrying out a full HIA. A full HIA will be required on those developments that are subject to an Environmental Impact Assessment and could be included within the Environmental Statement to avoid duplication.
22. Appendix 3 includes an optional Checklist Review Tool which is intended to be an additional tool for applicants to check their Full HIA has covered the necessary elements and for officers to check the submitted HIA's are robust. Applicants are not required to submit this checklist.

HIA Procedure

23. HIAs are commonly defined as “a combination of procedures, methods, and tools by which a [development] may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.”
24. HIAs must look at the issue of health and wellbeing comprehensively, and not focus solely on access to health services. Where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the proposals or secured through conditions or a Section 106 Agreement.

25. It is important that the applicant is proactive and ensures that the HIA is suitably progressed, as this is more likely to create ownership of the process as well as raising awareness of health impacts and how they can be mitigated or enhanced at an early stage of the development process. Whilst HIAs can be conducted prospectively, concurrently or retrospectively, the latter are not able to identify any changes to a proposal that may enhance positive health impacts or mitigate negative impacts. It is recognised that developers have incurred significant costs at the point that a planning application is submitted to the City Corporation.
26. Early prospective assessments of a planning proposal are fundamental to ensuring that planning proposals are not advanced to a stage at which it is uneconomical or unrealistic for a developer to modify that proposal. Where a HIA is needed this should be submitted as part of the pre-application documentation to allow maximum scope for the health issues to be identified and addressed in the proposed scheme. The timescales for the HIA will be agreed with the case officer.
27. There is no one definitive methodology for HIA although several “toolkits” have been developed which may be helpful. A useful source for guides, examples of completed HIAs and a directory of HIA practitioners can be found on Public Health England’s HIA gateway site. The aim of the HIA assessment is to identify all the potential health impacts based on evidence, and in the case of rapid or full HIA’s, to recommend measures to enhance positive impacts and mitigate adverse impacts, building on the screening exercise. This will involve examining the key elements of the proposal, considering their relationship to the range of wider determinants of health, health improvement opportunities and inequality, and deciding which impacts might require further assessment.
28. Where a potentially significant health impact is confirmed, for example concerning degradation of air quality, detailed actions that will be taken to mitigate adverse impacts should be submitted. Mitigation will only be required where evidence supports a potential and significant adverse impact on health. The planning case officer will offer support and advice in such instances.
29. HIA involves an evaluation of the quantitative evidence where it exists but importantly also recognises the importance of qualitative information. This may include the opinions, experience and expectations of those people who are potentially the most directly affected by a development. Therefore, HIA is not the preserve of any one disciplinary group. Instead, it draws on the experience and expertise of a wide range of “stakeholders”, who are involved throughout the process. These may include professionals with knowledge relevant to the issues being addressed, relevant voluntary organisations and, perhaps most importantly, representatives of the communities who may be affected by the development. HIA’s submitted to the City Corporation will be assessed by relevant planning officers and Corporation public health colleagues.
30. Recommendations arising from a rapid or full HIA should aim to mitigate any adverse health impacts arising from the proposed development and recognise and enhance any potential beneficial impacts on health. A record of changes made to a development proposal as a result of an HIA should be made in the HIA report.

31. HIA's should include a recommendation to carry out future monitoring of the health impacts that result from the development proposal, so that corrective action can be taken to address any unforeseen impact.

Contacts

For further information and advice on Health Impact Assessment and the planning process please contact the Planning Policy Team:

Phone: 0207 332 1857 or 0207 332 1846

Email: LocalPlan@cityoflondon.gov.uk

Appendix 1: Healthy City Planning Checklist

This checklist has been designed to support a desktop assessment HIA but also offers guidance as to relevant health issues in the City of London for Rapid and Full HIAs. It provides questions to consider when assessing a proposal and examples to support implementation. The questions are not exhaustive, and not all questions will be of relevance to all proposals.

Topic	Issues to consider	Further points to consider/examples	Applicant response	
			Achieved	Not applicable
Engagement	Has engagement and consultation been carried out with residents, the local community and the voluntary sector?	<ul style="list-style-type: none"> • Public website • Consultation events • Identifying relevant communities and stakeholders • Identifying any difficult to reach groups/addressing language barriers • Monitoring satisfaction of communities as scheme progresses 		
Active lifestyles	Does the proposal promote cycling and walking?	<ul style="list-style-type: none"> • Well-located, secure cycle storage • Protection of existing cycle routes • Accessible building entrances • Easily navigable/legible routes 		
	Is the public realm connected to pedestrian, cycle and public transport networks?	<ul style="list-style-type: none"> • Well connected, attractive, safe, and legible streets, footpaths and cycle network. • Public realm linked to existing networks 		
	Does the public realm allow all people to move easily between buildings and places?	<ul style="list-style-type: none"> • Step-free level access • Inclusive design • Clear signage • Legible pathways • Clear entrances to buildings 		
	Does the layout and design of the proposal minimise the need to travel and support sustainable travel?	<ul style="list-style-type: none"> • Walkable neighbourhoods • Co-location of services and facilities • Car-free proposal • Cycle storage • Links to public transport, pedestrian network, surrounding facilities 		
	Does the proposal retain, provide or improve any type of open space?	<ul style="list-style-type: none"> • Provision of open space on-site • Communal open space • Improved access to open space off-site 		
	Does the proposal provide open space for children and young people?	<ul style="list-style-type: none"> • Formal and informal play areas • Natural play • Open space accessible to all children 		
	Does the proposal provide or improve indoor/outdoor sports facilities?	<ul style="list-style-type: none"> • Leisure facilities • Improved access to play or other facilities off-site 		

Healthy environment and design	Does the proposal propose community and social infrastructure to fill identified gaps in provision and provide facilities for need created by the proposal?	<ul style="list-style-type: none"> • Medical facilities • Childcare provision • Social/meeting spaces 		
	Does the layout and design maximise accessibility and inclusivity?	<ul style="list-style-type: none"> • Easy to navigate around different elements of a site • Walking routes with dropped kerbs and clear signage • Step free level public realm 		
	Does the proposal minimise construction impacts for those living or working in the vicinity?	<ul style="list-style-type: none"> • Considerate Constructors scheme • Dust impacts • Noise impacts • Visual Impacts including light • Odours and exhaust fumes • Construction and Logistics Plan 		
	Does the design minimise exposure to sources of air and noise pollution for future and existing inhabitants?	<ul style="list-style-type: none"> • Indoor/outdoor air quality • Site layout and design • Avoidance of “street canyons” • Proximity of habitable rooms from roadside • Electric vehicle charging infrastructure • Low-emission renewable energy • Sound insulation • Noise from heating/ventilation 		
	Does the proposal provide any green infrastructure and conserve and increase biodiversity?	<ul style="list-style-type: none"> • Green roofs, green walls, trees, planting • Water features • Gardens 		
	Does the proposal include appropriate toilet provision?	<ul style="list-style-type: none"> • Publicly accessible toilets at ground level • Accessible toilets and Changing Place facilities • Community Toilet Scheme 		
	Does the proposal reduce the risk of flooding from all sources?	<ul style="list-style-type: none"> • Site sequential design • SUDS, such as permeable paving • Green infrastructure 		
	Is the proposal designed to avoid internal and external over-heating?	<ul style="list-style-type: none"> • Passive cooling • Shading in public realm • Green infrastructure 		
	Does the proposal include opportunities to increase access to healthy food?	<ul style="list-style-type: none"> • Access to free drinking water • Avoiding clusters of hot-food takeaways • Promote urban farming and community food projects 		
	Does the proposal provide opportunities for food growing?	<ul style="list-style-type: none"> • Provision of food growing space/roof gardens e.g raised beds or gardens • Incorporation of fruit and/or nut trees (edible landscaping) 		

	Does the proposal take into account age/Alzheimer friendly design?	<ul style="list-style-type: none"> • Clear signage and access routes • Slip resistant surfaces • Defined edges 		
	Does the proposal include design elements to minimise the risk of suicide?	<ul style="list-style-type: none"> • Barriers around public rooftop areas • Planting near rooftop edges to deter access to the edge • Barriers or netting on bridges 		
	Does the proposal include attractive, flexible public spaces, streets and buildings that provide opportunities for social interaction?	<ul style="list-style-type: none"> • High quality materials • Benches • Shading • Communal areas 		
	Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures?	<ul style="list-style-type: none"> • Ventilation • Shading • Landscaping 		
Healthy workplaces	Does the proposal maximize available BREEAM health and wellbeing credits and, for smaller developments, aim to incorporate the 'sprit' of BREEAM where full accreditation is not feasible?	<ul style="list-style-type: none"> • Lighting • Sound insulation • Avoiding Volatile Organic Compounds • Inclusive design • Ventilation 		
Page 241	Does the proposal incorporate infection control measures?	<ul style="list-style-type: none"> • Touchless technologies • Fresh air and good ventilation • Maximise outdoor space 		
	Does the proposal include good ventilation and good levels of fresh recycled air?	<ul style="list-style-type: none"> • Suitable ventilation systems installed • Access to fresh air where feasible 		
	Does the proposal provide facilities for active travel?	<ul style="list-style-type: none"> • Secure cycle parking • Shower facilities • Lockers 		
	Does the proposal encourage healthy eating?	<ul style="list-style-type: none"> • Kitchen space with facilities to store/heat food brought in from home • Canteen facilities with healthy food options • Accessible drinking water 		
	Is the proposal designed to include active building principles?	<ul style="list-style-type: none"> • Visible, central staircase • Layout to encourage walking • Spaces to allow people to socialise 		
	Does the proposal include relaxation and leisure spaces for employees?	<ul style="list-style-type: none"> • Roof terraces and balconies with seating areas/tables • Indoor quiet spaces with suitable furniture • Opportunities for exercise • Opportunities for growing food/tending plants 		
	Does the proposal incorporate biophilia principles?	<ul style="list-style-type: none"> • Plants and greenery inside building and on terraces • Access to natural light and views outside • Space and furniture to work outside where feasible 		

Healthy Housing	Are the dwellings accessible and adaptable?	<ul style="list-style-type: none"> • Design and layout of parking, entrances, hallways and internal space • Step-free access and level threshold • Future-proofed to accommodate changing needs • Lifts/accessible stairways • Adaptable homes (Building Regulations M4 (2)) 		
	Are any of the dwellings suitable for occupation by a wheelchair user?	<ul style="list-style-type: none"> • Design and layout of parking, entrances, hallways and internal space • Step-free access and level threshold • Entrance-level bedroom and living space • Building Regulations M4 (3) 		
	Do the dwellings London Plan internal space standards and have access to natural light, especially to habitable rooms?	<ul style="list-style-type: none"> • Adequate bedroom sizes, storage, ceiling heights and level access • Natural daylight 		
	Do the dwellings include any private outdoor amenity space, or communal outdoor space where applicable?	<ul style="list-style-type: none"> • Private balcony, patio, roof terrace • Shared amenity space • Space for sitting, drying clothes, and storage 		
	Is a mix of types, tenures and sizes of dwellings provided?	<ul style="list-style-type: none"> • Proportion of unit size mix to meet local needs • Mix of market and affordable housing • Family homes • Starter homes • Older persons housing • Build to rent/co-living housing for City workers 		
	Are a proportion of the dwellings provided affordable?	<ul style="list-style-type: none"> • Onsite provision where required • Integrated throughout the scheme • Equitable location and tenure blind • Equal access to facilities for all residents • Mix of tenures • Proportion of unit size mix to meet local needs 		
	Are the dwellings energy efficient?	<ul style="list-style-type: none"> • Passive design and orientation; maximising natural light • High fabric performance • Low carbon, low-emission solutions/technologies • Connection to existing/future decentralised energy schemes 		
	Indoor air/noise quality – is exposure to sources of air and noise pollution minimised?	<ul style="list-style-type: none"> • Site layout and design • Proximity of habitable rooms from roadside • Low-emission renewable energy • Sound insulation • Noise from heating/ventilation 		

Safe & vibrant neighbourhoods	Does the proposal incorporate TFL Healthy Streets criteria?	<ul style="list-style-type: none"> • Easy to cross • Places to stop and rest • Shade and shelter • Minimise noise • Prioritise walking, cycling and public transport 		
	Does the proposal consider the safety of pedestrians and cyclists, including vulnerable road users?	<ul style="list-style-type: none"> • Safe access • Lighting • Passive/natural surveillance • Separate cycling and walking routes • Children, older people and disabled people road safety considerations • Dementia-friendly paving 		
	Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	<ul style="list-style-type: none"> • Installations to guide traffic for maximum safety to pedestrians • Reducing vehicle movements through Delivery and Servicing Plans • Visibility surrounding servicing areas 		
Page 243	Does the proposal consider measures to reduce the risk of terrorism?	<ul style="list-style-type: none"> • Sufficient space for escape routes • CCTV • Planters/bollards to prevent hostile vehicles • Appropriate design of buildings and public realm 		
	Has the potential for impact on health and social care services been considered?	<ul style="list-style-type: none"> • Impacts on GPs, dentists, pharmacists, hospitals, A&E, community health services, mental health services and social care. • Health facility in scheme where appropriate 		
	Does the proposal provide any community facilities and encourage social inclusion by allowing people to interact?	<ul style="list-style-type: none"> • Community centre • Community/communal kitchen space • Accessibility of space • Co-location of facilities • Public realm space for cultural and community events 		
	Does the proposal incorporate features to help deter crime and promote safety?	<ul style="list-style-type: none"> • Clearly defined boundaries • Appropriate mix of land uses • Passive/natural surveillance • Lighting • High quality materials • Secure by Design 		
Access to work and training	Does the proposal provide opportunities for local employment or training, including temporary construction and permanent 'end-use' jobs (jobs created within one year of completion)?	<ul style="list-style-type: none"> • Local Employment Scheme • Training and apprenticeships • Non-construction jobs for local people via local procurement 		
	Does the proposal provide childcare facilities?	<ul style="list-style-type: none"> • Public or private childcare • Employee childcare 		

	Does the proposal encourage supply chain opportunities for local businesses through the construction and post-construction phase?	<ul style="list-style-type: none"> • Local sourcing of materials • Local procurement of ongoing products and services 		
	Does the proposal encourage educational opportunities?	<ul style="list-style-type: none"> • Indoor space and facilities for school groups • Public realm art/interpretation boards/historical and social context 		

Appendix 2: Resources

City Corporation guidance:

*City of London Corporation Joint Health and Wellbeing Strategy 2017-2020
(Will be updated November 2021)*

City of London Resident Estimates and Projections 2020

City of London Resident Population Indices of Deprivation 2019

City of London Open Spaces and Recreation Audit 2020

City of London City Plan 2036 Draft Infrastructure Plan 2020

City Statistics Briefing January 2020

City Corporation Business Healthy webpage

Good practice examples of HIA's in the City of London:
(To be added when available)

Other resources:

Design Council:
Healthy Placemaking 2018

Public Health England:
Healthy High Streets; Good placemaking in an urban setting 2018

International WELL Building Institute:
WELL Building Standard (WELL)

Town and Country Planning Association Resources:
Guide 8 - Creating Health Promoting Environments

Secured by Design:
Design Guides website

Sport England:
Active Design website

Appendix 3: Checklist review tool

This review checklist is intended to be an additional tool for applicants to check their Full HIA has covered the necessary elements and for officers to check the submitted HIA's are robust. Applicants are not required to submit this checklist.

1.0	Context	
1.1	Site description and policy framework	
	The report should describe the physical characteristics of the project site and the surrounding area	
	The report should describe the way in which the project site and the surrounding area are currently used.	
	The report should describe the policy context and state whether the project accords with relevant policies that protect and promote wellbeing and public health and reduce health inequalities.	
1.2	Description of project	
	The aims and objectives and final operational characteristics of the project should be described.	
	The estimated duration of construction and operational phases should be given (and decommissioning if appropriate).	
	The relationship of the project with other proposals should be stated.	
1.3	Public health profile	
	The public health profile should establish an information base from which requirements for health protection, health improvement and health services can be assessed.	
	The profile should identify vulnerable population groups and describe, where possible, inequalities in health between population groups and should include the wider determinants of health e.g social, cultural, economic and environmental factors that influence the health status of individuals or populations.	
	The information in the profile should be specific about timescales, geographic location and population groups.	
2.0	Management	
2.1	Identification and prediction of health impacts	
	The report should describe the screening and scoping stages of the HIA, and the methods used in these stages.	
	A description of how the quantitative evidence was gathered and analysed, where appropriate.	
	A description of how the qualitative evidence was gathered and analysed, where appropriate.	
2.2	Governance	
	The terms of reference for the HIA should be available and the geographical and population scope explained.	
	Any constraints or limitations in preparing the HIA should be explained e.g resources, accessibility of data.	
2.3	Engagement	
	The report should identify relevant stakeholder groups responsible for enabling health and well-being in the area which should be involved in the HIA.	

	The report should identify vulnerable population groups which should be involved in the HIA.	
	The report should describe the engagement strategy and consultation methods for the HIA.	
3.0	Assessment	
3.1	Description of health effects	
	The potential beneficial and adverse health effects of the project should be identified, including timescales.	
	The identification of potential health impacts should consider wider health determinants e.g social, economic and environmental factors which impact on people's health.	
	The causal pathway leading to health effects should be outlined, and underpinning evidence explained.	
3.2	Risk Assessment	
	The nature of the potential health effects should be detailed.	
	The findings of the assessment should explain the level of certainty or uncertainty of predictions of health effects.	
	The report should identify and justify any standards and thresholds used to assess the significance of health impacts.	
3.3	Analysis of distribution of effects	
	The affected populations should be explicitly identified.	
	Inequalities in the distribution of predicted health impacts should be investigated & any effects of the inequalities stated.	
	Effects on health should be examined based on the population profile and particular demographic or vulnerable groups, including residents and day time working population.	
4.0	Reporting	
4.1	Discussion of results	
	The report should describe how the engagement undertaken has influenced the results, conclusions or approach taken.	
	The report should state the effect on the health and wellbeing of the population of any considered options or alternatives.	
	The report should justify any conclusions reached and justify if some evidence has been afforded more weight.	
4.2	Recommendations	
	There should be a list of recommendations to facilitate the management and enhancement of beneficial health effects.	
	The level of commitment of the project proponent to the recommendations and mitigation methods should be stated.	
	There should be a plan for monitoring future health effects by relevant indicators and a suggested process for evaluation.	

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Committee(s): Planning and Transportation – For Recommendation Open Spaces & City Gardens Committee – For Decision	Dated: 29th June 13th July
Subject: Biodiversity Action Plan Consultation Response and Adoption Report	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	2,5,11 & 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain’s Department?	N
Report of: Colin Buttery, Director Open Spaces	
Report author: Jake Tibbetts, City Gardens Manager	

Summary

This report sets out the response to the consultation carried out on the Draft City of London Biodiversity Action Plan (BAP) 2021-2026 that was presented to Planning and Transportation on 30th March and Open Spaces and City Gardens committee on 27th April.

The BAP aims to ensure that the City meets its obligations towards the protection and enhancement of biodiversity.

A timetable for the production of the BAP was agreed by Open Spaces and City Gardens Committee in December 2020. A five week consultation process was held during May, the response to which can be seen in appendix A. This response helped form the draft BAP presented to committee in appendix B.

Members are asked to agree to the attached draft as the final text for the new City of London Corporation’s Biodiversity Action Plan (2021-26). Following agreement, the City Gardens team will develop a final document with photos and illustrations to accompany the text in preparation for an official launch.

This report is supported by the Planning and Transportation Committee for onward approval to the Open Spaces and City Gardens Committee.

Recommendations

- i) Members of the Planning and Transportation committee are asked to:
 - Recommend for onward approval to the Open Spaces and City Gardens Committee, the text of the final draft Biodiversity Action Plan 2021/2026 for

adoption, subject to the incorporation of any changes proposed by this Committee.

- ii) Members of the Open Spaces and City Gardens Committee are asked to:
- Approve the text of the final draft document for adoption.

Main Report

Background

1. The City of London produced its first Biodiversity Action Plan (BAP) in 2003 which was subsequently updated in 2010, 2012 and 2016. The BAP covers the geographical area of the Square Mile. Sites outside of the City are covered by the local authorities in which they are located.
2. Open Spaces committee agreed the following timetable for the development of the BAP in December 2020.

DATES	ACTION/ EVENT
2nd Dec	Present Timetable to Committee
17th Dec	First Draft of Biodiversity Action Plan circulated to Biodiversity Partnership Group
14th Jan	City of London Biodiversity Group - Consultation meeting
15th -30th Jan	Second Draft of Biodiversity Action Plan produced
1st -15th Feb 2021	Second draft circulated to Partnership Group for Further comments
8th Feb	Second draft presented to Open Spaces Committee
16th Feb -15th Mar	Third Draft of Biodiversity Action Plan Produced
30th March	Third Draft of Biodiversity Action Plan presented to Planning & Transportation Committee
27th April	Open Spaces Committee to sign off third draft of Biodiversity Action Plan
3rd May -31st May	Public Consultation
1st June - 15th June	Response to Public Consultation and Final draft Produced
29th June	Final draft of Biodiversity Action Plan presented to Planning & Transportation Committee for Information
13th July	Final draft of Biodiversity Action Plan presented to Open Spaces Committee for sign off
TBC	Launch

Current Position

3. In line with the above timetable the draft was subject to a consultation process that ran from the 3rd May and was extended to the 7th June.

The consultation was promoted through:

- The Biodiversity Action Plan Partnership Group
- A social media campaign
- City of London website
- City AM, City Matters, London Post and Horticulture Week
- Consultation poster displayed in City Gardens noticeboards
- The consultation documents were available in hard copy at libraries

4. An online form was produced which respondents were asked to complete.
5. The form was divided into nine sections, these largely reflected the structure of the biodiversity action plan:
 1. About You
 2. Biodiversity in the Square Mile and Beyond
 3. Target species
 4. Biodiversity Action Plan Themes
 5. Action Plan 1: Open space and habitat management
 6. Action Plan 2: The built environment
 7. Action Plan 3: Education and community engagement
 8. Action Plan 4: Data collection, surveys and monitoring
 9. Green infrastructure and biodiversity in the Square Mile
6. For sections 3-9 that related directly to the biodiversity action plan questions were asked to gauge levels of support of the draft document and each had an open text field for further comments.
7. The Consultation Statement document provides detail of the results of the consultation, it contains details all of the responses as well as changes that have been incorporated as a result of the consultation. This document can be found in appendix A.
8. The consultation gathered 83 responses, from residents, workers and visitors. It clearly demonstrated support for the document. As can be seen by the results to the questions regarding the documents four main themes and the corresponding action plans:
 - Do you agree that the themes that have been chosen for the BAP
73% responding "They are about right", with 19% responding "others should be considered"
 - Action Plan 1 : Open space habitat management
67% responding "Generally agree", with 22% responding "do not go far enough"
 - Action Plan 2 : The built environment
62% responding "Generally agree", with 30% responding "do not far enough"

- Action Plan 3 : Education and community engagement
78% responding “Generally agree”, with 11% responding “do not far enough”
 - Action Plan 4 : Data collection, surveys and monitoring
74% responding “Generally agree”, with 14% responding “do not far enough”
9. The response to the list of Target Species demonstrated less support than the other areas. However; 47% responded that the list was either “about right” (40%) or was “too extensive” (7%) with 45% responding that it “should be extended”.
10. Apart from a new action being added, no significant changes have been made following the consultation.

Strategic implications

11. The BAP ensures that a key aim of Corporate Plan; *‘To Shape Outstanding Environments’* is realised as well as the priorities;
- *We have clear air, land and water and a thriving sustainable natural environment*
 - *Businesses are trusted and socially and environmentally responsible.*
 - *Our spaces are secure, resilient and well-maintained*
12. Under the Natural Environment & Rural Communities (NERC) Act 2006 states that “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’.
13. The National Planning Policy Framework (NPPF) states that local planning authorities should set out a strategic approach to their Local Plans by planning positively for the creation, protection, enhancement and management of networks for biodiversity and green infrastructure.
14. The London Environment Strategy 2018 of which conserving and enhancing wildlife and natural habitats is a key element of the strategy, which recognises that important social, health and economic benefits result from greening the city.
15. The London Plan 2021 Policy G6: Biodiversity and access to nature reads:
- Sites of Importance for Nature Conservation (SINCs) should be protected.
- Boroughs, in developing Development Plans, should:
- 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

- 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINCS) and seek opportunities to address them
- 3) support the protection and conservation of priority species and habitats that sit outside the SINCS network, and promote opportunities for enhancing them using Biodiversity Action Plans
- 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
- 5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

16. The Proposed Submission Draft City Plan 2036 Policy OS3: Biodiversity reads:

Development should aim to secure net gains for biodiversity where possible by incorporating measures to enhance biodiversity, including:

- retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCS), including the River Thames
- measures recommended in the City of London Biodiversity Action Plan (BAP) in relation to particular species or habitats
- green roofs and walls, gardens and terraces, soft landscaping and trees
- green corridors and biodiversity links
- wildlife-friendly features, such as nesting or roosting boxes a planting mix and variation in vegetation types to encourage biodiversity
- planting which will be resilient to a range of climate conditions, with a high proportion of native plants
- a lighting scheme designed to minimise impacts on biodiversity.

17. The BAP is also integral to the Climate Action Strategy includes the following actions:

- *Introduce new land management practices across our open spaces aiming to maximise their ability to remove carbon, and optimise their biodiversity and resilience value*
- *Advocate the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing*
- *Enhance greening and biodiversity across our public realm and open spaces*

Financial implications

18. None

Resource implications

19. The development of the BAP document will be resourced by City Gardens staff, internal partnership members and relevant support services. £3k has been secured to pay for the final production of the document.

Legal implications

20. There would be risk of non-compliance of policy should the City not have an up to date BAP in place. Any BAP should meet the policy requirements as set out above.

Risk implications

21. There is a reputational and legal risk of not having a current BAP as the City has obligations towards the protection and enhancement of biodiversity.

Equalities implications

22. None

Climate implications

23. It is widely recognised that Biodiversity and Climate change are interconnected. Protecting and restoring ecosystems can help us reduce the extent of climate change and cope with its impact. The BAP will support the delivery of the City's Climate Action Strategy.

Security implications

24. None

Conclusion

25. A new BAP for the City is necessary to ensure that we continue to meet our legal and moral duties, it is also required to ensure that we meet our other strategic commitments. The current draft has been formed as a result of a careful process of internal discussions, development with the BAP partnership Group and external consultation. The public consultation has demonstrated support for the current draft. It is recommended that the attached draft is adopted as the new Biodiversity Action Plan 2021-26

Appendices

Appendix A – Draft City of London Biodiversity Action Plan 2021-2026 Consultation Statement

Appendix B – Draft City of London Biodiversity Action Plan 2021-2026

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City
Gardens

Draft City of London Biodiversity Action Plan 2021-2026 Consultation Statement

Consultation on the Draft City of London Biodiversity Action Plan 2021-2026 was subject to a consultation process that took place from Tuesday 3rd May until Monday 7th June 2021.

The consultation was promoted through:

- The Biodiversity Action Plan Partnership Group
- A social media campaign
- City of London website
- City AM, City Matters, London Post and Horticulture Week
- Notice boards in City Gardens Sites
- The consultation documents were available in hard copy at libraries.

An online form was developed and which respondent were asked to complete.

The form was divided into ten sections, these largely reflected the structure of the biodiversity action plan:

1. About You
2. Biodiversity in the Square Mile and Beyond
3. Target species
4. Biodiversity Action Plan Themes
5. Action Plan 1: Open space and habitat management
6. Action Plan 2: The built environment
7. Action Plan 3: Education and community engagement
8. Action Plan 4: Data collection, surveys and monitoring
9. Green infrastructure and biodiversity in the Square Mile

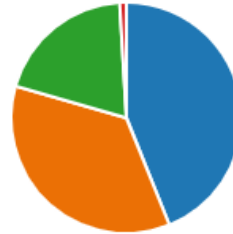
For sections 3-9 that related directly to the biodiversity action plan questions were asked to gauge levels of support of the draft document and each had an open text field for further comments.

NB. Changes that have been incorporated into the final draft are underlined in the text below.

1. Do you:

[More Details](#)

● Live in the City of London	47
● Work in the City of London	38
● Visit the City of London	21
● None of the above	1



2. What is the first part of your postcode? e.g. EC2Y



Comment/ Analysis

The consultation resulted in 83 responses online and 1 response as a word document. 44% of respondents live in the city, 36% work in the city and 20% are visitors. The map above shows the locations of the respondents.

Biodiversity in the Square Mile and beyond

3. I am concerned about the state of nature in the Square Mile

[More Details](#)[Insights](#)

Strongly agree	49
Agree	23
Neutral	6
Disagree	3
Strongly disagree	1



4. I am concerned about the state of nature in the UK

[More Details](#)

Strongly agree	60
Agree	13
Neutral	7
Disagree	1
Strongly disagree	1

**Comment/ Analysis**

Respondents are concerned about the state of nature, with 88% agreeing or strongly agreeing to the statement “I am concerned about the state of nature in the Square Mile” and 89% to the statement “I am concerned about the state of nature in the UK”

Target species

In consultation with the City of London Biodiversity Action Plan Partnership Group, the following species have been selected as 'target species'. These are species found within the Square Mile, take into consideration local, regional and national priorities and should be considered during development and conservation:

- House Sparrow
- Black Redstart
- Swift
- Peregrine Falcon
- Bats
- Wild bees
- Stag Beetle

Protected Species and/or Priority Species records in the City of London are listed in Appendix 2 of the draft Biodiversity Action Plan.

5. Do you feel this list of target species is:

[More Details](#)

[Insights](#)

● Too extensive	6
● About right	33
● Should be extended	37
● Do not know	6



6. Which, if any, other species would you like to be considered a target species?



Comment/ Analysis

The response to the list of Target Species was split. 47% responded that the list was either “about right” (40%) or was “too extensive” (7%) with 45% responding that it “should be extended”.

The aim of the selected target species is to identify flagship species to consider during development and conservation in the Square Mile and are based on recommendations

from our ecological audit that looked at data collected within the Square Mile. It should be remembered that improvements made for the target species cascade into improvements for other species and does not negate the fact that all protected and priority species, such as are listed on the London Priority Species List, should be considered in the planning process and during projects.

We consider that a focused list of target species helps to ensure that benefits are delivered. However as a result of the consultation response it is considered that a commitment to review the target species halfway through this BAP in 2023 will be a new action.

When asked what other species would respondents like considered for target species; 48% of 37 responses received indicated they wanted to see more bird species as target species and 29% of comments received indicated they would like to see more invertebrates including insects and pollinators as target species. Earthworms, were also mentioned and a new action to research and establish an approach to monitoring earthworms as part of Action Plan 4, as these are a good indicator of soil health and condition.

Section 4

...

Biodiversity Action Plan - themes

The Biodiversity Action Plan is divided into four themes which are supported by a set of action plans:

- Open Space and habitat management
Aim: to protect and enhance habitats and species in the City.
- The built environment
Aim: to improve green infrastructure in the built environment.
- Education and community engagement
Aim: to promote a greater understanding of the City's biodiversity.
- Data collection, surveys and monitoring
Aim: to improve monitoring and data on biodiversity in the City.

Action Plans have been developed for each theme to help achieve these aims.

7. Do you agree with the themes that have been chosen?

[More Details](#)

[Insights](#)

● Agree they are right	58
● Think others should be consid...	15
● Don't know	7

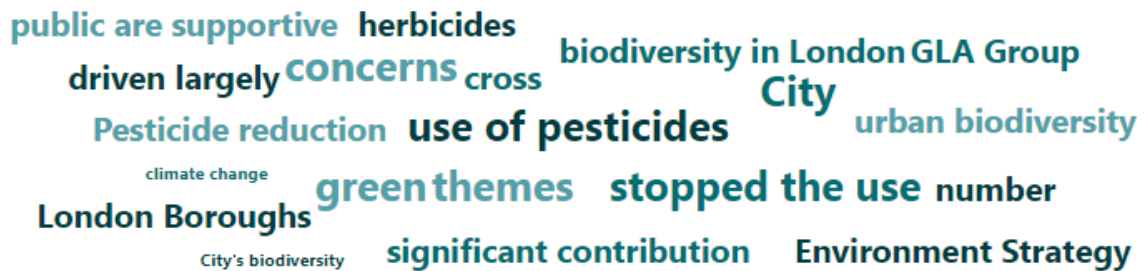


Comment/ Analysis

There was a strong level of support for the themes with 73% responding “They are about right”, with 19% responding “others should be considered”.

8. What other themes would you like to be considered?

5 respondents (19%) answered **use of pesticides** for this question.



Comment/ Analysis

In the 24 responses to the open question, there was a strong focus on the reduction or stopping completely the use pesticides in the responses. Please see below on the response to this.

Other responses asked for themes on wellbeing, air quality and climate change, and whilst it is accepted that these are subjects that are intrinsically linked with biodiversity they are covered by other City of London Corporation strategies and policies for which the BAP supports.

A change that will be adopted is the suggestion to change the aim for the built environment to : "Aim: to improve infrastructure for biodiversity in the built environment."

To therefore include measures such as nest bricks, bat boxes, and bee bricks, which are important for urban wildlife but not "green".

Other issues raised will be considered when delivering action plan 1.

Action Plan 1: Open space and habitat management

Aim: to protect and enhance habitats and species in the City.

Enable land owned and managed by both the City Corporation and privately, to be maintained and enhanced for biodiversity.

Key actions:

- Adopt the recommendations of the 2016 review of Sites of Importance for Nature Conservation (SINCs) in the City of London.
- Schedule and secure funding for a future SINC Review.
- Assess the potential of the Barbican Wildlife Garden to qualify as a Local Nature Reserve (LNR) and consider if that is an appropriate designation for this garden.
- Commission and secure funding for an ecologist to produce management plans for all City Corporation managed SINC sites.
- Carry out a baseline survey and commission and adopt a black redstart species action plan.
- Set up of a multi-departmental working group to develop guidance on managing historic walls, memorials and structures for biodiversity.

9. Do you consider these actions:

[More Details](#)

[Insights](#)

● Do not go far enough	18
● Generally agree	54
● Go too far	5
● Don't know	4



10. Please provide any comments other on the key actions:



Comment/ Analysis

There was a strong level of support for this action plan with 67% responding “Generally agree”, with 22% responding “don’t go far enough”.

Again, the use of pesticides was raised in the comments section, see below for the response on this matter.

Of the 26 respondents over a quarter mentioned in some form the need to focus on private landowners. It is felt that a number of the actions will improve this, and this will be a focus for the partnership group going forward.

Action Plan 2: The built environment

Aim: to improve green infrastructure in the built environment


Enable biodiversity to be incorporated into the built environment to enhance and connect green spaces.

Key actions:

- Develop an ecology toolkit and biodiversity checklist for projects and public realm schemes.
- Environment Bill - including assessment of duties as a local planning authority and biodiversity net gain.
- Develop sustainability planning guidance that includes green infrastructure, biodiversity and climate resilience.
- Review and amend the existing planning application validation process.

11. Do you consider these actions:

[More Details](#)

 Insights

● Do not go far enough	24
● Generally agree	50
● Go too far	4
● Don't know	3



12. Please provide any comments other on the key actions:

Comment/ Analysis

There was generally a strong level of support for this action plan with 62% responding “Generally agree”, with 30% responding “don’t go far enough”.

Again, the use of pesticides was raised in the comments section, see below for the response on this matter.

There were 29 comments on this action point and apart from pesticides there were no clear themes apart from pesticide use. The comments section raised a number of interesting points, many of which will be considered when delivering action plan 2.

Action Plan 3: Education and community engagement

Aim: to promote a greater understanding of the City's biodiversity

Identify and encourage best practice amongst private landowners and managers as well as develop the skills and knowledge of residents, City workers, school children and students through events, activities and volunteering opportunities.

Key actions:

- Provide advice, guidance and training to support the BAP both for City Corporation employees and the wider City community including residents, businesses, visitors, schools, colleges, developers and land managers.
- Support resident and community groups that contribute to local and national species recording and monitoring initiatives.
- Develop guidance on supporting pollinators in the built environment by establishing a working group.
- Promote and disseminate guidance for the London Invasive Species Initiative (LISI) species to raise awareness of these species and how they should be managed.

13. Do you consider these actions:

[More Details](#)

● Do not go far enough	9
● Generally agree	63
● Go too far	6
● Don't know	3



14. Please provide any comments on the key actions:



Comment/ Analysis

There was generally a strong level of support for this action plan with 78% responding “Generally agree”, with 11% responding “don’t go far enough”.

Again, the use of pesticides was raised in the comments section, see below for the response on this matter.

There were 13 comments on this action point and apart from pesticides there were no clear themes apart from pesticides. There were however some good ideas on improving education and community engagement that will be considered by the BAP partnership.

Section 8

...

Action Plan 4: Data collection, surveys and monitoring

Aim: to improve monitoring and data on biodiversity in the City.


Establish a structured approach to surveying and monitoring of sites to inform ongoing management decisions and identify future areas of priority. This includes professional ecology surveys, citizen science opportunities and records collected by voluntary groups and individuals.





Key actions:

- Maintain, improve, promote and utilise the information and services available via the Greenspace Information for Greater London Service Level Agreement.
- Develop and implement a planning condition which requires developers of relevant schemes to collect and submit relevant Biological data of their site to the City of London Planning Authority to improve data monitoring and assessment on biodiversity trends in the City.
- Produce a biological recording strategy.
- Identify funding to carry out a black redstart and bat baseline survey to guide future management interventions and enhancements.
- Undertake below ground mapping to identify opportunities and barriers for establishing new green infrastructure and sustainable drainage systems (SuDS) within the public realm.

15. Do you consider these actions:

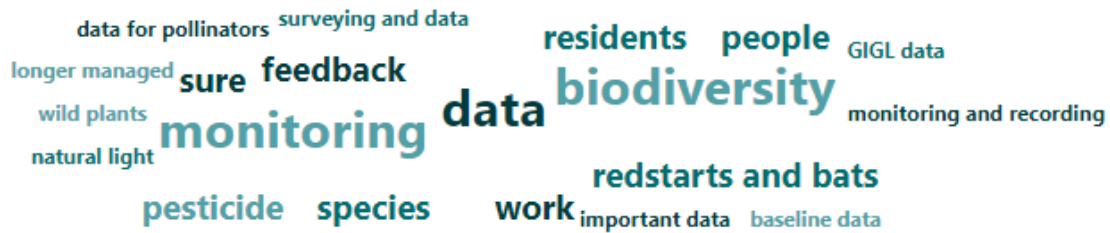
[More Details](#)

 Insights

	Do not go far enough	11
	Generally agree	59
	Go too far	8
	Don't know	2



16. Please provide any comments on the key actions:



Comment/ Analysis

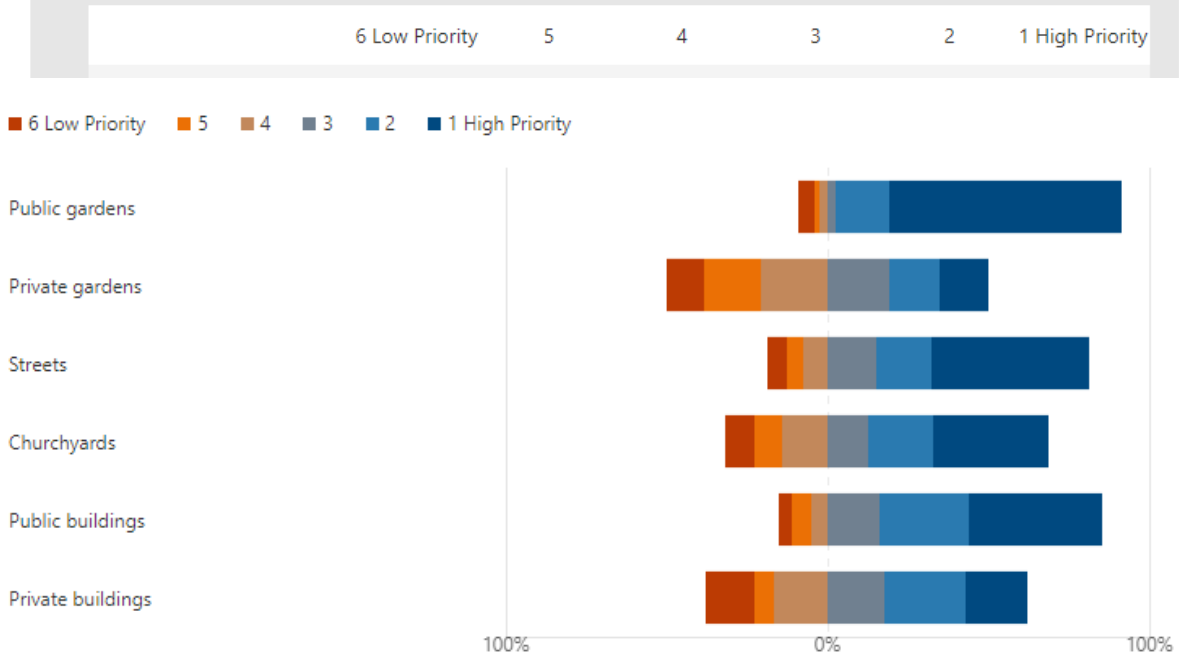
There was generally a strong level of support for this action plan with 74% responding “Generally agree”, with 14% responding “don’t go far enough”.

Again, the use of pesticides was raised in the comments section, see below for the response on this matter.

There were 17 comments on this action point and apart from pesticides there were no clear themes. The action to produce a biological recording strategy will take into consideration the comments to focus on the monitoring of pollinators including wild bees and moths. This will also support the development of guidance for pollinators in the built environment and how enhancements can be monitored.

Green infrastructure and biodiversity in the Square Mile

17. Can you list in priority order the locations below, that you feel would provide the most benefit from a focused approach to improving green infrastructure and biodiversity in the Square Mile: (1 = high priority, 6 = low priority)



Comment/ Analysis

The way this question was constructed ensure that responders had to respond in priority order, resulting in most responders giving more than one location the same priority and in a number of cases, responders gave every location the same priority score which has distorted the results. However, it is clear that from the above that respondents considered that Public Gardens could benefit the most from a focused approach. Followed in order by Streets, Public buildings, Churchyards, Private buildings and then private gardens. This is interesting as it is at odds with the open responses to Action Plan 2 which highlighted a need to focus on privately owned land and sites.

18. Do you have any other comments on the draft Biodiversity Action Plan?



Comment/ Analysis

29 participants responded to this open question. Some were supportive:

“A welcome and thorough document, with just a greater emphasis required on integrated measures due to their benefits regarding lifetime, low maintenance, success rate, temperature regulation with future climate change in mind, and aesthetic integration.”

“It is a very good initiative, thank you!”

“I think it's wonderful that this is being done! As a personal perspective, I think it's always good to remember that all wildlife ultimately depends on plants, at the bottom of the food chain, and the important role of 'weeds' in this structure.”

Some were critical:

“It wouldn't surprise me if these good intentions get overridden by some development or other work the City preferred to support.”

“Please concentrate on essential services and cleaning gardens and streets of rubbish”

“Waste of taxpayers' money.”

And many urged stronger actions and more commitment:

“Hopefully the BAP will be taken seriously and proper resources given for both the preparation of SINC management plans but also for monitoring these and the action plans.”

“Time is running out for this planet. Be bold an implement asap”

“This does not feel that it goes far enough and fast enough. The emptying of the City during lockdown gives a wonderful opportunity to reset the dial on how the streets and green spaces could be promoted even further and be truly ambitious for a green city.”

Response to Pesticides

Throughout the responses there was a clear focus on reducing or stopping pesticide use. The following are good examples of concerns.

“The Mayors of London's Environment Strategy contains a call for all in the GLA Group to reduce the use of pesticides. A number of London Boroughs have already reduced or stopped the use of pesticides and many other Boroughs are interested. This has been driven largely by concerns about urban biodiversity in London and is something the public are supportive of. Pesticide reduction is a cross-cutting theme that should be incorporated within the four existing themes. I believe that, in order to support biodiversity, ending the use of pesticides (including herbicides) would make a significant contribution.”

“A complete stop to the use of pesticides”

“Other than habitat, pesticide use is a key challenge for biodiversity, and must be addressed, including in the private sector. The Mayor of London is pushing for a pesticide free London and some boroughs are already pesticide free or going that way. Here in Lambeth, Parks stopped glyphosate use 2-3 years ago, Estates, last Summer, and August will be the last spraying of on the streets, with some streets choosing to opt out and the residents hand weeding. My own street has opted out for 3 years now -the various lockdowns over the past year have been a brilliant time to feel and see the benefits of a chemical free environment with an abundance of biodiversity!”

“In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly, management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.”

Firstly, it is important to state the current position in relation to the use of pesticides in the City. The City has taken great steps in reducing its use of Glyphosate, which receives much focus as it is the most commonly used herbicide. Street cleansing have stopped using Glyphosate and all other herbicides completely. Usage by the City Gardens team has reduced to less than five litres a year in total and we will seek to reduce this further. As part of the City Gardens Management Plan, which is due to be reviewed in 2022, the City Gardens team will undertake to review the use of all pesticides in its gardens with the BAP Partnership Group. Alternatives will be assessed, and their benefits and disadvantages evaluated.

Regarding the management of historic walls, pesticide use will also be reviewed, however this provides some challenges when removing woody plants such as Buddleia the choice is between the careful use of chemicals or the digging out of root systems and the unavoidable resulting damage to listed structures. Options will nonetheless be looked at and evaluated.

Appendix A - Full list of responses to all the open question

Comment received	Theme of response	City Corporation response
Question 8 - What other themes would you like to be considered?		
Wellbeing Aim: to create opportunities and spaces that allow people's wellbeing to benefit from the City's biodiversity.	Wellbeing	Access to nature to support wellbeing should be considered as part of the review and update of the Open Space Strategy SPD.
Pollution and air quality	Air quality	Pollution and air quality are specifically covered in the City Corporation's Air Quality Strategy 2019-2024.
I'd like to see another one - to create more green space within the City - at ground level (not just roofs)	Open space	Protection and creation of green space addressed in the draft City Plan 2036 and Open Space Strategy SPD.
There is a lot of focus on the diversity of fauna. Is it not also important to focus on greater diversity of flora in response to climate change as well as the needs of wildlife	Flora	A number of the actions aim to increase understanding of flora in the Square Mile. Actions such as the development of a ecology toolkit and biodiversity checklist, sustainability planning guidance and SINC management plans should focus on protecting and increasing flora diversity for a variety of benefits.
Adjust: The built environment should be: "Aim: to improve infrastructure for biodiversity in the built environment." To therefore include measures such as nest bricks, bat boxes, and bee bricks, which are important for urban wildlife but not "green".	Theme	Suggestion adopted. The wording better reflects the aim of this action plan to improvement infrastructure for biodiversity which includes but is not limited to improving green infrastructure.
Engagement with other city councils to promote methods of increasing and protecting biodiversity.	Engagement	Agreed that it is important to engage and share learning of ways of increasing and protecting biodiversity with neighbouring boroughs and Greater London.

Comment received	Theme of response	City Corporation response
Clean up the City in areas that have grown wild because of lack of maintenance - make them truly "green"	Maintenance	This is a subjective point of view and for some people wild areas are greener due to having a higher biodiversity value. We aim to meet the dual objectives of a more biodiverse environment and high quality amenity spaces.
Introduce more "wild" gardens.	Open space	The opportunity to expand or enhance areas of existing sites to improve the biodiversity value will be considered as part of the SINC Management Plans.
<p>No mention of population explosion of squirrels and pigeons infesting the Barbican. These wreck window box plants and need culling. The pigeons disturb sleep at night. Squirrels on the first floor above podium on terrace blocks run along fire escape route. I caught one in my flat. They eat eggs and destroy trees. About time CoL did something please. BEO takes no action. Pigeons worse while peregrines nest in [redacted] , so hawk cannot visit.</p> <p>There is also a plague of mosquitoes from July until autumn. It's impossible to leave windows open in the evening or get bitten. Money wasted on this project should be directed to cleansing gardens and open spaces of rubbish left behind by visitors each weekend.</p>	Squirrels and pigeons	This is primarily a pest control issue which should be considered as biodiversity enhancements are developed.

Comment received	Theme of response	City Corporation response
Reducing litter which has a visual impact but also impacts on wildlife.	Litter	Comment noted.
More trees! More green enclaves - rather than 'rooftop gardens'!	Trees; greening	Comment noted. Draft City Plan 2036, Open Space Strategy SPD and Tree Strategy SPD address provision of ground level open space and tree planting.
More feedback from the community.	Engagement	Noted that engagement with the community is vital for the success of the BAP with the support of the Partnership Group and development of Working Groups.
Consider preserving habitat instead of destroying for new developments and then trying to build back	Development	Preserving existing habitat is currently a considered during the planning process.
General greening of streetscapes. More on impact of light pollution.	Development; greening; lighting	The draft City Plan 2036 supports the greening of the public realm. The City of London Lighting Strategy contributes towards limiting light pollution.
Chosen themes look good. What about including climate change and climate change mitigation.	Climate change	Comment noted and it is recognised that biodiversity and climate change are interconnected. Climate change will be considered throughout the delivery of the action. The Climate Action Strategy 2020-2027 addresses these areas directly.
Creating more pockets for wildlife in the City by converting paved areas into green areas	Greening	The draft City Plan 2036 supports the greening of the public realm to support biodiversity such as the creation of green corridors and biodiversity links.

Comment received	Theme of response	City Corporation response
<p>In order to support biodiversity ending the use of pesticides (including herbicides) would make a significant contribution. The Mayors of London's Environment Strategy contains a call for all in the GLA Group to reduce the use of pesticides. A number of London Boroughs have already reduced or stopped the use of pesticides and many other Boroughs are interested. This has been driven largely by concerns about urban biodiversity in London and is something the public are supportive of. Pesticide reduction is a cross-cutting theme that should be incorporated within the four existing themes. Information is available at https://www.pan-uk.org/pesticide-free/</p>	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
<p>In order to support biodiversity ending the use of pesticides (including herbicides) would make a significant contribution. The Mayors of London's Environment Strategy contains a call for all in the GLA Group to reduce the use of pesticides. A number of London Boroughs have already reduced or stopped the use of pesticides and many other Boroughs are interested. This has been driven largely by concerns about urban biodiversity in London and is something the public are supportive of. Pesticide reduction is a cross-cutting theme that should be incorporated within the four existing themes.</p>	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
A complete stop to the use of pesticides	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
It would be hood to include information extinction of species.	Species	Species decline and biodiversity crisis referred to in the BAP.
I think broadly these are right, but and look forward to how you propose to expand these. I know where I live in Lambeth there are concerns about residents wanting parks and estates to look perfect and mown, but this is obviously where education must come in, firstly, and importantly, with Council officials who definitely prefer the easy route, unfortunately!	Engagement; maintenance	It is important to engagement and communicate with the community when changes to the management of a site are proposed.
Roof top gardens and growing plants on roofs of buildings	Greening; green roofs	The Biodiversity Action Plan promotes the value biodiverse roofs. The draft City Plan 2036 supports the installation of biodiverse extensive or intensive green roofs.
Pesticides - The Mayors of London's Environment Strategy contains a call for all in the GLA Group to reduce the use of pesticides. A number of London Boroughs have already reduced or stopped the use of pesticides and many other Boroughs are interested. This has been driven largely by concerns about urban biodiversity in London and is something the public are supportive of. Pesticide reduction is a cross-cutting theme that should be incorporated within the four existing themes. I believe that, in order to support biodiversity, ending the use of pesticides (including herbicides) would make a significant contribution.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
Question 10 - Action Plan 1: Open space and habitat management - Please provide any comments other on the key actions:		
<p>scope is limited. there is more that can be done in open spaces, including adding more green habitats.</p> <p>A lot of the private land is paved and corporate - can this be made more natural/green/welcoming for nature.</p>	Greening; development	The draft City Plan 2036 supports habitat creation to enhance biodiversity.
Actively create new habitats in the City, on rooves, in unused spaces...	Habitats	The draft City Plan 2036 supports the installation of biodiverse extensive or intensive green roofs. The BAP identifies open mosaic habitat and standing open water as target habitats for creation and enhancement.
Plant wildflowers everywhere. Far too many streets in square mile with no trees/plants.	Greening	The draft City Plan 2036 and Tree Strategy SPD support both greening and tree planting.
<p>Create more green spaces in the City, even tiny ones.</p> <p>Talk to companies and corporations about incorporating more plants and wild greens in private spaces as well.</p>	Open spaces; engagement	Both the draft Local Plan 2036 and Open Space Strategy SPD support increasing green infrastructure.
I would like key actions to include kore tree planting and greening programmes on city-owned land	Tree planting; greening	Tree planting is addressed in the Tree Strategy SPD and the Transport Strategy includes the proposal to incorporate more greenery into the City's streets and public spaces.
Too few green areas in general in City of London and no consideration in planning decisions concerning loss of natural light	Greening; Daylight and sunlight	The city is actively trying to increase green infrastructure both in the public and private realm. Loss of light is currently considered during the planning process.

Comment received	Theme of response	City Corporation response
Need to ensure that we bring in more volunteer groups to get their support and engagement e.g. Barbican Horticultural Society, Barbican Residents' Gardens Advisory Group	Engagement	Commented noted and it will be important to involve specific community and volunteer groups to support the BAP as any site specific plans are developed.
Greenspace is being steadily eroded in the City because some of it is privately owned. There should be a complete ban on development on open space. Disturbance is also a major issue for wildlife, and some areas should be human-free.	Open Space	The balance between open space and development is considered during the planning process and we are actively seeking to increase the amount of green infrastructure from development. However sometimes development necessitates an impact on green space.
There are other green spaces (e.g. in the roundel at the Museum of London) and tree lined streets (e.g. just south of Old Street/north of Golden lane/Charterhouse/Barts Sq) which should be protected too	Open space; trees	Green space and tree protection is not specifically covered by the BAP. For trees, the vehicle for this is Tree Protection Order legislation and is covered by the Tree Strategy SPD.
Barbican wild garden should not be nature reserve. It is a residential garden	Barbican; LNR	Comment noted.
Irrespective of LNR status, the Barbican Estate etc SBINC should be extended to include all the green infrastructure in the Barbican as well as the Golden Lane Estate and upgraded to SMINC status	Barbican; SINC	The boundary of existing and proposed SINC will be considered as part of any future SINC review.
Involve construction industry, land owners and large organisations into discussions	Engagement	Comment noted.
Do you need an ecologist to produce management plans?	Ecologist	Ecological expertise will be required to deliver a number of the actions including SINC Management Plans.

Comment received	Theme of response	City Corporation response
Tidy up what you have. Cannot see the point of encouraging wildlife in City of London. This is just the latest bandwagon to occupy inflated corporation employee numbers. Keep the community charge down and help reduce CoL budget in straightened circumstances.	Maintenance; resources	The BAP supports biodiversity in the Square Mile for the benefit of both wildlife and people.
Please protect the Barbican Wildlife Garden! A very special place which is greatly appreciated.	Barbican	Comment noted.
I'd like more communication about the falcons	Comms	Information and existing resources will be shared to raise awareness of target species.
Protocols to prevent chemicals being used in weed management.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Feels unambitious given the climate crisis	Climate change	Comment noted.
Would like to see targets set (and met) for increase in numbers of key species	Species; targets	Most species benefit from improvements or increase in suitable habitat for which targets can be set and monitored. The target species have also been selected where specific considerations or interventions will support the species.
As mentioned before to find more areas in the City for wildlife gardens or just trees.	Nature sites; trees	The opportunity to expand or enhance areas of existing sites to improve the biodiversity value will be considered as part of the SINC Management Plans. The draft City Plan 2036 and Tree Strategy SPD supports tree planting.
I would like to have seen something about a review of City gardens management practices such as increasing local composting, eliminating pesticides and herbicides, etc	Pesticides and herbicides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
<p>In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.</p>	Pesticides	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>
<p>Seems very modest - and leaves me wondering how you can not have already adopted 2016 recommendations as a minimum - don't you need something fit for 2021 and beyond.</p>	Targets	Comment noted.
<p>As institutions across the board we are not doing enough and we are running out of time.</p>	Targets	Comment noted.

Comment received	Theme of response	City Corporation response
<p>Other than habitat, pesticide use is a key challenge for biodiversity, and must be addressed, including in the private sector. The Mayor of London is pushing for a pesticide free London and some boroughs are already pesticide free or going that way. Here in Lambeth, Parks stopped glyphosate use 2-3 years ago, Estates, last Summer, and August will be the last spraying of on the streets, with some streets choosing to opt out and the residents hand weeding. My own street has opted out for 3 years now -the various lockdowns over the past year have been a brilliant time to feel and see the benefits of a chemical free environment with an abundance of biodiversity!</p>	Pesticides	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>
<p>Question 12 - Action Plan 2: The built environment - Please provide any comments other on the key actions:</p>		
<p>Toolkit is not enough to ensure green infrastructure is enhanced. can there be a target for the amount of green to be added?</p>	Greening	<p>The draft City Plan 2036 supports greening as part of development which is supported by the Urban Greening Factor.</p>
<p>Again more specific targets relating to tree planting and greening public spaces</p>	Trees; greening	<p>The draft City Plan 2036 and Tree Strategy SPD support both greening and tree planting which the BAP supports.</p>
<p>need more detail of "review and amend the existing planning application process? Please supply</p>	Development	<p>The current planning application process will be reviewed to see how improvements can be made to ensure that biodiversity is better considered by developers and planners during the process.</p>
<p>The greenery on buildings is normally ridiculous, not making up for the increased height of office buildings and often only viewable if flying over in a helicopter</p>	Green roofs	<p>Comment noted.</p>

Comment received	Theme of response	City Corporation response
emphasise use of green roofs for biodiversity rather than recreation	Green roofs	The draft City Plan 2036 supports the installation of biodiverse extensive or intensive green roofs.
Agree it is really important to work with developers to ensure that new buildings and refurbished buildings support the BAP	Engagement; development	Comment noted.
The density of built environment is a real issue in the City. Officer life is on the decline. STOP BUILDING OFFICES	Development	Comment noted.
<ul style="list-style-type: none"> • Develop an ecology toolkit and biodiversity checklist for projects and public realm schemes. - this will just be a tickbox for developers to replace or plant trees/green roof/walls which may not actually increase biodiversity so HABITAT and TREE LOSS should be key drivers for planning decisions 	Development; trees	The ecology toolkit and biodiversity checklist are intended to support City Corporation staff as a tool to for projects and public realm schemes.
Increase firm commitments of new buildings to include green infrastructure in their plans and offset carbon through biodiversity/afforestation schemes outside of the City.	Greening; carbon	The City's Urban Greening Factor which has recently been adopted as part of the Local Plan, which will result in greater green infrastructure. Regarding off setting, we are awaiting the new Environment Bill to give clear steer on biodiversity net gain.
There is consistently a net loss of small green spaces due to infill developments.eg. Mais House being a prime example, and the application by Lewisham Homes to develop on Hillcrest Woods in 2016. Lewisham Planning overrides green space protection consistently as favour is always given to development. Unless green spaces have legal protection, it is all up for grabs for building.	Open space	In relation to the Square Mile, the draft City Plan 2036 supports the protection of existing open and green space.

Comment received	Theme of response	City Corporation response
Clarify that the SPG includes important integrated measures for urban biodiversity that are not in the category of "green", e.g. nest bricks, integrated bat boxes, and bee bricks.	Planning	The draft City Plan 2036 supports that artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes wherever suitable to provide additional habitat for the City's target species. Opportunities for integrated measures to be included in the ecology toolkit and biodiversity checklist.
A full time ecology officer should be appointed to vet and monitor planning applications and there should be a policy to prefer retrofitting to demolition. All green infrastructure should be secured by s106 agreement.	Ecologist; greening; planning	Comment noted.
Focus on the City - forget "climate resilience" that is a national and international level. Money spent on "climate" is money not available for actual green programs of today	Priorities; climate change	The Climate Action Strategy 2020-2027 supports building climate reliance by providing thriving and biodiverse green spaces and urban habitats.
Connecting green spaces int CoL will just encourage more foxes and squirrels. Foxes already run around the Barbican car parks at night. There is no control on this and there should be.	Barbican; foxes; squirrels	Comment noted.
Perhaps more reuse of existing buildings rather than building new & usually oversized buildings.	Development	This is being looked at under both the Climate Action Strategy and Circular Economy work.
There should be a campaign to ensure that all residents in the Barbican plant and maintain their window boxes	residents; greening	Comment noted.
Survey of swift nesting sites, and how to provide more sites near them that more swifts will use. (Needs a few years, as swifts' habit is to first prospect for nearby nesting sites, and then return the following year to actually use them.)	Species	Comment noted.

Comment received	Theme of response	City Corporation response
Feels unambitious	Targets	Comment noted.
Would like to see strong enforcement of the policies.	Enforcement	Comment noted.
I would like to have seen more emphasis using this theme to develop better green corridors through the city	Greening	The draft City Plan 2036 and Open Space Strategy SPD support the provision and creation of green corridors.
Non-chemical weed and pest management should form a core part of the approach to the built environment.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
<p>In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.</p>	Pesticides	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>
<p>Some developers work hard to improve the environment for wildlife and deserve commendation- the London Wall Place development being a good example - however there is no sign this is actually prompted by anything from the Corporation - examples such as the supposed sky garden in 20 Fenchurch St show that anything goes where planning applications come from big corporate entities. Setting some ambitious objectives would be a start.</p>	Planning; development	<p>The draft City Plan 2036 supports the greening of the City through new development opportunities and refurbishments. All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context.</p>
<p>many of these measures should be mandatory</p>	Targets	<p>Comment noted.</p>
<p>Biodiversity and trees need as much protection as possible and we need to strengthen our policies around these sorts of things.</p>	Protection	<p>The draft City Plan 2036 and Tree Strategy SPD includes policy for protecting and improving biodiversity and retention of existing trees.</p>
<p>Pesticide use is a key destroyer of biodiversity, and must be addressed. Essential that all with interests taking the above process forward, must embrace a pesticide free approach, be it the Council, corporations or private groups.</p>	Pesticides	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>

Comment received	Theme of response	City Corporation response
Assess current environmentally responsible office space and building landlord to adhere to the green infrastructure in the building environment	Greening	Comment noted.
Question 14 - Action Plan 3: Education and community engagement - Please provide any comments other on the key actions:		
Fund community the establishment of community gardens in the city, or lease City of London land for this purpose. Fund schools outreach events on urban biodiversity in City schools.	Funding, schools	Comment noted.
Encourage big businesses in square mile to plant/put plants/wildflowers outside their buildings.	Engagement	Comment noted.
Too many working groups.	Working groups	Comment noted.
Agree - • Support resident and community groups that contribute to local and national species recording and monitoring initiatives. • Develop guidance on supporting pollinators in the built environment by establishing a working group. Rest are going to achieve nothing and a waste of resources	Priorities; resources	Comment noted.
I think setting up a volunteer program with businesses would be affective especially as many corporates give employee volunteer days	Volunteering	Volunteering opportunities to support the BAP will be identified as actions are progressed.

Comment received	Theme of response	City Corporation response
<p>In my opinion, more needs to be done to engage the community.</p> <ul style="list-style-type: none"> - Develop new educational projects aimed at families - residents and visitors - Engage with other CoL departments to coordinate a united strategy to inform other audiences of the value of the City's diversity - Utilise the resources already available by other CoL sections (resident's newsletters, visitors social media, City Information Centre, Libraries, screens...) to channel the relevant messages 	Engagement; communications	A Working Group focusing on communication will be established with the aim of identifying opportunities to engage with City community, raise awareness of the BAP and support biodiversity in the Square Mile.
The elected representatives should receive guidance etc and appoint a biodiversity champion from amongst them.	Members	Comment noted.
Support events for businesses (and encourage volunteer days) and schools.	Engagement	The actions of the BAP support providing advice, guidance and training to the City community.
Plenty of green spaces in suburbs owned by CoL. Adjoining councils have plenty of places if children really need to look at beetles, which I doubt. With all the other pests in Barbican, I can do without extra insects and birds tweeting all night outside bedrooms (as we had for weeks last winter)	Open spaces	The overall response to the consultation demonstrates a strong public desire to increase biodiversity within the Square Mile. Under the Natural Environment & Rural Communities Act 2006 (NERC), as a public authority in England, the City Corporation has a duty to 'in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'

Comment received	Theme of response	City Corporation response
I think this sort of reaching out tends (perhaps with schools as the exception) tends to reach people who are already interested/looking out for opportunities. Incentivising involvement (from employers, a wider range of residents and smaller businesses etc) could make a meaningful impact.	Engagement	Comment noted. A Working Group focusing on communication will be established with the aim of considering how the aims and benefits of the BAP reach the City community.
One of the key existing barriers is the attitudes of both the planning officers and the elected councillors who sit on the planning committee. While the the rhetoric is changing, planning decision continue to be made to the benefit and to deliver economic gain for developers to the detriment of our local environment.	Planning; Members	Comment Noted
Communicating with the public on biodiversity will be key to the successful delivery of the strategy. One key area for communication will be talking about the use of pesticides and how the City of London will reduce and end their use.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Again, essential to go pesticide free, failure will jeopardise this process. I think nearly all the public are against the use of pesticides, the rest can be got on board with education. Non chemical methods of control must be used, but also, habitats suitable for species must be promoted which may involve letting areas become more wilder.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Question 16 - Action Plan 4: Data collection, surveys and monitoring - Please provide any comments other on the key actions:		

Comment received	Theme of response	City Corporation response
When planning decisions are blocking out more and more natural light, it contributes to greenery and natural habitats not being able to thrive	Daylight and sunlight	The impact of shading produced by developments is currently considered during the planning process. We are looking at how this aspect can be improved whilst we review the planning process in respect to biodiversity.
Who pays for all this work?	Resources	The development of the BAP process has been funded by local risk budgets.
Not sure about focus on redstarts and bats to exclusion of other species. How do residents access the GIGL data? If they can't it is a missed opportunity	Species	No species are excluded, all relevant species should be considered as part of conservation and development, in particular protected and priority species. Target species have been selected where there are specific opportunities to support the species in the Square Mile. Data search reports are available from GiGL for the public and community groups.
Make better use of volunteers - a lot of people would be happy to help with this and it would increase engagement and monitoring	Engagement	Opportunities for volunteers to support engagement and monitoring are important and will be considered as the actions are developed.
- Create effective channels to engage with local communities to encourage feedback on biodiversity observations - Create a 'Friends of' or similar to report interesting sightings and create a buzz among those who care and are keen to contribute	Monitoring; engagement	The action to produce a biological recording strategy will look at opportunities to engage with the community to support species observations. Friends of City Gardens support biodiversity enhancements and surveys.
automate monitoring using sound recordings, cameras, machine learning and IoT technology	Technology	Methods of species monitoring will be considered as part of the action to develop a biological recording strategy.
An ecologist should be employed to support species surveying and data collection.	Ecologist	Ways of ensuring that the City has access to ecological advice and support are being explored.

Comment received	Theme of response	City Corporation response
Perhaps community and volunteer groups could receive funding to assist in monitoring and recording e.g. qualifying for time credits and small grants to buy bat monitors, binoculars etc.	Resources	Funding opportunities for the BAP in general and to support the biological recording strategy will be considered as this action is developed.
Publicise accomplishments and achievements in easy to read materials tailored to business, residents and visitors. People should be aware and proud of the work being undertaken in the Square Mile, and should be advocates for this in other areas.	Engagement	A Working Group focusing on communication will be established with the aim of identifying opportunities to engage with City community to raise awareness of the BAP and support biodiversity in the Square Mile.
This project is a waste of money and ill conceived. I'm sure it will employ many overpaid graduates who tweet their progress to much acclaim. It doesn't improve my environment.	Resources	Comment noted.
Should include an attack on light pollution from offices at night	Lighting	The City of London Lighting Strategy 2018 addresses the need to limit unwanted spill light.
Maybe encourage built-in swift bricks for new developments?	Species; development	Opportunities to directly support target species such as Swifts will be included in the ecology toolkit.
In addition to the black redstart and bat survey proposals, establishing baseline data for pollinators including wild bees, butterflies and moths would provide important data.	Species	The action to develop a biological recording strategy will explore and prioritise where baseline data is required.
Monitor the (likely) increase in insect biodiversity of spaces once they are no longer managed with pesticide products to remove wild plants.	Pesticides	The action to develop a biological recording strategy will identify priorities for monitoring. Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'
Again this looks like baseline effort - this is a bare minimum.	Targets	Comment noted.

Comment received	Theme of response	City Corporation response
Absolutely agree, with good signage with explanations, for example for wilder areas, or no mowing. Working a treat in Lambeth! Feedback of change needs to happen to help promote the changes.	Comms	Comment noted.
Biodiversity can only be protected by replacing the use of herbicides and other pesticides to manage plants and pests with chemical-free alternatives, and creating rich and safe habitats.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Question 18 - Do you have any other comments on the draft Biodiversity Action Plan?		
the streets could become green corridors to connect spaces and encourage wildlife. More ambition needed	Greening; targets	The draft City Plan 2036 supports 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.
Time is running out for this planet 🌍 Be bold and implement asap 🙌🙌🙌🙌	Targets	Comment noted.
It is a very good initiative, thank you!	Comment	Comment noted.
Waste of taxpayers' money.	Resources	Comment noted.
Ever higher buildings overshadowing green areas and private gardens/balconies with window boxes is leading to a reduction in greenery	Daylight and sunlight	The impact of shading produced by developments is currently considered during the planning process. We are looking at how this aspect can be improved whilst we review the planning process in respect to biodiversity.
Is there a clear view of what sorts of plants and wildlife would be best suited to life in the City and how that view might change over time?	Species; climate change	Actions such as the development of an ecological toolkit, sustainability planning guidance and guidance for pollinators in the built environment will provide details of opportunities for wildlife specific to the City.
I hope it is more than window dressing	Comment	Comment noted.
Can't believe all this isn't happening already	Comment	Comment noted.

Comment received	Theme of response	City Corporation response
Glad to see peregrine falcons called out - useful for controlling pigeon numbers too. Their numbers should be expanded.	Species	Comment noted.
Thank you for putting this together and requesting feedback.	Comment	Comment noted.
Biodiverse extensive green roofs (not sedum mats) offer the greatest potential for increasing biodiversity	Green roofs	Comment noted. The draft City Plan 2026 support the installation of biodiverse extensive or intensive green roofs.
A welcome and thorough document, with just a greater emphasis required on integrated measures due to their benefits regarding lifetime, low maintenance, success rate, temperature regulation with future climate change in mind, and aesthetic integration.	Development	Both the Biodiversity Action Plan and draft City Plan 2036 support that artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes.
The Biodiversity Action Plan goes some way to support nature in the Square Mile but the City really need a green infrastructure strategy to guide and prioritise biodiversity and greening interventions to have a real impact.	Policy	Comment noted.
Hopefully the BAP will be taken seriously and proper resources given for both the preparation of SINC management plans but also for monitoring these and the action plans.	SINCs; monitoring; resources	Comment noted.
See above comments. Please concentrate on essential services and cleaning gardens and streets of rubbish	Resources	Comment noted.

Comment received	Theme of response	City Corporation response
<p>Does the City have a light pollution policy? Too many offices remain illuminated & with Tv's left on 24hrs a day, 7 days a week. Could the impending green space on Ben Johnson podium be more carefully thought through? There appeared to be more birds thriving in the old garden that predated the Nigel Dunnet redesign. Could we have a space more dedicated to wildlife, and preferable incorporates anti-skateboarding measures.</p>	<p>Barbican; lighting</p>	<p>Comment noted. The City of London Lighting Strategy includes guidelines to help reduce light spillage and glare from retail and office premises.</p>
<p>The City of London is very polluted with traffic. Maybe the Biodiversity Plan should have a link to the reduction in Pollution plan? The other issue that relates to Biodiversity is rubbish and waste. Some roads and streets are a mess with strewn rubbish and this should be reduced to enable biodiversity to flourish.</p>	<p>Air quality; litter</p>	<p>The City of London Air Quality Strategy 2019-2024 addresses air pollution and the associated benefits of greening. The City of London Transport Strategy supports clean and well-maintained public spaces.</p>
<p>Private gardens and buildings occupy the most amount of space, and therefore need more attention.</p>	<p>Priorities</p>	<p>Comment noted, the built environment and privately managed spaces are a consideration of the Biodiversity Action Plan.</p>
<p>It wouldn't surprise me if these good intentions get overridden by some development or other work the City preferred to support.</p>	<p>Priorities; development</p>	<p>Comment noted.</p>
<p>I think it's wonderful that this is being done! As a personal perspective, I think it's always good to remember that all wildlife ultimately depends on plants, at the bottom of the food chain, and the important role of 'weeds' in this structure.</p>	<p>Species; habitats</p>	<p>Comment noted.</p>

Comment received	Theme of response	City Corporation response
This does not feel that it goes far enough and fast enough. The emptying of the City during lockdown gives a wonderful opportunity to reset the dial on how the streets and green spaces could be promoted even further and be truly ambitious for a green city.	Targets; greening	This policy should not be considered the City's sum ambition towards greening and repurposing the City. The draft City Plan 2036, Climate Action Strategy, Transport Strategy all demonstrate that the City is being ambitious in driving change.
Why has Paternoster square not got any green at all for example?	open space; greening	Comment noted.
I think an effort to make rooftops into diverse gardens and have a bee hive strategy atop buildings across the city to help the rooftop and ground level gardens/parks strong and flourishing.	Green roofs	The draft City Plan 2026 supports the installation of biodiverse extensive or intensive green roofs. The action to develop guidance for pollinators in the built environment will promote opportunities to support wild bees.
Biodiversity can only be protected by ending the use of herbicides to manage plants, and creating rich and safe habitat spaces.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Go as far as you possibly can - we need to act ASAP to reverse the climate emergency. Any repurposing of tarmac/road space to green space should be expedited	Greening	Comment noted.
All of these sites must be supported and be a priority. I'm sure that feels overwhelming, but I think with the will power this can happen. Going pesticide free, borough wide, for starters, must be a pivot for this entire process.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
<p>I hesitate to say it as I am involved with monitoring peregrine falcons in London, but I think this species sometimes receives too much attention, potentially at the expense of species like swifts, which arguably need more assistance right now. The City is only large enough to accommodate 1 or 2 peregrine pairs and many of the newer buildings are less well suited for peregrine nesting, but could potentially be utilised by swifts given the right nesting provisions. I used to hear black redstart on rooftops around the Guildhall but I'm not sure these are still attractive to them if they have had work done on them. There are definitely black redstarts in neighbouring areas (e.g. around the Law Courts) but I have not heard them around the Barbican or Moorgate in recent years. Ditto with sparrows at the Barbican. The Barbican should have massive potential for nesting birds in addition to peregrine falcons.</p>	<p>Species</p>	<p>Comment noted and this an example of how interventions for target species should be approached in different ways. Opportunities for Swifts, Black Redstarts and House Sparrows as target species will be considered as guidance is developed. The action to develop SINC Management Plans will also consider opportunities to support these species.</p>
<p>Biodiversity can only be protected by replacing the use of herbicides and other pesticides to manage plants and pests with chemical-free alternatives, and creating rich and safe habitats</p>	<p>Pesticides</p>	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>

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Draft
City of London
Biodiversity Action Plan
2021-2026

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1.0 Introduction

1.1 The City: A unique urban environment

The City of London Corporation is the governing body of the Square Mile dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally-successful UK.

1.2 What is Biodiversity?

Biodiversity is the term used to describe the variety of life on Earth. This includes animals, plants and fungi as well as recognisable wildlife such as birds, mammals and insects. The habitats are the places they live and how they interact with their surroundings as part of the ecosystem. Conserving biodiversity involves restoring and enhancing species populations and habitats as well as implementing measures to promote them in the future. The value of biodiversity extends beyond habitat and species with the benefits extending to a range of economic, social and intrinsic values.

1.3 Biodiversity in the City

The City of London has just under 33 hectares of open spaces which includes parks, gardens, churchyards and hard open spaces such as plazas and improvements to the highway. Most of the open spaces are small, primarily consisting of pocket parks smaller than 0.1 hectares. There is a need for additional open space in the City to provide facilities for workers, residents and visitors. These spaces help mitigate the effects of pollution and climate change, provide facilities for relaxation, tranquillity, agile working, leisure and sport, health and wellbeing and to increase biodiversity.

Ground level open spaces are mostly the result of two significant events in the City of London: the Great Fire of London in 1666 and bomb damage caused during World War II. These traumatic events resulted in damaged or destroyed buildings being repurposed and in many cases eventually becoming open spaces for the public to enjoy. Together these small, high quality and intensively used open spaces are highly valued and offer an important resource for biodiversity in the Square Mile. There is also an increasingly important resource for biodiversity at roof top level with the addition of biodiverse roofs and roof terraces.

Historically the City's open spaces have been managed primarily for amenity value and public enjoyment. However, recent changes in management practices have placed a greater emphasis on the importance of promoting biodiversity. Raised awareness of the natural environment amongst workers, residents and visitors has changed the ways in which the public enjoy, value and engage with open space in the Square Mile through interpretation, activities and events.

A full list of types of open spaces in the City of London is listed in [Appendix 3: Open space typology and categorisation](#).

1.4 Why does the City need a Biodiversity Action Plan?

According to the intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) the world is facing a biodiversity crisis. Nature is declining globally at rates unprecedented in human history, and the rate of species extinctions is accelerating, with grave impacts on people around the world now likely. The Report also tells us that it is not too late to make a difference, but only if we start now at every level from local to global.

The Biodiversity Action Plan (BAP) provides a strategic focus to ensure species and habitats are understood and considered throughout the decision making process. The BAP directly supports the overall aim of the City Corporation's Corporate Plan to shape outstanding environments.

The BAP provides a framework to ensure all legislative requirements and regional and national targets for protecting, conserving and enhancing biodiversity are met at a local level.

Outside of the Square Mile, the City Corporation owns or manages almost 4,500 hectares of historic and natural open spaces including Hampstead Heath and Epping Forest. These sites are of significant importance for habitats and species and include Sites of Special Scientific Interest, National Nature Reserves and Special Areas of Conservation.

The BAP covers the open spaces, habitats and species in City of London only, regardless of ownership. Open spaces outside of the City of London are covered by the relevant local authorities' Biodiversity Action Plans or alternative policy or strategy. The City Gardens team is responsible for tree and green space management for around 200 sites in the Square Mile including parks, gardens, churchyards, plazas and highway planting.

1.5 Structure of the Biodiversity Action Plan

The aim of the BAP is to produce a set of objectives and actions to assist members of the City of London Biodiversity Action Plan Partnership Group (Partnership Group) and the wider City community in delivering strategically planned biodiversity networks for both the City and Greater London, taking into consideration both local and national priorities.

The BAP will be delivered under the following themes:

- **Open space and habitat management**

Aim: to protect and enhance habitats and species in the City.

Enable land owned and managed by both the City Corporation and privately, to be maintained and enhanced for biodiversity.

- **The built environment**

Aim: to improve infrastructure for biodiversity in the built environment

Enable biodiversity to be incorporated into the built environment to enhance and connect green spaces.

- **Education and community engagement**

Aim: to promote a greater understanding of the City's biodiversity

Identify and encourage best practice amongst private landowners and managers as well as develop the skills and knowledge of residents, City workers, school children and students through events, activities and volunteering opportunities.

- **Data collection, surveys and monitoring**

Aim: to improve monitoring and data on biodiversity in the City.

Establish a structured approach to surveying and monitoring of sites to inform ongoing management decisions and identify future areas of priority. This includes professional ecology surveys, citizen science opportunities and records collected by voluntary groups and individuals.

2.0 National and regional policy context

2.1 National policy

In 2018 the Government published 'A Green Future: Our 25 Year Plan to Improve the Environment' which sets goals and targets for improving the environment. The Plan focuses on a number of cross-cutting themes including embedding an 'environmental net gain' principle for development, creating additional green infrastructure, planting trees and developing a Nature Recovery Network to support landscape-scale restoration of nature.

Under the Natural Environment & Rural Communities Act 2006 (NERC), as a public authority in England, the City Corporation has a duty to 'in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. This may include promoting biodiversity in planning and development, recognising the importance of conserving and enhancing biodiversity in public authority managed land and buildings and managing green infrastructure to support biodiversity.

The National Planning Policy Framework (NPPF) 2019 states that planning should contribute to conserving and enhancing the natural environment, habitats and biodiversity.

The City Corporation will participate in the emerging requirements to develop a Nature Recovery Strategy and co-ordinate with neighbouring boroughs.

The BAP should also consider national strategies such as The National Pollinator Strategy, which seeks to protect pollinating insects that support food production and the diversity of our environment.

2.2 Regional policy

The London Plan 2021 is an overall strategy document and policy framework for London, which includes green infrastructure, urban greening and biodiversity. Many of the objectives of the London Plan are incorporated and delivered as part of the City Corporation's Local Plan.

The London Environment Strategy includes action to make London cleaner, greener and ready for the future. The strategy includes policies to protect nature conservation sites, create priority habitats, conserve priority species and to ensure net gain in biodiversity.

3.0 Local policy context

3.1 Local policy

The proposed new City of London Local Plan, call the City Plan 2036 and currently referred to as the draft City Plan 2036, sets out the City Corporation's vision, strategy and objectives for planning up to 2036, together with policies that will guide future decisions on planning applications.

Once adopted, the draft City Plan 2036 will replace the current City of London Local Plan adopted in January 2015.

Policy OS3 of the draft City Plan 2036 specifically addresses biodiversity and states that development should aim to secure net gains for biodiversity where possible by incorporating measures to enhance biodiversity, including:

- Retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames
- Measures recommended in the City of London Biodiversity Action Plan (BAP) in relation to particular species or habitats
- Green roofs and walls, gardens and terraces, soft landscaping and trees
- Green corridors and biodiversity links
- Wildlife-friendly features, such as nesting or roosting boxes
- A planting mix and variation in vegetation types to encourage biodiversity
- Planting which will be resilient to a range of climate conditions, with a high proportion of native plants
- A lighting scheme designed to minimise impacts on biodiversity

The City Corporation has developed a series of strategies for improving streets and public spaces in the Square Mile which incorporate elements such as tree planting and urban greening. These are integral to supporting biodiversity in the planning process.

The BAP supports the City Corporation's Corporate Plan's aims to:

Contribute to a flourishing society

- People enjoy good health and wellbeing
- Communities are cohesive and have the facilities they need

Support a thriving economy

- Businesses are trusted and socially and environmentally responsible
- We have access to the skills and talent we need

Shape outstanding environments

- We have clean air, land and water and a thriving and sustainable natural environment
- Our spaces are secure, resilient and well-maintained

The City of London Open Space Strategy, which was adopted as a Supplementary Planning Document (SPD) in January 2015, sets out the principles to help improve the quality, management and accessibility of the open spaces of the Square Mile. The strategy comprises of ten strategic objectives which include ensuring that existing and new spaces make a positive contribution to the biodiversity value of the City through appropriate plant choice and habitat creation. A full list of the policies that support biodiversity in the City is set out in [Appendix 1](#).

3.2 Climate Action Strategy

The City Corporation has adopted its radical Climate Action Strategy 2020-2027 which breaks new ground and has the following goals:

- City Corporation scope 1 and 2 emissions are net zero by 2027 and scope 3 emissions are net zero by 2040.
- The City Corporation and its assets are resilient to climate change.
- The City Corporation supports UK and overseas organisations to become climate responsible.

The City Corporation is enacting a variety of measures to mitigate against impact of this on the Square Mile. This is to ensure that the City of London public spaces and infrastructure are resilient to the effects of climate change.

The following Climate Action Strategy aims are supported and enhanced by the BAP:

- Introduce new land management practices across our open spaces aiming to maximise their ability to remove carbon, and optimise their biodiversity and resilience value
- Advocate the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing
- Enhance greening and biodiversity across our public realm and open spaces

Biodiversity and climate change are interconnected. Protecting and restoring ecosystems can help us reduce the extent of climate change and cope with its impact. The BAP supports the creation of biodiverse green infrastructure to support the climate resilience of the Square Mile. This also assists with mitigating and adapting to the impacts on habitats and species and changes in prevalence of pests and diseases.

The BAP plays an important role in raising awareness of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity, access to nature and overall wellbeing.

The aim to incorporate more greenery in the City's streets and public spaces is supported by both the City of London Air Quality Strategy and Transport Strategy.

3.3 Lighting

The City of London Lighting Strategy aims to deliver a creative, holistic and smart approach in which light and darkness are better balanced to meet both a functional and aesthetic need. It is vital that impacts of lighting on sensitive species such as bats are considered during design, construction and operation of new developments especially in sensitive areas adjacent to SINCs and near lakes and rivers.

3.4 Urban Greening Factor

The London Plan 2021 states that major development proposals should contribute to the greening of London by including urban greening from the outset of the development design process. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of greening required in new developments.

In response to this requirement, the draft City Plan 2036 requires that major development proposals will be required to include a UGF calculation demonstrating how the development will meet the City Corporation's score of 0.3 as a minimum.

3.5 Biodiversity Net Gain

The draft City Plan 2036 states that development should aim to secure net gains for biodiversity where possible by incorporating measures to enhance biodiversity. The emerging Environment Bill will ensure that the delivery of Biodiversity Net Gain (BNG) through development becomes a mandatory part of the planning process.

4.0 Biodiversity in the City of London

The City Gardens team commissioned Greengage Environmental Ltd to undertake an audit of the BAP. The audit was a desk based exercise primarily based on data provided by Greenspace Information for Greater London (GiGL) and reviewed the City's habitats, species and policy.

The audit highlighted the successes of the BAP 2016-2020 and deficiencies which include:

- Greenspace connectivity and species distribution;
- Habitat diversity;
- Under recording of species;
- Invasive species awareness

To address these deficiencies, recommendations have been identified that can be delivered as part of the Action Plan. The recommendations of the audit target three key areas:

- Improved greenspace connectivity
- Diversification of City habitats and strategic habitat management
- Raising the profile of ecological issues and importance in the minds of the people who access and develop within the City.

Partnership Group

The Partnership Group was established to support the review of the BAP, assist with delivery of the actions and SINC review and selection process. The Group consists of representatives from the relevant departments of the City of London Corporation, business, community and resident representatives as well as ecology, species and biodiversity professionals.

As the City is unique in terms of its size, structure, opportunities and challenges for biodiversity, a more landscape-scale approach was developed for the current BAP. This means all the elements that influence habitats and species will be considered. Specific action plans will be developed for some species such as the Black Redstart and detailed guidance such as for pollinators in the built environment. This will maximise the benefits across all open and green spaces with specific objectives developed to prioritise actions for specific sites, species or areas of opportunity. Priority habitats and species have been identified at both a UK and London level by the London Biodiversity Partnership.

4.1 Habitats

The main types of habitats located in the City of London are:

- Amenity grassland
- Scattered trees
- Introduced shrub

The BAP can assist with the diversification of habitats in the long term which will both encourage greater species diversity and create habitats that are more resilient to a changing climate.

The 'priority habitats' identified by the London Biodiversity Partnership that are most relevant to the Square Mile are 'parks and urban green spaces' with an 'important habitat' identified as 'built structures'. The Action Plans have been developed to take into consideration these priority habitats. A further habitat recognised as a London biodiversity target within the City of London is standing water and the Tidal Thames, which is also the City's only Site of Metropolitan Importance for Nature Conservation (SMINC).

Whilst there are some sites with standing water that are dealt with in the BAP, the Tidal Thames is the prime responsibility of the Port of London Authority, with the City Corporation's responsibilities for the riverside and foreshore are detailed in draft City Plan 2036 Strategic Policy S17, Thames Policy Area. This states that development should not have an adverse impact on the SMINC and should seek opportunities to create or enhance riverside habitats.

4.2 Species

Species can be categorised into the following. It should be noted that a single species can be have multiple categories. The definitions are as follows:

- **Protected species** – protected by national and international legislation
- **Priority species** – species identified of particular conservation importance regionally including at a London and England scale.
- **Target species** – flagship species to consider during development and conservation in the Square Mile.

Protected and priority species that GiGL data shows frequently occur in the City and should be considered in the planning process and conservation interventions are detailed in [Appendix 2](#): Protected Species and/or Priority Species records in the City of London.

Following consultation with the Partnership Group and taking into consideration local, regional and national priorities the following species have been selected as target species:

- House Sparrow - *Passer domesticus*
- Black Redstart - *Progenitures ochruros*
- Swift - *Apus apus*
- Peregrine Falcon - *Falco peregrinus*
- Bats - *Chiropter spp.*
- Wild Bees – Bumblebees and Solitary Bees
- Stag Beetle - *Lucanus cervus*

These species are exemplars of their ecological niches, the interaction the species has with the surrounding environment, and also are in many cases highly adapted to the urban environment. They have been selected to highlight their importance within the City of London and to focus conservation management and monitoring. The target species selected also take into consideration national priority habitats and species are defined under Section 41 of the Natural Environment & Rural Communities Act 2006.

In addition to the identified target species, records held by GiGL show there are 60 species which are either legally protected or considered of national, regional or local policy.

4.3 Sites of Importance for Nature Conservation (SINCs)

The London Plan 2021 identifies the need to protect biodiversity and to provide opportunities for people to access nature through local green spaces. The best examples of key habitats and green spaces are identified as SINCs. SINCs are non-statutory designated sites identified by local authorities and are recognised as part of the planning process.

In London, sites are categorised of importance at a Metropolitan, Borough and Local level. The London Plan 2021 and London Environment Strategy states that SINCs should be protected.

The following sites have been identified in the City:

Table 1 - Sites of Importance for Nature Conservation in the City of London

Site Ref	Sites
	Sites of Metropolitan Importance for Nature Conservation (SMINC)
M031	The River Thames and its Tidal Tributaries
	Sites of Borough Importance for Nature Conservation (SBINC) Grade 2
CiBII01	The Temple Gardens
CiBII02	The Barbican and St Alphage's Garden
	Sites of Local Importance for Nature Conservation (SLINC)
CiL01	Pepys Garden and St Olave's Churchyard, Seething Lane
CiL02	St Paul's Cathedral Garden
CiL03	Cleary Gardens
CiL04	St Botolph without Bishopsgate Churchyard
CiL05	Aldermanbury Gardens
CiL06	The Roman Wall, Noble Street
CiL07	Finsbury Circus

SINCs are key to how the City Corporation delivers biodiversity. The small fragmented nature of the greenspaces across the highly built urbanised Square Mile need to meet many, often competing needs. This results in many SINCs having limited biodiversity potential. The focus needs to be on improving the biodiversity value of the SINCs and linking these sites with new green infrastructure.

In December 2015, the City Gardens team commissioned the London Wildlife Trust to review SINC's within the Square Mile. This included reviewing existing sites for their grading and boundary as well as three new proposed sites at Postman's Park, St Dunstan in the East Church Garden and Portsoken Street Garden.

The following changes including new and upgraded sites and boundary changes have been recommended. It is intended that these changes will be adopted as part of the draft City Plan 2036:

Table 2 - Proposed Sites of Importance for Nature Conservation in the City of London

Site Ref	Sites
	Sites of Metropolitan Importance for Nature Conservation (SMINC)
M031	The River Thames and its Tidal Tributaries
	Sites of Borough Importance for Nature Conservation (SBINC) Grade 1
CiBI01	Barbican Estate, St Alphage Garden and Barber Surgeons' Garden
	Sites of Borough Importance for Nature Conservation (SBINC) Grade 2
CiBI01	The Temple Gardens
CiBI03	Roman Wall, Noble Street and St Anne & St Agnes Churchyard
	Sites of Local Importance for Nature Conservation (SLINC)
CiL01	St Olave, Hart Street Churchyard
CiL02	St Paul's Cathedral Churchyard Gardens
CiL03	Cleary Garden
CiL04	St Botolph without Bishopsgate Churchyard
CiL05	Aldermanbury Gardens
CiL07	Finsbury Circus Gardens
CiL08	Postman's Park
CiL09	Portsoken Street Garden
CiL010	St Dunstan in the East Church Garden

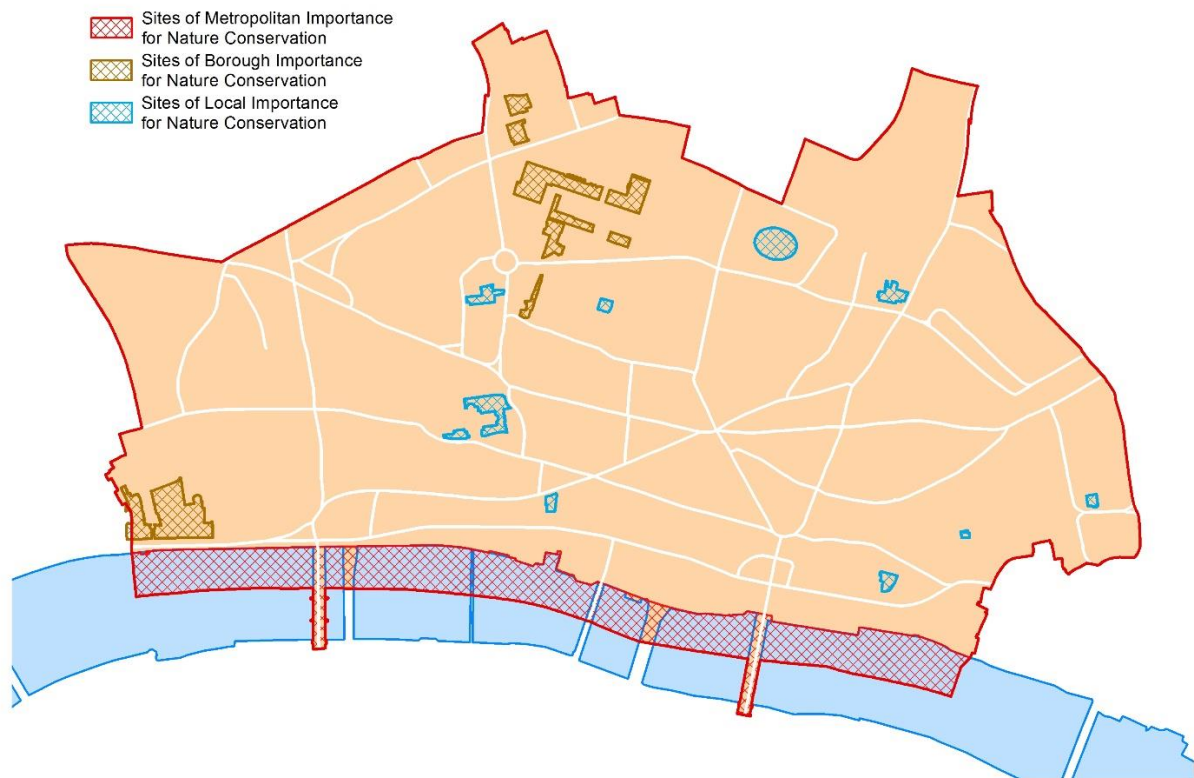


Figure 1 - Map of Sites of Importance for Nature Conservation (SINCs) in the City of London

4.4 Local Nature Reserves

The City of London does not currently have any sites designated as Local Nature Reserves (LNR). Action Plan 1 includes an objective for the potential for a site to qualify as an LNR and consider if this is an appropriate designation.

4.5 Open Spaces Audit

A comprehensive audit of all open spaces owned and managed by the City Corporation and private landowners is carried out by the Department of the Built Environment (DBE).

The draft City Plan 2036 sets out seven Key Areas of Change areas that are likely to experience significant change over the Plan period and present particular opportunities and challenges that warrant a specific policy focus. They Key Areas of Change are:

- Blackfriars
- Pool of London
- Aldgate
- Tower and Portsoken
- City Cluster
- Fleet Street and Ludgate
- Smithfield and Barbican
- Liverpool Street

The Open Spaces Audit will be used to support the BAP by identifying and prioritising biodiversity enhancements and providing access to nature and green space in the Square Mile.

4.6 Access to nature and green space in the City

Areas of deficiency in access to nature are areas in London where people have to walk more than one kilometre to reach an accessible Metropolitan or Borough Site of Importance for Nature.

Parts of both the Sites of Borough Importance for Nature Conservation (SBINC) Grade 2 located in the City of London have reduced or limited public access because they are privately owned or designated for residents' use. The nearest publicly accessible SBINC to the City of London that is managed by the City Corporation is Bunhill Fields Burial Ground. This site is located just outside the City's boundary in the London Borough of Islington.

The review recommended that the The Roman Wall, Noble Street SINC was both updated to a SBINC Grade 2 and extended to include St Anne & St Agnes Churchyard. The SINC has been renamed Roman Wall, Noble Street and St Anne & St Agnes Churchyard as a result.

Once the current recommendations have been adopted via the draft City Plan 2036, it is recommended that a future SINC review follows any major changes to a SINC. A SINC review would therefore be commissioned following the reinstatement and establishment of the SLINC at Finsbury Circus Gardens including any other proposed changes that are identified.

The opportunity to identify or upgrade sites to SBINC status may be identified as part of a SINC review. However, due to the dense urban nature of the City and the limited size of current local sites, opportunities may be limited. There is a clear deficiency in access to nature in the east of the City and particularly the City Cluster and Aldgate.

The London Plan defines deficiency in access to open space in relation to both the maximum distance residents should have to travel to access a public open space and the size and quality of that open space. The London Plan categorises public open spaces based on their structure and size. Most open spaces in the City are identified as 'Pocket Parks' with a minority of 'Small Open Spaces'. As identified in the London Plan, individuals should have access to these types of spaces within 400 metres of their homes with residential areas outside of this distance potentially defined as deficient in access to open space. Open space provision and types across London are detailed in [Appendix 4](#).

Identifying and maximising both the biodiversity potential and access for public enjoyment of these small sites in the City are of key importance. Management plans will be developed to focus both on enhancing the quality and accessibility of SINC's.

4.7 Achievements and recommendations

The City of London Biodiversity Action Plan 2016-2020 has made the following significant achievements:

- A review of SINCs in the City of London was completed by the LWT in 2016.
- A Service Level Agreement (SLA) with GiGL was secured for the Open Space Department (OSD).
- Delivery of a Biodiversity Audit for the City.
- Nine predator-secure bird feeding cages were funded and installed by Friends of City Gardens (FoCG) and bird feeding is carried out by volunteers in ten City gardens.
- FoCG monitor and clean bird boxes each autumn which provide valuable information on usage.
- Barbican Wildlife Group (BWG) has made improvement to habitats in the Barbican Wildlife Garden also undertaking species monitoring and community engagement activities and events.
- Annual breeding bird survey and black redstart sightings report carried out by FoCG.
- Bat activity monitored at 14 different locations over two years and talks and walks funded, organised and delivered by FoCG.
- Bat detection workshops organised by FoCG with support from the Bat Conservation Trust and funded by the City Corporation's Central Grants Programme.
- Lunch 'n' learn event on bats and birds in the City delivered to City Corporation staff.
- Planting improvements at Postman's Park to support its proposed status as a SLINC.
- Annual participation in the RSPB Big Garden Birdwatch by volunteers at targeted SLINC sites including the production of a report and the provision of data to GiGL for inclusion in the regional wildlife records dataset.
- Working with corporate volunteers to improve habitats within the parks, gardens, and churchyards of the Square Mile such as increasing shrub cover, installing log piles and leaf composting.
- Bulb planting of nectar-rich early flowering species for early emerging pollinators.
- Enhancement of two churchyard garden with pollinator-friendly species.

4.8 Health and wellbeing benefits of biodiversity

As well as the importance of conserving habitats and species, biodiversity and activities that enhance the environment are beneficial to people. The opportunities that exist for individuals to engage and promote biodiversity in the City of London contribute to an active and healthy lifestyle. Examples include taking part in planting activities in a green space, working to create new habitats, community food growing or using walks and trails to explore nature in the City. Biodiversity is also an important contributing factor in mitigating air pollution with specific planting used to improve local air quality and raise awareness within the community.

The City Corporation is also working with external organisations based in the Square Mile, such as Bart's Health NHS Trust to increase green infrastructure across their sites. Both participating in biodiversity related activities earning Tempo Time Credits and redeeming them on physical activities such as gyms and swimming pools have a positive impact on health and wellbeing. Access to green space and nature is also linked to improving the mental health and wellbeing of individuals as well as creating quiet and tranquil areas for workers, residents and visitors.

4.9 Education and community engagement

The work of promoting and enhancing SINC's provides a valuable opportunity for individuals to share and learn new skills, knowledge and experience as well as bringing together workers, residents and visitors with a shared passion for biodiversity. This form of engagement can be vital in encouraging local residents to become champions in promoting the quality and understanding of biodiversity in the City. For this reason, biodiversity enhancement is used as a platform for many events and activities in the City's green spaces.

4.10 Sustainability in the built environment

The built environment represents an important habitat in the City. It includes historic structures and monuments as well as new developments. Historic walls, churchyards and monuments may support plants which are protected or of notable species of local importance as well as provide nesting sites for birds. The sustainability of new structures in the built environment is now a crucial element of building design, with opportunities to support and enhance biodiversity. Developers can include green roofs and walls to contribute towards Building Research Establishment Environmental Assessment Methodology (BREEAM) certification through the creation of new habitats to support local biodiversity. At rooftop level there is increasing space for biodiversity to be delivered through biodiverse roofs.

As set out in the draft City Plan 2036 proposals for major developments will be required to achieve a minimum BREEAM rating of 'excellent' and aim for 'outstanding' against the current, relevant BREEAM criteria at the time of application. It is important that both existing structures and new developments include features that enhance and compliment the network of green infrastructure across the City and take habitats and species into consideration. Planners and developers have the opportunity to incorporate biodiversity using features such as nest boxes, biodiverse roofs and sustainable drainage systems (SuDS). As open space at ground level is limited, biodiverse roofs provide an excellent opportunity to create habitat comparable to open mosaic habitat which is also priority habitat in decline.

New developments or refurbishments must not negatively impact existing habitats without including adequate mitigation. For example, the Black Redstart population in the City is estimated to be at least 10 % of the UK breeding population. This is regarded as 'significant' and any changes to the rooftop habitat must be carefully considered. Similarly, the Peregrine Falcon is also an urban success story with a pair nesting in the City. These unique habitats need to be preserved without disturbance to ensure these rare species are protected.

5.0 Target species

The following target species have been selected as flagship species for their wider conservation value and importance. In general, they have been selected for their low population and vulnerability in the City as species to consider within development and conservation. They also act as a focus for raising awareness and targeting biodiversity conservation actions. Many of the actions to promote these species will have wider positive benefits to biodiversity in the Square Mile.

5.1 House Sparrow – *Passer domesticus*

Once a common sight in parks and gardens across the UK, it is now widely acknowledged that there has been a severe decline in the UK House Sparrow population. It is estimated that Greater London lost 70% of its House Sparrow population between 1994 and 2001. Due to this rapid population decline the species has received the highest level of conservation concern, red status, with the species needing urgent action. The reasons for this decline are complex and include disease, availability of food, air pollution and loss of habitat and nesting sites. The decline in House Sparrows has also been observed in the City with a few isolated colonies on the City fringes including Fortune Street Park and the Tower of London.

The priority actions for House Sparrows may also have a positive impact on all bird species present in the City, with interventions based in specific sites. Guidance will be developed and included in an ecology toolkit and SINC management plans to ensure habitat interventions are tailored to the needs of the House Sparrow. These recommendations will include provision of nest boxes, planting seed rich species, trialling supplementary feeding of protein-rich food during the nesting season and establishing more areas of dense shrub cover. It is also vital to engage with partner organisations and residents through citizen science initiatives to gain a greater understanding of the House Sparrows' remaining presence in the City.

5.2 Black Redstart – *Phoenicurus ochruros*

The Black Redstart is a small robin-sized bird that has adapted to live in the urban environment. There are fewer than 100 breeding pairs in the UK and the Black Redstart features on the red list of birds of conservation concern. The Black Redstart was first reported in London in the 1920s and the species has adapted to living in industrial and urban areas. The population increased significantly following the Blitz when bombsites provided the ideal habitat. The rubble between the bombed-out shells of buildings replicated the bare and stony cliffs of the Black Redstarts' natural habitat.

Central London and specifically the City of London are an extremely important location for this species, with a significant percentage of the national breeding population located in the Square Mile. The population is probably made up of resident pairs and breeding birds that travel from western to southern England between March and May and returning to wintering sites from September. The Black Redstart's population has seen a drop in numbers over the decades which have mainly been linked to loss of breeding sites as buildings have been redeveloped. The increase in the number of green roofs in the City is likely to be the key to continued success of this species in the Square Mile. A Species Action Plan will be developed to provide developers and building managers with advice on enhancing their roofs for the Black Redstart.

5.3 Swift – *Apus apus*

Swifts are summer visitors to London that arrive in April and leave in August to over-winter in Africa. They feed on insects and other invertebrates. Swifts nest in the crevices of cliff faces and have adapted to make the urban landscape their home by taking advantage of features that replicate this environment, favouring the eaves and roof space of buildings. Modern building design and the redevelopment of buildings have meant Swifts have been excluded from suitable breeding sites which have led to their significant decline in the UK. It is recommended that building management guidelines include retrofitting of Swift nesting boxes in refurbished buildings as well as new developments along the Thames riverside. Once there's a greater understanding of the Thames Riverside environment, opportunities for other species such as the House Martin may be identified.

5.4 Peregrine Falcon – *Falco peregrinus*

Peregrine Falcons have been present in the City for several years. They are given the highest degree of legal protection under Schedule 1 of the Wildlife and Countryside Act 1981. The species is present in many urban areas with the nesting sites closely monitored. Around 20% of the European peregrine population breeds in the UK and therefore it is important to protect this species.

The Peregrine Falcon's natural habitat is cliff ledges. These birds are attracted to the City as tall buildings mimic this habitat. The species also act as a natural predator of pigeons. One pair regularly nests in the City and has successfully raised young for several years. It is important that the nesting sites of these birds are protected, that artificial nests are installed at appropriate locations and building managers and occupiers are made aware of their significance and protected status.

5.5 Bats – *Chiroptera spp.*

There are 17 species of bats in the UK with the Common Pipistrelle, *Pipistrellus pipistrellus*, being the most common species in the inner London boroughs. Bats forage on insects such as moths and beetles and have specific roosting and hibernating preferences. They forage over water and use tree lines to aid navigation. The Common Pipistrelle is the species that has been identified most frequently as roosting and foraging within the City but other crevice-roosting species are also likely to be present.

Bat activity monitoring by FOCG has provided a vital insight and valuable data on presence of bats across the City. This data can support further opportunities to target monitoring to gain knowledge of roosts and commuting and foraging routes. Bats are regularly seen over the Barbican lakes and gardens, but they are also widespread elsewhere in the City.

Further surveying and monitoring are required to establish their distribution in the Square Mile. A group of volunteers has now been trained by FoCG to undertake bat walks which will take place during the summer months.

There continues to be a significant threat to bats in the UK in terms of loss of roosting, maternity and hibernating sites in both natural and artificial structures. Loss of suitable feeding sites and disruption of flight paths due to artificial lighting also have an impact on bat populations.

It is vital to raise awareness on the law protecting bats and their roosts from disturbance and the opportunities to increase individuals' knowledge and understanding of the potential for bats in the Square Mile. Interventions to protect habitats for bats in the City must include considering the impact of surrounding development. Habitat enhancements can include night-scented planting and appropriately-positioned artificial roosting sites such as bat boxes or bat bricks incorporated into buildings.

5.6 Wild bees (bumblebees and solitary bees)

Wild bees, which includes bumblebees and solitary bees, face serious decline from a range of pressures including habitat loss, pesticide use and climate change. Along with other types of pollinators such as wasps, butterflies, moths and hoverflies, these insects are vital to our environment with many of our food crops dependant on pollinators. The City is also home to domesticised honey bees managing in hives, often at roof level, by beekeepers.

Urban areas can provide a diverse range of flowering plants which extend the season and availability of pollen and nectar as well as providing nesting opportunities. This can be achieved by including nectar-rich planting in landscaping schemes and providing suitable nesting sites, either within the landscape or as artificial structures. Biodiverse roofs which provide an open mosaic habitat can also contribute towards providing suitable habitat.

Several of the Action Plans support wild bees and other pollinators in a number ways. This includes developing guidance on supporting pollinators in the built environment, producing an ecology toolkit and biodiversity checklist and guidance for developers. SINC management plans will identify site specific opportunities, protect existing features and amend maintenance regimes to improve the quality and diversity of habitats. Solitary bee species are typically under recorded in the City. The action to develop a biological recording strategy will assist with developing a greater understanding of pollinators and supporting flora in the Square Mile so interventions can be tailored to support specific species.

5.7 Stag Beetle – *Lucanus cervus*

The Stag Beetle is the UK's largest ground living beetle with concentration in population in south-west London. The Lesser Stag Beetle has been observed in the Barbican Wildlife Garden. Stag Beetles have a lengthy life cycle lasting up to seven years from egg to adult. The larvae rely on dead or decaying wood such as fallen trees, branches and stumps. The Stag Beetle is a nationally threatened species. The population decline is related to habitat loss due to development and the sanitisation of parks and gardens with the removal of dead and rotting material. Predators such as foxes can also disrupt the Stag Beetles from completing their life cycle.

Raising public awareness of the Stag Beetle, its life cycle and the benefits of dead and decaying wood, leaf litter and not 'tidying up' green spaces will help create suitable habitats for the wider invertebrate population. Leaf composting areas will be one of the features considered for all SINC sites as an outcome of site-specific SINC management plans. Log piles have been installed in many of the existing SINC sites and will be considered for newly designated sites. Stag Beetles act as an excellent flagship species to both engage with the public and promote positive habitat management for all invertebrates.

6.0 Target habitats

Two target habitats have been identified where there is the opportunity to create or enhance space for biodiversity within new or existing green spaces or the built environment. These habitats are also an important part of supporting the target species.

6.1 Open mosaic habitat

'Open mosaic habitats on previously developed land' has been identified as a priority habitat to create or restore in the London Environment Strategy. This habitat is typical of old industrial sites and was common in the City in the form of rubble of bomb damaged buildings following the Second World War. Biodiverse roofs can be created to replicate this habitat to create a range of conditions to support flora and invertebrate communities. This can be achieved with varying substrate depths, areas of bare ground and appropriately selected wildflower seeds and plug plants to suit the conditions. Features can include pebbles and stones, sandy mounds, logs and rope as well as areas with water. Singing posts and nesting boxes for Black Redstarts can also be incorporated.

6.2 Standing open water

Standing water, in the form of ponds and lake in the City, is identified as a priority habitat in the London Environment Strategy. Ponds and lakes are important for supporting a range of wildlife including fish, invertebrates, dragonflies, amphibians and birds as well as feeding ground for bats. There is the opportunity to improve the quality of existing ponds and lakes, create new ponds and incorporate access to water into the design of biodiverse roofs. SuDS schemes can also contribute towards increasing access to water for wildlife including pollinators as well as incorporating features such as bird baths.

7.0 Action Plans

To deliver the objectives of the BAP, four Action Plans have been developed. These deliver the key themes that support both the priority species and wider biodiversity priorities in the Square Mile.

Action Plan 1: Open space and habitat management

Aim: to protect and enhance habitats and species in the Square Mile

Action Plan 2: The built environment

Aim: to improve infrastructure for biodiversity in the built environment

Action Plan 3: Education and community engagement

Aim: to promote a greater understanding of the City's biodiversity

Action Plan 4: Data collection, survey and monitoring

Aim: to improve monitoring and data on biodiversity in the City

7.1 Action Plan 1: Open space and habitat management

It is intended that the recommendations of the review of SINCS in 2016 will be adopted via the draft City Plan 2036. The BAP also requires the City Corporation to both develop SINC management plans for sites managed by the City Corporation and to explore what equivalent documents may be in place for privately owned/managed sites.

The SINC management plan for each site will identify and develop agreed biodiversity enhancements and promote good management with a clear framework for delivery and annual review of progress. The SINC management plans will identify the specific actions for each site enabling the City Corporation to engage in a dialogue with interested parties and identify funding opportunities.

The range of enhancements will include:

- Increasing shrub cover and berry-bearing plants including hedges.
- Providing continuous vertical habitats from ground level to the tree canopy to create dense cover for roosting and nesting.
- Planting a range of nectar and pollen-rich species, including night-scented varieties that will provide forage for pollinators throughout the year.
- Amending management practices that may harm biodiversity, and introducing practices that will enhance habitats, such as leaf composting and mulching.
- Considering the biodiversity value of planting when redesigning, refurbishing or enhancing current open spaces.
- Considering the impact of climate change on biodiversity and choosing plants that are resilient to a range of climate impacts.
- Retaining and increasing deadwood for invertebrates in open space sites either as log piles or as a support for ivy, as well as for fungi.

Many of the City's open spaces such as the churchyards have a strongly historic character that underscores their biodiversity to powerful effect. A number include historic structures such as parts of the Roman and medieval City wall, exposed Victorian building basements, elements of former churches damaged or altered after the Second World War, gravestones damaged or destroyed in the Blitz, and memorial structures. Their structures provide an excellent host for mosses, lichens and ferns, as well as other wall-dwelling species. Many of these sites are unique habitats that will be surveyed and monitored. The SINC management plans for those sites will require all interested parties, including departments within the City Corporation, Historic England and Natural England, to be made aware of any proposed developments. The sites will be managed taking into consideration the habitat features identified and the desirability of maintaining their unique historic character. Many of these sites and structures are designated assets such as scheduled ancient monuments, listed buildings, or within conservation areas and Historic Parks and Gardens, all of which have statutory protection.

The BAP will identify opportunities to understand and contribute towards the River Thames as a Site of Metropolitan Importance for Nature Conservation. The City's artificial structures and river walls and foreshore provide an important habitat for wildlife with the Thames itself providing an important ecological corridor through the heart of London. Developments guided by the Thames Strategy and Riverside Walk Enhancement Strategy must protect biodiversity and encourage enhancements to this wildlife corridor as well as improve water quality with the use of SuDS. The City Corporation works with both the Environment Agency and Port of London Authority to enhance biodiversity along the River Thames. The Thames Tideway Tunnel which will improve water quality and associated biodiversity in the Thames by reducing sewer discharges into the river.

7.2 Action Plan 2: The built environment

The built environment includes all new and existing buildings, structures and public realm developments. Action Plan 2 focuses on the important contributions the built environment can make to supporting biodiversity. These include:

- Biodiverse roofs and green walls
- Tree planting
- Environmental enhancement schemes
- Biodiversity-rich planting schemes
- SuDS
- Installation of artificial nest boxes for targeted species

The draft City Plan 2036 supports the installation of biodiverse extensive or intensive green roofs and green walls on all appropriate developments. This has the potential to contribute significantly to the biodiversity and climate resilience of the City of London, complementing the network of green spaces at ground level. Well-designed biodiverse roofs provide the ideal opportunity to create the open mosaic habitat typical of brownfield sites, replicating the habitat favoured by species such as the Black Redstart. Although biodiverse roofs may have constraints depending on their location, they can provide favourable growing conditions such as a sunny aspect, which may be limited at ground level. This can increase the planting palette available to designers and provide opportunities for biodiversity. Roof gardens and terraces also play an important role in allowing access to amenity space for building occupiers and the wider community with the added value of providing connected aerial habitats. These spaces should be designed with consideration to supporting any biodiversity enhancements.

The City has an established network of ground level open spaces. Both street trees and environmental enhancement projects have the potential to improve the connectivity of SINC, green spaces and associated habitats. The draft City Plan 2036 acknowledges the importance of enhancement schemes which include trees and soft landscaping that promote biodiversity and link existing green spaces and routes in green corridors. The City of London Tree Strategy Part 2 also promotes the aim to increase existing stock and encourage green corridors that contribute to the biodiversity of the City.

Significant opportunities exist to improve the connectivity of green spaces and their biodiversity value. Development of the built environment has the potential to enhance the habitats of priority species that have adapted to and made the Square Mile their home. All buildings and infrastructure must therefore positively contribute to a range of sustainability issues and opportunities with biodiversity a key component. It is imperative that at an early stage in any development or landscape improvement that consideration is given to both the impact of new developments and potential for biodiversity enhancements. To ensure the maximum benefits to biodiversity are realised, the context of where the site sits in relation to the local biodiversity network, assessing assets such as individual trees, open spaces, SINCs, standing water and how the development can enhance, contribute and not detract from what is already there.

Considerations for not negatively impacting on the existing biodiversity network include:

- Ensuring lighting associated with construction sites does not unnecessarily illuminate nearby open spaces and disrupt bat foraging routes.
- Ensuring new lighting in public realm enhancement schemes does not have an adverse impact on biodiversity.
- Over provision of nesting boxes for territorial species in an area that can only support small numbers e.g. Peregrine falcon

Assets that should be considered to be included in any enhancement include:

- Installing well positioned and specified artificial nesting boxes or habitats.
- Retrofitting artificial structures to improve habitats for species such as bats and pollinators.
- Providing standing water on site
- Introducing log piles and other deadwood habitats
- Diverse planting schemes that provide habitat and food for wildlife

Temporary assets that can be introduced during development or on vacant sites include:

- Introducing temporary green walls or other pollen and nectar-rich features on construction sites and on hoardings which in some circumstances may be in place for many years.
- Taking advantage of vacant sites such as planters, beds or borders or areas undergoing redevelopment by sowing wildflower species to provide pollen and nectar as well as a temporary visual amenity.

Wherever possible providing interpretation on the background and history of a site as well as importance of features such as street trees and green roofs. Such suggestions can be developed in guidance to support the BAP.

7.3 Action Plan 3: Education and community engagement

Action Plan 3 covers a wide remit, including:

- Promoting a greater understanding of the City's biodiversity and informing stakeholders how their work or leisure might impact on the natural environment.
- Providing opportunities for stakeholders to contribute towards initiatives designed to enhance biodiversity in open spaces and to learn new skills.
- Encouraging volunteers and City Gardeners to work together on biodiversity projects.

The City has several established community and voluntary groups that engage in activities which promote and enhance the value of biodiversity in the City. These activities include:

- Weekly gardening sessions to support biodiversity at the Barbican Wildlife Garden by the BWG supported by a City Gardener.
- Workshops and other activities organised by BWG.
- Weekly garden maintenance sessions and one-off green space projects organised by FoCG volunteers for residents and corporate volunteers.
- Bird feeding and bird bath cleaning in 10 City gardens by FoCG volunteers.
- Monthly Bee Walks to support the national recording scheme run the Bumblebee Conservation Trust.
- Data collection and reporting to GiGL by FoCG and BWG volunteers.
- Nic's Secret Garden and Plant Rescue Nursery created and maintained by a City Gardener, with the assistance of BWG volunteers in an otherwise unused City space.
- Middlesex Street Gardeners' Club and Golden Lane Estate Allotment Group – "Golden Baggers"
- Support of and participation in campaigns such as the Royal Horticultural Society (RHS) It's Your Neighbourhood and London in Bloom that bring together City businesses and community and voluntary groups to have a positive impact on biodiversity in the Square Mile.
- The use of social media and dedicated websites by FoCG, BWG and Golden Baggers.

Community and voluntary groups provide a significant contribution in supporting biodiversity in terms of raising awareness of species and improving habitats. Their work should be supported and assistance provided in identifying funding streams that support their work.

National award schemes such as RHS Britain in Bloom and the Green Flag Awards and Green Heritage Site Accreditation managed by Keep Britain Tidy recognise the importance of considering biodiversity in all aspects of parks and open spaces management. The schemes also provide a stimulus for managers to strive for excellence and promote their achievements to a wider audience.

The City Gardens team will encourage City businesses to undertake corporate social responsibility (CSR) commitments in the City's green spaces. This will provide the ideal opportunity for City businesses and their employees to gain a greater understanding of the network of open spaces available in the City and make a positive contribution to biodiversity. This has a positive impact on building a stronger and engaged community in the City as well as developing the skills of individuals.

The City Gardens team will support raising awareness of the value of biodiversity in the urban landscape and how colleagues, workers, businesses and residents can help to protect and enhance it. The City Corporation supports the London-wide campaign to raise awareness of what SINC's are and their importance in the context of both the City and Greater London.

Biodiversity is an excellent platform to engage with children and to increase their understanding of the natural world. There are two state primary schools that take the majority of the City's resident children – The Aldgate School in the east of the City and Prior Weston, a London Borough of Islington primary school on the north-west edge of the City, adjoining Fortune Street Park, as well as another primary school, City of London Academy Islington (CoLPAI) also on the north-west edge of the City. In addition to these state schools there are several private schools and nurseries in or on the fringes of the Square Mile. Volunteer groups already work with both state schools and other nurseries to provide learning opportunities and support gardening activities. Both the City Corporation and volunteer and community groups can be of key importance in working with schools to support curriculum-based biodiversity activities. The City Gardens team will also identify and support opportunities for adult learning, both for individual personal development and to support biodiversity.

The City Corporation website will be developed to include information on biodiversity of the City, raise awareness of SINC's and explain what individuals and businesses, especially through volunteering and CSR, can do to support biodiversity in the Square Mile. Communication channels should be used to raise awareness of how biodiversity is being supported as well as disseminate good practice guidance. They will also be used to signpost respondents to other more detailed sources of information and how they can engage with delivery of the BAP.

7.4 Action Plan 4: Data collection, surveys and monitoring

It is essential that data on species and habitats is systematically collected and digitally recorded. This information can be used to inform planners and developers, help shape management plans and demonstrate the importance of green spaces and associated green infrastructure features. The data collected is a vital element for developing an evidence base for evaluating the success of interventions, and guiding future work. It is important to promote the value of the data to potential user groups and that the City Corporation contributes to the regional and national agenda to understand and protect biodiversity.

Analysis of the available data on protected species in the City shows a varied distribution of species which can possibly be linked to under-recording and monitoring of species. The lack of species records does not necessarily mean lack of presence. There is no evidence of recent species records for several SINC, which limits the ability to assess their current situation. Therefore, there is a need to target the monitoring of SINC and in particular underreported SINC. The management and monitoring of biodiverse roofs once installed is also an important to improve the understanding of how these roofs contribute to urban biodiversity.

GiGL is London's environmental record centre. It receives, collates and manages detailed information on aspects of open spaces, including habitat and species information. This data is available to planners and developers, to enable them to make informed decisions to protect and enhance biodiversity. GiGL's habitat and species datasets provide valuable information and it is important that this information is understood and considered to ensure that informed decisions are made.

More can be done to encourage the monitoring of successful habitats, provide information to make enhancements and inform future projects. The City Gardens team, planners and volunteers will actively engage with developers and building managers to encourage more ecological surveys of these habitats and the sharing of information. Data is invaluable to support funding bids and further ensure that projects and developments take into consideration the specific conditions that influence biodiversity in the City.

The OSD SLA with GiGL which provides access to data and services that can inform the decision making process to protect and enhance biodiversity. The data and interpretation provided by GiGL has been essential for supporting the SINC Review process and Biodiversity Audit as well as providing the evidence base for the BAP. Action Plan 4 highlights the need to continue to maintain an SLA with GiGL and promote and utilise the data and services available. The datasets held by GiGL should be reviewed to ensure they are an accurate reflection of the open space provision and urban greening in the Square Mile. The OSD will work in conjunction with the DBE when commissioning, collating and monitoring data.

The BAP identifies the need to monitor protected, priority and City specific target species. This can be achieved by a combination of data collection methods including commissioning systematic and targeted species surveys to gain a better understanding of the species and supporting habitats. A biological recording strategy will be developed to identify the priorities for monitoring from a species data perspective. The strategy will identify opportunities to inform the City's community about the City's open spaces and biodiversity and identify both existing and new opportunities to engage, such as RSPB Big Garden Birdwatch and City Nature Challenge. Species monitoring and recording also provides an accessible, achievable and measurable outcome for investment in biodiversity identification and survey training.

8.0 Funding opportunities

The City Gardens team will work with community and voluntary groups to access funding and sponsorship opportunities as they arise. These may be national schemes run by corporates, Heritage Lottery funding, Community Infrastructure Levy (CIL) funds, planning obligations commonly referred to as section 106 agreements or other City funds including the Social Value element of the City Corporation's procurement process.

9.0 How the BAP will be monitored and delivered

As progress towards achieving the actions of the BAP is made, it is important to record and communicate this to the members of the Partnership Group as well as the wider public. Lead Partners will update their actions on an annual basis and meet to review progress made. Biodiversity information, including the annually updated actions which will be provided to committee and made available to the Partnership Group.

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Table 3 - Action Plan 1: Open space and habitat management

Action No	Action	Lead Partner	Contributing Partner	To be completed by
OSHM1.1	Adopt via the City Plan 2036, the recommendations of the 2016 review of Sites of Importance for Nature Conservation (SINCs) in the City of London.	CoL PP	CoL OSD	2022
OSHM1.2	Schedule and secure funding for a future SINC review. Identify any proposed new sites, boundary changes or upgrades to be included as part of the review.	CoL OSD	SINC landowners/ managers	2025
OSHM1.3	Assess the potential of the Barbican Wildlife Garden to qualify as a Local Nature Reserve (LNR) and consider if that is an appropriate designation for this garden.	CoL CCS CoL OSD	BWG CoL PP	2023
OSHM1.4	Secure funding and commission for an ecologist to produce SINC management plans for all City Corporation managed SINC sites. Work with landowners and managers to develop management plans for privately owned/managed sites.	CoL OSD		2026
OSHM1.5	Carry out a baseline survey and commission and adopt a Black Redstart species action plan.	CoL OSD	FoCG	2024
OSHM1.6	Set up of a multi-departmental working group to develop guidance on managing historic walls, memorials and structures for biodiversity.	CoL HES	CoL OSD CoL CS	2024

Table 4 - Action Plan 2: The built environment

Action No	Action	Lead Partner	Contributing Partner	To be completed by
BE2.1	Develop an ecology toolkit and biodiversity checklist for the City of London Corporation staff as tool to support projects and public realm schemes.	CoL OSD	CoL DBE	2022
BE2.2	Following the enactment of the Environment Bill, assess how the City Corporation will meet its duties as a local planning authority in respect to aspects of the bill that are covered by amendment to the Town and Country Planning act, such as Biodiversity net gain.	CoL PP	CoL OSD	2026
BE2.3	Following the enactment of the Environment Bill, assess how the City Corporation will meet its duties as a local authority and implement strategies that are not covered by amendments to the Town & Planning Act.	CoL OSD	CoL PP	2026
BE2.4	Develop Sustainability Planning guidance encompassing, but not limited to, Green infrastructure, Biodiversity and Climate Resilience to ensure Developers and Planning officers take appropriate steps at pre-planning application and design development stages to meet local policy and national legislation.	CoL PP	CoL OSD	2024
BE2.5	Review and amend the existing planning application validation process to incorporate consideration of whether biodiversity surveys and reports are relevant and necessary for an application.	CoL DM	CoL OSD	2022

Table 5 - Action Plan 3: Education and community engagement

Action No	Action	Lead Partner	Contributing partner	To be completed by
ECE3.1	Provide advice, guidance and training to support the BAP both for City Corporation employees and the wider City community including residents, businesses, visitors, schools, colleges, developers and land managers.	CoL OSD	BAP PG	2026
ECE3.2	Support resident and community groups that contribute to local and national species recording and monitoring initiatives, through providing direct support for initiatives, by providing training and by collecting and promoting best practice that current groups have demonstrated.	CoL OSD	FoCG BWG	2026
ECE3.3	Develop guidance on supporting pollinators in the built environment by enabling biodiversity partnership working group.	CoL OSD	BAP PG	2023
ECE3.4	Promote and disseminate guidance for the London Invasive Species Initiative (LISI) species to raise awareness of these species and how they should be managed.	CoL OSD		2022

Table 6 - Action Plan 4: Data collection, surveys and monitoring

Action No	Action	Lead Partner	Contributing partner	To be completed by
DCSM4.1	Maintain, improve, promote and utilise the information and services available via the GiGL SLA including to be achieved through providing internal training.	CoL OSD	CoL DM CoL PP CoL M&I GiGL	2026
DCSM4.2	Develop and implement a planning condition which requires developers of relevant schemes to collect and submit relevant biological data of their site to the CoL PA to improve data monitoring and assessment on biodiversity trends in the City.	CoL PP COL DM		2022
DCSM4.3	Produce a biological recording strategy to target SINC's with under-recording of species and promote good practice. To include identification of target sites, under-recorded and desired species, promotion of best practice, identifying and promoting appropriate recording methods for different audience and supporting existing citizen science and species specific campaigns.	CoL OSD	BAP PG GiGL	2023
DCSM4.4	Identify funding to carry out a Black Redstart and bat baseline survey to guide future management interventions and enhancements.	CoL OSD		2025
DCSM4.5	Undertake below ground mapping to identify opportunities and barriers for establishing new green infrastructure and SuDS within the public realm.	CoL ERT		2024
DCSM4.6	Research and establish an approach to monitoring earthworms as an indicator of soil health and condition.	CoL OSD		2025

Table 7 - Key for action plan tables

Abbreviation	Organisation
CoL OSD	City of London Corporation, Open Spaces Department
CoL DBE	City of London Corporation, Department of Built Environment
CoL PP	City of London Corporation, Planning Policy
CoL DM	City of London Corporation, Development Management
CoL M&I	City of London Corporation, Monitoring & Information team
CoL CS	City of London Corporation, City Surveyor's Department
COL ERT	City of London Corporation, Environmental Resilience team
CoL CCS	City of London Corporation, Community and Children's Services
BAP PG	City of London Biodiversity Action Plan Partnership Group
FoCG	Friends of City Gardens
BWG	Barbican Wildlife Group
GIGL	Greenspace Information for Greater London

10.0 Appendices

10.1 Appendix 1: National, regional and local policy

The list below outlines the key policy and legislation at a local, regional and national level to which the BAP contributes towards their delivery and support:

National policy

A Green Future: Our 25 Year environment Plan

Natural Environment and Rural Communities (NERC) Act (2006)

National Planning Policy Framework 2019

Regional policy

The London Plan 2021

London Environment Strategy 2018

Local policy

City of London Local Plan 2015

Draft City Plan 2036

City of London Climate Action Strategy 2020-2027

City of London Air Quality Strategy 2019-2024

City of London Transport Strategy May 2019

City of London Lighting Strategy 2018

Joint Health and Wellbeing Strategy 2017-2020

City of London Tree Strategy Part 1 SPD 2012

City of London Tree Strategy Part 2 2012

City of London Open Spaces Strategy SPD 2015

City Gardens Management Plan 2011 – 2016

10.2 Appendix 2: Protected Species and/or Priority Species records in the City of London

Common name	Scientific name
Frequently occurring	
Black Redstart	<i>Phoenicurus ochruros</i>
Buff-tail Bumblebee	<i>Bombus Terrestris</i>
Common Cardar Bee	<i>Bombus Pascuorum</i>
Common Frog	<i>Rana temporaria</i>
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>
Dunnock	<i>Prunella modularis</i>
Grey Heron	<i>Ardea cinereal</i>
Grey Wagtail	<i>Motacilla cinereal</i>
Herring Gull	<i>Larus argentatus</i>
House Sparrow	<i>Passer domesticus</i>
Kestrel	<i>Falco tinnunculus</i>
Lesser Black Backed Gull	<i>Larus fuscus</i>
Peregrine falcon	<i>Falco peregrinus</i>
Small Garden Bumblebee	<i>Bombus Hortorum</i>
Starling	<i>Sturnus vulgaris</i>
Swift	<i>Apus apus</i>
White-tailed Bumblebee	<i>Bombus Lucorum</i>
Wigeon	<i>Anas Penelope</i>
Woodcock	<i>Scolopax rusticola</i>
Rarely Occurring	
Arctic tern	<i>Sterna paradisaea</i>
Avocet	<i>Recurvirostra avosetta</i>
Cinnabar	<i>Tyria jacobaeae</i>
Common Porpoise	<i>Phocoena phocoena</i>
Common Seal	<i>Phoca vitulina</i>
Early Bumblebee	<i>Bombus pratorum</i>
Firecrest	<i>Regulus ignicapilla</i>
Gadwall	<i>Anas Strepera</i>
Goldcrest	<i>Regulus regulus</i>
Hedgehog	<i>Erinaceus europaeus</i>
House Martin	<i>Delichon urbicum</i>
Jersey Tiger	<i>Euplagia quadripunctaria</i>
Kittiwake	<i>Rissa tridactyla</i>
Red-tailed Bumblebee	<i>Bombus lapidarius</i>
Lesser Redpoll	<i>Acanthis cabaret</i>
Little egret	<i>Egretta garzetta</i>
Meadow Pippit	<i>Anthus pratensis</i>
Mistle Thrush	<i>Turdus viscivorus</i>
Mute Swan	<i>Cygnus olor</i>
Nathusius's Pipistrelle	<i>Pipistrellus nathusii</i>
Pied Flycatcher	<i>Ficedula hypoleuca</i>
Purple Emperor	<i>Apatura iris</i>
Red kite	<i>Milvus milvus</i>
Redwing	<i>Turdus iliacus</i>

Common name	Scientific name
Rarely Occurring	
Rook	<i>Corvus frugilegus</i>
Rudy Darter	<i>Sympetrum sanguineum</i>
Shag	<i>Phalacrocorax aristotelis</i>
Short-eared Owl	<i>Asio flammeus</i>
Silver-washed Fritillary	<i>Argynnis paphia</i>
Skylark	<i>Alauda arvensis</i>
Song Thrush	<i>Turdus philomelos</i>
Stag Beetle	<i>Lucanus cervus</i>
Stock Dove	<i>Columba oenas</i>
Swallow	<i>Hirundo rustica</i>
Tawny Owl	<i>Strix aluco</i>
Tree Sparrow	<i>Passer montanus</i>
Willow Warbler	<i>Phylloscopus trochilus</i>
Wryneck	<i>Jynx torquill</i>

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10.3 Appendix 3: Open space typology and categorisation

The open space typologies used for the City of London Open Spaces Audit are identified in the table below:

Typology	Primary Purpose
Civic Spaces	Civic and market squares, and other hard-surfaced areas designed for pedestrians. Providing a setting for civic buildings, public demonstrations and community events.
Primary Civic Spaces	Civic and market squares.
Secondary Civic Spaces	Other hard-surfaced areas designed for pedestrians.
Parks and Gardens	Accessible, high-quality opportunities for informal recreation and community events.
Cemeteries and Churchyards	Quiet contemplation and burial of the dead often linked to the promotion of wildlife conservation and biodiversity.
Amenity Spaces	Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.
Natural and semi-natural greenspaces	Wildlife conservation, biodiversity and environmental education and activities.
Local Green Corridors	Wildlife conservation, biodiversity, environmental education and activities.
Provision for Children and Young People	Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, ball courts, (and) skateboard areas.
Outdoor Sports Facilities	Participation in outdoor sports, such as pitch sports, tennis, bowls, athletics or countryside or water sports.
Allotments, Community Gardens and Urban Farms	Opportunities for those people who wish to do so to grow their own produce as part of the long-term promotion of sustainability, health and social inclusion. Open countryside located on the boundary of an urban area.

10.4 Appendix 4: Public Open Space Categorisations

The table below provides an overview of the Public Open Space categories as defined in the London Plan 2021. Spaces are categorised according to their size, facilities and local importance and provide a clear method to evaluate open space provision and type across Greater London.

Open Space Categorisation	Size Guidelines	Distances from homes
Regional Parks	400 hectares	3.2 to 8 kilometres
Metropolitan Parks	60 hectares	3.2 kilometres
District Parks	20 hectares	1.2 kilometres
Local Parks and Open Spaces	2 hectares	400 metres
Small Open Spaces	Under 2 hectares	Less than 400 metres
Pocket Parks	Under 0.4 hectares	Less than 400 metres
Linear Open Spaces	Variable	Wherever feasible

10.5 Appendix 5: Registered Parks & Gardens

The following sites in the City of London feature on the Historic England 'Register of Historic Park and Gardens of special historic interest in England' which identifies sites of particular historic significance:

Site	Grade
Finsbury Circus	II
Golden Lane Estate Designed Landscape	II
Inner Temple	II
Middle Temple	II
The Barbican	II*

10.6 Appendix 6: Glossary

Explanation of terms used in BAP:

All London Green Grid

The All London Green Grid (ALGG) is a Greater London Authority (GLA) framework to promote the design and delivery of 'green infrastructure' across London.

Barbican Wildlife Group (BWG)

The BWG is a group of volunteer local residents who, with the City Gardens team, preserve, protect and enhance biodiversity in Barbican Wildlife Garden for the education and enjoyment of all Barbican Estate residents and guests. BWG also promotes the conservation the Garden's many habitats and its retention as a wildlife haven within the City. It also aims to foster and promote biodiversity within the Estate and to work with like-minded groups and organisations to promote and foster biodiversity within and beyond the Square Mile.

Biodiversity

Biodiversity is the term used to describe the variety of life on Earth. This includes wildlife such as animals, birds and plants, the habitats which are the places they live and how they all interact with their surroundings as part of the ecosystem.

Building Research Establishment Environmental Assessment Methodology (BREEAM)

BREEAM is the world's leading sustainability assessment method for master planning projects, infrastructure and buildings. It addresses a number of lifecycle stages such as new construction, refurbishment and in-use.

Citizen Science

Citizen science is scientific research conducted by amateur or non-professional enthusiasts. Citizen science may be performed by individuals or groups of volunteers and interested parties.

City of London Corporation

The City of London Corporation provides local government and policing services for the financial and commercial heart of Britain, the 'Square Mile'.

City Gardens, Open Spaces Department

The City Gardens team are responsible for tree and green space management for around 200 open spaces in the Square Mile including parks, gardens, churchyards, plazas and highway planting. The City Gardens team is also responsible for Bunhill Fields Burial Ground just outside the City boundary in the London Borough of Islington.

Corporate Social Responsibility (CSR)

CSR is a process which companies choose to follow to take responsibility for their actions and encourage positive impacts through their activities on the environment, consumers, employees, shareholders, communities and all other members of the public who may also be considered as stakeholders.

Department for Environment Food & Rural Affairs (Defra)

Defra is a UK government department responsible for safeguarding our natural environment, supporting our world-leading food and farming industry, and sustaining a thriving rural economy. Our broad remit means we play a major role in people's day-to-day life, from the food we eat, and the air we breathe, to the water we drink.

Friends of City Gardens (FoCG)

A community group of volunteers comprising City residents, City of London Guides, City workers and other interested parties. They support the City Gardens Team and have a special interest in promoting and enhancing biodiversity.

Greenspace Information for Greater London (GiGL)

GiGL is the capital's environmental records centre that collates, manages and makes available detailed information on London's wildlife, parks, nature reserves, gardens and other open spaces.

Green Corridors

Almost continuous areas of open space which are linked. They can act as wildlife corridors and serve amenity, landscape and access roles.

Green Infrastructure

A strategically planned and managed network of green spaces and other environmental features vital to the sustainability of any urban area. This includes although not exclusively trees, biodiverse roofs, green walls and green corridors.

Draft City Plan 2036

The City Corporation's Local Plan for the future development of the City of London, setting out what type of development the City Corporation expects to take place and where. It sets out the City Corporation's vision, strategy and objectives for planning up to 2036, together with policies that will guide future decisions on planning applications.

London Biodiversity Partnership

The London Biodiversity Partnership was formed in 1997 to bring together organisations to benefit wildlife and boost the capital's green space.

National Planning Policy Framework (NPPF)

Sets out government's planning policies for England and how these are expected to be applied.

Open Mosaic Habitat

Open Mosaic Habitats on Previously Developed Land (OMH) is defined by the Defra. They are found mainly in urban and formerly industrial areas and have high biodiversity value. This value includes rare plants, mosses, lichens and a large number of rare invertebrates, especially bees, wasps and beetles.

Open Space

Open space is land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.

Sites of Importance for Nature Conservation (SINCs)

Sites are designated as SINCs to highlight areas of ecological value in the City. The sites are graded as being of Metropolitan (SMINCs), Borough (SBINCs), or Local (SLINCs) importance.

Sustainable Drainage System (SuDS)

A range of sustainable measures for surface water management which reduce the amount, flow or rate of surface water discharge into sewers.

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Open Spaces Department

The City of London Corporation owns and manages a number of Open Spaces, Parks and Gardens in and around London as part of its commitment to sustaining a world class city. Each open space is a unique resource managed for the use and enjoyment of the public and for the conservation of wildlife and historic landscape.

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Agenda Item 8

Committee(s): Planning & Transportation Committee – for decision	Dated: 29/06/2021
Subject: Riverside Strategy for public consultation	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1 People are safe and feel safe 11 We have clean air, land and water and a thriving and sustainable natural environment 12 Our spaces are secure, resilient and well maintained
Does this proposal require extra revenue and/or capital spending?	No
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: Gordon Roy, Environmental Resilience Director	For Decision
Report authors: Holly Smith, Tim Munday and Janet Laban. Environmental Resilience Team, DBE	

Summary

The Environmental Resilience team in DBE has been developing a riverside strategy as one of the measures from the Local Flood Risk Management Strategy (LFRMS) 2021-27 as approved by Planning & Transportation committee on 16th February 2021. This report is seeking approval for the Environmental Resilience Team to continue to progress the Riverside Strategy and to put the City of London’s draft Riverside Strategy (Appendix A) out to public consultation to obtain the views of external stakeholders and users of the riverside. Once the public consultation is complete and comments considered, the Riverside Strategy will be brought back to this committee for adoption.

This City Riverside Strategy provides a roadmap to guide the City of London Corporation as Local Authority and Lead Local Flood Authority (LLFA) for the Square Mile. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change. The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future.

Recommendation(s)

Members are recommended to:

- Agree that the Riverside Strategy continue to be progressed by the City Corporation and,
- Endorse the draft Riverside Strategy to be sent out for public consultation for 6 weeks.

Main Report

Background

1. The Environment Agency led Thames Estuary 2100 Plan (TE2100) identifies actions that will need to be taken during this century to protect the land adjacent to the tidal Thames from flood risk. This area, including parts of the City, is protected from severe tidal flooding by the Thames Barrier and the other estuary defences. However, climate change impacts such as sea level rise and the prevalence of more extreme weather events mean that additional local and estuary-wide protection will be needed later this century.
2. Within the City the TE2100 plan identifies the need to raise flood defences to 5.85m AOD (above ordinance datum) by 2065 and 6.35m AOD by 2100. For the City's riverside this means raising parts of the flood defence by up to 1m although some sections are already at the required level for 2100. The adaptive pathways approach adopted in the TE2100 plan links the flood defence raising to sea level rise. Through the TE2100 ten -year review it is looking increasingly likely that these dates will be brought forward since sea level rise is accelerating faster than anticipated.
3. This defence raising will have an impact on riverfront structures and walkways, on views of the river from the riverside walk and from nearby buildings. These impacts will need to be managed in a way that integrates the raised defences with the wider riverside environs. It also presents opportunities to enhance the user experience of the riverside, improve opportunities for biodiversity and highlight the historic importance of the City's riverside. Planning now will enable the most cost-effective options to be implemented in a pro- active way, thus maximizing the potential opportunities associated with programmed works.
4. The Environmental Resilience team in the Department for the Built Environment (DBE) has been developing a riverside strategy to interpret the TE2100 plan at a local level. This is one of the measures from the statutory Local Flood Risk Management Strategy (LFRMS) 2021-27 as approved by Planning & Transportation committee on 16th February 2021.

Current Position

5. This draft City Riverside Strategy provides a roadmap to guide the City of London Corporation as Local Authority and Lead Local Flood Authority (LLFA) for the Square Mile. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change. The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future
6. The City of London is one of the first local authorities along the Thames Estuary to develop a Riverside Strategy in line with the TE2100 plan. The City Corporation received funding from the Thames Regional Flood and Coastal Committee to assist with the development of this strategy as a pilot for riparian LLFAs along the Thames Estuary. We have also participated in the Design Council's "Design in the Public Sector" programme (sponsored by the Local

Government Association) to improve the draft strategy. As a trail blazer in this area, there is a lot to be learned and disseminated to other local authorities who will be developing Riverside Strategies in the near future.

7. The Environmental Resilience Team has developed this draft strategy taking account of internal consultation with colleagues and feedback from the Environment Agency. We are now seeking approval for public consultation with external stakeholders including statutory bodies such as the Port of London Authority (PLA), the Mayor of London and the Marine Management Organisation (MMO), riverside users, riparian owners and any other interested parties. As mentioned previously, the City is the first local authority to produce a riverside strategy to tackle sea level rise, so receiving comments from external stakeholders will be very useful to the development of the strategy.
8. The draft Riverside Strategy (Appendix A) provides a mechanism for incremental flood defence raising exploiting opportunities to incorporate raising into planned works where possible for example through planned development at riparian sites or routine maintenance. The strategy also includes a series of design policies to ensure that such raising is not detrimental to the experience and functioning of the City's riverside.
9. The Thames Barrier currently protects Central London from river flooding and will continue to do so into the future. Given this protection, the fundamental need for upstream defence raising and a Riverside Strategy has been considered and discussed as part of internal consultation. The primary function of the Thames Barrier is to prevent tidal flooding in London, and it is currently closed when water levels due to high tides are forecast to overtop the river flood defences upstream of the Barrier. High water levels in the tidal Thames are increasing as a result of climate change resulting in more frequent barrier closures. A limit of 50 closures per year on average has been set to allow sufficient time for sustainable management of the Thames Barrier and to reduce navigation impacts. Raising the statutory heights of local flood defences along the Thames will be needed to manage the frequency of barrier closures by allowing higher water levels to pass up the Thames thus prolonging the life of the existing barrier. As water levels increase further, a major upgrade or replacement of the Thames Barrier will be required to protect London in the future. These options are being considered in the TE2100 Plan.
10. Another issue that has been raised through internal consultation is how the work required to *implement* the Strategy will be funded and who is responsible for the works. The Metropolis Management (Thames River Prevention of Floods) Amendment Act 1879 requires riparian owners to carry out flood works maintaining the flood defences that they own. For the City's short stretch this would apply to over 20 riparian owners including the City Corporation as landowner of riparian properties.
11. The costs for each riparian owner will vary depending on the length of flood defence, the level of raising required, the opportunity to incorporate raising into other planned works and the degree to which they incorporate other benefits. Other potential options for funding include the use of planning obligations applied to all areas that would benefit from the improved flood defences or use of the Community Infrastructure Levy. Alternatively, the flood defence raising could be

centrally funded as a nationally significant infrastructure project or through flood defence grant in aid with contributions from beneficiaries.

12. Exploration of the need for and funding of the TE2100 proposals is outside the scope of this Riverside Strategy and will be considered through the 10-year review of the TE2100 Plan. The City Corporation will seek to carry out a cost benefit analysis for some City Corporation owned sections of the flood defence. This will provide evidence for funding discussions, and a realistic picture of potential costs to riparian owners of implementing the TE2100 Plan, to feed into the TE2100 review consultation in early 2022.
13. Some riparian owners may challenge the legal basis of this requirement and the degree to which other TE2100 planned works such as replacement of the Thames Barrier should prevent the need for local defence raising. The logistics of ensuring that the whole of the flood defence is raised to the required level and connected to adjacent stretches will be a challenge. There is a danger that lack of funding will result in riparian owners failing to adequately complete this task. There are also challenges in establishing ownership and riparian responsibility, particularly where flood defence structures are not associated with adjacent buildings or extend over the riverbed or where lease arrangements are in place.

Options

14. The main alternative option to progressing the City's Riverside Strategy would be to challenge the TE2100 Plan through their public consultation in early 2022. The City Corporation's Local Plan 2015, draft City Plan 2036 and Local Flood Risk Management Strategy 2021-27 all support the TE2100 Plan. Both the adopted 2015 Local Plan and the draft City Plan refer to the need for flood defence raising and require new development along the City's riverside to be designed to enable future flood defence raising, noting the responsibility of riparian owners for the maintenance and enhancement of flood defences.
15. The preferred option is to progress the City's Riverside Strategy and share our learning from this with other riparian LLFAs providing protection for the whole Thames Estuary to 2100 and beyond. As LLFA we believe that the TE2100 Plan provides the best option for protection of the whole Thames Estuary. A more appropriate response to the TE2100 review would be to challenge the funding mechanism for implementation and explore other options for funding.

Proposals

16. It is proposed that the City Corporation continue to progress the Riverside Strategy.
17. It is proposed that the draft Riverside Strategy go out for public consultation. The strategy and associated documents will be made available on the City Corporation's website along with a StoryMap providing an engaging introduction to the strategy. Please contact the Environmental Resilience Team if you would like to view the draft StoryMap. The strategy will be sent to interested stakeholders including the Environment Agency, Mayor of London and other

statutory consultees; riparian owners, businesses and residents; and users of the river and riverside walk

18. It will be out for consultation for 6 weeks during which time the Environmental Resilience team will be available for meetings and discussions with stakeholders.
19. Comments made during the public consultation will be taken into account in finalising the strategy. The final strategy will be brought back to the Planning and Transportation Committee and Policy & Resources Committee for approval for adoption.

Key Data

20. An extensive desktop study was undertaken (including commissioning a UAV drone survey) to help identify the scale of the challenge faced along the City's 1.5 mile stretch of riverside. The research and evidence have informed the Implementation Approach and Design policies set out in this strategy. Appendix 1 of the draft strategy provides detailed maps and assessment of the following aspects:

- Raising requirements – end of Stage 2 (2065)
- Raising requirements - end of Stage 3 (2100)
- Non - developable sites
- Historic environment
- Land use and ownership
- Access to the riverside
- River safety
- Natural capital and biodiversity
- Public realm furniture
- Lighting

Corporate & Strategic Implications

21. **Strategic implications** - The City Corporation's Climate Action Strategy (CAS) 2020-2027 includes a strong focus on Climate Resilience against the six climate risks that the City faces:
 - Flood risk
 - Heat stress
 - Water resources
 - Natural capital
 - Pests & diseases
 - Food & trade
22. Implementation of this strategy will require an integrated approach so that solutions for each risk incorporate responses to other risks where possible. For example, measure to address flood risk on the City's riverside, should also incorporate greening to reduce heat stress; taking care to choose suitable plants which improve natural capital and biodiversity and are resistant to emerging pests and diseases.
23. The CAS approach sits well with the TE2100 Plan riverside strategy approach. This integrates improvements to flood risk management defences into wider redevelopment, enhancing the social, environmental and commercial aspects of the riverside. The

Environment Agency is encouraging councils and strategic planning authorities to use this approach to achieve additional benefits whilst addressing climate change related flood risks

24. As owner of riparian properties, the City Corporation is required under the Metropolis Management (Thames River Prevention of Floods) Amendment Act 1879 to carry out flood works, maintaining the flood defences that they own. If adopted this strategy will apply to all properties on the City's riverside. For City owned riparian properties elsewhere the TE2100 Plan will apply, along with any local measures required through the relevant local authority.
25. **Financial implications** – none
26. **Resource implications** – The external consultation will be managed by the Environmental Resilience Team in DBE as part of their program of work.
27. **Legal implications** - None
28. **Risk implications** - This strategy has been developed in response to Corporate and Departmental risks relating to climate change and flood risk. The strategy seeks to provide both appropriate flood defences and shape an outstanding riverside space. Without appropriate flood defences, there is a risk of damage to property and infrastructure and potential loss of life through catastrophic flooding. If opportunities are missed to shape an outstanding riverside space, the experiences of riverside users will be greatly diminished with an impact on the City's reputation. This could also represent a failure to realise the full potential of the City's riverside as a strategically important asset. There remains substantial uncertainty with regards to the speed and impact of sea level rise and the implementation, funding and future legislative requirements of the Thames Estuary 2100 Plan. This strategy has been developed fully acknowledging this uncertainty (and also the adaptive approach of the wider plan) and has been written to enable future flexibility while still allowing practical interventions now.
29. Failure to progress this strategy would risk non compliance with the City Corporation's statutory duties as LLFA and the commitments made in the Climate Action Strategy.
30. **Equalities implications** – A Test of relevance was carried out on the Strategy, please see Appendix B
31. **Climate implications** – This strategy forms part of the Climate Resilience strand of the Climate Action Strategy.
32. **Security implications** – none

Conclusion

The Environmental Resilience team in DBE has been developing a riverside strategy as one of the measures from the Local Flood Risk Management Strategy (LFRMS) 2021-27 as approved by P&T earlier this year.

This City Riverside Strategy provides a roadmap to guide the City of London Corporation as Local Authority and Lead Local Flood Authority (LLFA) for the Square Mile. The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change.

This report is seeking approval to put the City of London's Riverside Strategy out to public consultation to obtain the views of external stakeholders and users of the riverside. Once the public consultation is complete and comments considered, the Riverside Strategy will be brought back to this Committee for adoption.

Appendices

- Appendix A – draft Riverside Strategy for Public Consultation
 - Appendix 1 Where are we now – the evidence base
 - Appendix 2 Illustrative defence raising options
- Appendix B – Equalities Assessment Test of Relevance

Background Papers

Planning and Transportation Committee 16th February 2021. Agenda item 6 - Local Flood Risk Management Strategy 2021-27

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City of London Riverside Strategy

Committee version – approval for public consultation draft June 2021

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DRAFT

1. Introduction

- 1.1. The City of London and the wider capital has throughout the centuries benefited from its position on the River Thames. As a tidal river the need to defend against the highest of tides is well understood and the river's flood defences have long protected the Square Mile from flooding. Through this next century sea level rises and changes to the wider estuary defences are expected. There is a need to protect the City from tidal flooding which brings with it an opportunity to shape an outstanding riverside space.
- 1.2. The Thames Barrier forms an essential part of the flood defences for the estuary and currently protects central London (including the City) from flooding. Closure of the barrier is becoming more frequent but there is a limit to the number of times per year that the barrier can be closed without affecting the river's ecology, navigation and the maintenance regimes for the barrier itself.
- 1.3. The second major element of the City's flood protection is provided by a flood defence at the river's edge. This protects from fluvial waters when the barrier is raised and higher tides which do not require closure of the barrier. The Thames Estuary 2100 Plan (TE2100) proposes a replacement barrier later this century to protect the estuary from sea level rise.
- 1.4. Most of the riverside is accessible to the public due to a long-term ambition to complete the entire riverside walk on the north bank of the Thames. The need to raise significant sections of the flood defence will affect users experience of the riverside walk and adjoining premises and must be planned in a pre-emptive way to avoid unnecessary costs and disruption.
- 1.5. This City Riverside Strategy provides a roadmap to guide the City of London Corporation as Lead Local Flood Authority (LLFA) and Local Planning Authority for the Square Mile. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change. The strategy sets out how we plan to deliver the local flood defences that contribute to this overall aim. The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future.
- 1.6. Successful implementation of this strategy in the coming decades will be dependent on suitable funding mechanisms being put in place. Options for funding should be a key consideration during the early stages of the strategy.

2. Our Vision

- 2.1. The City Corporation is dedicated to shaping an outstanding riverside environment, protecting and supporting a flourishing society and a thriving economy fit for the coming century.
- 2.2. In its role as Lead Local Flood Authority, the City Corporation will progress this vision through a strategy that uses the opportunities brought about by the need

to raise our river flood defences to overcome challenges and ensure benefits to the people who live, work, learn and visit the Square Mile.

2.3. The following are the long-term goals of the strategy, balancing these will be key to its success and will guide future decisions for the riverside:

- To ensure continued flood protection to the end of the century and beyond by raising the defences and improving future maintenance.
- To maintain and improve pedestrian access along the entire length of the riverside.
- To protect and enhance our historic riverside assets.
- To promote the safe use of the river and riverside as a vibrant place to be for health and wellbeing.
- To increase the value of the riverside for natural capital and ecology.
- To safeguard protected and valued views.
- To maintain appropriate land use adjacent to the river.

2.4. This strategy and the wider TE2100 Plan will have implications for the City Corporation and Bridge House Estates as a riparian property owner. The full implications for the City Corporation's riparian properties within and outside the Square Mile will require further investigation. This strategy will be reviewed at least every 10 years in line with the TE2100 Plan and may be revised at any time in the light of new evidence that emerges.

3. Background

3.1. The River Thames flows through the City from its boundary with the City of Westminster to the west of Blackfriars Bridge, to its boundary with the London Borough of Tower Hamlets at the Tower of London. The river has a tidal range of seven metres twice per day, throughout this section. Along this stretch, one and a half miles of flood defences protects riverside properties and public realm at high tide. At low tide wide areas of foreshore are visible at several locations along the river within the City. The original natural state of the river has been modified and restricted with extensive land reclamation from the Roman Period and continual development of warehouse, quays, wharfs and jetties. Six bridges span the river within the City (Blackfriars road-bridge, Blackfriars railway-bridge, Millennium footbridge, Southwark Bridge, Cannon Street railway-bridge and London Bridge). The navigable river channel is used for a variety of vessels including barges towing waste and construction materials, river buses, leisure boats and river patrol boats. The ecology of the river has improved in the last 50 years and it is now designated as a Site of Metropolitan Importance for Nature Conservation (SMINC).

3.2. The historical development of the City is closely bound with its location on the Thames. The Roman settlement, established in the mid-1st Century grew rapidly, becoming the capital of Roman Britain and an important port. A permanent bridge is likely to have been in place by c52AD, at the most seaward point that

the river could be easily bridged. At this time the river was wider and shallower, and the riverbank was on the north side of modern Thames Street. The construction of successive waterfronts and land reclamation continued in the early medieval and later periods. The building and rebuilding of extensive wharves, docks, alleys and a network of narrow streets, linking the waterfront with the principal medieval markets at Cheapside and Eastcheap, underpinned the trading and commercial role of the City in the country and abroad. The significance of London meant that the Pool of London handled half the nation's trade by the end of the middle ages, and was the world's busiest port in the eighteenth century. Construction of new, larger docks and expansion of the port to the east gradually diminished the importance of the City as a port, a trend that accelerated from the late 1940s onwards. Warehouse buildings and wharfs went out of use and many sites were redeveloped for offices and housing. A riverside walk was established, incorporated into new developments and eventually linking to form a continuous pedestrian route.

3.3. A range of policies and strategies protect and shape the City's riverside (Table 1)

Table 1: Policies and strategies affecting the City's riverside

City of London	Greater London Authority	Other statutory bodies
Local Plan / City Plan 2036	The London Plan 2021	Environment Agency Thames Estuary 2100 Plan
	Implementation Report - Safeguarded Wharves Review 2018-2019	Dept for Housing Communities and local Government Wharves safeguarding direction Feb 2021
Thames Strategy SPD 2015	Mayor's River Action Plan 2013	Marine Management Organisation Marine Plan for South East inshore (draft)
Transport Strategy 2019	Mayor's Transport Strategy 2018	
Climate Action Strategy 2020-27		
Local Flood Risk Management Strategy (LFRMS) 2021-27		
Riverside Walk Enhancement Strategy 2014		
Waste Strategy 2014-2020 (under review)		

3.4. The Environment Agency led TE2100 Plan identifies actions that will need to be taken during this century to protect the land adjacent to the tidal Thames from flood risk. This area, including parts of the City, is protected from severe tidal flooding by the Thames Barrier and the other estuary defences. However,

climate change impacts such as sea level rise and the prevalence of more extreme weather events mean that additional local and estuary-wide protection will be needed later this century.

- 3.5. The primary function of the Thames Barrier is to prevent tidal flooding in London, and it is currently closed when water levels are forecast to overtop the river flood defences upstream of the Barrier. Water levels in the tidal Thames are increasing as a result of climate change resulting in more frequent barrier closures. A limit of 50 closures per year on average has been set to allow sufficient time for maintenance and navigation. Raising the statutory heights of local flood defences along the Thames will help to manage the frequency of barrier closures by allowing higher water levels to pass up the Thames thus prolonging the life of the existing barrier. As water levels increase further, a major upgrade or replacement of the Thames Barrier will be required to protect London in the future. These options are being considered in the TE2100 Plan.
- 3.6. Within the City the TE2100 plan identifies the need to raise flood defences to 5.85m AOD (above ordinance datum) by 2065 and 6.35m AOD by 2100. For the City's riverside this means raising parts of the flood defence by up to 1m although some sections are already at the required level for 2100. The adaptive pathways approach adopted in the TE2100 plan links the flood defence raising to sea level rise. Through the TE2100 ten -year review it is looking increasingly likely that these dates will be brought forward since sea level rise is accelerating faster than anticipated.
- 3.7. This defence raising will have an impact on riverfront structures and walkways, on views of the river from the riverside walk and from nearby buildings. These impacts will need to be managed in a way that integrates the raised defences with the wider riverside environs. It also presents opportunities to enhance the user experience of the riverside, improve opportunities for biodiversity and highlight the historic importance of the City's riverside. Planning now will enable the most cost-effective options to be implemented in a pro- active way, thus maximizing the potential opportunities associated with programmed works.
- 3.8. Various licenses and permits are required before any work is undertaken on the riverside or flood defence structures. (Table 2) This ensures that navigation, flood protection and natural capital are not compromised during or as a result of these works. Works may also need planning and listed building consents.

Table 2: Permits and Licenses that may be required for flood defence works

Organisation	License or permit required	Details
Port of London Authority (PLA)	River Works License	Any works in, on, over or under the river. This includes permanent works such as a new pier and any temporary works such as repairs to a river wall which requires access/ scaffolding

Environment Agency (EA)	Environmental Permit for Flood Risk Activity	Flood Risk Activities are activities in, under and over a main river and other activities that could affect flooding from a main river or sea.
Marine Management Organisation (MMO)	Marine License	Activities within the UK marine area including construction dredging deposit or removal of any substance or object, incineration, scuttling (sinking) or use of explosives
City of London Corporation	Planning Approval and/or Listed Building Consent	Any works related to changes to a development site or a listed building or structure.
Historic England	Scheduled Monument Consent	Any works that will affect a scheduled monument, whether above or below ground.

3.9 The City Corporation's Climate Action Strategy (CAS) 2020- 2027 includes a strong focus on Climate Resilience against the six climate risks that the City faces:

- Flood risk
- Heat stress
- Water resources
- Natural capital
- Pests & diseases
- Food & trade

Implementation of this strategy will require an integrated approach so that solutions for each risk incorporate responses to other risks where possible. For example, measure to address flood risk on the City's riverside, should also incorporate greening to reduce heat stress; taking care to choose suitable plants which improve natural capital and biodiversity and are resistant to emerging pests and diseases.

3.10 The CAS approach sits well with the TE2100 Plan riverside strategy approach. This integrates improvements to flood risk management defences into wider redevelopment, enhancing the social, environmental and commercial aspects of the riverside. The Environment Agency is encouraging councils and strategic planning authorities to use this approach to achieve additional benefits whilst addressing climate change related flood risks. Figure 1 summarises the co-benefits that will result from this Riverside Strategy Approach.

3.11 Following this approach, the City's ambition is to take every opportunity to create an attractive, accessible riverside which is resilient to the increasing risks of flooding through this century.



Figure 1: Benefits of the TE2100 Riverside Strategy Approach

4. Where are we now?

- 4.1. The City's riverside is used in a variety of different ways; ranging from an office or residential location, educational use, recreational uses and safety elements. It is a dynamic area that has evolved over time to become what it is now, a historic, multi-use area.
- 4.2. In order to develop a strategy that incorporates all these elements, it has been necessary to understand the existing riverside features and how they add to the character and environment of the area.
- 4.3. An extensive desktop study was undertaken (including commissioned a UAV drone survey) to help identify the scale of the challenge faced along the City's 1.5 mile stretch of riverside. Appendix 1 provides detailed maps and assessment of the following aspects:
 - Raising requirements – end of Stage 2 (2065)
 - Raising requirements - end of Stage 3 (2100)
 - Non - developable sites
 - Historic environment
 - Land use and ownership
 - Access to the riverside
 - River safety
 - Natural capital and biodiversity
 - Public realm furniture
 - Lighting

The research and evidence have informed the Implementation Approach and Design policies set out in section 5 of this strategy.

5. Realising our vision

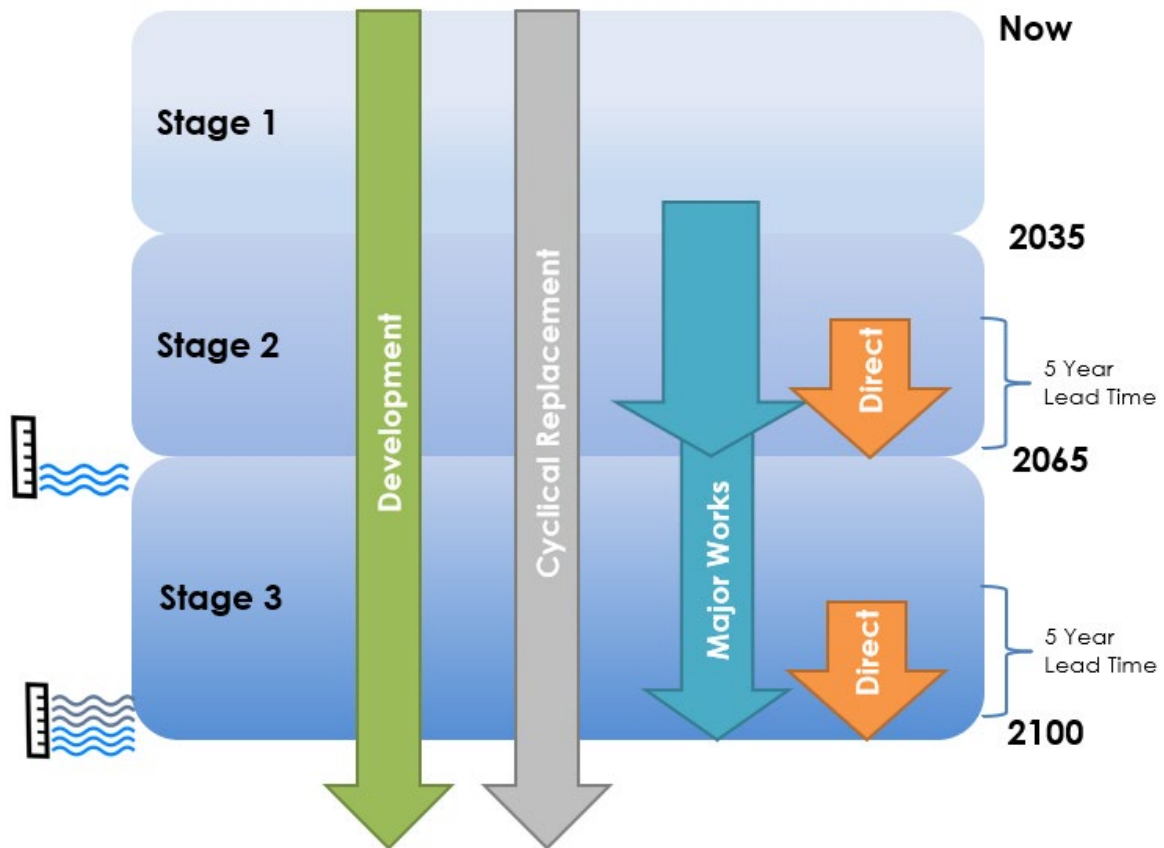


Figure 2: Suitable interventions for each time horizon

5.1. The long-term nature of this strategy risks decisions being delayed until later in the century. This would result in missed opportunities and increased costs in the future. By setting out what can be done in each time period (fig 3), this strategy leads the way in resilience planning, reducing disruption and overall cost of works. Each element of the strategy includes:

- the strategy point and the related policy
- why the policy is a good approach
- when the policy will apply and for how long
- in which areas the policy is relevant
- how the policy can be taken forward (recommendations)

IMPLEMENTATION APPROACH

5.2. The approach to implementing raising is detailed in the policies set out below. These policies outline the expected response to flood defence raising as opportunities arise as a result of development and cyclical maintenance. It is recognised that some parts of the riverside will need a coordinated approach across several adjacent sites. It is proposed that major works are planned and co-ordinated to minimise disruption for riverside occupiers and users. Finally, some

sections will not be covered by the preceding scenarios and will require direct intervention before the implementation dates set out in the TE2100 plan.

IMPLEMENTATION APPROACH – TE2100 alignment SP1

SP1 - TE2100 alignment

The City of London Corporation will follow the adaptive approach set out in the Thames Estuary 2100 Plan, using the dates and time periods it sets out. The City Corporation will commit to working in partnership with the Environment Agency, neighboring London Boroughs and other relevant parties to achieve the long-term aims of the Thames Estuary 2100 Plan.

- 5.3. The Thames Estuary 2100 Plan is the partnership plan for maintaining the flood defences for the entire tidal Thames. By committing to the timeframes as set out by the TE2100 Plan (and any revisions thereof) the City Corporation will be able to ensure that its flood defence remain sufficient for the risk and maintain the continuity of the wider defence with adjoining areas, including the London Boroughs with which it shares a riparian and land boundary (City of Westminster, London Boroughs of Tower Hamlets and Southwark).
- 5.4. This strategic point is a continuation of the City Corporation's existing policy and should continue to be applied going forward. This strategic point applies generally to the whole of the City's riverside.

SP1 Recommendations:

1. The City Corporation should continue to include in its Planning Policy and Local Plan an alignment with the TE2100 requirements
2. The City Corporation should regularly review the Riverside Strategy to coincide with reviews and updates of the TE2100 Plan and the City's own Local Plan.
3. The City Corporation should maintain a robust partnership with the EA, neighbouring boroughs and other partners in support of the wider TE2100 plan.

Three time horizons – three themes for flood risk management

 <p>First 25 years</p>	<p>The first 25 years from 2010 to 2034</p> <p>“Maintaining confidence and planning together”</p>	<ul style="list-style-type: none"> • Continuing maintenance, operation and essential improvements. • Creating new habitats, safeguarding the spaces for future flood management and working in partnership with others to reduce flood risk. • TE2100 will have a real influence in the preparation of, and updating of local strategic and spatial plans.
 <p>Middle 15 years</p>	<p>The middle 15 years from 2035 to 2049</p> <p>“Renewal and reshaping the riverside”</p>	<ul style="list-style-type: none"> • Many of the existing walls, embankments and smaller barriers will need raising and major refurbishment or replacement in this period. • These major projects provide an opportunity to reshape our riverside environment through working with spatial planners, designers, environmental groups and those who live and work in the Estuary area.
 <p>Up to 2100</p>	<p>To the end of the century from 2050</p> <p>“Preparing for, and moving into the 22nd century”</p>	<ul style="list-style-type: none"> • From 2070 (based on government’s current climate change guidance) a major change will be needed. • The decision on the “end of the century” option to be adopted must be made at the start of this period followed by planning and preparation for implementation • By 2070, flood risk management arrangements must be in place to take us to the end of the century – and beyond.

Figure 3 Thames Estuary 2100 Plan time horizons

IMPLEMENTATION APPROACH – Development SP2

SP2 - Development:

Where development is proposed on a riparian site the following will be expected at each stage:

Stage 1 (2021-2034): As a minimum the developer must demonstrate that the flood defence is capable of being raised to the future level. Developers are encouraged to implement raising to the 2100 level at this time where feasible.

Stage 2 (2035-2065): As a minimum, when new sites come forward for development during this period developers will be required to raise the river defence to at least the 2065 level and demonstrate that future raising to higher level is feasible. Developers should implement raising to the 2100 level at this time where feasible.

Stage 3 (2065 onwards): When new sites come forward for development during this period, developers will be required to raise the river defences to the 2100 level.

5.5. Development where it occurs in the immediate vicinity of the river can offer a cost-effective and less disruptive opportunity to provide defence raising and to implement a design that provides wider holistic benefits to the riverside. In addition, it offers an opportunity to resolve conflicts with building levels and the defence levels. The infrequent nature of development is likely to mean that this opportunity will not occur multiple times for individual sites during the course of this strategy.

5.6. Going forward there will be a continuation of the policy requiring developers to demonstrate that future defence raising is possible, this should include that the building will not be negatively impacted by future raising and developers are

encouraged to raise defence levels to the 2100 level as part of the development. From 2035 developers will be required as part of major new developments to raise defence levels to at least the 2065 level and as a minimum demonstrate that future raising to the 2100 can be accommodated.

- 5.7. This strategic point is a continuation and enhancement of existing policy which will apply from now on. This point will apply generally to the entire riverside where development is likely.

SP2 Recommendations:

1. The City Corporation should clarify existing planning policy through an update to the Thames Strategy Supplementary Planning Document (SPD)
2. The City Corporation should produce guidance on demonstrating the feasibility of future defence raising, this should include guidance on potential impacts that need to be addressed and resolving conflicts with adjoining sites.

IMPLEMENTATION APPROACH – Cyclical replacement and maintenance SP3

SP3 - Cyclical replacement and maintenance:

Where the City Corporation is responsible for the maintenance of the river defence, should a section need replacing or a major repair, raising opportunities should be evaluated for each stage (other riparian owners should be encouraged to take a similar approach):

Stage 1 (2021-2034): As a minimum the City Corporation must consider the feasibility of raising the river defence as part of the works or at least enabling future raising.

Stage 2 (2035-2065): As a minimum the City Corporation must enable future raising to the 2065 level where feasible and consider the feasibility of implementing to the higher level as part of the works.

Stage 3 (2065 onwards): The City Corporation must consider the feasibility of raising the defence as part of the works and enabling future raising to the higher level.

Riparian owners should take account of river wall raising on adjacent sites and co-ordinate works where feasible

- 5.8. All river defences have a limited effective lifespan and require regular maintenance. Across the time period concerned with this strategy it is possible that some defence structures will need replacement, which presents an opportunity incorporate raising and associated co benefits. Conversely where direct intervention is undertaken to implement raising, the life expectancy of the defence should be assessed and if appropriate the opportunity taken to consider wholesale replacement of the asset.
- 5.9. This is a new approach for the City Corporation as a riparian owner and should be implemented going forward, other riparian owners should be encouraged to

follow suit through demonstration of best practice. The point applies generally to the entire riverside.

SP3 Recommendations:

1. The City Corporation should change its internal procedures to ensure raising is considered as part of cyclical works.
2. The City Corporation should work in partnership with the EA asset monitoring team to encourage riparian owners to consider raising as part of their own maintenance regime.

IMPLEMENTATION APPROACH - Major works SP4

SP4 - Major works:

The City Corporation will work with the Environment Agency and riparian owners to identify stretches where major substantive works will be required to implement raising and seek to ensure that these come forward at the appropriate time such that:

Stage 1 (2021-2034): The City Corporation will have identified the stretches covered by this implementation approach, and instigated planning in conjunction with other stakeholders as required.

Stage 2 (2035-2065): By the end of this period the stretches identified at Stage 1 will have been raised to at least the 2065 level.

Stage 3 (2065 onwards): Further progress on these stretches will have ensured that the defences are raised to the 2100 level before the end of the century.

- 5.10 Some stretches of the river defence require significant works to enable raising and are either; due to their position unlikely to come forward as part of a development or are where a single structure covers multiple riparian sites in a way that restricts the capacity for a single development to implement raising meaningfully. Where this occurs a more thorough approach will be needed to ensure that raising occurs in a coordinated and timely fashion and incorporates appropriate co-benefits. When these sites occur at the City's boundary further considerations will be needed to ensure continuity with the neighboring borough.
- 5.11 It is likely that this approach will be required for raising to the Victoria Embankment, which mostly sits within the City of Westminster. Other possible structures which have been identified include London Bridge and the board walk structure over the river from Adelaide House to Old Billingsgate.
- 5.12 Dealing with these sections in a coordinated way, assists in overcoming challenges within a suitable timeframe and may unlock opportunities for external funding.

SP4 Recommendations:

1. The City Corporation should conduct a review of the flood defences within the Square Mile to identify areas where major works may be needed, including but not limited to:
 - a. Victoria Embankment: With Westminster City Council and other interested parties to consider issues arising from the need to raise the flood defences at Victoria Embankment.
 - b. Adelaide House to Old Billingsgate Market: With riparian owners and other interested parties to consider issues arising from the need to raise or replace flood defences at the elevated walkway structure between Adelaide House and Old Billingsgate Market.
 - c. London Bridge: Conduct a detailed engineering review of the implication of heightened water levels on the balancing structure with London Bridge's northern and southern abutments.

IMPLEMENTATION APPROACH - Direct intervention SP5

SP5 - Direct intervention:

Where raising is required but has not been fulfilled by the other implementation approaches (including where works have only prepared for future raising) the following should be undertaken:

Stage 1 (2021-2034): The City Corporation will engage with riparian owners to help them understand their legal responsibilities for flood defence raising and the consequences and implications on their sites of future raising.

Stage 2 (2035 – 2065): Stretches still requiring raising five years before the end of stage 2 will be identified and the City Corporation as Lead Local Flood Authority will work with the Environment Agency to enable riparian owners to fulfil their legal responsibility for flood defence raising at least to the 2065 level.

Stage 3 (2065 onwards): Five years ahead of the end of the century raising date any stretches yet to be raised to the higher level will be identified and the City Corporation as Lead Local Flood Authority will work with the Environment Agency to enable riparian owners to fulfil their legal responsibility for flood defence raising.

- 5.13 Any remaining sites where defence raising has not been implemented alongside development, other works or major projects, will need to be addressed through direct intervention in order to provide a contiguous defence. These interventions should seek to improve the riverside as much as is feasible. The City Corporation as LLFA, will work with the Environment Agency as enforcement authority, to ensure that riparian owners are able to fulfil their legal responsibilities resulting in continuous protection from sea level rise along the City's riverside.

- 5.14 This strategic point will be a progression of SP 2,3 and 4 beginning at the start of the second epoch and will need to be completed by the first raising point. This will apply at discreet local sites along the length of the riverside.

SP5 Recommendations:

1. The City Corporation should produce tailored site-specific guidance on raising requirements through Flood Risk Briefing Notes for individual riparian sites. Detailed technical designs will be the responsibility of riparian owners.
2. The City Corporation should develop a riverside flood defence communication strategy targeted at riparian owners which aims to establish a partnership approach.
3. The City Corporation should maintain an up to date record of flood defence levels to identify sites that will need direct intervention at key dates

IMPLEMENTATION APPROACH – Sequencing of flood defence raising SP6

SP6 - Sequencing of flood defence raising

Where stretches will require raising in both periods (2065 and 2100) riparian owners or their agents should consider the feasibility of implementing the complete raising in a single intervention and as a minimum demonstrate that the higher level of raising is achievable.

- 5.15 In the stretches which require the most raising it may be more economical and cause less disruption to implement raising to the 2100 level at the same time as the implementing the earlier level. This will be most appropriate where changes to associated structures with a design life that exceeds 2100 will also be required. As a minimum works to raising should demonstrate that further raising is achievable in future. In some locations it will be more appropriate to implement raising to the different levels at separate times, particularly where the design life expectancy of the defence structure may mean the asset needs replacing ahead of 2100.
- 5.16 The TE2100 Plan will be reviewed periodically to ensure its effectiveness in the face of climate change. The raising requirements are unlikely to change but the dates may be brought forward if sea level rise accelerates. This possibility should be considered when assessing each site.
- 5.17 This strategic point should be considered for all raising intervention types and will apply to all sites that require raising at the end of the first epoch.

SP6 Recommendations:

1. The City Corporation should use the review of the City of London Strategic Flood Risk Assessment to evaluate the feasibility of single or multistage interventions.

DESIGN

- 5.18 The City of London Riverside Survey report (Sept 2020) produced by Arcadis for the City Corporation includes a range of possible options for flood defence raising (appendix 2). Decisions on the most suitable option will need to be considered on a site by site basis taking account of engineering constraints, permits and licenses, planning considerations, aesthetics and potential for co-benefits.

DESIGN – Flood defence and walkway continuity SP7

SP7 - Flood defence and walkway continuity

Where raising is being considered, either through immediate works or in preparation for future raising, sufficient consideration shall be given to the adjacent sites and walkway levels to ensure the continuity of the defence and the riverside walk.

- 5.19 Raising an individual stretch, either through development or as part of cyclical works will affect the surrounding defences and walkway levels, particularly if these also require raising. The boundary of defences should be designed to enable raising the appropriate level in future and landscaping should enable level access between sites for all stages of implementation. Similar consideration will be required when demonstrating the achievability of future raising.
- 5.20 The walkway level plays an important role in the users experience of the riverside and how it functions as a space. It effects both the loading on the riverside defences, the interaction with adjoining buildings and provides inherent resilience to flooding. Provided that the walkway height is at a suitable height future raising should be able to be achieved within the parapet in most cases. Establishing a walkway level early can also benefit maintaining the accessibility and continuity of the riverside path.
- 5.21 Approvals for such works must ensure that the continuity of the flood defence and walkway with adjacent properties is maintained and future raising of adjacent sections is not compromised. The historic nature of the walkway and implications for archaeology will be a consideration in the development of proposals.
- 5.22 This strategic point will apply going forward and will apply in locations where stand-alone raising or development take place. It will be a particular consideration for sites on the Local Authority boundary.

SP7 Recommendations:

1. The City Corporation should produce guidance on demonstrating the feasibility of future defence raising; which should include the need for suitable designs which ensure continuity of both the flood protection and the riverside walk whilst avoiding compromising future raising of neighbouring sections.

2. The City Corporation should update the Riverside Walk Enhancement Strategy to take into account the need to provide a continuous defence and inclusive access between sites.
3. The City Corporation will work with the EA to ensure that flood defence and walkway continuity are considered as part of the defence permitting and licensing scheme.
4. The City Corporation will work with the London Borough of Southwark to ensure that London Bridge and Blackfriars Bridge's southern bridgeheads continue to provide a continuous flood defence along the southern bank of the Thames.

DESIGN – Accessibility SP8

SP8 - Accessibility

Defence raising should maintain access to and improve the accessibility of the existing Thames Path along the City's riverside and enhance connections with the rest of the City, including during construction.

- 5.23 The Thames Path National Trail runs along the north bank and the City Corporation has successfully secured public access parallel to the river for much of this stretch. The current diversions are a distraction for users and diminish the linear form of the public realm. As well as being part of the national path the riverside should be considered an important local east-west walking route. In recent years the City Corporation has through implementation of the Riverside Walk Enhancement Strategy undertaken work to provide level access across the route. Works to defence raising should not diminish this and where possible should improve accessibility through appropriate treatment of difference in walkway levels.
- 5.24 The City's riverside is separated from the rest of the City by a series of busy roads including dual carriageways and underpasses. At grade crossing points are infrequent and high-level walkways can be disjointed and difficult to navigate. Every opportunity should be taken to improve the connection of the riverside with the rest of the City through crossing points and opening up views of the riverside in between buildings.
- 5.25 This is a continuation of the City Corporation's existing approach and will apply along the full length of the City's riverside.

SP8 Recommendations:

1. The City Corporation should continue to secure public access to an uninterrupted riverside pedestrian route through implementing planning policy as part of the Thames Strategy SPD. This shall include seeking opportunities to improve connectivity between the City's riverside and the wider area.
2. The City Corporation should ensure that accessibility remains a focus of updates to the Riverside Walk Enhancement Strategy.

3. The City Corporation should produce planning guidance on demonstrating the feasibility of future defence raising. This will include a requirement to provide level access between sites and allow for further works where raising is proposed to occur at different times. This will apply during construction and thereafter.

DESIGN – River safety SP9

SP9 - River safety

River safety must be of primary concern and must not be compromised in the design, construction and the ongoing use of the river, flood defences and riverside walk.

- 5.26 Through the Port of London Act 1968 (as amended), the Port of London Authority (PLA) has the primary responsibility of maintaining safe access and managing and supporting the safety of vessels, the general public and all users of 95 miles of the tidal River Thames. A PLA River Works License is required for all works on the riverside.
- 5.27 River Safety is of paramount importance and is dependent on a range of structures and riverside equipment including stairs connecting the foreshore to the riverside walk, access/egress ladders and grab chains along the whole length of the City's riverside. In addition, drowning and suicide prevention equipment such as lifebuoys, barriers and signs are key to preventing fatalities in the river.
- 5.28 Designs for flood defence raising must ensure that river safety equipment is extended to the new flood defence height. The effectiveness of the safety equipment must be retained throughout construction periods and ongoing maintenance regimes must be put in place.
- 5.29 This requirement applies along the whole length of the City's riverside and will take priority. Mapping, maintenance and inspection of river safety equipment will be particularly important as changes are made to the flood defences and adjoining riverside walk and foreshore

SP9 Recommendations:

1. The City Corporation should work with the Environment Agency licensing teams to ensure that work on the flood defences is conditional on the retention of functioning safety equipment throughout any works and ongoing maintenance thereafter.

DESIGN – Biodiversity SP10

SP10 - Biodiversity

Opportunities for biodiversity should be designed into flood defence raising and associated works accounting for future raising needs and designing for future climate projections.

- 5.30 The River Thames is a site of metropolitan importance for nature conservation providing habitats and movement corridors for a range of species. Works on the riverside provide an opportunity to enhance this biodiversity and will be expected to deliver a net gain in biodiversity. As a south facing riverside the impact of climate change on heat stress will be a key issue as temperatures rise and periods of drought increase. Care must be taken to ensure that planting designs are suitable for the future climate and resilient to the pests and diseases that will become more prevalent.
- 5.31 For development sites a target Urban Greening Factor of 0.3 has been set in the City Plan 2036 Other sites should aim to achieve this level of greening where possible. All development and sites should aim to deliver a net gain in biodiversity through improvement or maintenance works and consideration should be given to the Biodiversity Action Plan 2021-26 (BAP).
- 5.32 [Estuary Edges](#) guidance, coordinated by the Thames Estuary Partnership, provides a set of design principles which will maximize the ecological value of the riverside

SP10 Recommendations:

1. The City Corporation should incorporate the estuary edges guidance as appropriate into the Riverside Walk Enhancement Strategy and other guidance as applicable.
2. Those undertaking work to the flood defence should seek expert ecological advice when designing works on the riverside to maximize natural capital benefits, deliver net gains in biodiversity and ensure the longevity of planting in the face of climate change.

DESIGN – Historic environment SP11

SP11 - Historic environment

The historic assets on the riverside must be protected and enhanced and opportunities for education and interpretation included wherever possible.

- 5.33 The rich history of the City's riverside is obscured by layers of development and visible only as glimpses in certain areas. The flood defence walls and associated structures are listed in some locations e.g. Victoria Embankment and there are scheduled ancient monuments at Baynard House and Queenhithe Dock. Many riverfront buildings and structures are designated heritage assets, listed buildings or Scheduled Monuments and may be in conservation areas. There are also areas of significant archaeological potential and non-designated assets.
- 5.34 Proposals that may alter or affect heritage assets would need careful consideration of potential options and their impact to protect the special architectural and historic interest of a listed building. Where works involve disturbance to the foreshore, permissions, licenses and permits will be required and any archaeological finds must be recorded with the Museum of London.

- 5.35 This strategy provides a significant opportunity to incorporate education and interpretation along the riverside through temporary and permanent exhibitions and signage.

SP11 Recommendations:

1. The City Corporation's design and archaeology team and the Museum of London must be consulted during the design stage for all works on the City's riverside and their recommendations agreed and implemented.
2. The City Corporation should include sections on historic sensitivity in the Flood Risk Briefing Notes for individual riparian site.

DESIGN – Building and infrastructure interfaces SP12

SP12 - Building and infrastructure interfaces

Designs must take account of the interface between buildings, infrastructure, walkways and flood defences to maintain accessibility, and views of the Thames.

- 5.36 The buildings along the Thames riverside have many points where they interface with the river and riverside environment. This includes entrances and thresholds which align with the walkway levels, window heights which allow views towards the river and in some cases steps down to the river. In some areas, basements will be within the zone of the defence structure. As the flood defences and walkways are raised buildings will need to be designed or modified in relation to the new levels.
- 5.37 The flood defences also accommodate infrastructure such as sewer outflows, moorings and access piers for river craft. Designs must incorporate the necessary infrastructure for continued use of these facilities.
- 5.38 From now onwards whenever changes to buildings are undertaken through redevelopment, refurbishment or maintenance, the relationship to the 2100 flood defence levels must be considered through building design. For some areas this will require minimum intervention whilst other buildings will need significant alteration. The defence raising requirement map provides an indication of the most challenging areas where maximum defence raising is required. Special attention must be given to historic buildings to ensure that historically significant features are conserved or enhanced through this process.

SP12 Recommendations:

1. The City Corporation should produce planning guidance on demonstrating the feasibility of future defence which will include building and infrastructure interfaces
2. The City Corporation as LLFA and the Environment Agency, as part of its riverside flood defence communication strategy, should engage with riparian owners to highlight future requirements and encourage them to take action ahead of the deadlines for flood defence raising. A riverside partnership would facilitate collaborative working between affected riparian owners.

DESIGN – River views SP13

SP13 - River views

All works on the riverside must be designed to maintain views of the river from pedestrian walkways, seating areas, buildings and the lanes and passages between buildings

- 5.39 Views of the River Thames from the riverside walk, adjacent seating areas and glimpsed between buildings provides a unique context for the southern part of the City. Insensitive flood defence raising could obscure views of the river and the rich range of activities it supports. The opportunity to view the river from ground and first floors of riverside buildings and the public realm is greatly valued by occupants and should be incorporated into designs taking account of future defence raising needs. Views for wheelchair users and children should be maintained.

SP13 Recommendations:

1. The City Corporation should incorporate guidance on the importance of river views into the Flood Risk Briefing Notes for individual riparian sites.

DESIGN – Flood defence and edge protection SP14

SP14 - Flood defence and edge protection

Works to the riverside must result in a functional flood defence, effective edge protection and should incorporate principles of good riparian design.

- 5.40 The flood defences and edge protection measures are a significant element in the riverside public realm, affecting user experience of the riverside walk. With notable exceptions the flood defences also form the edge protection to prevent people from entering the water. In some places the edge protection takes the form of railings or parapets above the functional flood defence. As a general principle, the edge protection should prevent people from climbing over, through or ducking under but should allow safe egress from the tidal River Thames or the foreshore. Parapets should be designed to act as a barrier that prevents anyone from sitting or climbing on them.
- 5.41 Raising the functional flood defence will result in changes to the edge protection in places, for example by replacement of railings with a solid structure. These changes will impact on the feel of the associated riverside and should be designed sympathetically to the surrounding site.
- 5.42 Taking into account the other design related strategy points, proposed works should apply the principles of good riparian design to ensure that appropriate designs are implemented.
- 5.43 This strategic point is a continuation of the existing planning and corporate policy and corporate policy and will apply to all stretches requiring raising.

SP 14 Recommendations:

1. The City Corporation should produce guidance on demonstrating the feasibility of future defence raising which promotes best practice in riparian design and that this should be incorporated into future updates of the Riverside Walk Enhancement Strategy.

DESIGN – Lighting SP15

SP15 - Lighting

Suitable lighting must be maintained along the riverside but lighting columns should be removed from the flood defence structures, to enable future raising, unless they are of historic significance

- 5.44 The flood defence wall throughout most of its length supports lighting columns some of which are of historic significance. This will present challenges to incremental raising of the flood defence for 2065 and 2100 requirements. As a general principle, lighting columns should be removed from the flood defence structures unless they are of particular historic significance e.g. Sturgeon Lamps. The City Corporation has published a [Lighting Strategy](#) including recommendations for lighting of the City's riverside (section 4.3.14). Designs should comply with this guidance whilst maintaining continuity along the riverside.
- 5.45 Subways and underpasses present opportunities for lighting to the walls as well as bridge soffits to help create positive thresholds for pedestrians after dark.
- 5.46 Undercrofts may present challenges where flood defence raising reduces light level during the day. Maximum natural light and views of the river should be maintained by using glass for raising where possible.

SP15 Recommendations:

1. The City Corporation team should ensure that future updates of the lighting strategy and riverside walk enhancement Strategy retains historic lighting but enables incremental raising of the flood defence structures
2. Those undertaking works to the flood defence should retain or reposition lighting structures of historic significance to enable flood defence raising.

FUNDING SP16

SP 16 - Funding

The City Corporation will work with the Environment Agency, Defra, the Greater London Authority and riparian owners to explore effective funding mechanisms for future flood protection to combat sea level rise in line with the TE2100 Plan.

- 5.47 A key issue that has arisen throughout discussions on implementing the Thames Estuary 2100 Plan is that of funding and who will be responsible for funding the required works.
- 5.48 The [Metropolis Management \(Thames River Prevention of Floods\) Amendment Act 1879](#) requires riparian owners to carry out flood works maintaining the flood

defences that they own. The act defines flood works as follows: *The expression "flood works" means the entire or partial construction, alteration, reconstruction in the same or any altered position of any bank and the repairing, raising, strengthening improvement or removal of any bank and the enlargement, contraction, raising, lowering, arching over, improvement or alteration of any sewer, channel or water course, and the discontinuance, closing up or destruction of any such sewer channel or watercourse necessary for the protection of lands within the limits of this Act from floods or inundations caused by the overflow of the River Thames.*

- 5.49 For the City's short stretch this would apply to over 20 riparian owners. The costs for each riparian owner will vary depending on the length of flood defence, the level of raising required, the opportunity to incorporate raising into other planned works and the degree to which they incorporate other benefits. Other potential options for funding include the use of a Community Infrastructure Levy which could be applied to all areas that would benefit from the improved flood defences. Alternatively, the flood defence raising could be centrally funded as a nationally significant infrastructure project or through flood defence grant in aid with contributions from beneficiaries. Exploration of these options is outside the scope of the City Corporation's strategy and must be considered at a wider scale. The City Corporation will seek to carry out a cost benefit analysis for some City Corporation owned sections of the flood defence. This will provide evidence for funding discussions, and a realistic picture of potential costs to riparian owners of implementing the TE2100 Plan.
- 5.50 Some riparian owners may challenge the legal basis of this requirement and the degree to which other TE2100 planned works such as replacement of the Thames Barrier should prevent the need for local defence raising. The logistics of ensuring that the whole of the flood defence is raised to the required level and connected to adjacent stretches will be a challenge. There is a danger that lack of funding will result in riparian owners failing to adequately complete this task. There are also challenges in establishing ownership and riparian responsibility, particularly where flood defence structures are not associated with adjacent buildings or extend over the riverbed or where lease arrangements are in place.

SP15 Recommendations:

1. The Environment Agency should work with central Government, the GLA, LLFAs and riparian owners to establish what level of financial support will be needed to implement the TE2100 riverside strategy approach.
2. The Environment Agency, Defra or GLA should develop a mechanism for Thames wide financial support to ensure that flood protection is not compromised by lack of funding.
3. The City Corporation should seek to carry out a cost benefit analysis for raising of some City Corporation owned sections of the flood defence.

4. The City Corporation as LLFA should assist with funding applications for the raising of flood defence infrastructure.

GOVERNANCE and STRATEGY REVIEW SP 17

SP17 - Governance & strategy review

The Planning & Transportation (P&T) Committee, supported by the officer level Flood Risk Steering Group, will oversee the implementation of this strategy which will be reviewed at least every 10 years.

- 5.51 Sea level rise and other climate impacts are dependent on the global effort to reduce carbon emissions in line with the Paris Agreement. Ten-year reviews of the UK Climate Projections (UKCP18) and the Thames Estuary 2100 Plan will highlight changes in the speed of sea level rise. This in turn will influence the dates when action is needed for local flood defences. If sea level rise accelerates the dates may be brought forward rather than the actions changing. Alongside this the City Corporation has committed to reviewing its Strategic Flood Risk Assessment every five years providing local data to inform this strategy. These sources of evidence are essential to ensure that the City's response takes account of the latest climate data.
- 5.52 The City Corporation's actions as Lead Local Flood Authority have been delegated to the P&T Committee. The actions outlined in this strategy will be implemented and monitored through the City Corporation's statutory Local Flood Risk Management Strategy (LFRMS) reporting progress annually to the P&T Committee, the Environment Agency and Defra.

SP16 Recommendations:

1. The City Corporation will keep up to date with climate impacts on the City's riverside through a range of evidence sources and review this strategy at least every 10 years.
2. Implementation, monitoring and reporting will be through the LFRMS and will be overseen by the officer level Flood Risk Steering Group and P&T Committee.

6. IMPLEMENTATION, RESOURCES and RISKS

- 6.1 The implementation of this strategy will be led by the City Corporation in its statutory roles as Lead Local Flood Authority and Local Planning Authority. The adopted Local Flood Risk Management Strategy 2021-27 (LFRMS), which is a requirement of the Flood and Water Management Act 2010, includes a commitment to prepare a Riverside Strategy. This strategy 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.

- 6.2 Where recommendations relate to external bodies, existing partnerships and relationships shall be used where possible to facilitate these actions. Governance structures, confidentiality agreements, and memorandums of understanding will be used where necessary to facilitate partnership working, setting out the key objectives, working arrangements, decision making processes and any dispute resolution for the duration of the collaboration.
- 6.3 The City Corporation has developed a range of resources which have informed this strategy and are available on request:
- Drone video showing the City's riverside – July 2020
 - Point cloud of the flood defences and riverside - July 2020
 - Survey report including details of the flood defence structures and possible raising options 2020
 - Flood Risk Briefing Notes for individual riparian sites on the City's riverside
 - City of London Strategic Flood Risk Assessment
- 6.4 This strategy has been developed in response to Corporate and Departmental risks relating to climate change and flood risk. The strategy seeks to provide both appropriate flood defences and shape an outstanding riverside space. Without appropriate flood defences, there is a risk of damage to property and infrastructure and potential loss of life through catastrophic flooding. If opportunities are missed to shape an outstanding riverside space, the experiences of riverside users will be greatly diminished with an impact on the City's reputation. This could also represent a failure to realise the full potential of the City's riverside as a strategically important asset.
- 6.5 There remains substantial uncertainty with regards to the speed and impact of sea level rise and the implementation, funding and future legislative requirements of the Thames Estuary 2100 Plan. This strategy has been developed fully acknowledging this uncertainty (and also the adaptive approach of the wider plan) and has been written to enable future flexibility while still allowing practical interventions now. However, this uncertainty still represents a risk to the successful implementation of this strategy.

7. APPENDIX 1 Where are we now – Riverside maps

See separate document

8. APPENDIX 2 Illustrative defence raising options

See section 5 of City of London Riverside Survey Report (Arcadis 2020)

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This document summarises the evidence base for the City of London Riverside Strategy, providing data and mapping from our desktop study, drone survey and associated technical report and City Corporation Geographic Information System

City of London Riverside Strategy

Appendix 1 Where are we now – the evidence base

Raising Requirements – End of Stage 2 (2065)

In order to determine the magnitude of raising of the flood defence that is required to meet the TE2100 levels, we need to know what the current levels are. All of the tidal flood defences within the City currently meets the current statutory requirements from the Environment Agency (5.41m and 5,28m AOD upstream and downstream of London Bridge respectively). But there are large variations in how much they go above these levels

Raising requirements have been set out for both the end of Stage 2 (2065) the 2065 Level (5.8m AOD) and the end of Stage 3 (2100) the 2135 Level (6.3m AOD) (please note, these dates could be brought forward by the Environment Agency in line with climate change projections).

The magnitude of raising requirements were determined from a survey of the flood defence heights in July 2020. A survey measured the heights of the flood defences and consultants compared to the existing defence levels. This maps shows the indicative level of raising required for each section of the river flood defence to provide the 2065 defence level.

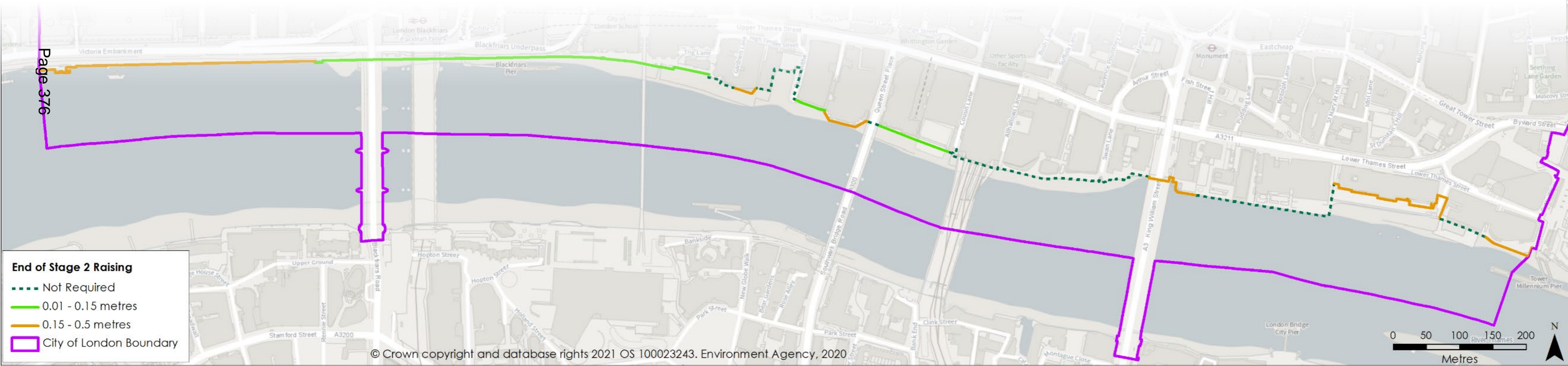
The survey made assumptions about the flood defence structures and more detailed surveys will be needed to ascertain the exact flood defence level for individual structures where works are proposed. This will be particularly important where the parapet is incorporated into the defence.

There are discreet areas in which no raising is required to reach the 2065 Level. Where raising is needed it is generally only up to 150mm with the exception of 6 sites which require more significant raising.

How does this impact the Strategy?

There are significant stretches of the flood defence which will not need to be raised before the end of Stage 2 (2065). The strategy should focus on the areas that require raising to first TE2100 level, whilst still enabling preparation for raising to higher level at a later time. Areas needing raising at the first stage intrinsically need raising to the higher level in future, which will impact choices on implementing raising and the design for future raising.

The magnitude of raising required will impact the scope and range of benefits that raising may unlock



Raising Requirements – End of Stage 3 (2100)

The TE2100 Plan has two target dates at which different levels of raising need to be implemented. The later of these is for the end of Stage 3 (2100) and is intended to provide protection up to 2135 and requires a defence level of 6.3m AOD along the whole stretch of the City's riverside.

Similar to the Raising Requirements – End of Stage 2 map the current levels of the defence from the 2020 survey have been compared to the proposed flood defence levels. This gives an indication of the magnitude of raising required in each stretch.

The majority of the City's riverside will need some form of flood defence raising to achieve the higher level.

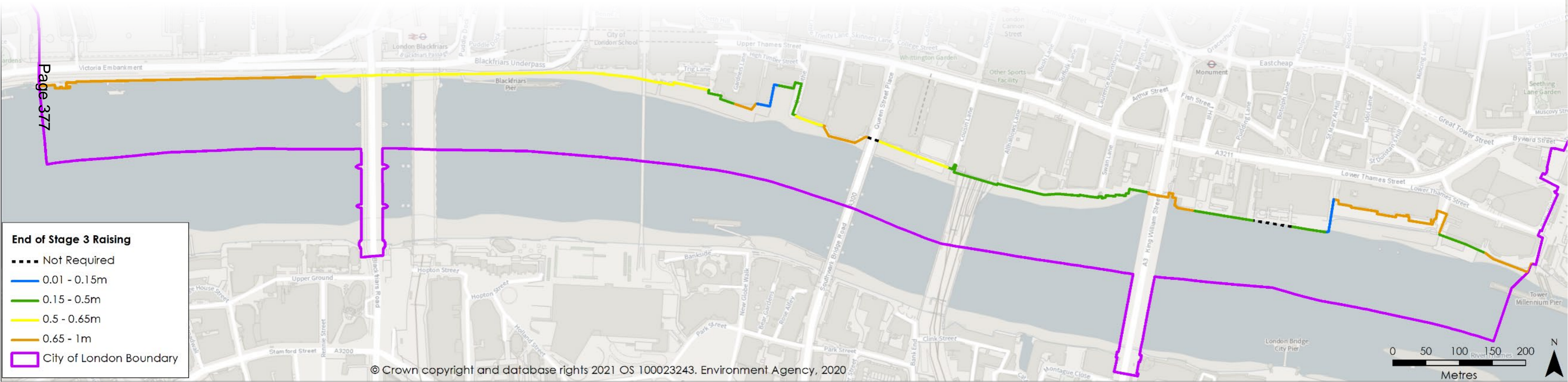
These raising requirements shown do not account for raising that will occur before Stage 3 to achieve the 2065 Levels. Work to implement the early level will be an opportunity to implement at the higher defence level at an earlier stage. At very least the earlier works should enable raising to the future level.

Adjoining sites require different levels of raising, the continuity of the defence should be accounted for especially where sections are raised separately.

How does this impact the Strategy?

The phasing of defence raising works will be impacted by the implementation method and whether previous works have been required to achieve the 2065 Level. Earlier raising to the 2135 Level and where works allow for future raising will minimise disruption in areas where direct intervention is required and will help towards ensuring a continuity of the defence.

The expected design life of defence structures will have to be considered when assessing the feasibility of raising the defence to the higher level.



Non-Developable Sites

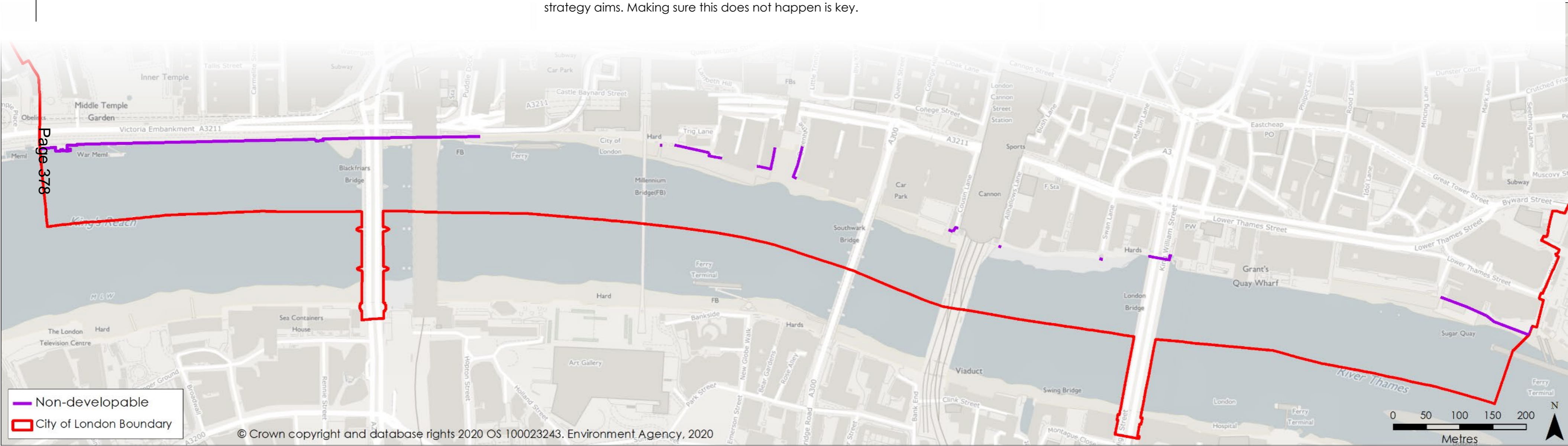
A proportion of the flood defence raising can be achieved through re-development of riverside sites over the coming years.

However, there are certain areas that have been identified that will not come up for development. These are areas such as Victoria Embankment that is not associated with a development as it is along a road. Also, areas that have recently been developed so will not come up again before the flood defences need raising.

Other areas include ends of roads down to the river such as the end of Cousin Lane and Allhallows Lane. These sites would be raised by direct intervention but would not be consistent with the rest of the riverside and would not benefit from the wider strategy aims. Making sure this does not happen is key.

How does this impact the Strategy?

As these areas have been identified, a plan needs to be in place on how these will be raised outside of developments.



Historic Environment

The whole riverside is of significant historical importance as it is the birthplace of London. The foreshore is littered with archaeological finds from history that have been logged on the *Greater London Historic Environment Records* database, but there will be many more that haven't been found yet.

There are 2 conservation areas adjacent to the riverside, The Temples and Whitefriars. Both are on the west side of the City.

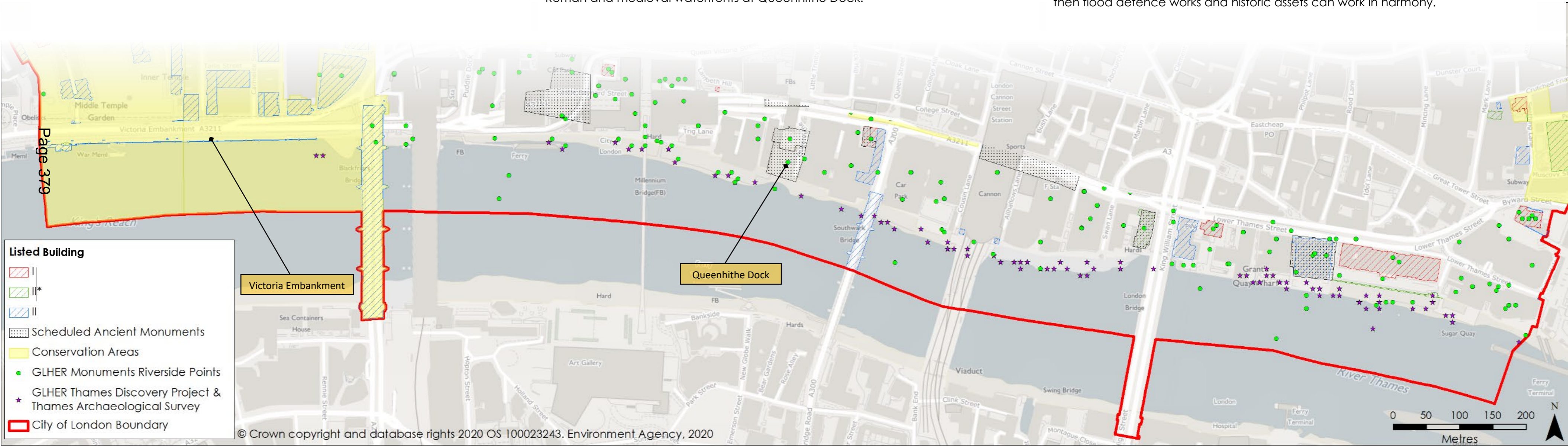
There are many listed structures along the riverside including bridges, railings, buildings and the actual flood defence, most notably the Victoria Embankment on the west side of the City.

There are also scheduled ancient monuments along the river, most notably the Roman and medieval waterfronts at Queenhithe Dock.

How does this impact the Strategy?

The City's riverside is steeped in history but much of it cannot be seen or appreciated currently. This brings an opportunity to bring out the historic importance of the riverside through this strategy.

Sometimes historic assets can limit the amount of work that can be done on a site, but if this strategy makes sure to highlight the historic importance of the riverside, then flood defence works and historic assets can work in harmony.



Land Use and Ownership

There are over 20 different landowners along the Riverside with a mix of public and privately-owned land. Public owners include the City Corporation and other public bodies such as the PLA. Land use along the river is mainly commercial offices, with two distinct residential cluster. There are around 320 residential units in each clusters, this accounts for around 8% of the total City's residential units (City of London's LLPG, 2021). Currently, it is the landowners responsibly to maintain and raise the flood defence that falls within their boundary.

There is the additional layer of complexity with freeholders and leaseholders of land. Different agreements may be in place about who pays for maintenance of the flood defence (therefore the raising), the freeholder or leaseholder.

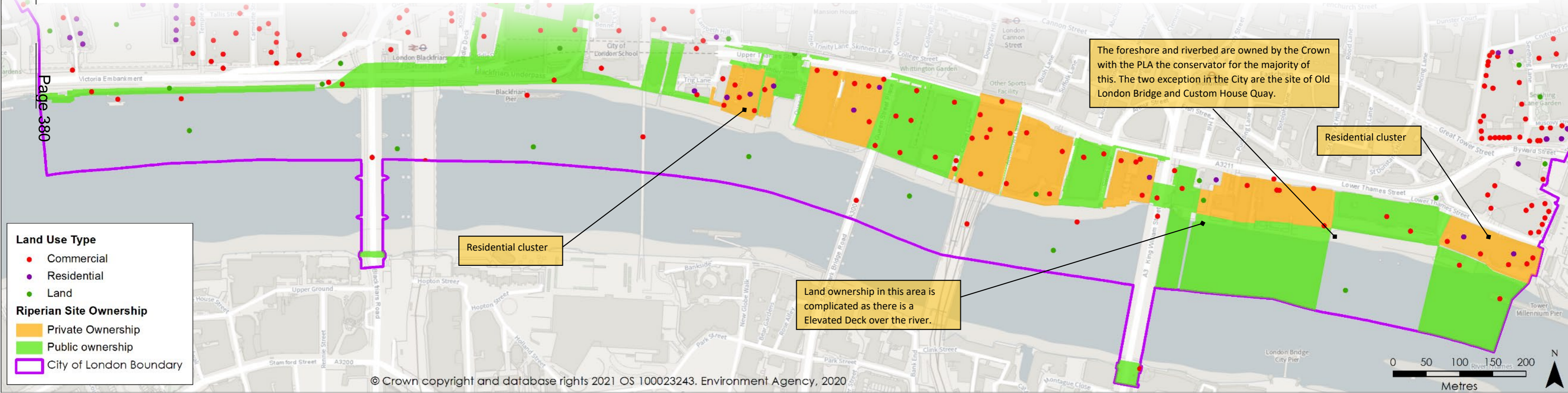
The emerging CityPlan 2036 promotes a mix of commercial and cultural uses being led by office development to add vibrancy to the riverside. Any development on or over the river is restricted to uses which require a riverside location for a river use. Freight and passenger transport are also encouraged, as well as waste (residential and construction) transport from Walbrook Wharf.

A more detailed breakdown of land use can be found in the [Thames Strategy SPD](#).

How does this impact the Strategy?

With over 20 landowners, plus leaseholders, the individual raising of the flood defence by each owner could result in a sporadic, random mix of raising methods. This would impact the riverside walk and public access. Also, if one owner does not do the raising, the whole project fails. A strategy to make the flood defence raising coherent is vital to maintain riverside views and accessibility.

When interviewing one of the owners along the river, much emphasis was put on bringing all the parties involved to get a joint up approach on how the raising is going to be done.



Access to the Riverside

Access to the riverside from the rest of the City is quite poor in most areas. As the riverside is built up, there are few opportunities to open up areas for access.

There is a busy road behind the row of buildings directly at the riverside. This is another barrier to access to the riverside as it can be hard to cross and is not a particularly pleasant environment.

There are a number of stairs and lifts that bring people to the riverside. Currently, the whole riverside walk is wheelchair friendly. However, the City Corporation has had long term success in securing public access to the riverfront via development.

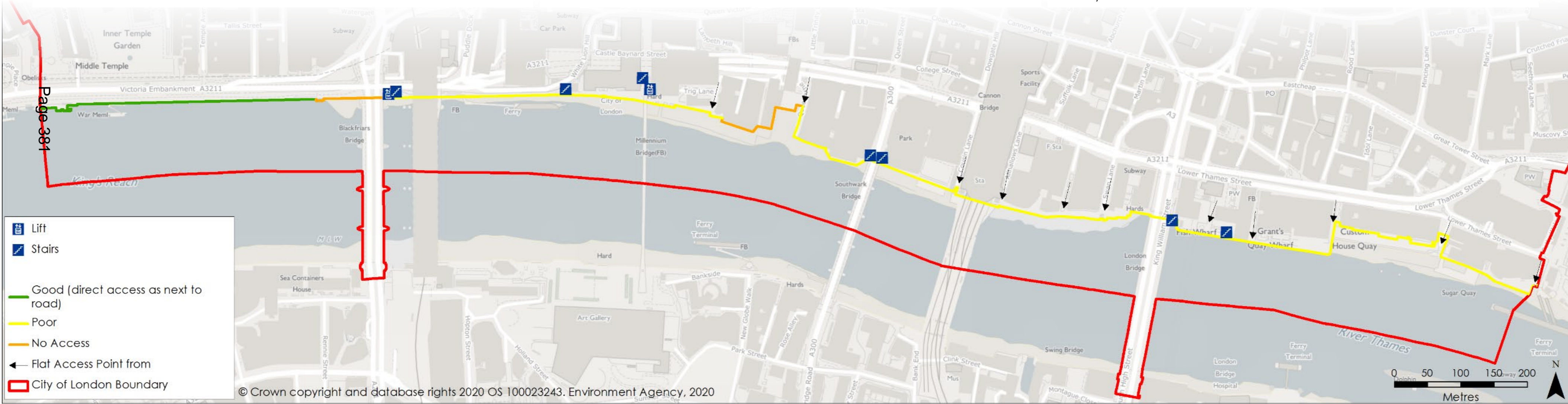
The Thames Path runs almost continuously along the City's Riverside and is an important, low pollution, east-west pedestrian route through the City. Strava, the running and cycling app, shows the City's riverside is almost constantly used by runners at all times of day and throughout the week. 121 interviews show the riverside is liked by runners and walkers as it is wider than most footpaths in London, is not polluted and has nice views across the river, you can see the sky.

How does this impact the Strategy?

Opportunities to increase access to the riverside will only come with development of a site. Every opportunity should be taken through planning to secure better access.

If raising works are to be done by each owner at different times, then there may be issues of wheelchair access between sites if one walkway is higher than next doors.

As an important route in the City, any works to the flood defences may impact the usability of the riverside walk.



River Safety

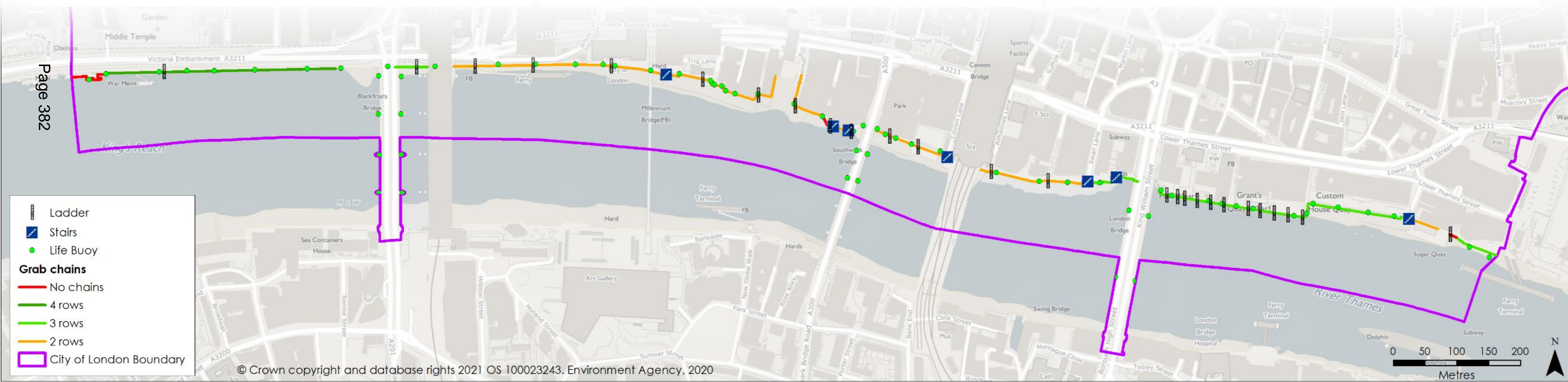
Lifesaving equipment include life buoys and grab chains.

There are also many access points such as stairs and ladders out of the river and foreshore.

The emerging City Plan 2036 Policy s17 Thames Policy Area requires "maintaining and enhancing access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards."

How does this impact the Strategy?

This equipment and access points should be retained and ideally improved upon going forward.



Natural Capital and Biodiversity

The River Thames is a huge part of the natural capital of the City as a Site of Metropolitan Importance for Nature Conservation.

There are a number of green roofs along the riverside, linking the important river habitat to other natural spaces.

However, the majority of the riverside walk is hardscape, with a few trees dotted along the riverside and a few planting beds.

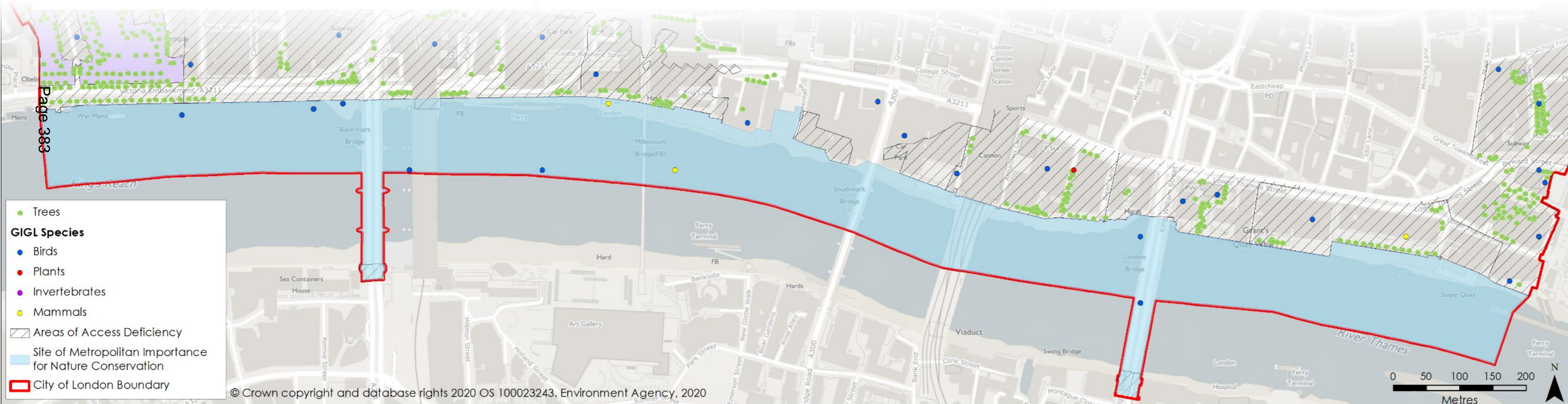
Read more about biodiversity in the City on the website:

<https://www.cityoflondon.gov.uk/things-to-do/city-gardens/target-species>

How does this impact the Strategy?

There is huge opportunity to increase natural capital along the riverside. Creating green corridors from the river into the City could increase biodiversity in the whole City.

Going forward, increasing tree shade cover should be prioritized as the riverside is south facing and is going to be a hot area when temperatures rise in line with climate change projections.



Public Realm Furniture

This map and the map on the next page show bins, benches, bollards and lighting on the riverside.

There are specific design guides and technical manuals on the Public Realm section of the City of London website:

<https://www.cityoflondon.gov.uk/services/streets/public-realm-and-lighting-design-guidance>

Lighting is a consistent feature along the riverside, it is well lit throughout with a lot of the lighting mounted on the flood defence wall.

Benches are sporadically spaced along the riverside, some areas have a lot of benches, other having none. This may be due to the width of the riverside walkway being narrow in some areas.

Bins are again sporadically placed along the riverside with a lot in some areas and none in others.

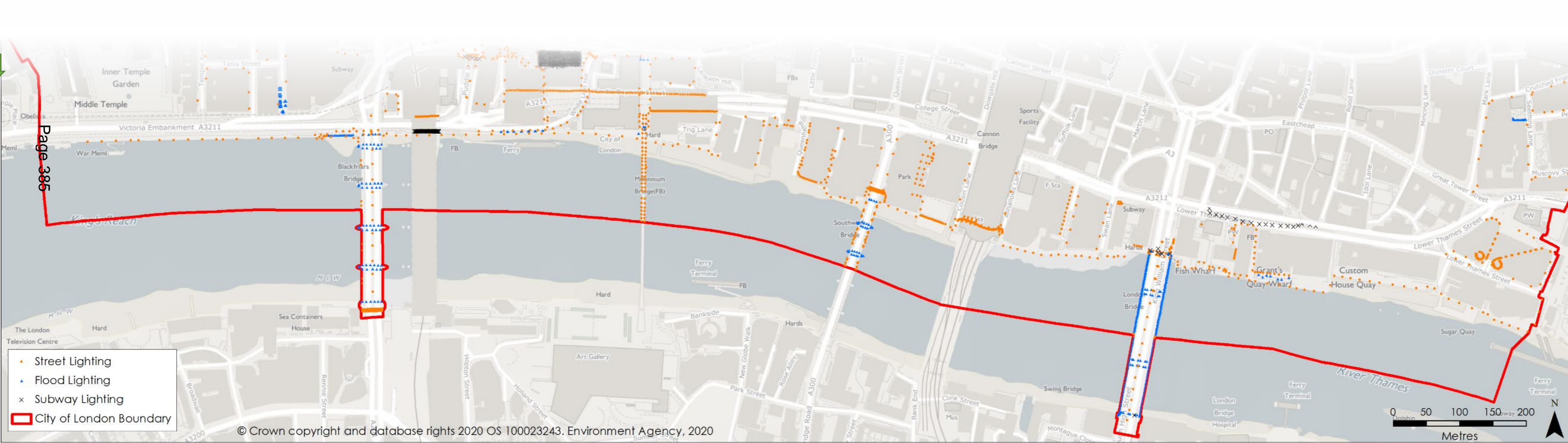
How does this impact the Strategy?

This strategy will allow more useful public realm features to be integrated into the riverside. This will be in line with the City of London's Public Realm guidance.

Lighting may need to be reconsidered as part of the river wall, as it may be difficult to raise lighting columns.



Public Realm Furniture- Lighting



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This appendix is an extract from the City of London Riverside Survey report November 2020 undertaken by Arcadis. For a copy of the full report please contact floodrisk@cityoflondon.gov.uk

City of London Riverside Strategy

Appendix 2 Illustrative defence raising options

The options given in this extract are for illustrative purposes only and are not intended to be recommendations and do not cover all possible options for flood defence raising.

5 Options for Raising Flood Defences

This section explores potential options for raising flood defences. The table in Appendix C indicates which options could be applicable to the various areas of the wall covered in the survey. It should be noted that this does not form a comprehensive feasibility study. The options shown may not be a suitable or preferred solution and other options may become apparent following further targeted study.

5.1 Option A - Raising Existing Parapet or Wall

Increasing the existing height of many sections of the current defences could be achieved by raising the height of existing solid parapets, shown in Figure 16.

This solution would involve removing any existing coping stones and raising the height of the parapet to the required level before reinstalling copings and other features. Any lighting columns located on top of the existing defences would also need to be removed before the defences are raised but could then be replaced on top of the new section upon completion.

Raising the existing structure height can offer a cost-effective and environmentally sustainable solution which maximises the use of the existing structure. Whole life maintenance requirements and costs would also be relatively low, and new materials could match the existing defences.

The underlying river wall and existing parapet wall would need to be assessed to ensure they have suitable capacity for the flood loading. This may require intrusive investigations to obtain sufficient detail on the existing structure. If the underlying structure is found to be inadequate, then complex and costly strengthening may be required.

If the existing structure is of heritage importance, options for raising it will be constrained depending on the specific details of the listing.

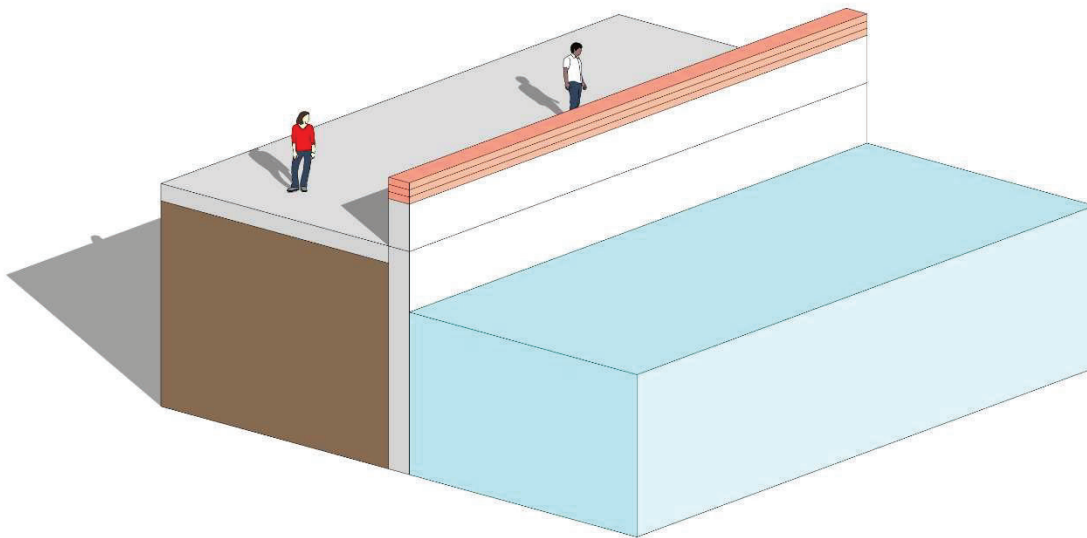


Figure 16 - Raising Existing Defences Solution Sketch

5.2 Option B - Glass Parapet on Top of Existing Defence

Existing flood defences can be raised through the use of structural glass parapet panels, as illustrated in Figure 17. Glass panels would be installed on top of the existing defences and offers a more contemporary solution to provided flood defence. The underling river wall and existing parapet wall would need to be assessed to ensure they have suitable capacity for the flood loading. This may require intrusive investigations to obtain sufficient detail on the existing structure. If the underlying structure is found to be inadequate, then complex and costly strengthening may be required.

Self-cleaning coatings can be applied to the glass to prevent build-up of surface contaminants reducing maintenance inputs.

A major advantage of this solution is that the glass panels can cause less visual intrusion and enable views to be maintained, a particular benefit if the height of the wall relative to the pavement is high.

Each glass barrier is formed of high strength structural glass within engineered frames. The glass walls are designed for marine environments and to withstand static and impact loads. The watertight glass walls can provide flood protection by up to 1.8m as standard. The glass walls can be provided as individual panels which are incorporated into solid flood defences, or as a completely free-standing glass wall. Multiple panels can be used to cover span any length of wall and can follow any contour too. Concealed tamper proof fixings are also used to reduce the possibility of vandalism.

Glass walls can however be more expensive compared to Option A above, and generally offer a 50-year design life. They may also not be suitable for structures of heritage importance.

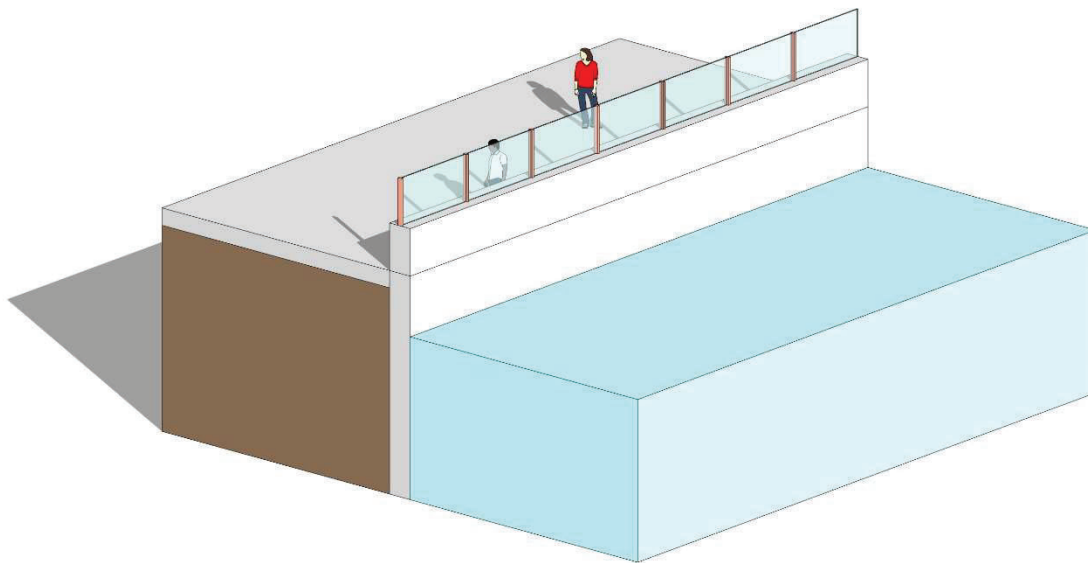


Figure 17 - Glass Parapets Solution Sketch

5.3 Option C - Demountable Barriers

Demountable barriers have the flexibility of being fully removable when not required. An example of this solution in situ is depicted in Figure 18 below. The barriers are typically formed of aluminium panels inserted into steel channel posts. Clamps are used to compress seals to create a watertight barrier against flood water. Barriers can be used on slopes up to 20° and can accommodate step and direction change for flood depths up to 4m.

The demountable barriers can be fitted to suitable existing foundations using chemically fixed sleeve anchors. When removed, only stainless steel bolt blanks are visible at each post location. Spans of 3m, unsupported, and up to 6.5m, supported with back bracing, are possible. The barrier beams weigh 8kg/m which generally allows for safe single-person lifting of beams up to 2.5m long.

The demountable barriers solution can be well-suited to locations where access or open space is required, such as at stairways and other small sections of the existing defences. Due to the assembly operation prior to a flood, this solution could have onerous operational requirements, especially if significant lengths are required to be installed due to the on-call personnel required. The underlying structure would also need to be assessed to ensure it has sufficient capacity.

This solution may be more favourable for heritage structures as it is visually less onerous.

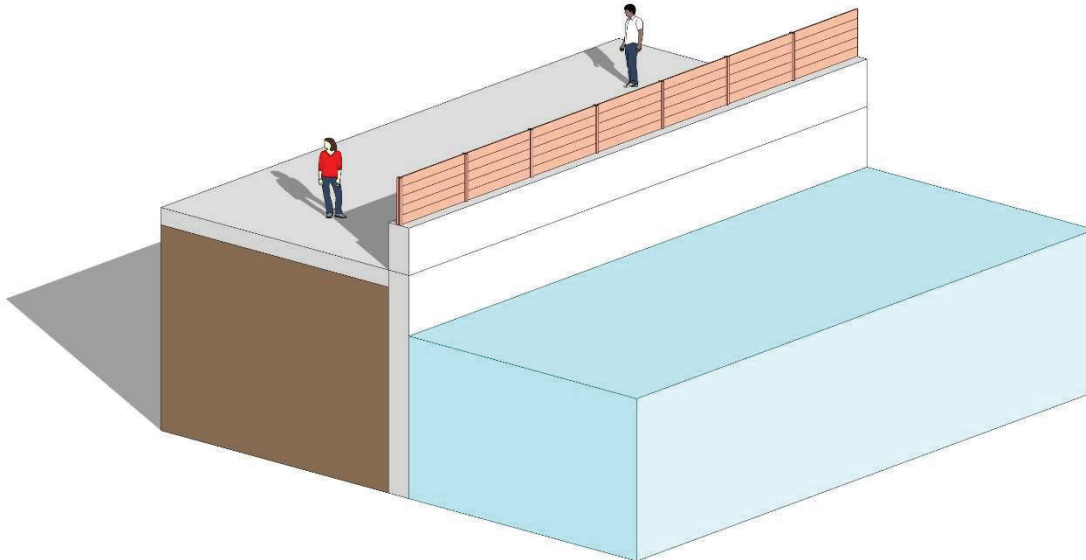


Figure 18 - Demountable Barriers Solution Sketch

5.4 Option D - Build-Out

At certain locations along the river a new, elevated, structure either cantilevered or supported on piles could be constructed in front of the existing flood defences. The form of this defence could be specified to complement existing structures and is particularly suited to areas where existing buildings form the current defences. It could be self-supporting or supported from the existing structure (subject to a suitable assessment). It could also form part of the overall riverside strategy, providing riverside access where there currently is none.

This is however likely to be an expensive option and will be visually intrusive, which may not be suitable in some areas with heritage constraints. In addition, it will likely locally impact the flood capacity of the river. The Environment Agency are usually opposed to any reduction in flood capacity on the Thames foreshore so gaining consent for this option would be onerous.

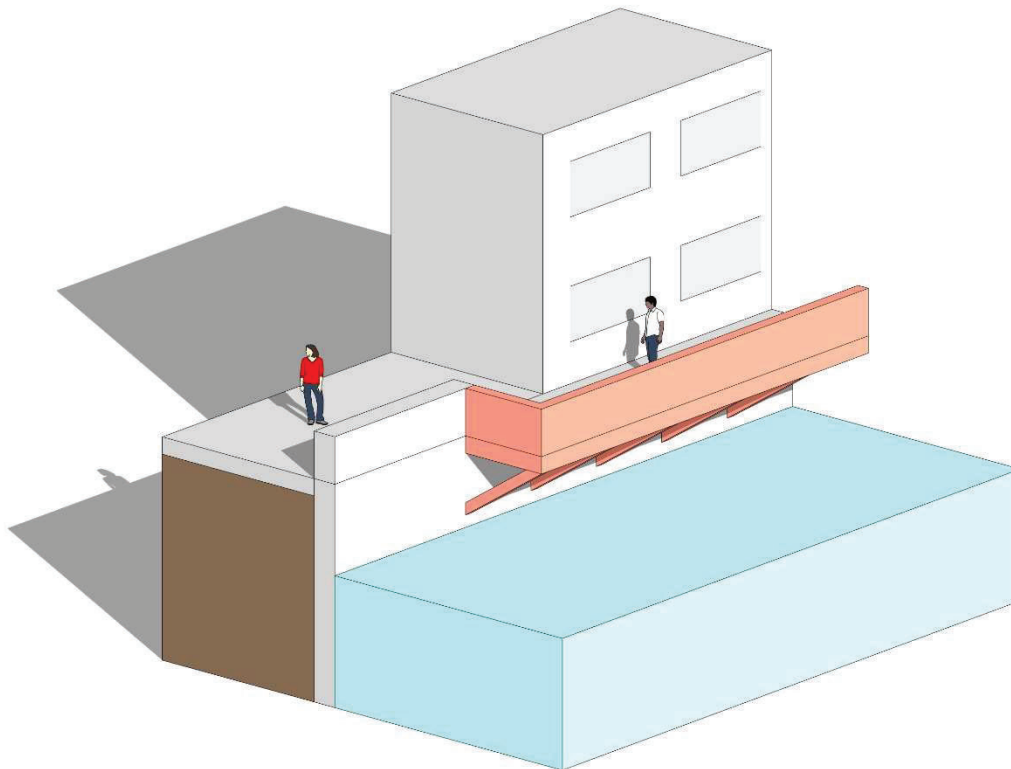


Figure 19 - Build-Out Solution Sketch

5.5 Option E - New Barrier Behind the Existing Defence

For sections of riverside walkway where there is sufficient space behind the existing wall, a new permanent flood defence barrier could be constructed, shown in Figure 20. Depending on the local site constraints, the distance of the new barrier to the existing can vary to suit its environment e.g. between a carriageway and footway.

The provision of a separate barrier discrete from the existing flood wall defences could reduce the need for structural investigations and strengthening of the existing wall. However, the new wall may require foundations in footways/carriageways that can be very congested with utilities which would complicate construction and may require diversions.

This option could be beneficial for heritage structures as it is possible to provide defences without impacting the heritage structure. Furthermore, it could be incorporated into a wider streetscape scheme with increased social benefits such as providing dedicated cycle lanes separated from traffic, or hard landscaped areas where defences levels are incorporated into the overall design. In some areas, existing set back walls could be repurposed as flood defences without materially changing the current aesthetics.

The use of set-back walls are likely to require flood gates or demountable barriers where the set-back section of wall connects to the riverside sections of flood wall. This has operation and maintenance considerations.

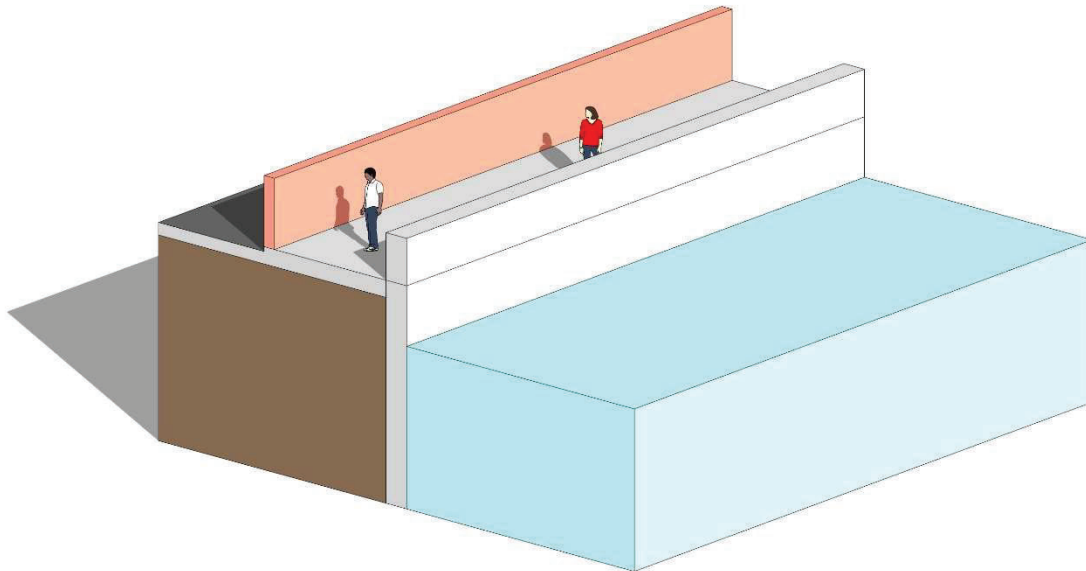


Figure 20 - Barrier Behind Existing Defence Solution Sketch

5.6 Option F - Flood and Storm Tide Gates

At locations where small gaps are present in the existing flood defence walls, such as at stairways to the foreshore and at pier or quay access points, flood gates can be provided.

Flood gates can open horizontally or vertically and can be moved manually, hydraulically, or electrically. Flood gate defence types can come in the form of lift-hinge, swing-hinge, pivot and sliding. Each of these can be operated by a single person and can be single or double leafed. The gates can be fully lockable with a single locking point, and be provided with anti-theft and vandal resistant features. An example sketch of a single leafed swing-hinge gate is depicted in Figure 21.

Gate components are typically manufactured from structural steel, aluminium, and/or stainless steel and can have low maintenance requirements. The gates are designed for extreme weather durability and have design lives in excess of 25 years, after which the seals may need to be replaced.

Depending on the product selected, both horizontally and vertically opening gates can be provided which would not impede wheelchair or pushchair access. Gate sizes can vary and can range anywhere up to 6.4m wide and 4.4m high for single gates. Double gates can also be provided for situations up to 9m wide and up to 4.5m high with a demountable central post.

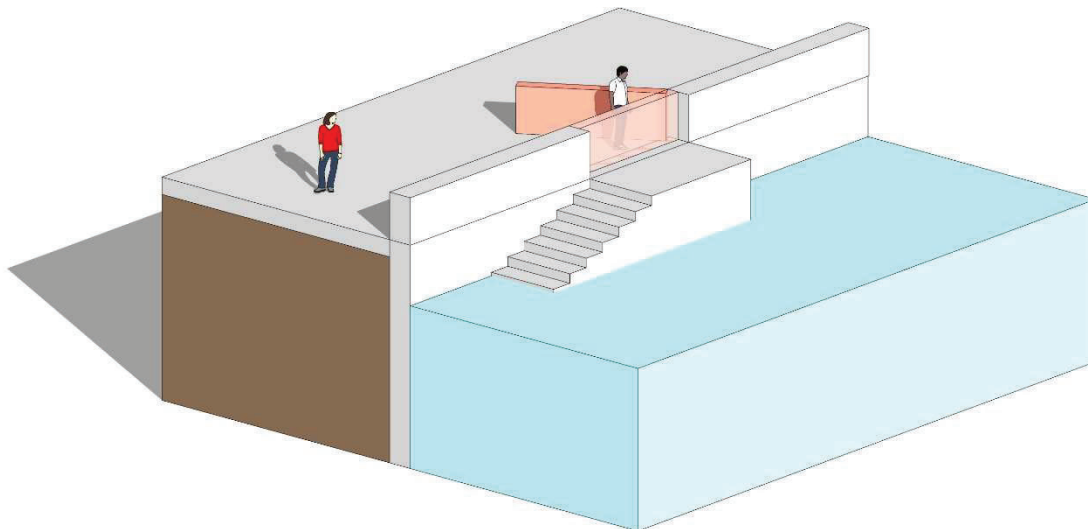


Figure 21 - Flood and Storm Tide Gates Solution Sketch

5.7 Option G - Self-Activating Barrier

The Self-Activating Barrier (SAB) is a flood defence system which uses the rising level of floodwater to automatically raise the barrier from the ground. A sketch of the barrier is shown in Figure 22 and a diagram explaining how the system works is illustrated in Figure 23.

The SAB can be installed to any length and can be constructed up to 2.5m high. Steel basins are used for lengths up to 8m and are supplied prefabricated with the floating wall for ease of installation. For lengths in excess of 8m, a concrete basin is required, with post breaks every 12m. The barrier is flush with normal ground level when not in use, allowing wheelchair, push-chair and other user users to pass unimpeded and results in an uninterrupted view.

Due to the system being powdered by the approaching floodwater, no human, mechanical or electrical intervention is required, either to raise the barrier or to act as a warning system and therefore operational costs are minimal. After 50 years the seals may need to be replaced.

The SAB is a high-cost solution compared to some alternate options and also requires a relatively deep foundation.

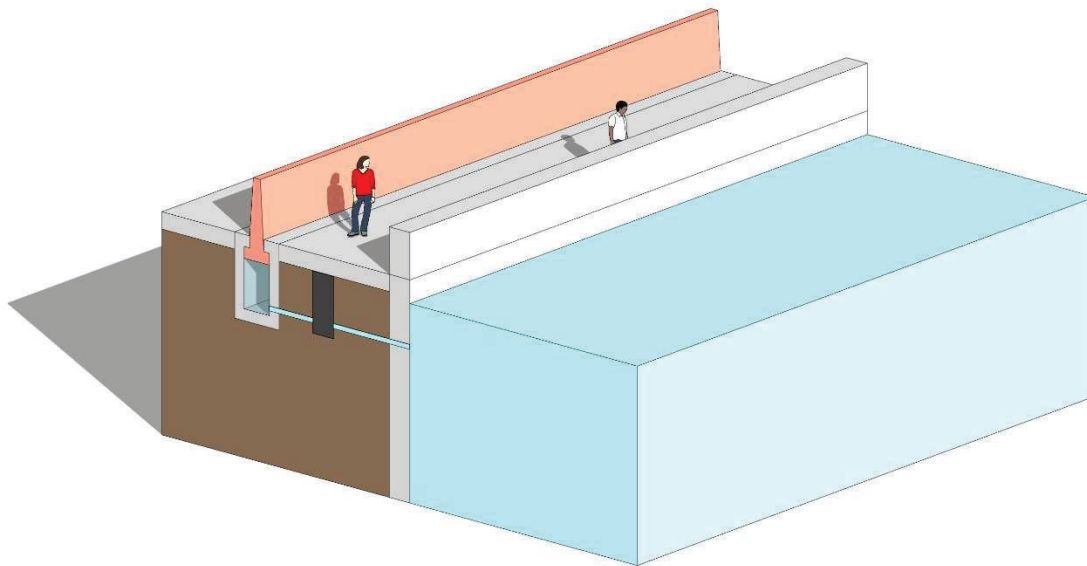


Figure 22 - Self-Activating Barrier Solution Sketch

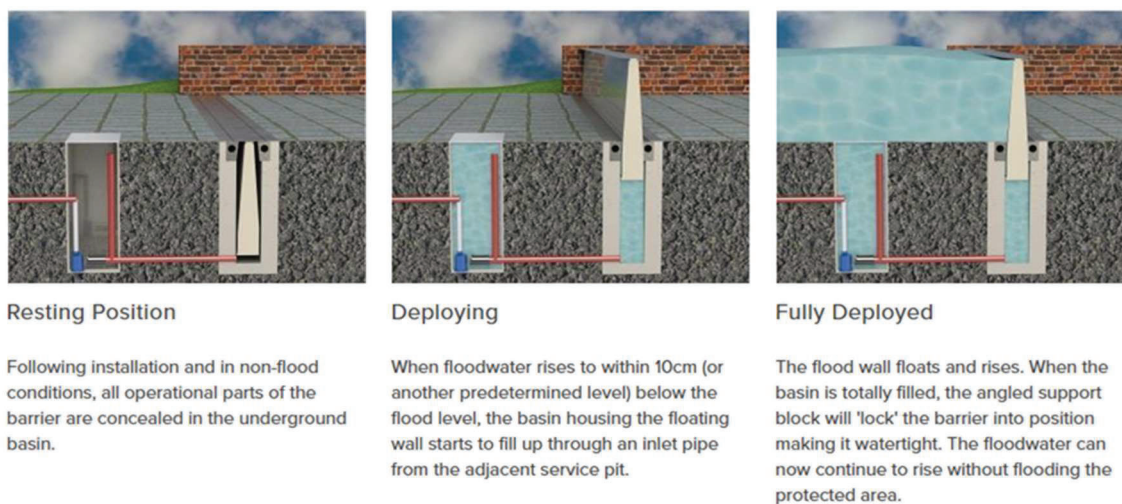


Figure 23 - Self-Activating Barrier System Mechanism (© M3 Floodtec)

5.8 Option H - Construct a New Wall and/or Parapet

This option would provide a new flood defence parapet on top of the existing river wall. This could be either to replace existing sections of open post and rail parapets, or to replace existing solid parapets where it is not economically viable to strengthen them. An example of this can be seen in Figure 24 below.

The construction of a new wall or parapet allows for greater flexibility in its specification compared to other options. A new wall could be constructed from a variety of material options, such as masonry, concrete, glass and timber. The existing river wall, or other underlying structure, would need to be assessed for capacity and may need to be strengthened or even replaced. Options may also be limited in areas of heritage importance.

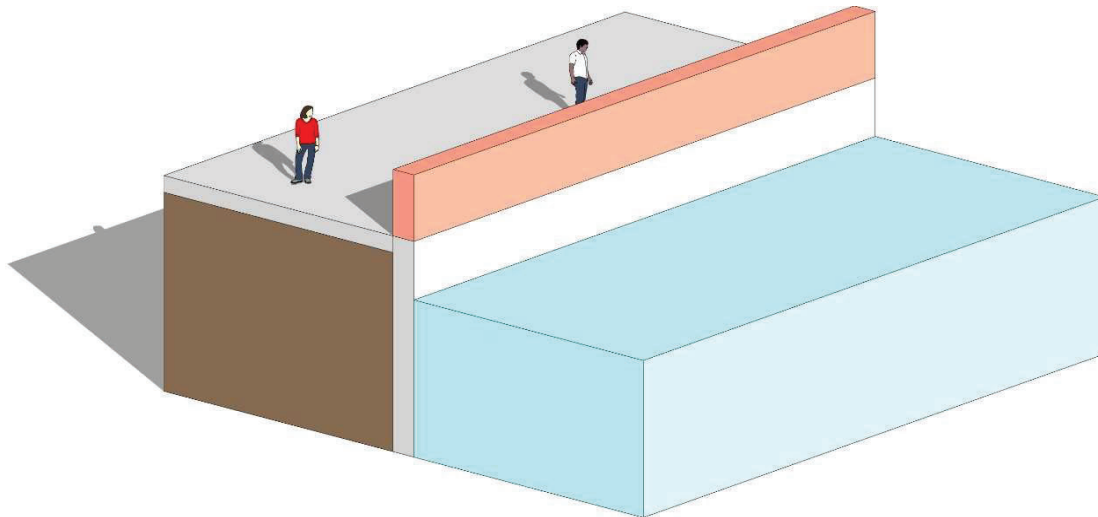


Figure 24 - New Wall or Parapet Solution Sketch

5.9 Option I - New Wall in Front of Existing

This option would construct a new wall in front of the existing wall and can be seen in Figure 25. Although this option as the benefit of providing addition riverside space it has been discounted at this stage and is noted here for purposes of completeness only. The reason for this is that building out into the Thames will have significant impacts to the flood capacity and characteristics of the river in this area. The Thames is relatively narrow at this location and it is very unlikely that consent would be given for this type of solution. In addition, large sections of the river wall are either of heritage importance or visually contribute to the unique feel and aesthetic of the Thames riverside in this area. Building a new wall in front of the existing wall would significantly change this aesthetic and is therefore likely to encounter heritage approvals issues.

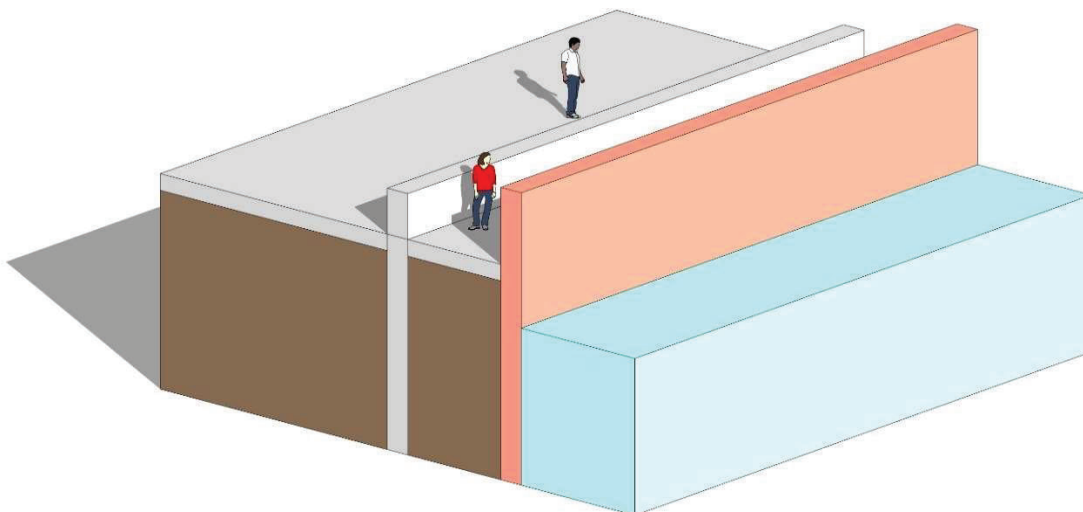


Figure 25 - New Wall in Front of Existing Defence Solution Sketch

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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

Page 397

What is due regard?	How to demonstrate compliance
<p>• It involves considering the aims of the duty in a way that is proportionate to the issue at hand</p> <p>• 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</p> <p>• 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Case law has established the following principles apply to the PSED:</p> <ul style="list-style-type: none"> • Knowledge – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind. • Sufficient Information – must be made available to the decision maker • 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. • 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. • 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 • 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.

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.

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.

- **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 data 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

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.

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 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.

- 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: Riverside Strategy					
2. Brief summary (include main aims, proposed outcomes, recommendations / decisions sought):					
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:					
Page 399	Protected Characteristic (Equality Group) <input checked="" type="checkbox"/>	Positive Impact	Negative Impact	No Impact	Briefly explain your answer. Consider evidence, data and any consultation.
	Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If this work is NOT complete, then future generations will have to deal with major flooding in London
	Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Accessibility between riverside sites has been recognised in the strategy.
	Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Marriage and Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Pregnancy and Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Accessibility between riverside sites has been recognised in the strategy.
	Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Sex (i.e gender)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. There are no negative/adverse impact(s)					
Please briefly explain and provide evidence to support this decision:		The possible negative impacts have been resolved in the text.			

5. Are there positive impacts of the proposal on any equality groups? Please briefly explain how these are in line with the equality aims:

6. As a result of this screening, is a full EA necessary? (Please check appropriate box using)

Yes

No

Briefly explain your answer:

7. Name of Lead Officer: Holly Smith

Job title: Environmental Resilience Officer

Date of completion: dd/mm/yyyy

Signed off by Department
Director :

Name:

Date:

Committee(s)	Dated:
Planning & Transportation Committee	29 June 2021
Subject: Department of the Built Environment Risk Management – Quarterly Report	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?	No
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 Information
Report author: Elisabeth Hannah	

Summary

This report has been produced to provide the Planning & Transportation Committee with assurance that risk management procedures in place within the Department of the Built Environment are satisfactory and that they meet the requirements of the corporate Risk Management Framework.

This report only considers risks managed by the Department of the Built Environment that fall within the remit of the Planning & Transportation Committee. Parallel reports regarding risks that fall within the remit of the Port Health & Environmental Health Committee are submitted to that Committee.

Risk is reviewed regularly as part of the ongoing management of the operations of the Department of the Built Environment. In addition to the flexibility for emerging risks to be raised as they are identified, a process exists for in-depth periodic review of the risk register.

Since the last report to Members there has been no change in the list of Corporate risks managed by the department.

There is one Corporate Risk managed by the Department of the Built Environment:

- CR20 - Road Safety (Current risk: RED)

There are no Departmental RED Risks managed by the Department of the Built Environment.

The Department has identified a number of risks in relation to COVID 19. The Departmental level risks are listed at Appendix 3 and are being reported to both this Committee and the Port Health & Environmental Services Committee.

Recommendation

Members are asked to:

- Note the report and the actions taken in the Department of the Built Environment to monitor and manage effectively risks arising from the department's operations.

Main Report

Background

1. The Risk Management Policy and Strategy of the City of London Corporation requires each Chief Officer to report regularly to Committee the risks faced in their department.
2. The Risk Management Policy and Strategy is updated annually, with the next review due May 2022. Only minor changes have been made in the 2021 review and this focuses on the new Senior Leadership Group responsibilities. It is worth noting that further changes may be required in year should there be amendments as a result of the Target Operating Model implementation, and you will be notified should this occur.
3. Risk owners are consulted, and risks are routinely reviewed with the updates recorded in the Corporate (Pentana) system.
4. Each risk managed by the Department of the Built Environment is allocated to either the Planning & Transportation Committee or the Port Health & Environmental Services Committees. **This report only considers risks managed by the Department of the Built Environment that fall within the remit of the Planning & Transportation Committee.**

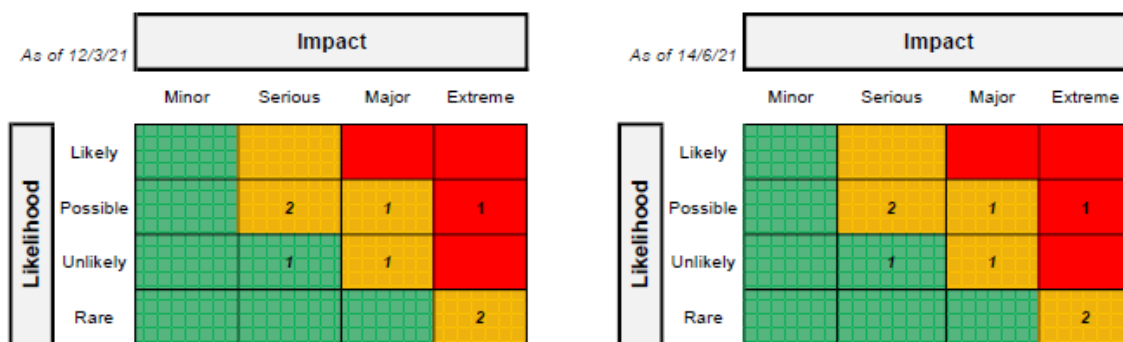
Parallel periodic reports are submitted to the Port Health & Environmental Services Committee.

Current Position

5. This report provides an update on the current risks that exist in relation to the operations of the Department of the Built Environment that fall within the remit of the Planning & Transportation Committee.
6. In order to reduce the volume of information presented, and accordance with the Corporate Risk Management Strategy, this report includes all Corporate and Departmental level risks but not Service Level risks (unless there are changes which are considered to be likely to be of interest to Members).
7. The risk register captures risk across all four divisions within the department, (Transportation & Public Realm, District Surveyor, Development and Policy & Performance), risks relating to the City Property Advisory Team are managed by the City Surveyor. The department provides advice relating to the City bridges to the City Surveyor's department, but the risks are owned by the City Surveyor.

Heatmap

8. At the request of Members, you will note below heatmaps of the department's risks. This is a graphical summary of the current departmental risks as presented in Appendix 2 (departmental risks). A comparison with the those presented at the last report (March 2021) is included. Note that this is a snapshot comparison of our risk profile.



Summary of Key Risks

9. The Department of the Built Environment is responsible for one Corporate Risk. This is:

Road Safety (CR20) which is RED

This is the risk related to road traffic collisions.

This risk score remains assessed as 24 (RED) with a Likelihood of Probable (3) and an Impact of Extreme (8). This is above the Target Risk score of 16 and unchanged since March 2021.

The following mitigation measures are currently being implemented:

- Launching Charterhouse Square School Street in late April.
- Continuing to progress All Change at Bank, with public consultation recently closing and feedback currently being reviewed.
- Subject to Court of Common Council approval a new programme to deliver pedestrian priority and pavement widening has been established.
- Locations for future Healthy Streets minor schemes have been identified in preparation for delivery once TfL funding is confirmed.
- Promoting online cycle skills training while in person cycle training is suspended.
- Providing cycle training at City of London School for Girls and The Aldgate School.

COVID-19 Risks

10. The Department has identified two departmental risks arising from the impact of COVID19. These are held on the Public Services SILVER group risk

register. Exceptionally these risks are being reported both to this Committee and to the Port Health & Environmental Services Committee.

11. The Departmental has BRONZE groups, two of which (Highways, Parking & Enforcement and Development & Construction) relate to the work of this Committee. Each of these BRONZE groups has identified a service risk relating to their (potential) failure to deliver the services required by SILVER. Whilst service risks are not routinely reported to Committees these risks are included in Appendix 3 because they are likely to be of interest to Members.
12. COVID19 risks will be reviewed by GOLD in July with a view to amalgamation with the general department risk register.

Significant Risk changes and other items of particular interest to Members

13. Regular review of risks has identified no Departmental Level risk where the Current Risk score has changed.
14. The Target Risk Ratings/Scores have also been reviewed since the last report to Members and no changes have been identified.
15. It is worth noting that risk DBE-TP-11 regarding the Beech Street roofing panels will be removed from future reports as the tiles have now been removed therefore the risk is no longer live.

Risk Management Process

16. Risk and control owners are consulted regarding the risks for which they are responsible at appropriate intervals based on the level of risk and the likelihood that this level will change. In general, RED risks are reviewed monthly; AMBER risks are reviewed quarterly; and GREEN risks are reviewed quarterly, 6 monthly or annually depending on the likelihood of change.
17. Members will notice that some risks reported are already at the Target Risk Rating & Score and are only subject to Business As Usual actions. These risks are included in accordance with the Corporate Guidance to assist this committee fulfil the role of Service Committees (as defined in the Corporate Risk Management Strategy) to “Oversee the significant risks faced by the Departments in the delivery of their service responsibilities.”

Key Data

Not Applicable

Corporate & Strategic Implications

- Strategic implications – Not Applicable
- Financial implications – Not Applicable
- Resource implications – Not Applicable

- Legal implications – Not Applicable
- Risk implications – Not Applicable
- Equalities implications – Not Applicable
- Climate implications – Not Applicable
- Security implications – Not Applicable

Conclusion

18. Members are asked to note that risk management processes within the Department of the Built Environment adhere to the requirements of the City Corporation's Risk Management Framework and that risks identified within the operational and strategic responsibilities of the Director of the Built Environment are proactively managed.

Appendices

- Appendix 1 – City of London Corporation Risk Matrix
- Appendix 2 – Register of DBE Corporate and Departmental risks (Planning & Transportation Committee)
- Appendix 3 – Register of DBE COVID19 SILVER group risks (Planning & Transportation Committee)

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City of London Corporation Risk Matrix (Black and white version)

Note: A risk score is calculated by assessing the risk in terms of likelihood and impact. By using the likelihood and impact criteria below (top left (A) and bottom right (B) respectively) it is possible to calculate a risk score. For example a risk assessed as Unlikely (2) and with an impact of Serious (2) can be plotted on the risk scoring grid, top right (C) to give an overall risk score of a green (4). Using the risk score definitions bottom right (D) below, a green risk is one that just requires actions to maintain that rating.

(A) Likelihood criteria

	Rare (1)	Unlikely (2)	Possible (3)	Likely (4)
Criteria	Less than 10%	10 – 40%	40 – 75%	More than 75%
Probability	Has happened rarely/never before	Unlikely to occur	Fairly likely to occur	More likely to occur than not
Time period	Unlikely to occur in a 10 year period	Likely to occur within a 10 year period	Likely to occur once within a one year period	Likely to occur once within three months
Numerical	Less than one chance in a hundred thousand (<10-5)	Less than one chance in ten thousand (<10-4)	Less than one chance in a thousand (<10-3)	Less than one chance in a hundred (<10-2)

(B) Impact criteria

Impact title	Definitions
Minor (1)	Service delivery/performance: Minor impact on service, typically up to one day. Financial: financial loss up to 5% of budget. Reputation: Isolated service user/stakeholder complaints contained within business unit/division. Legal/statutory: Litigation claim or find less than £5000. Safety/health: Minor incident including injury to one or more individuals. Objectives: Failure to achieve team plan objectives.
Serious (2)	Service delivery/performance: Service disruption 2 to 5 days. Financial: Financial loss up to 10% of budget. Reputation: Adverse local media coverage/multiple service user/stakeholder complaints. Legal/statutory: Litigation claimable fine between £5000 and £50,000. Safety/health: Significant injury or illness causing short-term disability to one or more persons. Objectives: Failure to achieve one or more service plan objectives.
Major (4)	Service delivery/performance: Service disruption > 1 - 4 weeks. Financial: Financial loss up to 20% of budget. Reputation: Adverse national media coverage 1 to 3 days. Legal/statutory: Litigation claimable fine between £50,000 and £500,000. Safety/health: Major injury or illness/disease causing long-term disability to one or more people Objectives: Failure to achieve a strategic plan objective.
Extreme (8)	Service delivery/performance: Service disruption > 4 weeks. Financial: Financial loss up to 35% of budget. Reputation: National publicity more than three days. Possible resignation leading member or chief officer. Legal/statutory: Multiple civil or criminal suits. Litigation claim or find in excess of £500,000. Safety/health: Fatality or life-threatening illness/disease (e.g. mesothelioma) to one or more persons. Objectives: Failure to achieve a major corporate objective.

(C) Risk scoring grid

		Impact			
		Minor (1)	Serious (2)	Major (4)	Extreme (8)
Likelihood	X				
	Likely (4)	4 Green	8 Amber	16 Red	32 Red
	Possible (3)	3 Green	6 Amber	12 Amber	24 Red
	Unlikely (2)	2 Green	4 Green	8 Amber	16 Red
	Rare (1)	1 Green	2 Green	4 Green	8 Amber

(D) Risk score definitions

RED	Urgent action required to reduce rating
AMBER	Action required to maintain or reduce rating
GREEN	Action required to maintain rating

This is an extract from the City of London Corporate Risk Management Strategy, published in May 2014.

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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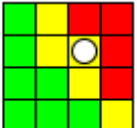
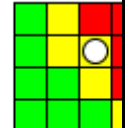
DBE Committee Report (P and T only) Corporate & Departmental

Report Author: Elizabeth Hannah
Generated on: 16 June 2021

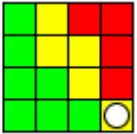
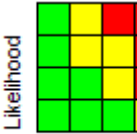
Rows are sorted by Risk Score

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
<p>20 Road Safety Page 409</p> <p>23-Oct-2015 Ian Hughes</p>	<p>Cause: Limited space on the City’s medieval street network to cope with the increased use of the highway by vehicles, pedestrians and cyclists within the City of London. Interventions and legal processes take time to deliver safely and effectively.</p> <p>Event: The City Corporation’s statutory duties and the measures outlined in the Transport Strategy are not fully and effectively implemented.</p> <p>Effect:</p> <ul style="list-style-type: none"> •The number of casualties occurring on the City’s streets rises or remains unchanged instead of reducing •The safety and feeling of safety of the City’s communities is adversely affected (Corporate Plan Outcome 1) •Physical or mental harm suffered by those involved in collisions and their associates •Economic costs of collisions impact on individuals, City businesses and wider society •The City Corporation’s ability to improve road safety is adversely impacted with businesses and/or the public by virtue of loss of credibility and/or authority 	<p>Likelihood</p> <p>Impact</p>	<p>24</p> <p>The risk assessment is unchanged, reflecting the probability that a fatality is fairly likely to occur while mitigation measures are being implemented. Mitigating measures include: Launching Charterhouse Square School Street in late April. Continuing to progress All Change at Bank, with public consultation recently closing and feedback currently being reviewed. Subject to Court of Common Council approval a new programme to deliver pedestrian priority and pavement widening has been established. Locations for future Healthy Streets minor schemes have been identified in preparation for delivery once TfL funding is confirmed. Promoting online cycle skills training while in person cycle training is suspended. Providing cycle training at City of London School for Girls and The Aldgate School.</p> <p>14 Jun 2021</p>	<p>Likelihood</p> <p>Impact</p>	<p>16</p> <p>31-Mar-2022</p> <p>Reduce</p>	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR20l Road danger reduction and Vision Zero	A programme of projects to reduce road danger on the City's streets including: <ul style="list-style-type: none"> • Bank on Safety and All Change at Bank • RDR engineering programme • 15mph traffic limit • Ludgate Circus (lead by TfL) 	Charterhouse Square School Street launched in late April. Public consultation on All Change at Bank has been completed and feedback is currently being reviewed. Recommendations of next steps are expected to go to Committee in September. Improvements to Creechurch Lane (by Leadenhall Street) and Gresham Street (by Wood Street) have been completed. Subject to Court of Common Council approval a new programme to deliver pedestrian priority and pavement widening has been established. The first phase of this programme will consist of reviewing and potentially retaining temporary Covid-19 transport measures. Locations for future Healthy Streets minor schemes have been identified in preparation for delivery once TfL funding is confirmed.	Ian Hughes	14-Jun-2021	31-Mar-2022
CR20m Road Danger Reduction campaigns and engagement	Campaigns and engagement activities to encourage safe behaviours and promote safe vehicles, including: <ul style="list-style-type: none"> • Active City Network • User and stakeholder liaison • Schools programme 	Opportunities for campaigns, training and engagement have been limited due to ongoing Covid-19 restrictions and impacts. In person cycle training is currently suspended but there has been some interest in free online cycle skills training, with 62 people signing up as of the end of April. We are planning activity for the coming months including events and security cycle marking with City of London Police. City of London School for Girls and The Aldgate School received cycle training in May.	Ian Hughes	14-Jun-2021	31-Mar-2022

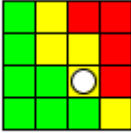


Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Flight path
DBE-PP-01 Adverse planning policy context 06-Mar-2015 Paul Beckett	Cause: A desire in Government and others to change the existing planning system in a way which may be detrimental to the City Event: Changes detrimental to the City are implemented Impact: Adverse changes cannot be prevented using local planning control	 Likelihood	12	Additional risk from national changes to permitted development rights are being mitigated by the preparation of a replacement Article 4 Direction due to be finalised July 2021 and implemented August 2022. Risk to City Plan preparation timetable due the Mayor London's consultation response will be mitigated by liaison with GLA officers to agree suitable refinements to the Plan. 25 May 2021	 Likelihood	12	31-Dec-2021 Accept	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
DBE-PP-01a Business as usual mitigating controls	(1) Ongoing monitoring of government regulations; (2) continue monitor progress of, and seek to influence, forthcoming legislation	City Corporation submitted an objection in Jan 2021 to the Government's consultation on its proposed changes to permitted development rights. We are currently liaising with neighbouring boroughs regarding further representations we might make.	Paul Beckett	08-Mar-2021	31-Dec-2021

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
DBE-02 Service/Pipe Subways 02-Dec-2015 Page 41 Hughes; Giles Radford	Cause: Provide safe access and egress for utilities and maintenance functions, whilst having operatives entering the confined space to undertake checks. Event: A lack of Oxygen, poisonous gases, fumes and vapour, liquids and solids that suddenly fill spaces, Fire and explosions, hot conditions, Entrapment and falling debris. Impact: Fatality / Major Injury / Illnesses	 Likelihood Impact	8 No further update 21 May 2021	 Likelihood Impact	8 31-Dec-2020 Reduce	

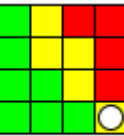
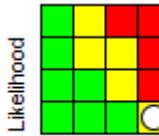
Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
DBE-02a Business As Usual Mitigations	Confined space working is avoided when possible. All PPE and other equipment required for a SSOW shall be suitable and sufficient for the tasks identified. The following PPE and equipment shall be provided, as stated in the approved code of practice All openings are controlled through a central booking system. A subway must not be entered if permission to do so has been refused. No booking will be granted to parties who are not on the database. If the contractor is not on the database they must seek approval from CoL regarding their	All business as usual mitigations have been reviewed, they are very much current and continue to work effectively.	Giles Radford	19-Feb-2020	31-Dec-2020

	<p>works. Once confirmed, the contractors will be added to the system before agreeing access.</p> <p>All works and operatives entering the pipe subway must comply with the code of practice for access and safe working in local authority subways.</p> <p>Regular inspections of the structure, covers, condition and asbestos surveys are undertaken.</p> <p>The Permit to enter form must be completed and contractors checked to ensure they have suitable and sufficient equipment to enter a confined space.</p> <p>No smoking is allowed at any time.</p>				
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Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
<p>DBE-DS-01 The District Surveyor's (Building Control) Division becomes too small to be viable</p>	<p>Cause: Reduced Income causes the service to be unviable Event: Development market fails to maintain momentum or our market share shrinks Impact: Reduced staffing levels do not provide adequate breadth of knowledge and experience</p>	<p>Likelihood</p>  <p>Impact</p> <p>8</p>	<p>The risk has been reviewed and the scoring is unchanged.</p> <p>The plans to create of a Local Authority Trading Company are still on hold and are being reviewed in the light of expected changes in the Building Control Regulation regimen that arise following the publication of the Hackett Report (on the Grenfell fire) and the Building Safety Bill. The proposed new Act is anticipated to be approved by Autumn 2021. In parallel the City of London is working with other Boroughs under the London District Surveyors Association to deliver the anticipated new work under the Building Safety Act across London.</p> <p>An additional strand to the BAU control has been added. Involvement with developers as part of the planning application process and appears to be working well</p>	<p>Likelihood</p>  <p>Impact</p> <p>8</p>	<p>31-Dec-2021</p>	

25-Mar-2015 Gordon Roy			25 May 2021			Accept	
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Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
DBE-DS-01a Business as usual mitigating controls	(1) Continue to provide excellent services [evidenced by customer survey]; (2) Maintain client links with key stakeholders; (3) Continue to explore new income opportunities; (4) Continue to undertake cross-boundary working. (5) Involvement with developers as part of the planning application process.	Business as usual controls have been reviewed and are suitable.	Gordon Roy	08-Mar-2021	31-Dec-2021
DBE-DS-01c Business Plan development	Following approval of Summit Group, a Business Plan is being developed and to be presented to members for consideration in due course.	Awaiting for government guidance. Due summer 2021.	Gordon Roy	08-Mar-2021	30-Apr-2022

Risk no, Title, Creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
DBE-TP-11 Beech Street Roofing Panels 20-Nov-2020 Ian Hughes	Cause: Water seepage from Barbican highwalk fails to be contained by drip tray capture and drainage system above the roof panels. Event: Corrosion of supports holding roof panels in place causes structural failure. Effect: Panels fall with the potential for death or serious injury if they strike pedestrians or vehicles.	 Likelihood Impact	8 All ceiling panels now removed in order to remove the risk to pedestrians and traffic of panels dropping. Options for a ceiling replacement will be assessed later this year in advance of a capital bid for 2022/23. 28 May 2021	 Likelihood Impact	8 31-Dec-2022 Accept	

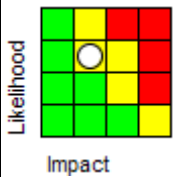
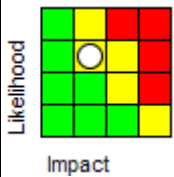

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date

DBE-TP-11a Inspection & reactive works	A programme of monthly visual inspections by our contractor has been established. Any panels where the supports are identified as being at significant risk of failure are removed.	Latest visual inspection complete with consultant's report indicating risk of further panels falling due to water ingress & wind conditions. No specific panels identified as immediately dangerous but issue considered urgent.	Ian Hughes	09-Mar-2021	31-Jan-2021
DBE-TP-11b Options appraisal	Based on the consultant's report following the initial support failure and next detailed inspection an options appraisal process will be undertaken.	Options appraisal complete; full removal of ceiling panels recommended by officers. Key Members informed; funding agreed; contractor resources being mobilised for removal later this month. Future replacement options will be considered as part of a subsequent capital bid and the needs of the Beech St enhancement project.	Ian Hughes	09-Mar-2021	30-Apr-2021
DBE-TP-11c Resolution of underlying problem	The underlying problem is being addressed through the waterproofing programme which is being managed by the Department of Community and Children's Service (DCCS) and there is the potential for including the replacement of the roof panels within the City Surveyor's Beech Street refurbishment works.	DCCS waterproofing programme is due to start in 2022; information exchange already underway.	Ian Hughes	09-Mar-2021	30-Apr-2021

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Flight path
DBE-PL-02 Not being able to meet the needs/requirements of the world business centre and the political environment 23-Mar-2015 Gwyn Richards	<p>Cause: Staff are badly briefed in relation to the planning development needs of the City as a world business centre</p> <p>Event: Perception that we are not responsive to the planning development needs of the City as a world business centre</p> <p>Impact: The City's reputation suffers and we fail to deliver buildings that meet the needs of the City as a world business centre</p>	 Likelihood	6	<p>The risk has been reviewed and although there continues to be uncertainty regarding the wider economic situation, post-Brexit and COVID-19 the likelihood and impact are unchanged. The easing of COVID-19 restrictions is expected to be better understood by September and this is under regular review. The continuing changes in Planning legislation introduce further uncertainty especially further recent proposals – this is being closely monitored and may result in an increase in the risk score. Given the level of uncertainty regular meetings with stakeholders are continuing at an increased frequency.</p> <p>09 Jun 2021</p>	 Likelihood	6	31-Dec-2021	
							Accept	

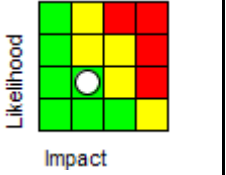
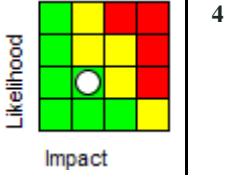

Action no,	Action description	Latest Note	Action	Latest Note	Due Date
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Title,			owner	Date	
DBE-PL-02a Business as usual mitigating controls	(1) Continue to work closely with other parts of the department; the City Property Advisory Team; other City of London Departments; & the Greater London Authority. (2) To work closely with the development industry, the City Property Association and hold regular meetings with City agents. (3) Participation at MIPIM. (4) Co-ordination with the Recovery Taskforce	The Business As Usual controls have been reviewed in the light of COVID-19 and we continue to work closely, meeting remotely, with the development industry, the City Property Association and hold regular meetings with City agents and co-ordinate with the Recovery Taskforce. MIPIM 2020 was cancelled and MIPIM 2021 has been postponed until June 2021 in Cannes. The implications of legislative changes (both those that have already been introduced and those which are the subject of the White Paper) have been assessed and staff have been briefed. The City participated, through the Planning Policy Team, in the Government's consultation. The (non-MIPIM) controls, which have been implemented, are appropriate and effective.	Gwyn Richards	05-Mar-2021	31-Dec-2021

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
DBE-TP-03 Major Projects and Key Programmes not delivered as TfL funding not received 27-Mar-2015 Bruce McVean	Cause: City of London fail to bid at the appropriate time or City of London lose credibility with TfL or Reduced funding from TfL Event: TfL funding for Local Investment Plan ceased or significantly reduced Impact: Unable to deliver highway investment & improvement programmes	 6	The overall score is unchanged. This reflects the expectation that some level of TfL funding will be available this financial year but that the amount remains uncertain and may be lower than previously expected. Some projects or programmes may be paused or delayed if funding is not available or is significantly reduced, but all major projects are expected to be able to progress. 25 May 2021	 6	30-Nov-2021 Reduce	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
DBE-TP-03a	Send Annual Spending Submission to TfL	Annual Spending Submission will be submitted once TfL have confirmed funding for 2021/22.	Bruce	24-Nov-2020	30-Nov-2021

Annual Spending Submission		This is likely to be towards the end of Q4 2020/21.	McVean		
DBE-TP-03b TfL meetings	Conduct quarterly meetings with TfL-	Meeting schedule will be arranged once funding is confirmed and Annual Spending Submission submitted to TfL.	Bruce McVean	10-Mar-2021	31-Mar-2022
DBE-TP-03c TfL Bid Process	Submit bid(s) in line with TfL timetable (e.g. Liveable Neighbourhoods)	Opportunities to participation in future bidding rounds will be kept under review. Opportunities are expected to be limited 2021/22.	Bruce McVean	24-Nov-2020	30-Nov-2021

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
DBE-PL-06 S106 Controls Page 416 30-Nov-2018 Gwyn Richards	Cause: Disjointed control mechanisms in relation to processing and monitoring S106 agreements. Event: Failure to implement Audit recommendations. Effect: Loss of funds; non-compliance with agreements and reporting; potential reputational damage		Since the Chamberlain's department apportion costs to S106 and CIL annually and not in real time there is to be a discussion between the Chamberlain's finance staff for DBE and Internal Audit to consider if the recommendations need to be reviewed. Discussions have taken place with Chamberlain's but due to competing pressures this matter has not been finalised. The Chamberlain's team are continuing to keep separate financial records (including on CBIS) and there is regular contact with the various services to ensure there are spending plans for all S106 funds. We will be reviewing the need for interaction between Exacom and CBIS and the options for reporting. 14 Jun 2021		31-Mar-2021	
					Accept	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date

DBE-PL-06c Interaction with software supplier & Chamberlain's Finance	There is a need to (a) import data from CBIS into Exacom to ensure that it contains up to date expenditure and allocation information; and (b) prepare the necessary budget reports from Exacom.	Due to the mechanisms within the Chamberlain's department whereby expenditure is apportioned to S106 and CIL annually and not in real time the recommendations relating to this in the Internal Audit report are not deliverable at present. This is to be the subject of a discussion between the Chamberlain's finance staff for DBE and Internal Audit to consider if the recommendations need to be reviewed. Due to competing pressures this discussion has not yet taken place, but discussions have taken place with Chamberlain's which are ongoing. Once this is complete we will review the need for interaction between Exacom and CBIS and the options for reporting.	Gwyn Richards	12-Mar-2021	31-Mar-2021
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DBE COVID-19 Risks

Report Author: Elizabeth Hannah

Generated on: 16 June 2021



Rows are sorted by Risk Score

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Flight path
CVD19 SGPS Failure by BRONZE to deliver the Waste and Litter service required by SILVER (DBE) (RECOVERY) 17-Apr-2020 Jim Graham	<p>Cause: The pandemic leads to a critical number of waste collection and street cleansing staff (employed by our term contractor Veolia) being unable to attend work due to illness/self-isolation/caring responsibilities.</p> <p>Event: Our contractor is unable to provide a waste collection and street cleansing service.</p> <p>Impact: Household waste remains uncollected, littering and fly tips increase to the extent that it leads to a secondary public health issue.</p>		8	No significant issues, service running as expected		4	31-Dec-2021	
				10 Jun 2021			Reduce	


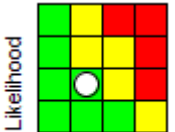

Action no, Title,	Action description	Latest Note			Action owner	Latest Note Date	Due Date
CVD19 SGPS 24a Utilising	Officers have put in place a robust process for	Staffing levels remain consistent and unaffected. No need to use contingencies			Jim Graham	10-Jun-2021	31-Dec-2021

Alternative Resources	sourcing alternative staff to ensure the waste collection from households and streets continues to happen by utilising HGV drivers from alternative sources in this order: 1. Spare drivers from street cleansing service. 2. Veolia Commercial Waste Drivers and Operatives. 3. City Officers with HGV licences. 4. 3rd party commercial drivers with HGV licences.				
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Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
<p>CVD19 SGPS 25 Failure by BRONZE to deliver the highways, parking & enforcement service required by SEVER (DBE) (RECOVERY)</p> <p>17-Apr-2020 Ian Hughes</p>	<p>Cause:</p> <ul style="list-style-type: none"> The pandemic leads to a critical number of staff (employed by our highway term contractor J B Riney) being unable to attend work due to illness/self-isolation/caring responsibilities. The pandemic leads to a critical number of staff (employed by our parking contractor Saba) being unable to attend work due to illness/self-isolation/caring responsibilities. The pandemic leads to a critical number of City of London staff being unable to attend work due to illness/self-isolation/caring responsibilities. The pandemic leads to a failure of the supply chain of our highway term contractor (J B Riney) <p>Event: Our contractors and/or City of London staff are unable to provide a highway maintenance and/or parking service.</p> <p>Impact:</p>	<p>8</p>	<p>Following approval at P&T Committee in April the following temporary Covid-19 measures removed from the following streets:</p> <ul style="list-style-type: none"> Queen Street – All measures to be removed Cannon Street – All measures to be removed Moorgate by London Wall – Southbound bus & cycle only restriction to be removed Devonshire Square to White Kennet Street – All measures to be removed Middlesex Street – Two way working to be removed Cullum Street – All measures to be removed Coopers Row – All measures to be removed <p>Review of services underway in advance of progressive release from lockdown restrictions & recovery priorities.</p> <p>01 Jun 2021</p>	<p>8</p>	<p>31-Dec-2021</p> <p>Accept</p>	

<ul style="list-style-type: none"> • Failure to maintain the highway in a safe state leading to personal damage injuries. (1, 3 and 4) • Increased inability to manage car parks leading to increases potential for crime and anti-social behaviour, increased fire risk and associated loss of income (2 and 3). • Failure to manage on-street parking leading to loss of access by emergency services to residential and business premises (2 and 3). • Failure to monitor 3rd party on-street activities licenced by the City of London leading to unsafe systems of work. 						
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Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
Page 4 of 11 CVD19 SGPS 25a Contractor London	Working with contractors to ensure that they are adequately forecasting staff or supply chain issues to ensure that the City received adequate warning of the need to decrease service levels any further allowing decisions to be taken in a timely and reasonable manner. Where works are continuing we have worked with the contractor to ensure that they have adequate risk assessments and method statements in place to minimise the infection and other risks to staff.	Works are continuing as scheduled – BAU	Ian Hughes	01-Jun-2021	31-Dec-2021
CVD19 SGPS 25b City staff resilience	Reducing the overall number of City of London staff on duty in the City at any one time. This reduces the risk to individual members of staff and therefore the risk of staff shortage in the future. Monitoring of the full range of on-street activities is being achieved by sharing of resource between teams on a rota.	Limited rota of staff involved in surveillance is continuing. Staff are reminded to continue to follow government guidelines on Covid safe working. Preparation for a gradual return to Guildhall underway.	Ian Hughes	01-Jun-2021	31-Dec-2021
CVD19 SGPS 25c Saba staff	Enforcement of the Bank on Safety scheme traffic order transferred to working from home.	Normal services for both enforcement of on-street parking/moving traffic contraventions and car parks (off street parking).	Ian Hughes	01-Jun-2021	31-Dec-2021

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
CVD19 SGPS 27 Failure to deliver the New DBE - Finance (DBE) (RECOVERY) 17-Apr-2020 Paul Beckett; Elizabeth Hannah; Ian Hughes Page 423	Cause: The pandemic has changed the traffic (both people and vehicular) of the working City <ul style="list-style-type: none"> drastically reducing the number of visitors and workers making trips closing down building sites for periods of time until safe working practises can be established reduction in development activity Event: Departmental income reduced by approximately £8.4m and approx. £800k in project recoverable charges. Impact: Department unable to operate in line with base budget, as well as meeting Fundamental Review targets as agreed by RASC. Shortfall of approx. 30% of the 20/21 net departmental budget of £27,274,000. On street parking account finances will be reduced.	 Likelihood Impact	Continued to be regularly monitored by the Senior Leadership Team (SLT). 09 Jun 2021	 Likelihood Impact	31-Mar-2021 Accept	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CVD19 SGPS 27b Affordability	Review affordability of projects which rely on 'on street parking account' funding	With capital bids agreed & budgets now set for 2021/22, budgets will be monitored on a monthly basis to ensure impacts of Covid & progress towards recovery are factored into project affordability considerations.	Ian Hughes	09-Mar-2021	31-Dec-2021
CVD19 SGPS 27c Recovery (FY 20/21)	Focus on recovery in the second half of 20/21 in relation to departmental budget and wider economy and planned fee increases	Budget being reviewed for quarter 1 21/22	Ian Hughes	10-Mar-2021	31-Dec-2021
CVD19 SGPS	Focus on recovery in the first half of 21/22 in	Risk reviewed as part of BAU and will be monitored in the context of service savings necessary to		30-Mar-2021	30-Sep-2021

STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Thursday, 29 April 2021

Minutes of the virtual meeting of the Streets and Walkways Sub (Planning and Transportation) Committee held on Thursday, 29 April 2021 at 11.00 am

Present

Members:

Graham Packham (Chairman)
Shravan Joshi (Deputy Chairman)
Randall Anderson
Peter Bennett
Marianne Fredericks
Sheriff Christopher Hayward
Deputy Jamie Ingham Clark
Oliver Sells QC
Christopher Hill (Ex-Officio Member)
Paul Martinelli (Ex-Officio Member)
Deputy Barbara Newman (Ex-Officio Member)

Officers:

Ian Hughes	- Department of the Built Environment
Bruce McVean	- Department of the Built Environment
Leah Coburn	- Department of the Built Environment
Olumayowa Obisesan	- Chamberlain's Department
Joseph Anstee	- Town Clerk's Department
Shani Annand-Baron	- Town Clerk's Department
John Cater	- Town Clerk's Department
Melanie Charalambous	- Department of the Built Environment
Simon Glynn	- Department of the Built Environment
Maria Herrera	- Department of the Built Environment
Nina Houghton-Worsfold	- City of London Police
Daniel Laybourn	- Department of the Built Environment
Nicola Bradbury	- Department of the Built Environment
Janet Laban	- Department of the Built Environment
Giles Radford	- Department of the Built Environment
Samantha Tharme	- Department of the Built Environment
George Wright	- Department of the Built Environment

At the beginning of the meeting, Deputy Barbara Newman, as the most senior Member of the Sub Committee, was moved into the Chair until the Election of a Chairman.

1. **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Deputy Alistair Moss and William Upton.

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

Sheriff Christopher Hayward declared an interest in Item 11 – City of London Transport Strategy – Review 2022, and advised that he would withdraw from the discussion and decision on this item.

3. **ELECTION OF CHAIRMAN**

The Sub Committee proceeded to elect a Chairman in accordance with Standing Order No.29, and Graham Packham, being the only Member who expressed his willingness to serve, was duly elected as Chairman of the Sub Committee for the ensuing year.

The Chairman then gave thanks to the Sub Committee for their support and paid tribute to the outgoing Chairman for his leadership of the Sub Committee during challenging times.

The immediate past Chairman, Oliver Sells, then gave warm thanks to all Members and officers for their support during his time as Chairman and advised that he would continue to support the new Chairman and Deputy Chairman in continuing the positive work of the Sub Committee.

The Chairman then gave thanks to outgoing Member Alderman Alison Gowman for her excellent contributions to the work of the Sub Committee, particularly in respect of road safety and policing.

4. **ELECTION OF DEPUTY CHAIRMAN**

The Sub Committee proceeded to elect a Deputy Chairman in accordance with Standing Order No.30, and Shravan Joshi, being the only Member who expressed his willingness to serve, was duly elected as Deputy Chairman of the Sub Committee for the ensuing year.

The Deputy Chairman thanked Members for their support and advised that he was looking forward to working with the Chairman and the Sub Committee in continuing its positive work.

5. **MINUTES**

RESOLVED – That the public minutes and non-public summary of the meeting held on 18 February 2021 be agreed as a correct record.

6. **PEDESTRIAN PRIORITY PROGRAMME**

The Sub Committee considered a report of the Director of the Built Environment A three-year programme implementing pedestrian priority and pavement widening schemes across the Square Mile to enhance the comfort and safety of people walking. The Chairman introduced the item, commenting that this was an important project which would hopefully lead to an evidence-based approach and avoid some of the problems reported in other London boroughs.

In response to questions from Members, the Director of the Built Environment advised that further assessment on interventions and network management would be undertaken, as well as traffic modelling to explore the interaction of the proposals with other schemes. It was further advised that the public consultation on All Change at Bank would be taken into account in progressing the scheme. The Director of the Built Environment then gave the Sub Committee further detail on the Air Quality data used and advised that more recent data would be included in the Year 2 proposals. Members suggested that a timetable capturing all the planned works be produced for ease of reference and to aid monitoring.

In response to a question from a Member, the Director of the Built Environment confirmed that all temporary measures could be reviewed and designs of existing and proposed measures would be looked at in detail. A Member commented that some schemes may be adversely impacted by the return of footfall and traffic to the City and stressed that network flexibility should be maintained. The Director of the Built Environment responded that further assessment and stakeholder engagement would be undertaken and confirmed that any measures could be modified, retained or rolled back as necessary.

RESOLVED – That the Streets & Walkways Sub Committee:

1. Agree that a budget of **£199,000** is approved to reach the next Gateway for Year 1 interventions;
2. Note the total estimated cost of the programme at **£6 - £8 million** (excluding risk);
3. Note the total estimated cost of Year 1 of the programme at £2.5 - £3.2million;
4. Note the methodology set out in paragraphs 12.1 below to prioritise City streets for improvements;
5. Approve the streets to be included in Year 1 of the programme, set out in paragraph 5.7;
6. Approve the Programme reporting plan;
7. For Year 1 only, approve the submission of combined Gateway 3/4 reports as the next gateway (for the reasons set out in paragraph 5.9);
8. For Year 1 only, authorise the Director of Built Environment, in consultation with the Chairman and Deputy Chairman of Streets and Walkways and Projects Sub, to approve the Gateway 5 report (for the reasons set out in paragraph 5.9; and

9. That delegated authority is given to the Director of the Built Environment, in consultation with the Chamberlain, to make any adjustments between elements of the project budget.

7. CLIMATE ACTION STRATEGY - COOL STREETS AND GREENING PROGRAMME

The Sub Committee considered a report of the Director of the Built Environment regarding a Climate Action Strategy programme to develop climate resilient streets and open spaces in the Square Mile.

RESOLVED – That the Streets & Walkways Sub Committee:

1. Agree that a budget of £320,000 is approved for:

- Programme framework development (4-year programme)
- Climate resilience measures catalogue
- Installation of smart sensors and data protocols for monitoring
- Opportunity mapping and gap analysis for climate resilience solutions
- Identification and prioritisation of sites.

This is a capitalised resource against the proceeding capital works;

2. Note the total estimated cost of the Cool Streets and Greening project at £1.7M for Year 1. The remaining funds will be for installation of resilience measures in priority sites and will be subject to Gateway 3,4 & 5 approvals; and
3. Note that the likely cost range for the Cool Streets & Greening 4-year programme will be an estimated £1.7M per annum over 4 years – Total £6.8M.

8. CITY CLUSTER AREA - PROGRAMME UPDATE

The Sub Committee noted a report of the Director of the Built Environment providing an update on the City Cluster delivery framework, which is structured around three programmes and focused on the implementation of the City Cluster Vision.

RESOLVED – That the report be noted.

9. CITY CLUSTER AREA - WELLBEING AND CLIMATE CHANGE RESILIENCE PROGRAMME IMPLEMENTATION (2021-2024)

The Sub Committee considered a report of the Director of the Built Environment regarding the City Cluster Wellbeing and Climate Change Resilience Programme. In response to questions from Members, the Director of the Built Environment gave the Sub Committee further detail on the funding strategy, which was subject to funding being secured. Members advised that the programme be co-ordinated with the culture-related Committees and it be ensured that there would be sufficient pedestrian space available accounting for increased numbers of tables and chairs outside.

RESOLVED – That the Streets & Walkways Sub Committee:

1. Note the estimated implementation budget is a minimum of £1.447m based on current estimates for the projects outlined in this report;
2. Note that the estimated implementation budget will be further increased by external sponsorship with the exact amount to be confirmed at Gateway 5;
3. Agree that the 7 projects listed in the Options Appraisal table are approved to be taken forward to Gateway 5, at which point individual project reports will be submitted for approval, in line with the project procedure;
4. That £90,000 from the Pinnacle and Mitre Square Section 106 agreements is approved for the programme budget to continue the development of the 7 projects to Gateway 5;
5. Note that further projects listed in Appendix 1, may be developed in future years, subject to funding being confirmed; and
6. That within the overall programme budget, funds can be moved between the 7 individual projects and between staff costs, fees and works to maintain pace of delivery and maximum efficiency of the process.

10. **CITY CLUSTER AREA - ACTIVATION AND ENGAGEMENT PROGRAMME**

The Sub Committee considered a report of the Director of the Built Environment regarding the City Cluster Activation and Engagement Programme.

A Member expressed their disappointment that only one option had been presented and asked that future reporting at least provided some information as to why alternative options had been discounted. The Member also sought assurances regarding funding for the project, much of which was currently unsecured. Members also stressed the importance of close contact with local stakeholders and suggested developing a map promoting the secret gardens and pocket parks in the area and the wider City which were relatively unknown.

The Director of the Built Environment then gave the Sub Committee some further detail on the programme approach and of engagement with stakeholders so far. Whilst the project funding was complicated, there were section 106 funds which could be used for the project if needed as contingency. In response to a question from a Member about Jubilee Place, the Director of the Built Environment advised that officers had discussed the wall and railings with the Open Spaces Department. Whilst there had been issues with anti-social behaviour, a barrier with a more open design and more entry points had been proposed.

RESOLVED – That the Streets & Walkways Sub Committee:

1. Note an increase in the estimated programme budget specifically to address City recovery “Vibrant Offer” recommendations. The programme cost range is estimated to be £200-£300k, for the delivery of the programme on an annual basis, initially over 3 years;
2. Note that the overall programme budget will be substantially funded by external sponsorship. The exact budget is subject to the level of external funding which is to be confirmed at the next Gateway;
3. Agree that planning for large and medium scale activation programmes (Option 1 and 2) be continued, with detailed options to be presented at Gateway 4-5; and
4. That a budget of £68,000 (£20k staff costs and £48k fees) from the Section 106 Agreement from the Pinnacle is approved to reach the next Gateway and to deliver events to support City’s Recovery in summer 2021.

11. CITY OF LONDON TRANSPORT STRATEGY - REVIEW 2022

The Sub Committee considered a report of the Director of the Built Environment sets out the context and recommended approach for a review of the 25-year City of London Transport Strategy, which was scheduled for review every three years.

RESOLVED – That the Streets & Walkways Sub Committee:

1. Agree that the review of the Transport Strategy will focus on amending and adding proposals, and that the current Vision, Aims and Outcomes remain valid;
2. Note the governance arrangements next steps for the review:
 - Further research and analysis
 - Stakeholder meetings and workshops
 - Public survey and focus groups

12. BLOOMBERG DEVELOPMENT HIGHWAY WORKS

The Sub Committee considered a report of the Director of the Built Environment regarding the Bloomberg Development Highways project. The Chairman introduced the item and praised the quality of the project and its outcomes.

Members noted the unique approach to street lighting where the building sensitively lights the public highway and commented that this had been a successful and innovative approach which had mutually beneficial outcomes for developer and the Local Authority. The Director of the Built Environment confirmed that further opportunities to undertake this approach to street lighting would be pursued where appropriate and that updated guidance for lighting was under development.

RESOLVED – That the Streets & Walkways Sub Committee:

1. Note the content of this report;
2. Agree to close the Bloomberg Development Highways project;
3. Authorise the Chamberlain's department to return unspent S278 funds to the developer, subject to verification of the final accounts; and
4. Authorise the Chamberlain's department to return the Section 106, CIL and City's Cash balances to their respective accounts/codes.

13. **CONSOLIDATED REPORT - SHOE LANE QUARTER PUBLIC REALM ENHANCEMENTS - PHASES 1 AND 2**

The Sub Committee considered a report of the Director of the Built Environment regarding Phases 1 and 2 of the Shoe Lane Quarter Public Realm Enhancements project. The Chairman introduced the item and advised that this had been a good project with positive, high-quality outcomes. The Chairman added that the project represented a good example of greening HVM measures as an alternative to bollards. A Member noted the lessons learned set out in the report and advised that care should be taken to avoid similar issues arising on future projects.

RESOLVED – That the Streets & Walkways Sub Committee:

1. Note the content of this outcome report;
2. Authorise the Chamberlain's department to return unspent section 106 and 278 funds to the developers as set out in the respective legal agreements, after any required maintenance sums are accounted for and subject to the verification of the final accounts;
3. Should it be request by the client, authorise the transfer of any unspent funds, following verification of the final accounts, to a separate project where the financial commitment resides with the same client; and
4. Agree to close the Shoe Lane Quarter Public Realm Enhancements – Phases 1 and 2 projects.

14. **HIGHWAY CONSTRUCTION & MAINTENANCE TERM CONTRACT TENDER**

The Sub Committee received a report of the Director of the Built Environment seeking Member approval for the procurement strategy to be used in the selection of a new term contractor for highway construction & maintenance services.

The Sub Committee paid tribute to JB Riney for their work over the course of the existing contract, as well as their knowledge of the City and engagement with stakeholders and communities. Members then commented that value for money in respect of service as well as price should be a key consideration in awarding the next contract. Members also expressed some surprise that the Sub Committee had not been asked to take a decision on this matter given the

connection between the Sub Committee's work and that of the prospective contractor.

A Member, also a Member of the Procurement Sub Committee, gave assurances that tender decisions were not guided by price alone, with quality also held in high regard. Whilst a 60/40 weighting was usual practice, a 70/30 weighting had also been exercised where appropriate. The Member, noting the consensus amongst the Sub Committee and the importance of this procurement exercise, suggested that the Sub Committee send a note to the Procurement Sub Committee asking that the quality aspect be increased in the tender assessment in order to reflect the importance of ensuring a quality contractor was appointed.

The Director of the Built Environment advised that the procurement exercise would seek to evolve on the existing contract and maintaining standards would be of utmost importance. Whilst the report principally advised of the decisions still to come, officers would consider the governance arrangements for the contract award, due during 2022, as it was appropriate that the Sub Committee be engaged in this process. The Director of the Built Environment further advised that key quality mechanisms would be retained for this tender, and that the aim would be to maintain standards whilst also seeking to improve where possible. Furthermore, the weighting of price and quality was not restricted and could be reviewed.

The Chairman, noting the evident interest and concern on the part of the Sub Committee, proposed that the Sub Committee's views be put to the Procurement Sub Committee, and this was agreed.

RESOLVED – That the report be noted, and that a resolution be put to the Procurement Sub Committee regarding the procurement strategy.

15. **REPORT OF ACTION TAKEN**

The Sub Committee received a report of the Town Clerk advising Members of actions taken by the Town Clerk since the last meeting of the Committee, in consultation with the Chairman and Deputy Chairman, in accordance with Standing Order No. 41. The Chairman introduced the item and gave Members some further context behind the action taken, in respect of the 5G Wireless Concession, and the reasons for progressing the decision under urgency procedures.

In response to questions from Members, the Director of the Built Environment advised that work on improving broadband infrastructure in the City was ongoing, and noted Members' suggestion that the estates be given focus, due to reported issues with coverage. The Director of the Built Environment further advised on futureproofing and the benefits of the action taken in comparison to alternative solutions. The Sub Committee was advised that locations for the installations would not be put forward unless they were considered to be optimal, and that the installations did not generate noise.

RESOLVED – That the report be noted.

16. **OUTSTANDING REFERENCES**

The Sub Committee received a list of outstanding references.

Dockless Vehicles

The Director of the Built Environment advised that operators had been selected for the e-scooter trial, which was due to start in June, with a detailed update due to be submitted to the Planning & Transportation Committee in due course.

Beech Street

The Director of the Built Environment gave the Sub Committee an update on developments in respect of the scheme since the last meeting of the Sub Committee.

RESOLVED – That the list of outstanding references be noted.

17. **ANY OTHER BUSINESS**

a) **MUSEUM OF LONDON GYRATORY PROJECT**

The Sub Committee considered a report of the Director of the Built Environment regarding the Museum of London Gyratory project. A Member requested that regular consultation with Aldersgate Ward Members and the Barbican Centre be undertaken as the project progressed.

RESOLVED – That the Streets & Walkways Sub Committee agree:

1. A restart of the project that remains wholly within currently agreed budget resources to ensure a coordinated highway and public realm design approach with the emerging Section 278 proposals at 81 Newgate Street and Bastion House;
2. A change of project name to “St. Paul’s Gyratory Project”; and
3. The revised budget detailed in Appendix 2.

LIFFE Trader Statue

The Town Clerk advised that the LIFFE Trader Statue, previously situated in the South Ambulatory, had been relocated to its new position on Dowgate Hill. An unveiling had been planned for 20 May to which all Members of the Sub Committee were invited. The Town Clerk advised that details and a calendar invitation would be circulated following the meeting.

Denizen Building

A Member asked whether highway works around The Denizen building were planned, following the completion of the development, as the poor quality of the pavements carried risk of accidents. Another Member advised that residents had raised concerns about this matter. The Director of the Built Environment advised that this would be taken away for clarification.

Beech Street Tunnel

A Member queried whether there had been any developments in respect of permanent solutions to the issues experienced by residents as a result of

difficulties for delivery drivers and taxis in navigating the Experimental Traffic Order. A Member responded that they had been in regular contact with officers and residents on this matter, with improved signage having been installed and further representations made.

The Director of the Built Environment responded that Google Maps had now been updated, with improved signage deployed and further communications being sent to the list of stakeholders. The gaps to the central reservation had now been made, with works completed. A Member commented that this should substantially improve the situation as all addresses could now be accessed. The Director of the Built Environment added that warning notices had been issued for an extended period for this scheme, and advised that contact had been made with logistics companies where it was reported that they did not have up-to-date information.

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 item(s) 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.	Paragraph No.
19	3
20	-

19. NON-PUBLIC MINUTES

RESOLVED – That the non-public minutes of the meeting held on 18 February 2021 be agreed as a correct record.

20. ANY OTHER BUSINESS THAT THE SUB COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There was no other business.

The meeting ended at 12.34 pm

Chairman

Contact Officer: Joseph Anstee
Joseph.Anstee@cityoflondon.gov.uk

PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	18 March 2019 2 April 2019 30 April 2019 24 May 2019 18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019 28 Jan 2020 18 Feb 2020 6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021	<p align="center"><u>Daylight/Sunlight – Alternative Guidelines</u></p> <p align="center">Chief Planning Officer and Development Director</p> <p>A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight, and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.</p>	UPDATE (12 May 2021) – see action 1a)

	30 March 2021 22 April 2021 12 May 2021 8 June 2021		
1a)	5 March 2020 30 March 2021 22 April 2021 12 May 2021 8 June 2021	<p style="text-align: center;"><u>Radiance Studies</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>A Member referred to a training session that had taken place for the Committee earlier this morning, and in which a consultant had expressed a view that radiance studies were the best way for laymen to assess the impact of developments on daylight where there was a genuine concern about this issue. The consultant felt that, in appropriate cases, the applicant should be asked to provide a radiance study.</p> <p>In view of this, the Member asked Officers to undertake, when future applications were received in which daylight will be an issue, to ask the applicant to prepare a radiance study to be provided to this Committee so that Members could make an informed assessment of the issue.</p>	<p>UPDATE (12 May 2021) – The Committee received a report of the Chief Planning Officer and Development Director and Members noted the benefits and robustness of using radiance studies. Members therefore asked Officers to come back to the Committee with information around what the legal position was on the City Corporation taking this forward in terms of its own standards and methods of assessment and also on the ability of applicants to use radiance studies within their submissions. It was felt that this piece of work should be done in tandem with exploring the use of radiance studies nationally with the BRE and exploring with them precisely when new national guidance on daylight/sunlight analysis would be coming forward.</p> <p>To be completed: Further report to Committee setting out/providing updates on these points by Autumn 2021.</p>
2	18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019 28 Jan 2020 18 Feb 2020 6 March 2020	<p style="text-align: center;"><u>Construction Works</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>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</p>	<p>UPDATE: (16 Feb 2021) – A Member chased progress on this action given the ongoing cumulative impact of construction works on residents in the City, particularly during national lockdown periods whilst they were confined to their homes. The Interim Chief Planning Officer and Development Director undertook to refocus efforts on this in the coming months with a view to reporting back to the Committee thereafter.</p>

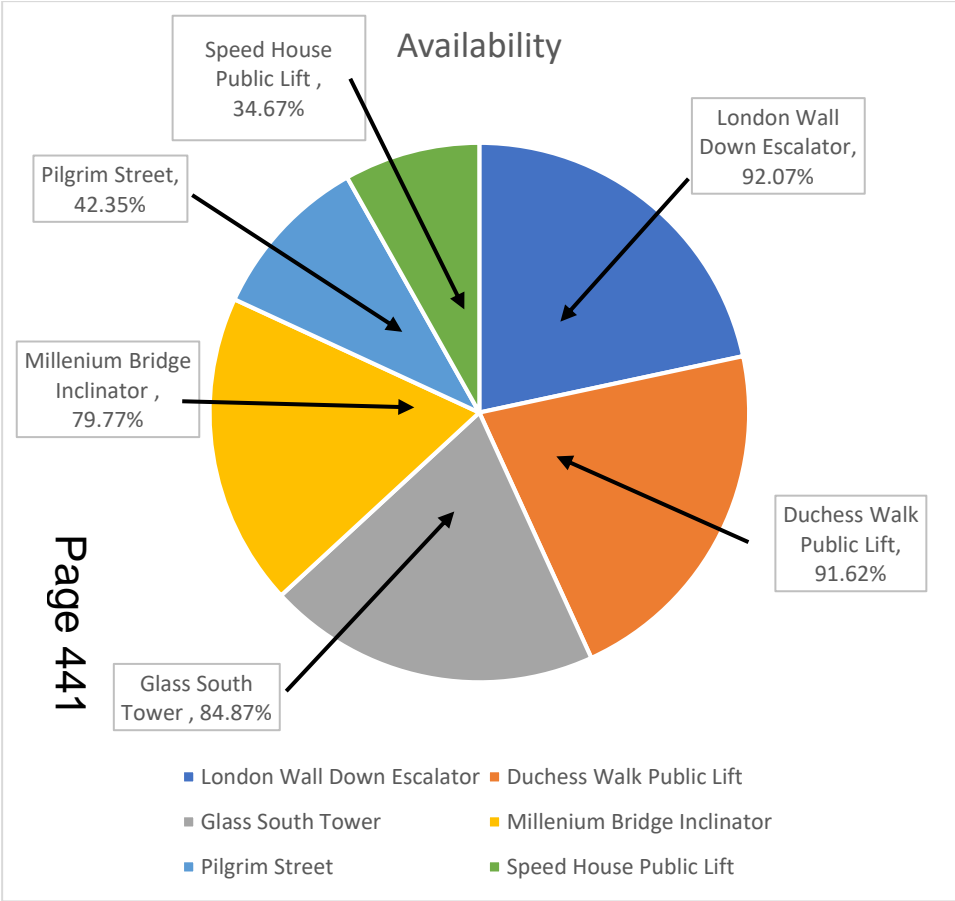
	<p>2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021</p>	<p>when applications were first approved/granted consent.</p> <p>The Chair reiterated that Members had also requested, at the last meeting of this Committee, that Officers consider what powers, if any, might be used with regard to construction time periods and how construction in any given area might 'dovetail'.</p>	<p>FURTHER UPDATE (30 March 2021): A Member reported that Officers had been in touch with her to provide further information around whether conditions could be added to the development of a site and when this commenced.</p> <p>To be completed: Summer 2021</p>
3	<p>6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021</p>	<p style="text-align: center;"><u>Member Training</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director / Director of the Built Environment</p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to</p>	<p>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.</p> <p>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.</p>

		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 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2021 15 Dec 2021 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021	<p><u>Barbican and Golden Lane Conservation Area SPD</u></p> <p>Chief Planning Officer and Development Director</p> <p>A Member highlighted that a Conservation Management Plan was still awaited for this area in the form of a Supplementary Planning Document. He added that this was originally approved by this Committee in October 2018 and that he had requested an update on progress on several occasions since. He asked that this also now be included within the list of Outstanding Actions so that it was not lost sight of entirely.</p>	<p>UPDATE (30 March 2021) - The Interim Chief Planning Officer and the Development Director stated that a further report would be put to this Committee itemising every response received under the public consultation which would run for 6 weeks from March 2021 alongside Officer responses to these. An amended version of the draft document absorbing the responses received would then be put to Members of this Committee for approval before being adopted.</p> <p>To be completed: Amended draft document to Committee for final approval by July 2021.</p>
5	5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021	<p><u>Whole Life Carbon Guidelines</u></p> <p>Chief Planning Officer and Development Director</p> <p>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.</p>	<p>UPDATE (30 March 2021): A Member noted that there were currently no training sessions planned for the Committee on the subject of Whole Life Carbon Impact and questioned whether Officers could provide an update on this as she was aware that it had been the subject of various discussions outside of meetings. The Interim Chief Planning Officer and Development Director confirmed that this was a key focus for Officers and that they were currently scoping the opportunities for training for Members around this which would be led by Kerstin Kane.</p> <p>To be completed: Training to be offered by June 2021.</p>

8.	9 March 2021 30 March 2021 22 April 2021 12 May 2021	<p style="text-align: center;"><u>Short Stay Cycle Parking Solutions</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>A Member reported that she had previously asked a question of Officers regarding short stay cycle spaces and was grateful for their response. She noted that, across applications granted over the past 12 months, the City were falling short of the London Plan requirements. The Member highlighted that Officers were now intending to bring a paper to the 30 March 2021 meeting of this Committee to look at how this deficit could be resolved.</p>	<p>UPDATE (30 March 2021): Members requested a further, more strategic report on this matter to be brought back to the Committee within the next three months. They confirmed that this should also include a map detailing where current cycle spaces were situated in the City.</p> <p>To be completed: Further report to Committee by July 2021.</p>
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PLANNING AND TRANSPORTATION COMMITTEE REPORT 22/05/2021 – 10/06/2021



Code	Name	Time OOS	Availability
0945	London Wall Up Escalator SC6458959	0 00:00	100%
0978	Atlantic House SC6458966	0 00:00	100%
7730	Wood Street Public Lift SC6458970	0 00:00	100%
7921	Little Britain SC6458967	0 00:00	100%
7963	London Wall East SC6458964	0 00:00	100%
7960	London Wall West SC6458965	0 00:00	100%
7998	Tower Place Public Lift SC6458962	0 00:00	100%
7999	Tower Place Scenic Lift SC6458963	0 00:00	100%
7964	Blackfriars Bridge SC6462771	0 03:42	99.23%
7740	Moor House SC6458968	0 04:21	99.09%
7997	33 King Williams Street SC6462850	0 22:20	95.35%
0944	London Wall Down Escalator SC6458958	1 14:05	92.07%
0924	Duchess Walk Public Lift CL24	1 16:14	91.62%
0916	Glass South Tower SC6459244	3 00:38	84.87%
0929	Millennium Bridge Inclinator SC6459245	4 01:05	79.77%
0976	Pilgrim Street SC6458969	11 12:43	42.35%
7345	Speed House Public Lift SC6459146	13 01:34	34.67%

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Points to Note:

- There are 17 Public Lifts/Escalators in the City of London estate. The report below contains details of the 6- public escalators/lifts that were out of service less than 95% of the time.
- The report was created on 11 June 2021 and subsequently since this time the public lifts or escalators may have experienced further breakdowns which will be conveyed in the next report.

PLANNING AND TRANSPORTATION COMMITTEE REPORT 22/05/2021 – 10/06/2021

Location	Status as of 10/06/2021	% of time in service Between 22/05/2021 and 10/06/2021	Number of times reported Between 22/05/2021 and 10/06/2021	Period of time Not in Use Between 22/05/2021 and 10/06/2021	Comments Where the service is less than 95%
London Wall Down Escalator SC6458958	In service	92.07%	1	38 hours	Unfortunately, the service was suspended by members of the public pushing the emergency stop button. We continue to work with our supplier to develop better controls to stop this from happening whilst keeping the health and safety measures in place.
Duchess Walk Public Lift SC6462323	In Service	91.62%	1	40 hours	Engineer attended site and found a fault with the door mechanism, parts required. Engineer returned to site once received, repaired lift and left in service.
Glass South Tower - SC6459244	In Service	84.87%	1	72 hours	Engineer attended site and found a fault with the door mechanism, parts required. Engineer returned to site once received, repaired lift and left in service. (not connected to the Duchess Walk repair)
Millennium Bridge Inclinor SC6459245	In Service	79.77%	1	97 hours	Engineer attended site and released passengers, found fault with the door closing mechanism, parts required. Engineer returned to site once received, repaired lift and left in service.
Pilgrim Street - SC6458969	In Service	42.35%	1	276 hours	Engineer attended site and found a fault with the auto dialler, replacement parts ordered.

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					Engineer returned to site once received, repaired lift and left in service.
Speed House Public Lift SC6459146	Not in Service	34.67%	1	313 hours	Engineer attended site and found a fault with one of the three power phases to the lift, UKPN attendance required to rectify the problem. UKPN attended on 16 th June 2021, rectified the fault and the lift was left in service.

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Committee(s)	Dated:
Planning and Transportation	29 th June 2021
Subject: Delegated decisions of the Chief Planning Officer and Development Director	Public
Report of: Chief Planning Officer and Development Director	For Information

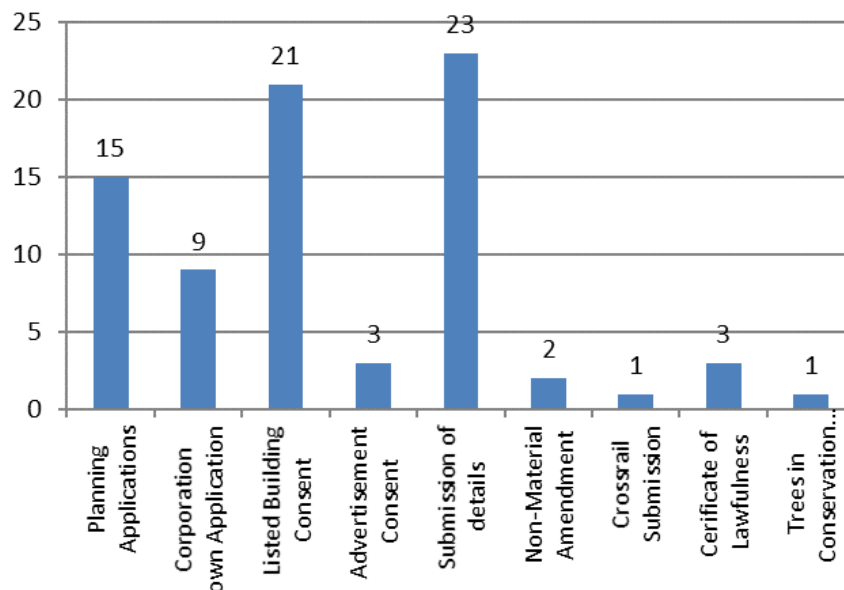
Summary

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 Seventy Eight (78) matters have been dealt with under delegated powers. Twenty One (21) relate to works to Listed Buildings, Three (3) applications for Advertisement Consent, Twenty Three (23) relate to conditions of previously approved schemes, Two (2) applications for Non-Material Amendments, One (1) Crossrail Submission application, Three (3) Certificate of Lawfulness applications, One (1) application for works to Trees in a Conservation Area, and Nine (9) Corporation's Own applications.

Fifteen (15) Full applications for development have been approved including 272sq.m of new floorspace and One (1) application. for change of use.

Breakdown of applications dealt with under delegated powers



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 Details
21/00235/LBC Aldersgate	391 Shakespeare Tower Barbican London EC2Y 8NJ	Internal refurbishments including removal and installation of several internal walls and doors to make amendments to the room layouts including making a hatch opening between the kitchen and living room. The new doors will be full height. Installation of shallow suspended false ceilings with inset spot lighting throughout the flat.	Approved 25.05.2021	Mr and Mrs Kenneth & Jane Ollerton
21/00239/LBC Aldersgate	101 Seddon House Barbican London EC2Y 8BX	Remove internal WC wall, remove and rebuild bedroom wall and new nib wall to end of cabinetry in dressing room. Alterations to open-plan kitchen layout. False ceilings in hallway, WC, kitchen, dressing room and bathroom.	Approved 10.06.2021	Residence Interior Design Ltd
21/00267/LBC Aldersgate	608 Mountjoy House Barbican London EC2Y 8BP	Refurbishment of duplex penthouse maisonette to include demolition of existing stair	Approved 10.06.2021	Mr And Mrs Auty

		and replacement thereof with heritage-and-safety-appropriate stair; addition of mezzanine work area in barrel-vaulted space; addition of cantilevered study area; demolition of wall to create combined bathroom and WC; demolition of various walls to open kitchen and bedroom to living area		
21/00305/LBC Aldersgate	291 Shakespeare Tower Barbican London EC2Y 8DR	Internal refurbishment including changes to internal layout. Fittings and finishes in existing bathrooms and kitchen removed and replaced.	Approved 15.06.2021	Spurrier and Meager
21/00375/LBC Aldersgate	222 Lauderdale Tower Barbican London EC2Y 8BY	Replacement of door between the kitchen and utility room with a full height glazed pocket door.	Approved 10.06.2021	Deborah Cowles
21/00417/MDC Aldersgate	Alder Castle House 10 Noble Street London EC2V 7JX	Submission of Interim Travel Plan pursuant to condition 4 of planning permission ref: 20/00905/FULL	Approved 02.06.2021	Covent Garden IP Ltd
21/00143/MDC Aldgate	Site Bounded By 19-21 & 22 Billiter Street, 49 Leadenhall	Details of facade materials pursuant to condition 22 (a) (in part) of the planning	Approved 08.06.2021	Vanquish Properties UK Ltd

	Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings London EC3	permission dated 25.02.2014 (13/01004/FULEIA)		
21/00225/MDC Aldgate	Site Bounded By 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings London EC3	Details of facade materials, typical details and handrails pursuant to condition 22 (b), (d), (f) (in part) of the planning permission dated 25.02.2014 (13/01004/FULEIA).	Approved 08.06.2021	Vanquish Properties UK Ltd
21/00240/FULLR3 Aldgate	Bury Court London EC3A 7BA	Temporary installation of a sculpture for a period of up to 24 months, as part of the 10th edition of Sculpture in the City, to be taken down on or before 29 May 2023: Stone (Butch) by Rosanne Robertson.	Approved 25.05.2021	City of London Corporation
21/00244/FULLR3 Aldgate	Mitre Square London EC3A 5DH	Temporary installation of one sculpture: RedHead Sunset Stack by Almuth Tebbenhoff for a period of up to 24 months to be taken down on or before 29 May 2023.	Approved 25.05.2021	City of London Corporation

21/00250/FULLR3 Aldgate	Cunard Place London EC3A 3BP	Temporary installation of an artwork composed of four sculptures for a period of up to two years to be taken down on or before 29 May 2023: Reactivity by Regitze Engelsborg Karlsen.	Approved 25.05.2021	City of London Corporation
21/00407/PODC Aldgate	Site Bounded By 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings London EC3	Submission of the Local Training Skills and Job Brokerage Strategy (Fit-out) and the Local Procurement Strategy (Fit-out) pursuant to Schedule 3 Paragraph 2.7 and 8.13 of the Section 106 Agreement dated 29 May 2014, as amended by the Deed of Variation dated 17 November 2020 (Planning Application Reference 13/01004/FULEIA)	Approved 15.06.2021	Vanquish Properties (UK) Limited Partnership
21/00077/LDC Bassishaw	Land Bounded By London Wall, Wood Street, St. Alphage Gardens, Fore Street Avenue, Bassishaw Highwalk, Alban Gate Rotunda, Alban Highwalk,	Submission of details of a Conservation Method Statement pursuant to condition 4 e) of Listed Building Consent dated 27/06/2011(application number 10/00837/LBC)	Approved 27.05.2021	London Wall Place LTD Partnership

	Moorsfield Highwalk, And Willoughby Highwalk London EC2			
21/00171/CLEUD Bassishaw	2 London Wall Place London EC2Y 5AU	Certificate of lawful existing regarding the current use of the first floor as retail floor space falling within Use Class E.	Grant Certificate of Lawful Development 25.05.2021	Two London Wall Place Limited
20/00247/FULL Bishopsgate	8 - 10 Brushfield Street London E1 6AN	Retention of six air conditioning units at roof level.	Approved 08.06.2021	Stephenson House Limited
20/00248/LBC Bishopsgate	8 - 10 Brushfield Street London E1 6AN	Retention of six air conditioning units at roof level.	Approved 08.06.2021	Stephenson House Limited
21/00052/FULL Bishopsgate	Exchange House 12 Primrose Street London EC2A 2EG	Creation of external terrace at roof level including demountable pergola structure, external seating and works to facilitate access.	Approved 25.05.2021	Bluebutton Properties UK Limited
21/00230/LBC Bishopsgate	Bishopsgate Institute 230 Bishopsgate London EC2M 4QH	Refurbishment and alteration works to install acoustic panels to the ceiling and walls in the Upper Hall at first floor level.	Approved 27.05.2021	Rosie Baker
21/00232/LBC Bishopsgate	9A Devonshire Square London EC2M 4YN	Internal fit out of fifth floor offices.	Approved 15.06.2021	Cogent

21/00247/FULLR3 Bishopsgate	Central Public Realm Area 100 Bishopsgate London EC2N 4JL	Temporary installation of a sculpture for a period of up to 24 months, as part of the 10th edition of Sculpture in the City, to be taken down on or before 29 May 2023: Rough Neck Business by Mike Ballard.	Approved 25.05.2021	City of London Corporation
21/00276/MDC Bishopsgate	6 - 9 Eldon Street London EC2M 7LS	Details of how the welfare facilities will operate as to not adversely affect the existing office and retail uses in the building pursuant to condition 6 of planning permission 20/00859/FULL dated 28/01/2021.	Approved 27.05.2021	Broadgate Eldon Properties Limited
21/00320/FULL Bishopsgate	135 Bishopsgate London EC2M 3TP	Placement of temporary outdoor tables and chairs associated with adjacent retail operations.	Approved 02.06.2021	Eataly Retail UK Limited
21/00425/LDC Bishopsgate	150 Bishopsgate London EC2M 4AF	Submission of details of alterations to the listed shopfront pursuant to Condition 4(c) of listed building consent dated 16.06.2011 (10/00169/LBC).	Approved 15.06.2021	UOL
21/00015/CLOPD Bread Street	Juxon House 100 St Paul's Churchyard London	Application for a Certificate of Lawful Development for	Grant Certificate of Lawful Developme	Denton Associates

	EC4M 8BU	proposed works at ground floor level comprising the replacement of three windows and the installation of metal louvres.	nt 08.06.2021	
21/00491/PODC Bread Street	Christchurch Court 10 - 15 Newgate Street London EC1A 7HD	Submission of the Local Procurement Strategy and the Local Training Skills and Job Brokerage Strategy (Demolition & Construction) pursuant to Schedule 3 Paragraphs 1.1, 2.2 and 2.5 of the Section 106 Agreement dated 22 December 2020 (Planning Application Reference 20/00179/FULL).	Approved 15.06.2021	Shiying Property London Limited
19/01338/FULL Bridge And Bridge Without	Adelaide House London Bridge London EC4R 9HA	Planning permission is sought for alterations and extension of the building including: (i) reconfiguration of main entrance including new sesame lift; (ii) alterations to eastern lightwell including extension into existing service riser with new windows and refurbishment of external fire escape stairs/lift; (iii) replacement of rooftop plant	Approved 03.06.2021	St Martins Property Investments Ltd

		rooms, lowering of south eastern corner rooftop wall and erection of roof top lobby with associated landscaped amenity terrace; and (iv) removal of cycle shelter and car parking on riverside terrace and replacement with landscaped amenity area and installation of sesame lift to riverside level (25sq.m).		
19/01339/LBC Bridge And Bridge Without	Adelaide House London Bridge London EC4R 9HA	External and internal alterations of the building including: (i) fabric removal and refurbishment works on all floors; (ii) replacement of all windows; (iii) installation of two additional lift shafts and lifts; (iv) extension of floor slabs into service risers; (v) removal of half landing toilet floors; (vi) reconfiguration of main entrance and foyer including new sesame lift, new doorways in internal wall, platform lifts to ground floor level and installation of new sesame lift at riverside level; (vii) alterations to eastern lightwell	Approved 03.06.2021	St Martins Property Investments Ltd

		including extension into service riser with new windows and refurbishment of external fire escape stairs/lift; (viii) replacement of plant including rooftop plant rooms, lowering of south eastern corner rooftop wall and erection of roof top lobby with associated landscaped amenity terrace; (ix); and internal alterations to level -2 to create new cycle parking, changing facilities and waste storage facilities.		
21/00160/ADVT Bridge And Bridge Without	3 Eastcheap London EC3M 1AG	Installation and display of i) a fascia sign will internal illumination to the lettering only, measuring 1.84m by 0.45m, ii) a non-illuminated fascia sign, measuring 2.85m by 0.4m, and iii) an externally illuminated projecting sign, measuring 0.66m by 0.66m at a height of 2.78m from the pavement.	Approved 25.05.2021	Greggs Plc

21/00156/FULL Castle Baynard	Condor House 10 St Paul's Churchyard London EC4M 8AL	Use of part ground floor (Unit 7) and part lower ground floor (Unit 3) as Class E Use; and external alterations to shopfront at Unit 7.	Approved 08.06.2021	Prime UK Condor T S.a.r.l C/o AXA Investment
21/00159/LBC Castle Baynard	5 Pemberton Row London EC4A 3BA	Addition of a ceramic blue plaque to the front facade of the building to commemorate the building's association with the culturally influential previous owner.	Approved 08.06.2021	Mr Andrew Weisz
21/00196/ADVT Castle Baynard	24 Bride Lane London EC4Y 8DT	Installation and display of: one internally illuminated fascia sign measuring 0.5m high by 2.39m wide at a height above ground of 3.89m; one internally illuminated projecting sign measuring 0.5m high by 0.6m wide by 0.1m deep at a height above ground of 2.75m; and one non-illuminated vinyl measuring 0.21m high by 1.1m wide.	Approved 25.05.2021	Halewood Artisanal Spirits
21/00198/FULL Castle Baynard	81 Fleet Street London EC4Y 1EL	External alterations including removal of two ATM's and infill the openings to match existing marble/ granite.	Approved 25.05.2021	Barclays Bank PLC

21/00366/TTT Castle Baynard	Tideway Working Area Blackfriars Bridge Foreshore Victoria Embankment London EC4Y 0DR	Partial discharge of schedule 3 requirements relating to the pipe subway pursuant to BLABF 24 of the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended.	Approved 15.06.2021	Bazalgette Tunnel Limited
21/00041/FULL Cheap	2 Gresham Street London EC2V 7QP	Creation of external terraces at levels 6 and 7 including installation of glazed balustrades, access doors and associated works.	Approved 27.05.2021	St Martins Management Corporation
21/00283/LBC Cheap	20 King Street London EC2V 8EG	Removal of internal walls within 1st floor office spaces.	Approved 02.06.2021	Shanghai Land (City) Ltd
20/00978/MDC Coleman Street	21 Moorfields London EC2Y 9AE	Submission of details and samples of materials pursuant to condition 19 (a) and (b) (in part) of planning permission dated 04/05/2018 (app. no. 17/01095/FULEIA).	Approved 25.05.2021	LS 21 Moorfields Development Management
21/00256/LBC Coleman Street	Chartered Accountants Hall Moorgate Place London EC2R 6EA	Repairs and adaptation of no.1 stained glass window at gallery level in the Main Reception Room.	Approved 08.06.2021	Institute of Chartered Accountants In England

<p>21/00324/NMA Coleman Street</p>	<p>21 Moorfields London EC2Y 9AE</p>	<p>Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission dated 04/05/2018 (app. no. 17/01095/FULEIA) to amend the wording of Condition 59 to allow for a reduction in the number of cycle parking spaces.</p>	<p>Approved 27.05.2021</p>	<p>LS 21 Moorfields Development Management</p>
<p>21/00391/MDC Coleman Street</p>	<p>Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA</p>	<p>Details of a Plant Noise Assessment pursuant to condition 2 of planning permission (application no. 20/00424/FULL) dated 18th September 2020.</p>	<p>Approved 10.06.2021</p>	<p>The Montcalm Hotel Group</p>
<p>21/00086/FULL Cornhill</p>	<p>Livery Hall Merchant Taylors Hall 30 Threadneedle Street London EC2R 8JB</p>	<p>Installation of a drainage flood relief system comprising an underground attenuation tank and pumping station connected by a new cast iron drain pipe and discharging into the existing underground drains on the site.</p>	<p>Approved 08.06.2021</p>	<p>Merchant Taylor's Company</p>

21/00087/LBC Cornhill	Livery Hall Merchant Taylors Hall 30 Threadneedle Street London EC2R 8JB	Installation of a drainage flood relief system comprising an underground attenuation tank and pumping station connected by a new cast iron drain pipe and discharging into the existing underground drains on the site.	Approved 08.06.2021	Merchant Taylor's Company
21/00242/FULLR3 Cornhill	99 Bishopsgate London EC2M 3XD	Temporary installation of two artworks for a period of up to 24 months, to be taken down on or before 29 May 2023: Silent Agitator by Ruth Ewan and Keeping Time by Isabella Martin.	Approved 25.05.2021	City of London Corporation
21/00124/FULL Cripplegate	16 Wallside Barbican London EC2Y 8BH	Replacement of garage door. Conversion of a domestic garage for residential use and associated alterations.	Approved 27.05.2021	Kouyoumjian
21/00125/LBC Cripplegate	16 Wallside Barbican London EC2Y 8BH	Replacement of garage door. Conversion of garage for residential purposes. Internal demolition and replacement of internal walls. New internal doors, kitchen and bathrooms.	Approved 27.05.2021	Kouyoumjian

21/00141/MDC Cripplegate	Former Richard Cloudesley School Golden Lane Estate London EC1Y 0TZ	Submission of details of doors on the school buildings pursuant to part d) of condition 24 of planning permission 17/00770/FULL dated 19th July 2018.	Approved 10.06.2021	ISg
21/00220/LBC Cripplegate	40 Bowater House Golden Lane Estate London EC1Y 0RJ	Refurbishment of maisonette including restoration of original features and new kitchen and bathroom	Approved 08.06.2021	Mr and Mrs Buyers
21/00269/LBC Cripplegate	96 Breton House Barbican London EC2Y 8PQ	Replacement of kitchen and bathroom, replacement bathroom door and false ceiling to facilitate new lighting arrangement.	Approved 02.06.2021	Mr Christopher Ash
21/00224/MDC Farringdon Within	15 Old Bailey London EC4M 7EF	Submission of additional details and material samples pursuant to the discharge of condition 4 of (18/00124/FULL) and condition 3 of (18/00125/LBC) both dated 27 September 2018.	Approved 27.05.2021	Mr Alex Shamash
21/00237/MDC Farringdon Within	Stationers Hall Stationers Hall Court London EC4M 7DD	Details of below ground works including foundations and drainage pursuant to condition 3 (in part) of planning permission dated	Approved 08.06.2021	The Worshipful Company of Stationers

		17/10/2019 (application number 19/00521/FULL)		
21/00259/FULL Farringdon Within	60 Holborn Viaduct London EC1A 2FD	Application under Section 73 of the Town and Country Planning Act 1990 (as amended) for the removal of condition 24 of planning permission dated 08/08/2011 (app. no. 11/00213/FULL).	Approved 25.05.2021	NBIM Eleanor 1 Nominee Limited
21/00262/MDC Farringdon Within	Stonecutter Court 1 Stonecutter Street London EC4A 4TR	Detail of a Deconstruction Logistics Plan pursuant to condition 4 of planning permission dated 28.03.2019 (18/00878/FULMA J)	Approved 15.06.2021	The Stonecutter Court Unit Trust
21/00263/MDC Farringdon Within	Stonecutter Court 1 Stonecutter Street London EC4A 4TR	Submission of a Water Management Plan and confirmation letter from Thames Water pursuant to condition 7 (b) and (c) of planning permission 18/00878/FULMAJ dated 28th March 2019.	Approved 25.05.2021	The Stonecutter Court Unit Trust
21/00264/MDC Farringdon Within	Stonecutter Court 1 Stonecutter Street London EC4A 4TR	Submission of an Environmental Management Plan pursuant to condition 3 of planning permission 18/00878/FULMAJ	Approved 25.05.2021	The Stonecutter Court Unit Trust

		dated 28th March 2019.		
21/00404/PODC Farringdon Within	Stonecutter Court 1 Stonecutter Street London EC4A 4TR	Submission of the Highway Schedule of Condition survey pursuant to Schedule 3 Paragraph 8.1 of the Section 106 Agreement dated 28 March 2019 (Planning Application Reference 18/00878/FULMAJ).	Approved 10.06.2021	Stonecutter Court Unit Trust (Trustee 1) Ltd
20/00380/FULL Farringdon Without	St Dunstan In The West 186A Fleet Street London EC4A 2HR	Alterations to the entrance comprising the extension of the external landing and steps, and the installation of: (i) a platform lift; (ii) new handrails; and (iii) external lighting.	Approved 10.06.2021	Worshipful Company of Carmen St Dunstan Heritage Trust
20/00381/LBC Farringdon Without	St Dunstan In The West 186A Fleet Street London EC4A 2HR	Alterations to the entrance comprising the extension of the external landing and steps, and the installation of: (i) a platform lift; (ii) new handrails; (iii) a signage panel; and (iv) external lighting.	Approved 10.06.2021	Worshipful Company of Carmen St Dunstan Heritage Trust
20/00910/FULL Farringdon Without	Chancery House 53 - 64 Chancery Lane London WC2A 1QS	Creation of a new roof terrace at level 3 fronting Chancery Lane, amendments to the existing building	Approved 08.06.2021	Chancery House London Nominee 1 Limited

		comprising works to the Lower Ground floor lightwell, replacement of existing external air bricks with louvres, replacement of existing rooftop plant, installation of PV panels at level 7, provision of a new entrance at lower ground floor level and new UKPN sub-station at lower ground floor level.		
21/00122/FULL Farringdon Without	5 Essex Court And 4 Brick Court Middle Temple London EC4Y 9AH	External works including raising the pavement to provide level access to 4 Brick Court and 5 Essex Court, the creation of two new stairways and the installation of 10 No. Electric Vehicle Charging Points and associated works.	Approved 03.06.2021	The Honourable Society of The Middle Temple
21/00126/FULL Farringdon Without	New Court, 1 Essex Court, 4 Essex Court, 4 Brick Court & 5 Essex Court Middle Temple London EC4Y 9AR	Installation of a safe access system at roof level for roof maintenance at 1 Essex Court, and temporary safe access installations at roof level at New Court, 4 Essex Court and 4 Brick Court & 5 Essex Court.	Approved 27.05.2021	The Honourable Society of The Middle Temple

21/00127/LBC Farringdon Without	New Court, 1 Essex Court, 4 Essex Court, 4 Brick Court & 5 Essex Court Middle Temple London EC4Y 9AR	Installation of a safe access system at roof level for roof maintenance at 1 Essex Court, and temporary safe access installations at roof level at New Court, 4 Essex Court and 4 Brick Court & 5 Essex Court.	Approved 27.05.2021	The Honourable Society of The Middle Temple
21/00183/CLOPD Farringdon Without	General Market Charterhouse Street London EC1A 9PS	Application for Certificate of Lawful Development for structural and other internal works.	Grant Certificate of Lawful Development 28.05.2021	Gerald Eve LLP
21/00335/TCA Farringdon Without	Inner Temple Garden Crown Office Row London EC4Y 7HL	Works of pruning to one Platanus x acerifolia (London Plane) tree.	No objections to tree works - TCA 10.06.2021	The Honourable Society of The Inner Temple
21/00241/FULLR3 Langbourn	Cullum Street London EC3M 7JJ	Temporary installation of a sculpture for a period of up to 24 months, as part of the 10th edition of Sculpture in the City, to be taken down on or before 29 May 2023: Orphans by Bram Ellens.	Approved 25.05.2021	City of London Corporation
21/00243/LBC Langbourn	Leadenhall Market London EC3V 1LR	Temporary installation of a sculpture: Untitled by Tatiana Wolska, for a period of up to 24 months years, to be taken down on or before	Approved 25.05.2021	Dan Page

		the 29 May 2023.		
21/00245/FULLR3 Langbourn	XL House 70 Gracechurch Street London EC3V 0HR	Temporary installation of a sculpture for a period of up to 24 months, as part of the 10th edition of Sculpture in the City, to be taken down on or before 29 May 2023: Untitled by Tatiana Wolska.	Approved 25.05.2021	City of London Corporation
21/00254/LBC Langbourn	Leadenhall Market London EC3V 1LR	Temporary installation of 30 flags, as part of the 10th edition of Sculpture in the City, for a period of up to 2 years, to be taken down on or before 29 May 2023: Symbols by Guillame Vandame.	Approved 25.05.2021	Dan Page
21/00248/FULLR3 Lime Street	O/S 1 Undershaft London EC3P 3DQ	Temporary installation of two sculptures for a period of up to 24 months, as part of the 10th edition of Sculpture in the City, to be taken down on or before 29 May 2023: Harlequin Four by Mark Handforth and Cosmos by Eva Rothschild.	Approved 25.05.2021	City of London Corporation
21/00289/MDC Lime Street	22 - 24 Bishopsgate London EC2N 4BQ	Submission of BREEAM Final Certificate pursuant to Condition 27 of planning permission 16/00849/FULEIA dated 11.09.2017	Approved 15.06.2021	22 Bishopsgate General Partner Ltd

21/00296/NMA Lime Street	Leadenhall Court 1 Leadenhall Street London	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 18/00740/FULEIA dated 28th March 2019 to vary the wording of Condition 15 so that it refers to 'water saving measures' instead of 'rainwater harvesting and grey water recycling systems'.	Approved 10.06.2021	1 Leadenhall Limited Partnership
21/00188/MDC Queenhithe	Ocean House, Fur Trade House, Queensbridge House, 10 Little Trinity Lane, London EC4	Details of an Access report pursuant to condition 11 of planning permission (application no. 11/00572/FULMAJ) dated 20th March 2012.	Approved 03.06.2021	Pinboard Limited
21/00257/MDC Queenhithe	62 Upper Thames Street London EC4R 3TA	Details of waste storage and collection facilities pursuant to condition 8 of planning permission (application no. 15/01015/FULL) dated 5th November 2015.	Approved 15.06.2021	Pinboard Ltd
21/00307/MDC Queenhithe	Ocean House, Fur Trade House, Queensbridge House, 10 Little Trinity	Details of a Health & Safety Plan (Construction Phase) pursuant to condition 3 of planning	Approved 10.06.2021	Other Pinboard Limited

	Lane, London EC4	permission (application no. 11/00572/FULMAJ) dated 20th March 2012.		
21/00438/PODC Queenhithe	Millennium Bridge House 2 Lambeth Hill London EC4V 4AG	Submission of the Local Procurement Strategy and Local Training Skills and Job Brokerage Strategy (Demolition and Construction) pursuant to Schedule 3 Paragraphs 2.1, 3.2 and 3.5 of the Section 106 Agreement dated 18 March 2021 (Planning Application Reference 20/00214/FULMAJ).	Approved 10.06.2021	AG Beltane MBH B.V.
21/00467/PODC Queenhithe	Millennium Bridge House 2 Lambeth Hill London EC4V 4AG	Submission of the Highways Schedule of Condition Survey pursuant to Schedule 3 Paragraph 6.1 of the Section 106 Agreement dated 18 March 2021 (Planning Application Reference 20/00214/FULMAJ).	Approved 10.06.2021	AG Beltane MBH B.V.
21/00083/ADVT Tower	8 - 14 Cooper's Row London EC3N 2BQ	Installation of an internally illuminated fascia sign measuring 3.05m (W) by 0.9m (H) by 0.1m (D) above the fire exit on south east elevation.	Approved 25.05.2021	Jurys Hotel Management (UK) Limited

21/00176/FULL Tower	All Hallows By The Tower Byward Street London EC3R 5BJ	The installation of one GPS unit mounted on a support pole on the south western elevation of the tower at approximately 19.0 metres above ground level, and associated development for the provision of 5G network.	Approved 02.06.2021	Net for Cornerstone and Telefonica
21/00249/FULLR3 Tower	Open Space In Front of Fenchurch Street Station Fenchurch Place London	Temporary installation of an artwork composed of three sculptures for a period of up to two years, to be taken down on or before 29 May 2023: Bloom Paradise by Jun T. Lai.	Approved 25.05.2021	City of London Corporation
21/00034/LBC Vintry	Five Kings House 1 Queen Street Place London EC4R 1QS	Proposed programme of like-for-like repairs, cleaning, and redecoration works to the street facing elevations of Five Kings House.	Approved 02.06.2021	The Vintners' Company

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Agenda Item 14

Committee(s)	Dated:
Planning and Transportation	29 th June 2021
Subject: Valid planning applications received by Department of the Built Environment	Public
Report of: 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 Details
21/00374/FULL Aldersgate	1 London Wall, London, EC2Y 5EA	Installation of external structures including 1x pergola and fixed furniture, and external lighting to the tenth floor terrace.	25/05/2021	Jump Trading International Limited
21/00388/FULL Bishopsgate	Sun Street Passage, London, EC2A 2JN	Installation of a platform lift and enclosure at Sun Street Passage and associated works.	02/06/2021	Bluebutton Developer Company (2012) Limited
21/00413/FULL Bridge And Bridge Without	33 - 39 Eastcheap, London, EC3M 1DT	Change of use of the basement unit at 37-39 Eastcheap from restaurant (Use Class E) to drinking establishment (Sui Generis) and amalgamation with the basement unit at 33-35 Eastcheap resulting in the creation of a single unit for a restaurant (Use Class E) at the ground	21/05/2021	Qualibest Eastcheap Ltd

		floor unit at 37-39 Eastcheap.		
21/00482/FULL Castle Baynard	St Paul's Cathedral, St Paul's Churchyard, London, EC4M 8AD	Application under section 73 of the Town and Country Planning Act 1990 (as amended) for the variation of condition 1 of planning permission 20/00394/FULL, dated 22/07/2020, to extend the time limit for the removal of the temporary ramp on the west side of the south transept from 30/06/2021 until 30/12/2022.	08/06/2021	Registrar, St Paul's Cathedral
21/00405/FULL Cordwainer	St Pancras Church Garden, Pancras Lane, London	Alterations to fenestration, removal of portion of masonry wall, and erection of new stair at the rear of 80 Cheapside to create new entrance; and reconfiguration of St Pancras Churchyard Gardens open space, including new railings and gates to Pancras Lane and removal of Locust 'Sunburst' (Gleditsia triacanthos) tree.	19/05/2021	Ideal Century Investments Limited, C/o Oxygen
21/00420/FULL Cornhill	78 Cornhill, London, EC3V 3QQ	Proposed blocking up of existing bank entrance door on Cornhill and associated alterations to facade; including replacing the door with a window to match the existing, the installation of glazing at lower ground floor level, and installation of railings in front of the new window at ground floor to match existing.	24/05/2021	AXA UK Pension Trustees Ltd C/o AXA Real Estate

21/00462/FULL Cripplegate	302 Crescent House, Golden Lane Estate, London, EC1Y 0SN	Replacement of window frames, entrance door frame and glazing on the north-facing facade of Flat 302, Crescent House. with single glazing and profile to match existing.	02/06/2021	City of London Corporation
21/00392/FULL Farringdon Within	65 Holborn Viaduct, London, EC1A 2FD	Use of the site as a temporary cultural open-air work/event space and garden (Sui Generis) along with the provision of hard and soft landscaping and associated works.	18/05/2021	Dominvs Project Company 16 Ltd
21/00415/FULL Farringdon Without	9 Holborn, London, EC1N 2LL	Replacement of existing glazed facade and pair of building entrance doors at street level with a single glazed door and fixed side panels. Proposal to enlarge an existing access door at Level 3 and replace with a set of glazed bifold doors. Proposal of rooftop at Level 3 to form a private terrace with freestanding green wall to the Party Wall with 10 Furnival Street.	21/05/2021	CREO London Limited
21/00448/FULL Farringdon Without	1no Phone Box Kiosk In-front of 21 Fleet Street, EC4Y	Change of use of an existing BT telephone box to a retail kiosk (Class E). Replacement of the existing telephone box glazing with toughened 4mm safety glass and instillation of self-contained modular kiosk unit, new hinge and lock system to existing door.	31/05/2021	RKC Estates

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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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