



## Planning and Transportation Committee

**Date:** TUESDAY, 7 SEPTEMBER 2021

**Time:** 10.30 am

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

<b>Members:</b>	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	

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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/ygYYK0FUCPM>

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 Assistant Town Clerk or the Comptroller and City Solicitor 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, hybrid meeting held on 20 July 2021.  
  
**For Decision**  
(Pages 7 - 26)
4. **100 AND 108 FETTER LANE LONDON EC4A 1ES - OPTION A**  
Report of the Chief Planning Officer and Development Director.  
  
**For Decision**  
(Pages 27 - 164)
- 4A. **100 AND 108 FETTER LANE LONDON EC4A 1ES - OPTION B**  
Report of the Chief Planning Officer and Development Director.  
  
**For Decision**  
(Pages 165 - 298)
5. **TRANSPORT STRATEGY: TIMETABLE FOR REVIEW**  
Report of the Director of the Environment.  
  
**For Information**  
(Pages 299 - 340)
6. **DEPARTMENT OF THE BUILT ENVIRONMENT RISK MANAGEMENT - QUARTERLY REPORT**  
Report of the Executive Director, Environment.  
  
**For Information**  
(Pages 341 - 364)
7. **PUBLIC MINUTES OF THE STREETS AND WALKWAYS SUB COMMITTEE**  
To receive the draft public minutes of the Streets and Walkways Sub-Committee meeting held on 8 July 2021.  
  
**For Information**  
(Pages 365 - 370)

8. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

**For Information**  
(Pages 371 - 376)

9. **PUBLIC LIFT REPORT**

Report of the City Surveyor.

**For Information**  
(Pages 377 - 378)

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

Report of the Chief Planning Officer and Development Director.

**For Information**  
(Pages 379 - 416)

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

Report of the Chief Planning Officer and Development Director.

**For Information**  
(Pages 417 - 430)

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

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

14. **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**

15. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the informal, hybrid meeting held on 20 July 2021.

**For Decision**  
(Pages 431 - 434)

16. **ISSUES REPORT: PUBLIC REALM SECURITY PROGRAMME - CONTINUED  
DELEGATED AUTHORITY**

Report of the Director of the Built Environment.

**For Decision**  
(Pages 435 - 446)

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

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



## **PLANNING AND TRANSPORTATION COMMITTEE**

**Tuesday, 20 July 2021**

**Minutes of the informal, hybrid meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.30 am**

### **Present**

#### **Members:**

Deputy Alastair Moss (Chair)  
Oliver Sells QC (Deputy Chairman)  
Randall Anderson  
Douglas Barrow  
Peter Bennett  
Mark Bostock  
Deputy Peter Dunphy  
John Edwards  
Sophie Anne Fernandes  
John Fletcher  
Marianne Fredericks  
Tracey Graham  
Graeme Harrower  
Deputy Tom Hoffman

Deputy Jamie Ingham Clark  
Alderman Alastair King  
Alderwoman Susan Langley  
Oliver Lodge  
Andrew Mayer  
Deputy Brian Mooney (Chief Commoner)  
Deputy Barbara Newman  
Graham Packham  
Susan Pearson  
Judith Pleasance  
Deputy Henry Pollard  
James de Sausmarez  
Alderman Sir David Wootton

#### **Officers:**

Angela Roach	- Assistant Town Clerk
Gemma Stokley	- Town Clerk's Department
Jayne Moore	- Town Clerk's Department
Julie Mayer	- Town Clerk's Department
Shani Annand-Baron	- Media Officer
James Gibson	- Technology Support
Charlie Pearce	- Technology Support
Simon Owen	- Chamberlain's Department
Dipti Patel	- Chamberlain's Department
Fleur Francis	- Comptroller and City Solicitor's Department
Gwyn Richards	- Chief Planning Officer and Development Director
David Horkan	- Department of the Built Environment
Bruce McVean	- Department of the Built Environment
Ian Hughes	- Department of the Built Environment
Paul Monaghan	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Gordon Roy	- Department of the Built Environment
Samantha Tharme	- Department of the Built Environment
Elisabeth Hannah	- Department of the Built Environment
Bhakti Depala	- Department of the Built Environment

Richard Steele	- Department of the Built Environment
Lucy Foreman	- Department of the Built Environment
Trina DeSilva	- Department of the Built Environment
Emmanuel Ojugo	- Department of the Built Environment
Toni Bright	- Department of the Built Environment
Jon Averbs	- Director of Markets & Consumer Protection
Ruth Calderwood	- Department of Markets & Consumer Protection
Peter Davenport	- Department of Markets & Consumer Protection

### **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 15<sup>th</sup> 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 Deputy Keith Bottomley, Sheriff Christopher Hayward, Shravan Joshi, Natasha Lloyd-Owen, Alderman Bronek Masojada and William Upton QC.

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

The Chair declared a professional interest in relation to item 24 of the non-public agenda and reported that he would withdraw from the meeting whilst this matter was considered with the Deputy Chairman presiding over this.

3. **MINUTES**

The public minutes and summary of the informal, hybrid meeting held on 29 June 2021 were considered and approved as a correct record.

**MATTERS ARISING**

**Panel Arrangements – Wider Consultation** (page 9) – A Member requested a further update on this matter and what opportunities there would be for residents and other stakeholders to feed into proposals around the possible formation of Planning Panels to consider future planning applications. The Chair reported that the Policy and Resources Committee had considered this matter at their meeting earlier this month and had requested that Officers bring forward a further report examining alternative proposals to geographic panels, after having took on board the will of this Committee who voted to support the principle of panels but did not support the fixed, geographical nature of these. Alongside this, the Chair confirmed that an engagement strategy would also be worked up.

In response to a further question, the Chair underlined that this matter had already been debated extensively by this Committee and had sent a resolution outlining its thoughts to the Policy and Resources Committee. He assured Members that a further report would now be produced and presented to this Committee in due course and that there would therefore be a further opportunity for Members to vote according to their preferences. He confirmed that there would be greater clarity on this in terms of timescales post summer recess.

4. **SHORT STAY PUBLIC CYCLE PARKING IN THE CITY**

The Committee considered a report of the Interim Director of the Built Environment and Director of Planning and Development regarding Short Stay Public Cycle Parking in the City.

A Member commented that in the area of the City in which he resided, the majority of on-street parking was used by small traders and small commercial vehicles servicing City businesses and residents. He therefore cautioned against surrendering these spaces and sought assurances that short stay cycle parking standards would be met for all future developments. Officers responded to state that they were working towards retaining as many of the temporary cycle parking spaces that were currently in situ as possible as well as identifying new suitable locations for these. It was reported that current data suggested that these temporary spaces were already being well used but that further data would be gathered on this. It was also underlined that the report stated that any of the temporary cycle parking that was currently utilising on-street car parking spaces would only be made permanent with Member approval.

A Member referred to the figures in Table 1 of Appendix 2 as shocking and stated that she felt it was quite possible for developers to provide these spaces with adequate funding and some creative thinking. She cautioned against requesting financial contributions in lieu of providing the spaces and expressed concern that this could lead to the same issues encountered with social

housing provision and difficulties for Officers in terms of identifying any appropriate locations where these additional spaces could be sited given the space requirements. The Member went on to highlight that areas of the City which had the densest amount of office accommodation had the fewest areas of cycle parking and underlined the need to introduce things such as cycle hubs and to insist that developers got creative. She concluded by stating that she was against approving the recommendations around the negotiation of financial contributions.

Another Member referred to long stay, private cycle parking and stated that he was concerned that, in areas such as Carter Lane, it would be difficult for Officers to retrofit and install appropriate cycle parking. He stated that he had therefore sought assurances that the City Corporation would facilitate businesses paying for off-site cycle parking and reported that he had received this from earlier correspondence with Officers. Officers spoke to confirm that work was already underway on this and that they had identified a number of providers who were prepared to bring in the right type of parking if appropriate locations could be identified for this purpose. It was reported that this model was already in operation in Soho and would be an effective means of meeting some of the longer term need and working with private providers to improve space in some of the City's underground car parks for this purpose for example.

A Member stated that this issue underlined the importance of complying with policy - highlighting that, for many years, developers had been under providing in terms of cycle parking and facilities on site. She agreed with one of the previous speakers, stating that if developers wanted to pay for parking spaces they could pay for these in the City's car parks given that there was capacity here and the need for the City Corporation to find alternative revenue streams for these. In terms of signposting people to parking spaces, the Member commented that this should be achievable using app technology. The Member concluded by stating that she was opposed to charging developers to utilise on-street parking and was also very concerned that the Committee now found itself in this position by seemingly ignoring policy when granting planning applications. Officers responded to acknowledge that more work was required around the use of app technology and signposting available spaces.

In terms of the wider point around financial contributions being accepted in lieu of the provision of spaces, the Chair highlighted that the report set out that each application would be considered on its merits and that this would only be offered as a rare exception. Officers confirmed that they were committed to pressing developers to provide short stay cycle parking on site and would only accept financial contributions in very exceptional circumstances, in line with the London Plan 2021 policy.

In response to further comments around the introduction of cycle hubs, Officers reported that it was difficult to say at this stage when further sites would become available for this purpose but underlined that an Officer had been appointed to lead on this work. Officers undertook to provide further updates on this work to the Committee as part of the quarterly update on the Transport Strategy. The Chief Planning Officer confirmed that the City were already in

discussion with a number of schemes to discuss the incorporation of cycle hubs within these schemes.

A Member spoke again to highlight that residential and office blocks often had to retrofit to provide facilities for their residents/workers and stressed that she did not feel that this Committee should accept any applications that did not comply with policy. She added that, if it were true that a financial contribution would only be negotiated in lieu of spaces in very exceptional circumstances, then she would like to see these circumstances outlined to the Committee on each occasion with Members asked to take a final decision on this and satisfy themselves that every possible option had been explored and that this policy was not being taken advantage of. The Chair seconded this point and asked that Officers make it clear to applicants that they would be required to come before the Committee to justify any exceptions.

**RESOLVED – That Members:**

- Request that any exception to the policy and any proposed financial contribution to make up for a shortfall in short stay cycle parking be brought before this Committee for final decision.
- Delegate authority to officers to negotiate financial contributions for short stay cycle parking stands to be placed on the highway.
- Delegate authority to officers to investigate, design and install cycle parking infrastructure in appropriate locations, when funding is made available from developers under S106 contributions.

**5. GATEWAY 3/4 - DOMINANT HOUSE FOOTBRIDGE FUTURE OPTIONS**

The Committee considered a Gateway 3/4 report of the Director of the Built Environment regarding Dominant House Footbridge Future Options.

**RESOLVED – That the Committee:**

1. Approve Option 2 (concrete and joint repairs)
2. Approve the revised total estimated cost of the project at £340, 864 (excluding risk)
3. Approve budget to proceed to the next gateway (£18,000)

**6. LOCAL IMPLEMENTATION PLAN FUNDED SCHEMES 2021/22**

The Committee considered a report of the Director of the Built Environment regarding the provision of Transport for London (TfL) Local Implementation Plan (LIP) funding to the City of London Corporation for the year 2021/22.

**RESOLVED – That Members:**

- Approve the allocations up to the maximum set out in table 1, for the year 2021/22
- Delegate authority to the Director of the Built Environment in consultation with the Chair and Deputy Chairman of the Planning & Transportation Committee and the Chairman and Deputy Chairman of the Streets &

Walkways Sub Committee to allocate any additional funds which are made available by TfL in 2021/22 financial year

- Delegate authority to the Director of the Built Environment to reallocate the TfL grant between the approved LIP schemes should that be necessary during 2021/22 up to a maximum of £150,000.

**7. CONFIRMATION OF THE NON-IMMEDIATE ARTICLE 4 DIRECTION TO REMOVE PERMITTED DEVELOPMENT RIGHTS FOR THE CHANGE OF USE OF OFFICES (CLASS E(G)(I)) TO RESIDENTIAL (CLASS C3)**

The Committee considered a report of the Director of the Built Environment regarding confirmation of the Non-Immediate Article 4 Direction to remove permitted development rights for the change of use of offices (Class E(g)(i)) to residential (Class C3).

Officers spoke to briefly summarise the context to this, stating that there was an existing Article 4 direction which had been in place for a number of years and enabled the City Corporation to retain local planning control over change of use from offices to housing in the City. The Government had now changed the wider context of this as part of their deregulation agenda. Members were reminded that this Committee had considered a report in May 2021 to replace the City's existing Article 4 direction with a new one which would take effect as of next year. The City Corporation were bound to give a year's notice on this to avoid any compensation liabilities and so it was therefore proposed that these steps be taken now ahead of the new direction taking effect next summer.

Officers went on to report that just ten responses had been received to the consultation on the draft direction which launched in May and that seven of these were supportive and from a wide range of significant bodies. The decision sought today was therefore about confirming the wish to take the draft direction which had been consulted on forward and providing a year's notice of this intention so that it could take effect from 1 August 2022. Officers concluded by cautioning that the Secretary of State did have the right to intervene and amend or refine the direction, however, it was reported that his office had been consulted on the draft direction and had provided no response on this to date. Officers underlined that they would maintain communication channels with MHCLG on this between now and August 2022 and report back on any issues to this Committee if necessary.

Members spoke to underline the importance of this measure for the City and express their firm support for this.

**RESOLVED – That Members:**

- Agree that it is expedient that some of the new permitted development described in class MA should not be carried out unless permission is granted by the City Corporation.
- Approve the confirmation of the non-immediate Article 4 Direction made on 13 May 2021 and coming into force on 1 August 2022 for the whole of the City of London, removing permitted development rights granted by

Class MA, Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 for the change of use of a building or any land within its curtilage from offices (Use Class E(g)(i)) to residential (Use Class C3).

- Authorise officers to take all necessary steps to give effect to the decision including publicising confirmation of the Article 4 Direction in accordance with statutory requirements.

8. **SUPPORTING THE RECOVERY OF THE HOSPITALITY SECTOR: AL FRESCO EATING AND DRINKING POLICY UPDATE, OFF-SALE AND TEMPORARY EVENT NOTICE EASEMENTS**

The Committee considered a report of the Director of Markets and Consumer Protection providing a summary of pavement licences currently granted and outlining proposals to facilitate the pavement licence application process until 30 September 2022.

Officers introduced the report by stating that it amended the Al Fresco Policy to take account of proposed legislative changes under the Business and Planning Act 2020 and also national guidance. Essentially, the amendments to the policy as set out within the report extended the time limit for providing tables and chairs under the Business and Planning Act until the end of September 2022 as opposed to the end of September 2021. It was highlighted that this was still yet to have completed the parliamentary process, but it was hoped that this would happen by the end of this week and ahead of the parliamentary recess. The report also asked that the 'zero' fee approved by Members last year be extended. Officers reported that there were approximately 84 live licences and that, introducing a fee for these would only generate around £8-9,000 in revenue, with the department actually incurring costs in terms of collecting this. Finally, it was reported that national guidance had been produced by the Centre for the Protection of National Infrastructure around counter-terrorism and this recommended that any existing CCTV was operational and that anyone involved with pavement licences, particularly the licence holder, should complete the ACT (Action Counter Terrorism) training. Officers were supportive of this and outlined that they did not feel that this was too onerous a task. Officers highlighted that many Members and those within the trade had questioned whether these provisions were likely to be made permanent but stated that this remained unclear at present. Officers highlighted that a document entitled 'Build Back Better Highstreets' released by the government earlier this year did have a section dedicated to pavement licences and did discuss these changes under the Business and Planning Act, stating that the desire was for these to be made permanent.

The Deputy Chairman referred to paragraph 10 (c) of the report, commenting that he felt that this added to the requirements for licensees and questioned whether it was necessary for them to have to consider counter-terrorism vulnerabilities in the premises risk assessment and require that they follow the new guidance/training as he felt that this seemed to be overly bureaucratic. He championed a more flexible approach to these requirements to help businesses

to get back to where they wanted to be. Officers assured the Committee that a proportionate response would be taken here.

Another Member spoke, highlighting that she had raised these same points when the matter had been considered by the Licensing Committee last week. She outlined that the national guidance around counter terrorism was clear in that if a pavement licence holder did not already have CCTV, they were not required to install it in order to meet the requirements to hold the licence. However, whilst the second part of paragraph 5 of Appendix D tracked the national guidance, the opening sentence of this paragraph confused the matter and could be read as suggesting that a licence holder *must* install CCTV to cover their pavement licence area if they had not already done so which went beyond the national guidance. She therefore questioned whether this was the City's attempt to, unusually and disproportionately, create an additional condition and require that small cafes with perhaps just one or two tables outside to have expensive CCTV equipment in operation at a time when businesses were struggling to recover from the pandemic. The Member concluded by proposing that the first sentence of paragraph 5 at Appendix D was therefore removed in its entirety.

Another Member spoke to support this point around CCTV requirements and underlined that, over the years CCTV had not been a standard requirement for either new licences or licence renewals with the Licensing Committee only tending to insist on it where there had been a problem such as antisocial behaviour leading to a licence review. He added that CCTV was also automatically installed in places such as larger nightclubs or larger premises within residential areas. The Member reported that, when this matter had been discussed at the most recent meeting of the Licensing Committee, the City of London Police had spoken to suggest that it was not their intention that every premises with a pavement licence should now have CCTV. The Member went on to state that those premises who had not previously had tables and chairs outside may find it impractical to change the focus of their existing CCTV to monitor this pavement area. He felt that this matter should be dealt with on a discretionary basis and not be made a standard requirement.

Officers responded to these points to clarify that it was not their intention to insist that all premises had a CCTV system in operation and that this paragraph was aimed at those premises who already had existing CCTV and the need to ensure that this was functional and being used and monitored. They stated that they would be happy to amend or remove the opening part of this paragraph to make this clearer to all. It was also highlighted that these points were not conditions of licence but were intended as guidance/recommendations to pavement licence holders.

With regard to proportionality, Officers reported that the placing of tables and chairs, although not necessarily that different to the old tables and chairs system, had brought to light the possible dangers associated with their positioning on the pavement, particularly with regard to terrorism. The idea of recommending training was therefore around raising people's awareness of these possible dangers and no more. It was confirmed that the training took no



longer than 25 minutes to complete and was offered free of charge. It was not therefore felt that this was too onerous a task and neither did it slow down the decision -making process for any new applications.

Officers added that they had worked closely with the Police to ensure that the approach to pavement licences was streamlined with them and were pleased to report that this had been working extremely well to date with no issues to report in the recent past around good, proportionate decision making. It was not the Police's intention to request the installation of CCTV for all premises with pavement licences but more to ensure that those who did already have the systems in place had them in working order and were regularly monitoring them. It was highlighted that this was also about the prevention of crime and disorder in general as well as counterterrorism.

After hearing Officers confirm that it was not the intention to require the installation of CCTV where it did not already exist, a Member suggested that the opening sentence of paragraph 5 of Appendix D (page 131) be deleted. He was satisfied that the second part of this paragraph very clearly dealt with existing CCTV systems and therefore tracked national guidance/national model conditions. A second Member agreed with this proposal, suggesting that the inclusion of the opening sentence of paragraph 5, Appendix D confused the policy and could cause difficulties for Officers considering applications further down the line.

Another Member requested clarity on the requirements around existing CCTV systems which he underlined may require further expenditure for licensees to upgrade or add to in order to cover the area outside of their premises. Officers clarified that a proportionate response would be expected.

Some Members underlined that they had raised these concerns at the most recent meeting of the Licensing Committee where this report had been submitted for information. Some Members advocated for the report being amended by Officers to deal with the points raised today before being resubmitted to both this and the Licensing Committee for decision.

Another Member underlined that licensed premises needed clarity on this matter and therefore expressed concern around deferring a decision today. He added that, if the only real point of contention, was the opening sentence of paragraph 5, Appendix D, then he would support the suggestion that this be deleted and ask that the Committee vote on this if necessary. Other Members spoke in support of this suggestion and the need to offer clarity to the licensing trade on requirements for the year ahead as soon as possible.

In response to a question regarding the timing of a decision on this, Officers clarified that the current legislation which permitted pavement licences would expire at the end of September 2021. If there were to be no amendments to the Business and Planning Act ahead of this date, pavement licences would no longer be in existence. If, however, the legislation which had been drafted by parliament and was in place as a statutory instrument, did gain parliamentary approval, this would be extended until the end of September 2022. A decision

on this matter would therefore be required by the end of September 2021 at the latest, although it was noted that it would be preferable for the Committee to reach a decision today so that Officers were not put in a position where they were only able to grant any applications for licences received in August for a period of just 2-3 weeks before renewing.

**RESOLVED** – That, subject to the deletion of the first sentence of paragraph 5, Appendix D, Members:

1. Agree the streamlined reapplication process as outlined in paragraph 8 of this report.
2. Agree the pavement licence duration period as outlined in paragraph 10(a) of this report.
3. Agree a zero fee for all pavement licence applications as outlined in paragraph 10(b) of this report.
4. Agree the strengthened requirement to comply with the new national Counter Terrorism Protective Security Pavement Licence guidance in para 10(c) of this report.

**9. RECOVERY TASKFORCE - UPDATE**

The Committee received a report of the Director of Innovation and Growth updating Members on the implementation of the recommendations of the Recovery Taskforce report: *Square Mile: Future City*, published in April 2021.

A Member sought assurances from Officers that the section dealing with outdoor fitness and leisure initiatives was still part of the Recovery Taskforce work. Officers were pleased to confirm that opportunities for outdoor fitness, leisure and exercise, both for individuals and as organised events, are part of the Recovery Taskforce activities and that any update on these would be provided in future reports where necessary.

**RESOLVED**, That Members note the progress made on the implementation of the recommendations of the Recovery Taskforce report, *Square Mile: Future City*.

**10. REVENUE OUTTURN 2020/21**

The Committee received a joint report of the Chamberlain, the Director of the Built Environment, the Director of Open Spaces and the City Surveyor comparing the revenue outturn for the services overseen by the Planning and Transportation Committee in 2020/21 with the final budget for the year.

**RESOLVED** – That Members note the report and the carry forward of local risk underspending to 2021/22.

**11. DEPARTMENT OF THE BUILT ENVIRONMENT BUSINESS PLAN PROGRESS REPORT Q4 21/22**

The Committee received a report of the Director of the Built Environment setting out the progress made during Q4 of the 2020/21 Departmental Business Plan.

**RESOLVED** - That Members note the report and appendix.

**12. TRANSPORT STRATEGY: 2020/21 PROGRESS UPDATE AND 2021/22 - 2023/24 DELIVERY PLAN**

The Committee received a report of the Director of the Built Environment summarising progress with delivering the Transport Strategy in 2020/21 and setting out the Delivery Plan for 2021/22 – 2023/24.

A Member raised a question on the Beech Street and Barbican Zero Emissions Zone which, according to this report, appeared to be on hold. Officers reported that the experimental traffic order for the zero-emission street on Beech Street had been the subject of two legal challenges. It was confirmed that the hearing for the second challenge – a judicial review of the decision to continue the experiment – took place on 29th and 30th June and that the City Corporation were still awaiting the judgement from this hearing.

Members were informed that the current experiment was due to conclude in September at the end of the maximum period of 18 months allowed for experimental traffic orders. It was confirmed that, due to the judgement from the first legal challenge, the experimental order could not be made permanent through the usual truncated process. It had been hoped that it would be possible (although challenging) to make a permanent order through the non-truncated process before the experimental order expired. However, an interim order issued when the judicial review was granted permission to proceed to hearing, had prevented Officers from undertaking any further work, including public consultation, on a permanent order. It was reported that Beech Street, Golden Lane and Bridgewater Street would reopen to general traffic when the current experiment concludes in September. As yet, no decisions had been made about the future plans for Beech Street, but it was highlighted that Officers remained committed to improving air quality and the public realm in this location and the surrounding area. It was reported that Officers currently intended to go out to public consultation in the Autumn to seek views on future options on this. Finally, it was confirmed that Officers were preparing to brief local ward members and update residents and other stakeholders on Beech Street over the coming weeks.

The Member thanked Officers for this clarification and welcomed the consideration of the wider, surrounding area but questioned the planned timetable for this, stating that, for those residents who were in favour of the scheme, this would be concerning in terms of both air quality and the movement of traffic.

Another Member stated that he was personally very disappointed with the way that this had gone and asked Officers to confirm the cost of this work to date. He also asked whether Officers could confirm that, as of 18 September, the whole of the Beech Street Zero Emissions Zone would be reversed and re-open to traffic. Officers confirmed that, on 18 September, the current arrangements would end, and that Beech Street, Golden Line and Bridgewater Street would revert back to previous arrangements including access for traffic. Officers undertook to revert back to the Member in writing on the costs incurred to date on legal charges.

Another Member emphasised his support for the proposed new consultation referred to by Officers and encouraged the inclusion of easier, alternative access for pedestrians to use the higher level and not the tunnel should they wish to traverse Beech Street within this – something which he had long championed. He commented that, at present, it was incredibly difficult for pedestrians to find their way up to the higher level here, particularly at the eastern end, due to construction and the positioning of the steps. Officers responded to state that they would be very happy to consider how easier and alternative access to the highwalks might be incorporated into the consultation process as part of the wider, area- based approach proposed.

A second Member supported this point, stressing that existing signage at ground level to the podium was inadequate and resulted in this clean-air, large, open space being massively underutilised. He questioned why Officers could not address this matter without the need for any further consultation. Officers agreed that the installation of signage alone would not require specific consultation but that any wider proposals concerning access to the highwalks would.

Another Member commented on plans to raise the zebra crossing utilising Section 106 monies from the development on Golden Lane and stated that she understood that there were also plans to raise the crossing as it reached the junction of Golden Lane and Fann Street/Brackley Street. Given that this was a residential area and the fact that there was also accommodation for elderly residents in Fann Street, the Member asked that more be done to expand the use of raised crossings that not only provided protection as vehicles approached a junction, but also provided a safer, level crossing for elderly residents, and those with impairments. She stressed the need for safety measures such as these to be progressed with some urgency, particularly given the reintroduction of traffic here in the coming months. Officers responded to state that raised crossings were something that they were keen to roll out across the Square Mile in line with the Transport Strategy to improve both safety and accessibility. Officers clarified that the projects referred to by the Member were in addition to and intended to compliment the Section 106 works and that funding for these were due to come from Transport for London. Officers stated that they too were keen to see this rolled out as quickly as possible.

Officers responded to the points raised so far stating that they were unable to commit to a more precise timetable for this process but reiterated that the aim was for consultation to commence in Autumn with any changes then taking up to 12-18 months to progress thereafter. Officers underlined that they were, of course, very aware of the air quality issues here and therefore remained committed to moving this work forward as quickly as possible.

A Member, also the Chairman of this Committee's Streets and Walkways Sub-Committee, expressed his disappointment that the Beech Street experiment could not be made permanent and was due to cease in September. He underlined that this had been a difficult project for many reasons but that the

Sub-Committee's collective determination to continue with it, had allowed for further adjustments to be made to successfully address delivery issues and access problems for Barbican residents, while also accomplishing significant improvements in air quality. It was reported that there now seemed to be broad support for the project among the majority of local residents and other stakeholders. Due to the outcome of the first judicial review and the need to await the outcome of the second, there was a need to stop the experiment in September, however, the Member wished to assure local Ward Members and residents that the Sub-Committee remained fully committed to delivering a permanent scheme as soon as possible. The Member went on to state that he had asked Officers to ensure that the cessation of the current experiment would attempt to ensure that any future replacement scheme could easily utilise the changes already made so that, for example, the new cameras already installed might be switched off as opposed to removed entirely. The Committee were being informed that exact details of how the experimental changes would be disabled was being planned at present and the Member commented that he understood from a local Ward Member that many residents would like to see the new gaps in the tunnel median retained. He therefore asked whether this could also be taken into consideration should it be permitted on a legal basis. Communications on this matter would be sent to all stakeholders as soon as the position was clear and this would include Ward Members, the Barbican Association and the Golden Lane Residents Association, among others. Consultation would then begin in Autumn around a permanent scheme to deliver permanent air quality and public realm improvements in Beech Street. The Chair thanked the Member for his leadership on this matter and added the support and determination of the grand Committee to that of the Sub-Committee.

Another Member expressed concern that, on occasion, some residents appeared to have been more fully briefed on these matters than Members of the Sub-Committee. She stressed that this had been an emotive and divisive issue and underlined the need for full reports on this in future as opposed to oral updates. The Member went on to refer to the recently installed turn offs into car parks for those travelling from west to east along Beech Street which had been actioned in response to comments received. She understood that these would not now be retained with the cessation of the current project and the resulting increase in traffic but questioned this given the safety benefits they offered as well as the expenditure on this to date. Officers accepted the point that local Ward Members ought to be briefed in advance of these matters reaching Committee and apologised for any recent oversight here. With regard to the gaps in the central reservation, Officers clarified that these were originally closed for safety reasons but stated that it had been possible to open these whilst the experiment was in place due to the significant drop in traffic levels. These might therefore have to be reinstated for safety reasons if traffic levels increased, although Members were assured that the reinstallation could be relatively light touch so that, if possible/appropriate, any agreed future state could be quickly achieved avoiding any costly engineering works. The Chairman of the Streets and Walkways Sub-Committee stated that he would welcome further dialogue with Officers on this aspect in due course.

Another Member commented that opening Beech Street and Golden Lane to all traffic would create major new safety issues for local residents and expressed concerns that this would be contrary to the City Corporation's policy around the reduction of road traffic accidents in the City. He added that, whilst he sympathised with not doing too much to change the measures introduced through the experimental scheme, he also felt that it would be important to demonstrate all of the difficulties of the previous situation and the problems with/consequences of retaining Beech Street as an all vehicle access way. Officers commented that the safety implications of this were well understood and underlined that they were committed to improving road safety on the City's streets. The situation would therefore be very carefully monitored with the cessation of the current experimental scheme. Officers also clarified that these areas would revert back to previous arrangements as of 18 September.

A Member spoke to thank Officers for their commitment to consultation with Ward Members and local residents but underlined that his understanding that spend on this experiment to date had already been in excess of £1.5million. Officers reiterated that they would provide the Member with full details of costs in writing, including a breakdown of any costs associated with the legal challenges. Officers reported that this had been a useful experiment from their point of view and felt that it would support and inform them in moving towards whatever permanent solution was decided upon.

Another Member spoke to question why any future changes could potentially take 12-18 months to introduce following consultation in the Autumn, given that the current experiment had been introduced much more rapidly. Officers stressed that they hoped to be able to progress more quickly than this but underlined that this would be dependent on what emerged from the consultation process and whether there was a decision to move immediately to a permanent scheme or to initially move again to some kind of experimental traffic order which was the easiest way to compress timescales. Further details on timetable would be shared with Members in due course.

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

### 13. **CITY LIGHTING STRATEGY - UPDATE**

The Committee received a report of the Director of the Built Environment providing Members with an update on the Implementation of the City's Innovative Lighting Strategy from 2018 that sought to deliver a holistic and co-ordinated approach to lighting the Square Mile.

Officers introduced the report by highlighting that it covered a number of issues such as street lighting for the public realm as well as lighting inside and outside of City buildings. It was reported that this was originally something that the Port Health and Environmental Services Committee had taken an interest in as they had been keen to understand what was being done in terms of lighting in the context of the Climate Action agenda and the target for achieving net zero for emissions in the Square Mile by 2040. The report set out enhancements to the Square Mile, the success in rolling out LED street lighting in the City and also the numbers in terms of energy and maintenance savings. Officers stated that

the strategy had allowed them to ensure that they were delivering the right amount of light in the right places at the right time. They also pointed to the ability now, with modern technology, to be able to vary things such as lighting levels, timings and temperature. It had also provided the opportunity to look at localised issues and areas of crime and disorder and licensing hotspots that perhaps required additional lighting.

It was reported that a Member had corresponded with Officers prior to this meeting around the ability to adjust lighting levels to assist those such as running groups in the City after dark and, again, it was highlighted that new technology enabled Officers to address these matters much more easily.

With regard to lighting from buildings, it was highlighted that this was somewhat of an interim report as planning Officers were currently working on a planning advice note that would set out the best practice guidance for new developments. Officers reported that they were able to work with new developments as they came forward to look at reducing energy usage, ensuring that lighting was sustainable and complemented the public realm and that there were some good examples of this recently. It was highlighted, however, that some of the Officers powers were limited in terms of existing developments and that the Climate Action agenda would therefore prove useful in this respect around communicating the City's ambitions and setting out expectations on a wider level.

A Member who had previously worked on the introduction of a Code of Practice for Office lighting reported that, at the time, there had been some scepticism that an unenforced Code of Practice may not work. Whilst building managers themselves tended to be enthusiastic about having office lights correctly extinguished every evening, many found that their powers were also limited in terms of enforcing these practices with their own tenants.

A Member expressed her support for a further evening walkaround for the Committee to take place in the Autumn.

**RESOLVED** – That Members note the progress and next steps outlined in the report.

**14. DISTRICT SURVEYORS ANNUAL REPORT 2020/21**

The Committee received a report of the Director of the Built Environment updating them on the workings of the District Surveyor's Officer which reports to it for the purposes of building control, engineering services for the City's major infrastructure and to provide resilience to buildings and businesses within the Square Mile that may be affected by climatic and environmental risks.

Officers confirmed that building control had been severely affected by the pandemic over the past year with the amount of construction work being undertaken dropping off quite dramatically. Applications for here and the private sector therefore dropped by approximately 50% in comparison with normal levels. However, due to some relatively large schemes, income only fell by approximately 75%. The pandemic forced the surveying team to move to

working from home, which was achieved successfully, with new methods adopted for carrying out site inspections remotely. During the summer months, Officers had worked alongside the Health and Safety Team to develop a COVID secure site inspection regime this was still in operation now.

Members were informed that, in March 2021, building control lost three very experienced surveyors with over 100 years' service between them due to retirement. A recruitment process had been embarked upon with one new recruit set to join the team in September. It was reported that the team had now also taken on a third technical apprentice who would be starting university in September. The office therefore continued to evolve and grow its own building control surveyors.

It was reported that the engineering team continued to be extremely busy looking after the infrastructure of the City and had completed the London Bridge waterproofing works on budget and on time and had also been monitoring Thames Tideway through the tunnelling works that had now passed through the City and the new culvert at the bottom of the fleet. Officers were pleased to report that there had been no detrimental effects on any of the City's structure as a result of this work. It was reported that the team continued to work with the Museum of London around Smithfield and were continuing to do a lot of the repairs to the underground structures here.

With regard to environmental resilience, the team continued to look at risks associated with climate change and had recently presented their newly proposed Riverside Strategy and, earlier in the year, their Local Flood Risk Management Strategy to the Committee. It was reported that the team continued to progress resilience projects and embed resilience through their Climate Action Strategy work.

Finally, Members were informed that the new Fire Safety Act was currently going through Parliament and that this would change how building control operated. Royal Assent was expected in Spring 2022 and Officers undertook to update the Committee on this in due course.

The Chair praised the excellent work of the Environmental Resilience Team in particular and the development of things such as the Riverside Strategy.

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

15. **AIR QUALITY ANNUAL STATUS REPORT FOR 2020**

The Committee received a report of the Director of Markets and Consumer Protection demonstrating progress with actions contained within the latest Air Quality Strategy and presenting air quality monitoring data.

**RESOLVED** - That Members note the contents of the Air Quality Annual Status Report for 2020.

16. **OUTSTANDING ACTIONS**



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

**RECEIVED.**

**17. PUBLIC LIFT REPORT**

The Committee received a public lift report of the City Surveyor for the period 12/06/2021 – 02/07/2021.

**RECEIVED.**

**18. 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 detailing development and advertisement applications determined by the Interim Chief Planning Officer and Development Director or those so authorised under their delegated powers since the report to the last meeting.

**RESOLVED** – That the report be noted.

**19. 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.

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

**London Wall West**

A Member questioned whether the Committee could be informed who the client body was for this important site which covered Bastion House and the existing Museum of London. He went on to ask for information around the scope of this work and stated that he had been informed that the team had been advised by 'planners' that residential accommodation should not be considered as an option here. Given the importance attached to housing and the site location, nearby to existing residential areas, the Member asked whether Officers could clarify that this advice was given and, if so, the basis for it.

The Chief Planning Officer and Development Director clarified that the developer had instigated discussions with the City's planning team to discuss broad policy and key planning issues and scope the art of the possible on the site. He added that, as Members were well aware, the existing site was a very rich dynamic mix of uses, including the Museum, office space and retail. It was therefore the view of Officers that there was scope for a similarly dynamic mix of uses on the new site to include potentially offices, cultural uses, retail uses and residential uses. Officers did feel that this would be an appropriate site for

a residential development or the inclusion of an element of residential accommodation given its close proximity to the City's important residential communities to the immediate north of the site. Members were informed that Officers were keen to continue to explore possibilities around a richer, more dynamic mix of uses for this site with the developer although it was underlined that, if the developer were to opt to apply for an office-led development, this would not be contrary to policy.

The Member thanked the Chief Planning Officer for clarity on this and confirmation that residential use was not being discouraged by planners.

### **Radiance Studies**

A Member commented that this Committee had, for many years now, been assessing loss of light by a means not necessarily understood by many Members (BRE guidelines). However, two years ago, an expert consultant retained by the Corporation had first recommended the use of radiance studies as a tool that could be more easily understood. Despite this, the Member noted that the Committee had not yet been provided with a radiance study for any of the several applications it had considered in the last two years where loss of light had been an issue, including the one considered at its last meeting. The Member therefore asked for assurance that, when the Committee next considered an application that entailed a loss of light and for which a BRE assessment had been produced, a radiance study will also have been requested of the applicant.

Another Member spoke to state that the narrative included on this topic under the Committee's list of Outstanding Actions was entirely consistent with his recollection and the fact that Members had agreed that there needed to be further dialogue with the BRE on their possible adoption of radiance studies and what the legal position would be should they decide against this and the Committee still seek to mandate their use. The Member also felt that City Officers should be fully trained on the technique so that they were able to provide independent advice to the Committee regarding the results of any studies used in future applications.

Another Member underlined that she felt that it was important for Members to have every possible tool at their disposal when considering an application in order to fully understand the implications. She therefore questioned why this matter had not been progressed in the last two years and why developers would resist providing these if it assisted in terms of both Members and the general public understanding the true impact of their scheme.

Officers responded to confirm that they would be requesting radiance assessments from applicants for all future applications where a BRE assessment had been submitted. Members were also informed that Officers continued to discuss the use of radiance assessments with developers at the pre-application and application stage and were also in discussions with the BRE as to the emerging amendments to their daylight/sunlight assessments.

**MOTION** – The Member who had originally posed the question, moved that whenever this Committee considered an application that entailed a loss of light and for which a BRE assessment had been carried out, Officers will also request a radiance study of the applicant.

The Motion was seconded.

The Comptroller and City Solicitor intervened to caution that, when an application was received, there was a list of statutory requirements setting out what was required to validate it. In addition, there was also a local list which was considered and approved by Members. Under statutory requirements, Officers could not refuse to validate an application if the information requested was not referred to on either the local or statutory list. Whilst the Committee could therefore send a strong message to developers on the wish to see them provide this information, it was not currently a policy requirement.

The Member who had proposed the motion clarified that he had never suggested that the validation of a planning application should be questioned because an applicant had been asked to produce a radiance study and had refused to do so as this would clearly be illegal. However, he was calling for a radiance study to be requested for any application which involved a loss of light, and for which a BRE analysis had been produced. If a developer were to refuse this request, he was clear that this matter could not be forced as it was not an obligation. The Committee could, however, reasonably draw an inference as to why they had chosen not to provide this given that it was generally agreed that this was a useful tool.

The Chief Planning Officer and Development Director commented that radiance studies had now been requested for almost every major, relevant scheme that was now due to be considered by this Committee in the coming months and that the views of this Committee had been heard by Officers and developers. Officers also underlined that there was a big difference in terms of requiring and requesting such studies and highlighted that the VSC information was required as the BRE were the national authority on these matters and recommended a certain approach, with Officers therefore requiring developers to provide information in accordance with BRE guidelines. Any additional tools deemed to enhance Members' understanding and allow them to make a better judgement could, by all means, also be requested. It was confirmed that it was for the BRE to decide whether radiance was a useful tool and to endorse it if they saw fit through their review of national guidelines.

Another Member spoke to agree that this was clearly a useful tool and would enlighten discussions around applications. He therefore supported Officers requesting these but would not wish to push any further at this stage.

The Member withdrew his motion following the assurances from Officers that radiance studies would be requested of applicants for all future, relevant applications that entailed a loss of light.

*At this point, the Chair 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.*

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

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

22. **EXCLUSION OF THE PUBLIC**

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

**Item No(s)**

23 & 24  
25 - 26

**Paragraph No(s)**

3  
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23. **NON-PUBLIC MINUTES**

The non-public minutes of the hybrid meeting held informally on 29 June 2021 were considered and approved as a correct record.

24. **GATEWAY 5 PLANNING & REGULATORY SERVICES CASEWORK MANAGEMENT SYSTEM (PRSCMS) PROJECT**

The Committee considered and approved a joint, Gateway 5 report of the Director of the Built Environment and the Director of Markets and Consumer Protection regarding the Planning & Regulatory Services Casework Management System (PRSCMS) Project.

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

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

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

Members raised issues concerning the Bastion House/Museum of London site, Pavement Licences and associated Security Concerns and Suicide Prevention in the non-public session.

**The meeting closed at 12.56 pm**

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Chair

**Contact Officer: Gemma Stokley**  
**[gemma.stokley@cityoflondon.gov.uk](mailto:gemma.stokley@cityoflondon.gov.uk)**

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	7 September 2021
<b>Subject:</b> 100 And 108 Fetter Lane London EC4A 1ES Demolition of 100 and 108 Fetter Lane and construction of a new building for office use (Class E) and a public house comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.  [For the avoidance of doubt this application relates to 'Option A' as set out in the application documents. A separate application for 'Option B' is under consideration and is the subject of separate consultation and assessment]	<b>Public</b>
<b>Ward:</b> Farringdon Without	<b>For Decision</b>
<b>Registered No:</b> 21/00454/FULMAJ	<b>Registered on:</b> 21 June 2021
<b>Conservation Area:</b>	<b>Listed Building:</b> No

## Summary

The Applicant has submitted two applications with two options for the existing White Swan Public House at 108 Fetter Lane which is occupied by a third party.

Option A (21/00454/FULMAJ): Proposes to demolish this property alongside 100 Fetter Lane to enable the full redevelopment of the Site and to provide a new

replacement public house in the north eastern corner of the Site.

Option B (21/00534/FULMAJ): In the event that the Applicant is unable to

incorporate 108 Fetter Lane into the redevelopment, this separate application proposes to retain the existing White Swan pub and to build around it. Option B will not provide a new public house given the existing pub will be retained, and instead will provide a flexible commercial unit (Class E(a)(b)(c)(d)) in the north eastern corner of the Site where the Option A new public house would otherwise be sited.

The proposed development includes Demolition of 100 and 108 Fetter Lane and construction of a new building for office use (Class E) and a public house comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

The scheme delivers a high quality, office-led development that would provide a minimum of 13,178sq.m (GIA) of new flexible office floorspace (Class E) across Level 1 to level 11, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. The scheme makes optimal use of the site and provides an uplift of approx. 7,100sq.m (GIA) of office floorspace. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including small and medium sized companies which supports post-covid recovery as identified in the 'London Recharged: Our Vision for London in 2025' report. The proposal would also incorporate a ground level retail unit that would enable a range of retail/restaurant/cafe uses to come forward (78sq.m (GIA)), providing active frontage to the Bream's Buildings elevation, and would help enliven the new public realm between the Site and St. Dunstan's burial ground.

The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through skilful modelling of the elevations, well-considered massing and the use of high-quality, innovative materials. The proposed new public house would be a particularly jewel-like feature that would add architectural richness to the development and would be an innovative reimagining of the London public house as a type. The proposed development would be an appropriate and sympathetic neighbour not only to the buildings immediately adjacent but also to the wider streetscape.

The proposed demolition of the White Swan public house would result in a low level of less than substantial harm. It is considered that, in heritage terms, this harm would be outweighed by the provision of a new public house of

significant architectural quality, bearing the same name as the existing public house and thereby continuing the long tradition on this site.

The proposed development has the potential to impact three Assessment Points: Protected Vista 5A.2 (Greenwich Park) and River Prospects 16B.1 and 16B.2 (Gabriel's Wharf).

The proposed development is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General Wolfe statue to St Paul's Cathedral. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.

The proposed development would be visible towards the westerly edge of this River Prospects 16B.1 and 16B.2 (Gabriel's Wharf). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development would preserve the viewer's ability to read the riverside landmarks in the view.

The magnitude of change in these is considered negligible and the proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LVMF SPG.

The scheme would deliver significant public realm enhancements including a new pedestrian route linking Mac's Place with Breams Buildings to the south, widening of Greystoke Place and a new publicly accessible pocket park adjacent to St Dunstan's burial ground.

A total of 204 long stay and 28 short stay cycle parking spaces (compliant with the London Plan) would be provided at ground floor level, accessed from Mac's Place, along with associated cycling facilities including lockers and showers. Access for cyclists would be via two prominent cycle parking entrances at ground level off Mac's Place, or via a dedicated entrance off Fetter Lane. The provision of both long stay and short stay cycle spaces would meet the requirements of the London Plan.

The proposed short stay cycle parking would be provided entirely within the site boundary at ground floor level. 8 spaces would be located within the new

public realm (private land) adjoining the northern end of Mac's Place. One stand would be located on Greystoke Place (on private land) which will provide space for two cycles. The remaining 18 spaces would be provided within a new publicly accessible cycle store. This would be located adjoining the new pocket park and visible from Breams Buildings and the new route through the site.

In order to improve the pedestrian priority of the surrounding area a section 278 agreement will be secured which would deliver improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding the site to be replaced with York stone, and any cycle improvements necessary to allow access to the cycle parking.

The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street, therefore the servicing is proposed to remain as existing. A cap for the number of vehicles servicing the development would be no more than 14 vehicles per day which would ensure the number of vehicles proposed, is equal to or less than the estimated existing situation. The applicant was required to demonstrate how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, it would not be possible to deliver the new pedestrian route through, due to space limitations of the site. Therefore, on balance, on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.

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

The daylight and sunlight assessment demonstrates that there would be some loss of amenity with respect to daylight in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most impacted rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole. All of the windows



assessed would receive more than 0.8 times their former value in respect of sunlight and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.

The submitted sun on ground assessment demonstrates that the nearby residential and public open spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE Guidelines. The overshadowing assessment of 95 Fetter Lane (commercial) undertaken on 21 March showed that the eastern and western side roof terraces are likely to experience a noticeable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21st March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21st March. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight. However, given the spaces are in commercial use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.

An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. The report assesses the proposals against Strategic Policy CS10 which seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not

prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

Additional material considerations are as follows:

- Securing a development within the City, that would provide land uses which support the diversification, vitality and growth of the City as a world class business destination
- Increase in a diverse retail provision on the site, enhancing the retail offer in, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.
- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
- The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through the use of high-quality faience materials to the new public house elevation and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms.

It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan.

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

### **Recommendation**

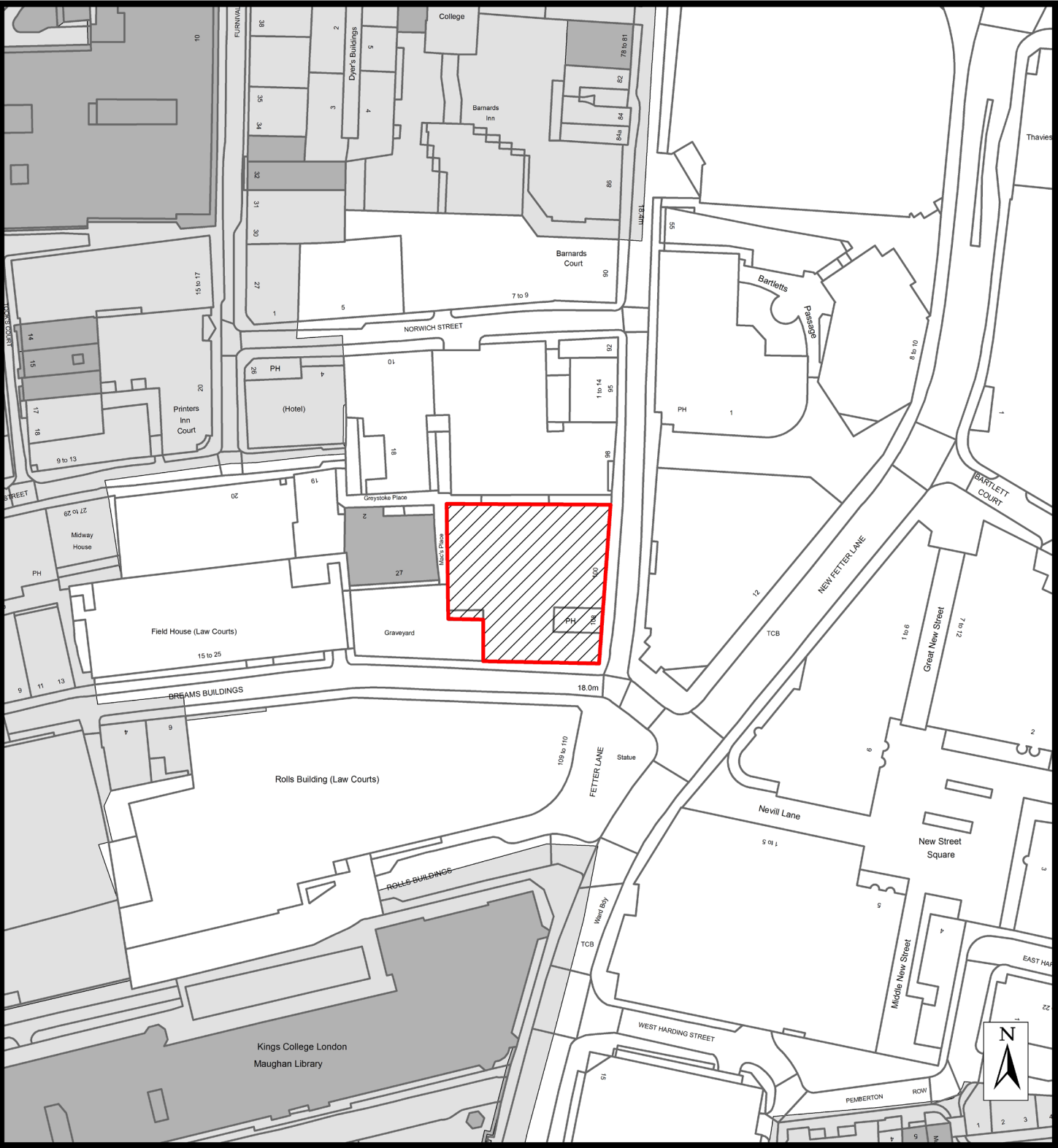
(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

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

(3) 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).

# Site Location Plan







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ADDRESS:

100 & 108 Fetter Lane  
EC4A 1ES

CASE No.  
21/00454/FULMAJ

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





Existing Building



White Swan Public House – Taken from DAS page 33





View along Greystoke Place from Fetter Lane looking west – taken from DAS page 33



View along Greystoke Place from Mac's Place looking east – taken from DAS page 34



View along Mac's Place towards St Dunstan's Garden – taken from DAS page 34



Existing servicing entrance along Greystoke Place – taken from DAS page 41

## **Main Report**

### **Site and surroundings**

1. The site comprises 100 Fetter Lane, 108 Fetter Lane, and Greystoke Place, and is bound by Fetter Lane to the east, Bream's Buildings to the south, St. Dunstan-in-the-West burial ground and Mac's Place to the west and 98 Fetter Lane to the north.
2. 100 Fetter Lane and 108 Fetter Lane were both built at the same time in the 1950's and were originally used for printing and publishing before being converted to their current uses over time. 100 Fetter Lane provides office accommodation over basement, ground and 7 upper storeys. 108 Fetter Lane is a 4 storey plus basement public house called The White Swan.
3. A UKPN substation is also located within the basement of 100 Fetter Lane which is only accessible for maintenance purposes.
4. There is no vehicle access to either building, with all deliveries, servicing and refuse collections taking place on street, unmanaged. There is no existing car, cycle or other forms of parking on the Site.
5. Greystoke Place is also located within the Site boundary and runs along its northern edge, providing a pedestrian route through to the west from Fetter Lane, linking to Mac's Place, St. Dunstan-in-the-West burial ground and No. 2 Greystoke Place. The upper floors of 100 Fetter Lane partially oversail Greystoke Place 98 Fetter Lane. The whole of this section of Greystoke Place is adopted public highway, with the underlying land in the ownership of the Applicant and within the Site boundary.
6. The existing building comprises 6,381sq.m (GEA) of office (Class E) floorspace and 463sq.m (GEA) of drinking establishment (Sui Generis) floorspace, with 30sq.m (GEA) occupied by the UKPN substation.
7. The existing building is not listed, nor is it located within a conservation area. Immediately adjacent to the west of the Site beyond Mac's Place sits the Grade II listed 2 Greystoke Place. The Chancery Lane Conservation Area is located nearby to the south, west and north.
8. It is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General Wolfe statue to St Paul's Cathedral.
9. The surrounding area is characterised predominately by commercial office buildings. Residential units are located immediately to the west at 2 Greystoke Place, and nearby to the north at 95 Fetter Lane.
10. The former burial ground of St. Dunstan-in-the-West (also referred to as St. Dunstan's burial ground in this report), immediately to the west of the site, is an open space which is understood to be open to the public from 8am to 7pm or dusk, whichever is earlier, excluding Christmas and New Years' Day. The burial grounds are owned by the London Diocesan Fund and maintained by the City Corporation.



## **Proposal**

11. Planning permission is sought for the demolition of 100 and 108 Fetter Lane and the construction of a new building for office use (Class E) and a public house comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.
12. The proposed development would comprise:

<b>Use</b>	<b>Floorspace (GIA)</b>	<b>Floorspace (GEA)</b>
Office (Class E)	13,178sq.m	15,005sq.m
Public House (Sui Generis)	234sq.m	302sq.m
Cafe (Class E)	78sq.m	90sq.m
UKPN (Sui Generis)	42sq.m	37sq.m
External publicly accessible space	226sq.m	226sq.m

13. The proposed building would comprise basement (including a small sub-basement), ground, mezzanine plus 12 upper storeys and a roof plant level and will reach a maximum height of 75.1m AOD. At ground floor level, an office lobby accessed from Fetter Lane would provide entry to office floorspace located at floors 1 to 11. The basement would mainly house plant, storage, a UKPN substation and the sub-basement would house a rainwater attenuation tank.
14. A new pub is proposed at the north east corner of the Site at the junction of Fetter Lane and Greystoke Place, occupying ground and mezzanine levels with additional space in the basement. The ground and mezzanine levels would provide the tradeable space.
15. New publicly accessible external space is proposed at ground floor level. A new pedestrian route is proposed linking Greystoke Place / Mac's Place with Brems Buildings to the south, between the proposed building and St. Dunstan's burial ground. This route would include a new pocket square adjacent to St. Dunstan's burial ground, which would be covered by the upper storeys of the proposed new building. A Cafe space (78sq.m GIA) is proposed fronting Brems Buildings and the new public realm between the site and St. Dunstan's Burial Ground, with access to both. It is also proposed to widen part of Greystoke Place and set back the building line on the corner of Fetter Lane and Bream's Buildings. In total 226sq.m of new external publicly accessible space would be provided.
16. The pocket square is proposed to be gated for security and maintenance purposes. It would be open to the public between 6am and midnight. The

opening hours and details of the management of this space and the other areas of permissive public realm within the proposed development will be secured by the S106 Agreement.

17. A total of 204 long stay and 28 short stay cycle parking spaces would be provided, with 10 of the short stay spaces provided within the new public realm. Access for cyclists would be via a dedicated cycle parking entrance at ground level off Mac's Place, with access also possible from Fetter Lane. The building is proposed to be car free as per the existing arrangement.
18. The building is proposed to be serviced from the street as per the existing arrangement. This would be subject to consolidation which would be secured via a S106 obligation.
19. The Proposed Development would include an extensive range of soft landscaping features to enhance urban greening biodiversity, including on the roof terraces, pocket square and edge planters. Where roof spaces cannot be accessed for practical reasons the surfaces would be greened where possible.
20. For the avoidance of doubt this application relates to 'Option A' as set out in the application documents. A separate application for a similar scheme which retains the existing pub in its current location ('Option B') is also under consideration (app. no. 21/00534/FULMAJ).

### **Consultation**

21. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders prior to the submission of the application including extensive pre-application consultation with key decision making authorities, key stakeholders and local community (including nearby residents). Given the impact of the COVID-19 pandemic remote engagement and consultation activities were undertaken comprising:
  - A meeting with Fleet Street Quarter
  - A meeting with St. Dunstan's burial ground (With CoL Open Spaces Officers in attendance).
  - Meetings with neighbouring occupiers including Weil Gotshal & Manages (London) LLP, MacFarlanes, Bird and Bird, The White Swan Public House and Owner/Occupiers of 2 Greystoke Place.
  - Email correspondence with other neighbouring occupiers who responded to consultation letters.
22. The responses to the pre-application consultation included: some concern over reduction in pub trading area; potential for the relocated pub causing noise and disturbance; support for the proposed public realm enhancements; and queries over landscaping treatment for public realm, and their interaction with St. Dunstan's burial ground.
23. Following receipt of the application for planning permission, the application has been consulted upon and advertised on site and in the

press. One letter of objection was received from Bird and Bird LLP, 12 New Fetter Lane.

24. Copies of all received 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.

Consultation Responses	
Greater London Authority	<p>Land Use Principles: The site is located in the CAZ and within the City of London which encourages the provision of new office space. The principle of office use is supported. Subject to the assessment by the City of the value of the public house, the proposals are supported in principle.</p> <p>Offices: The City of London is projecting office growth of 1,150,000sqm of office space between 2011-2026. Its proposed submission draft plan 2036 projects 2,000,000 sqm of office space between 2016 and 2036. This proposal will help support this requirement.</p> <p>Urban Design: The approach to scale, massing and architecture is supported. The improved public realm increases connectivity and permeability of the area, which is supported, however the applicant should consider ensuring access is not restricted to certain times of the day.</p> <p>Heritage: The scheme is considered to have a positive impact on the setting of the nearby Grade II building. The impact on views, including strategic views, are acceptable. A watching brief during excavation is recommended in relation to archaeology remains.</p> <p>Transport: An Active Travel Plan and a contribution of £220,000 for cycle hire is required. Works required should be secured under Section 278 or as part of the Section 106 Agreement. Further consideration is needed in regard to onsite disabled persons parking and short-stay cycle parking. A DSP, CLP and a cycle promotion plan are required.</p> <p>Sustainable Infrastructure: Urban greening, biodiversity net gain, flood risk and sustainable drainage comply with policy requirements. Further information is required for energy, circular economy and water efficiency (for Option A). The applicant has provided additional information in</p>

	<p>relation to points raised for energy, which is currently being reviewed. The Whole Life Carbon Assessment has been re-submitted in the correct format and is currently under review. No information has been provided in relation to digital infrastructure therefore compliance with London Plan Policy SI 6 cannot be determined at this stage.</p> <p>Environment: Air quality impacts are generally acceptable. Further clarification is required, and the applicant has provided additional information in relation to points raised. This is currently being reviewed.</p>
<b>Officer Response to Comments</b>	<p>Consideration of the impacts on the Design, Heritage, Sustainability are set out in the report.</p> <p>The Applicant is willing to explore the provision of a Blue Badge Space within the vicinity of the site with the City Corporation. This would be secured through the S278 Agreement.</p> <p>The applicants is willing to contribute towards a Cycle Hire / Network Improvements Contribution. This contribution amount is still under negotiation between the applicant and Transport for London.</p> <p>A DSP, CLP and a cycle promotion plan are proposed to be secured via a S106 agreement.</p>
City of London Police	<p>The proposed public house should have an additional entrance / exit on Greystoke Place to avoid people walking round the street corner with drinks.</p> <p>Details of lighting within the proposed pocket park / public route to ensure it doesn't become a drinking hub.</p>
<b>Officer Response to Comments</b>	<p>A secondary entrance to the pub on Greystoke Place would be provided.</p> <p>Details of external lighting and a lighting strategy for the building are proposed to be conditioned.</p>
Historic England	Responded confirming they have no comments to make.
Southwark Council	Responded confirming they have no comments to make.
Tower Hamlets	Responded confirming they have no comments to make.
Greenwich	Responded confirming they have no objections.

Camden	No response received
Lewisham	No response received

<b>Objection from Neighbouring Residential Occupiers</b>	
<b>Representations</b>	
Bird and Bird LLP, 12 New Fetter Lane	<p>The proposals would cause harm to the setting of Grade II listed former YRM Offices.</p> <p>The proposals would result in the overshadowing of 12 New Fetter Lane.</p> <p>The proposals would increase the Light Pollution to residential windows in No. 2 Greystoke Place.</p>
<b>Officer Response to Comments</b>	<p>The impact on the setting of Grade II listed former YRM Offices is addressed in Heritage Assets section of the report.</p> <p>The impact on overshadowing to this property is addressed in the Overshadowing section of the report.</p> <p>The impact of light pollution to the residential windows at No. 2 Greystoke Place is addressed in the Light Pollution section of the report.</p>

### **Policy Context**

25. 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.
26. 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.
27. 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.

### **Considerations**

#### **Relevant Statutory Duties**

28. 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).

## **NPPF**

29. 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”. In respect of sustainable development, the NPPF states at paragraph 10 that ‘at the heart of the Framework is a presumption in favour of sustainable development.’ At paragraph 11(c) the NPPF states that for decision-making this means ‘approving development proposals that accord with an up-to-date development plan without delay...’.
30. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
  1. the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
  2. 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
  3. 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)
31. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
32. Chapter 6 of the NPPF seeks to promote Building a strong, competitive economy.
33. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
34. Chapter 8 of the NPPF seeks to promote healthy and safe communities.
35. Para 92 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
36. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 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”.

37. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
38. Paragraph 113 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”.
39. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”
40. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
41. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
42. Paragraph 154 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

43. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
44. Paragraph 195 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.
45. Paragraph 197 of the NPPF advises, "In determining applications, local planning authorities should take account of:
  - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) the desirability of new development making a positive contribution to local character and distinctiveness."
46. Paragraph 199 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
47. Paragraph 200 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional"
48. Paragraph 202 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting.
49. Paragraph 203 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**

50. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets.

### **Considerations in this case**

51. In considering this planning application 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.
52. 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.
53. 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).
54. The principal site-specific issues in considering this application (in accordance with the over-arching issues above) are:
- Economic development and the provision of additional office accommodation.
  - Acceptability of the relocation of the Public House
  - The acceptability of the scheme in design and heritage terms including impact on heritage assets and an assessment of the proposed public realm alterations.
  - 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.
  - 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 solar glare and light pollution impacts of the proposal
  - Consideration as to whether fire safety has been taken into account in the design.
  - The results of the Health Impact Assessment.

- The equality impacts of the proposal.
- The requirement for financial contributions

### **Economic Development and the Provision of Office Accommodation**

55. 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.
56. 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.
57. 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.
58. 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.
59. 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.

60. 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.
61. 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.
62. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
63. 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.
64. 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.
65. 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**

66. The application site currently accommodates 6,000sq.m (GIA) of office space. The application proposal would deliver 13,178sq.m (GIA) of office

space on the site. This equates to a total uplift in office space across the site of 7,178sq.m (GIA).

67. Office space would be provided at 12 levels of the new building. The floorplates have been designed to have good daylight conditions, consistent floor depths and allow for a flexible multi tenancy arrangement. The terraces at levels 5-9 and 12 would provide amenity space for future occupiers.
68. 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 proposed new building is of a high quality.
69. The improved and enlarged office accommodation supports the aims of Local Plan policy CS1 and the Proposed Submission Draft City Plan 2036 policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the Proposed Submission Draft City Plan 2036.

#### **Provision of retail (Class E)**

70. The proposal would incorporate a ground level retail unit that would enable a range of retail/restaurant/cafe uses to come forward (78sq.m (GIA). The site is not located in a Principal Shopping Centre (PSC) or Retail Link as defined by the Local Plan.
71. The introduction of this retail unit is welcomed as it would provide active frontage to the Bream's Buildings elevation, enliven and bring vibrancy to the new public realm between the Site and St. Dunstan's burial ground, and would provide services for workers and residents. A condition is recommended to ensure that the spaces are used for retail/restaurant/cafe use are not changed to any other use within Class E.
72. It is considered that this provision would accord with Local Plan policies CS20, DM1.5 and DM20.4 and draft City Plan policies S5 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.

#### **Relocation of Public House (Option A)**

73. The application site is not located within a designated Principal Shopping Centre (PSC) or Retail Link as set out in the Local Plan. The existing site contains one retail unit in the form of The White Swan Public House drinking establishment (Sui Generis) at 108 Fetter Lane.
74. The existing White Swan Public House (368sq.m) is a four storey plus basement public house, with ancillary kitchens and offices on the upper floors. Although the pub is quite large only 148sq.m is used as 'tradable floorspace'.
75. The White Swan Public House has operated on the development site for over 150 years with records going back to the mid-nineteenth century.

This area, like many areas of the City had many more public houses than today with a notable site further north of here at 90 Fetter Lane (White Horse Coaching Inn) which was destroyed in the early 1990s and is referred to in the Chancery Lane Area Character Summary Management Strategy SPD (2016). The application site previously included the former Printer's Devil Public House.

76. The site and surrounding area (to the east) suffered extensive bomb damage during World War II. The office building and public house were reconstructed in the 1950s and originally used for printing and publishing. Further alterations were made in the 1970s including the demolition of the Printer's Devil Public House. The existing pub has not been designated an Asset of Community Value (ACV).
77. It is considered that the existing public house holds a moderate level of historical significance as the latest in a long lineage of public houses bearing this name, and is considered to be a non-designated heritage asset (further discussion of this can be found in the Heritage section below). The proposed demolition would result in a low level of less than substantial harm.
78. Local Plan policy CS20 states that existing retail facilities should be protected unless it is demonstrated that they are no longer required and to resist the loss of retail frontage and floorspace. Policy DM20.3 resists the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, and which enhance the City's vibrancy. Although there would be a technical loss of retail floorspace the use would remain and there would be an increase in active frontages. The scheme is considered to comply with the relevant retail policies of the Local Plan.
79. Policy HC7 in the adopted London Plan 2021 states that "Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future". The supporting text at para 7.7.4 indicates that boroughs "should consider the replacement of existing pubs in redevelopment and regeneration schemes, where the loss of an existing pub is considered acceptable."
80. In the emerging City Plan 2036 Policy CV1 (Protection of Existing Visitor, Arts and Cultural Facilities) it is recognised that there are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. The supporting text states that "Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include...historic public houses which have a heritage, cultural, economic or social value to local communities".
81. Draft Policy CV1 states that "loss of facilities will only be permitted where this would facilitate the overall enhancement of visitor, arts or cultural provision within the vicinity or where it has been demonstrated that the existing facility has been actively marketed for its current or an

alternative visitor, arts or cultural use at reasonable terms for such a use.” However, the supporting text indicates that marketing evidence will not be required if it can be demonstrated that the loss of a facility is part of a business plan to deliver improvements to another similar facility nearby.

82. It is proposed to create a replacement public house, to be positioned in the north-east corner of the site. This would provide 234sq.m of drinking establishment use (Sui Generis) across basement, ground and mezzanine levels activating the frontage of Fetter Lane and the refurbished and widened Greystoke Place. There would be an overall loss of 134sq.m of drinking establishment floorspace. The proposed new public house would operate 187sq.m of ‘tradeable space’, so although there would be a loss of overall drinking establishment floorspace there would be an increase in tradeable space (39sq.m) with new kitchen facilities and storage located in the basement. The new unit would be clad in blue glazed terracotta (over four storeys) enabling a distinctive piece of architecture in this area of the City.
83. As well as the quantitative improvement in tradeable/publicly accessible floorspace, there would be a qualitative improvement compared to the existing situation. The existing pub has a narrow floorplate with only a single aspect and limited active frontage on to Fetter Lane with no external space. The new pub would have substantially increased active frontage with wider floorplates and would be dual aspect, fronting on to both Fetter Lane and Greystoke Place. To compliment this, Greystoke Place would be widened, providing new external amenity space outside the pub for outdoor drinking. The proposals would also improve the quality of the pub in design terms – the existing building is unattractive and will be replaced by a new, purpose-built jewel-like building clad in high quality materials.
84. The existing White Swan public house operates until midnight. Conditions are proposed to restrict the opening hours of the proposed public house to between 7am and 11.30pm, and to require the submission of an Operational Management Plan for the public house to detail the operational measures to be put in place to protect the amenity of the nearby residents and to ensure Greystoke Place would not be obstructed by the pub’s patrons.
85. It is considered that the low level of less than substantial harm would be outweighed by the provision of a new public house of significant architectural quality, bearing the same name as the existing public house and thereby continuing the long tradition on this site. The increased quantum of floorspace and higher quality internal space should provide both improved economic benefit from the public house and enhanced social space for local residents, workers and other members of the public. As such it is considered that the proposals accord with Local Plan policy CS20, draft City Plan policy CV1 and London Plan policy HC7.

## **Design**

### **Principle: Demolition of the existing building**

86. The site is not within a conservation area and none of the buildings are listed.
87. The existing building is the surviving half of a larger building known as Oyez House, designed by T.P. Bennett and constructed in the early 1950s for the Solicitor's Law Stationary Society. It incorporated offices, printing works and two public houses: the Printer's Devil to the north and the White Swan to the south, which bookended a loosely symmetrical brickwork composition over a Portland stone base which rose in scale towards the western end of the site. In the 1980s, Oyez House was subdivided into two distinct and self-contained halves. Subsequently in the early 21<sup>st</sup> century the northern half was redeveloped as a new office building, 98 Fetter Lane, including the demolition of the former Printer's Devil public house.
88. The surviving southern half of Oyez House (excluding the White Swan public house) is an office building rising to seven storeys over a basement at its highest level and is of brickwork with punched window openings and a Portland stone ground floor treatment. The building has been subject to alteration and partial recladding. It is considered a nondescript example of its type and date and the principle of its demolition is acceptable.
89. The White Swan public house is considered to be a non-designated heritage asset of a moderate level of historical significance and a low level of architectural significance. Accordingly, its proposed demolition would result in a low level of less than substantial harm. This impact is discussed in greater detail in the 'Heritage Assets' section of this report.

### **Height and bulk**

90. The site is located towards the west of the City. The proposed building would rise to a height of 75.1m AOD and would comprise thirteen floor levels and a plant room over a basement.

### **Design approach**

#### **Architecture**

91. Externally, the proposed development would take the form of four individual blocks, responding to the site's various townscape settings: green open space and lower-rise historic and modern buildings to the west and mid-rise, taller modern buildings to the east. Reading as a series of different buildings, the proposed development would vary in scale, height, form and would bring a great richness of materiality and architectural exuberance to this part of the City.
92. The tallest and most prominent element would be the main block. It would present full elevations east to Fetter Lane and south to Breams Buildings and partial elevations to the north and west. The main block facades would be arranged on a grid system with expressed metal

columns carrying thick horizontals of crushed concrete in an orange hue. These strata of solid material would give the main block a monumental, solid quality in townscape views and would frame recessed apertures shaded with aluminium fins. Brise soleils would be arranged across the south and east elevations only where required to mitigate sunlight, serendipitously expressing the sun's path across the faces of the building. The main core of the building would be located against the inner face of the stair core, allowing the staircases to be expressed through the glazing of the east elevation.

93. The main entrance to the building would be located on the south-east corner of the main block. Here, the elevations would be dramatically cut away to create a triangular entrance with a chamfered building line, expanding the public realm and creating a dynamic focal point in townscape views. The double-height ground floor elevations would be of solid crushed concrete with irregular punched openings, playing on the forms and design of traditional frontages. At the top of the main block would be a smaller two-storey element comprising an upper plant room and lower pavilion providing access to the southerly roof terrace. The upper plant room and building crown would be of metalwork, comprising a mesh screen with wraparound aluminium fins. There would be extensive greening to the roof terrace.
94. The new public house would be located in the north-east corner of the site. This would be a jewellike re-creation of the existing White Swan public house currently embedded in the centre of the Fetter Lane elevation. Originally, the White Swan stood further to the north and consequently it is proposed to re-site the public house there; this would also allow for the optimal layout of the internal floor plan of the proposed development. The proposed new public house would take the form of a four-storey block with elevations to Fetter Lane and to Greystoke Place. It would be entirely constructed of shimmering glazed brick, electric-blue in colour, with a series of regular punched window openings at higher level. At ground floor level, the frontage to Fetter Lane would be an ingenious 'negative image' of the existing pub's traditional frontage, an approach carried around on the Greystoke Place elevation. The final details of the elevations, including their enrichment through the incorporation of stamped and embossed details to the punched openings, would be secured via condition.
95. To the west of the site, the proposed development would drop down in scale to address the burial ground. This part of the development would take the form of a six-storey pavilion block faced in smooth grey crushed concrete with regular punched window openings. Above, its stepped roof form would provide green terraces for the building occupants, while the pavilion would be lifted off the ground floor plane to allow a new public route through the site to snake from Bream's Buildings to Mac's Place. Between the main block and pavilion would be a north-south bay of the development which would carry an extensive green walling system intended to address and complement the former burial ground. This green 'slice' of the proposed development would mediate between the pavilion and the main block in height and would have a stepped roof



form that would provide external terraces to various floor levels of the main block. Like the pavilion, it would be lifted off the ground floor for the new public route.

### Public Realm

96. The proposals would transform the public realm around the site. Currently, the existing building offers no form of accessible public space at ground floor level and no active frontages apart from the existing public house. Contrastingly, the proposed development would create a significant amount of new publicly accessible space at ground floor level in the form of a new route between Bream's Buildings and Mac's Place. At a maximum of 3.4m wide and 5.5m high, this route would significantly enhance the locality's permeability and amenity and with the public house would incorporate a new cafe at the south entrance, fronting Brems Buildings, to boost the quantum of active frontages offered by the proposed development. It would have the effect of significantly widening Mac's Place by setting the building line further back. The proposed new route would incorporate an attractive sunken garden as a green space for people to dwell; traversing the eastern boundary of the burial ground, it would allow for new perspectives and experiences of that important open space. Details of the junctions between the new route and the burial ground would be secured via condition.
97. The proposed development would offer further gains of public realm to the south-east corner of the site, where the proposed chamfered entrance would release more of the footway, and at the north-east corner, where the north frontage of the new public house would be set back to create a wider entrance to Greystoke Place – 3.15m instead of the existing width of 2.15. Further along its length, the height of Greystoke Place would be raised from 2.79m to 4.1m. As well as these spatial improvements, Greystoke Place would incorporate a tiled mural referencing the history of printing in the locality. This theme would also be expressed more widely in carvings on edges, reveals and columns across the ground floor plane. Details would be secured via condition.
98. Lighting would be integrated throughout the ground floor plane, varying between wall-mounted uplighters on the elevation, feature lighting to artworks and other similar elements and luminaires integrated into the ground and soffit of the new public route. This would ensure the sophisticated architecture and spatial qualities of the development are appreciated after nightfall and final details would be secured via condition.

### Heritage Assets

#### **Strategic views – London View Management Framework**

99. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's character and identity at a strategic level.
100. The proposed development has the potential to impact three Assessment Points: Protected Vista 5A.2 (Greenwich Park) and River

Prospects 16B.1 and 16B.2 (Gabriel's Wharf). The magnitude of change in these is considered negligible and would accord with the visual management guidance for both, preserving the viewers' ability to recognise the Strategically Important Landmark (St Paul's Cathedral) and other landmarks in the views.

#### 5A.2 – Greenwich Park looking from the General Wolfe statue to St Paul's Cathedral

101. The site of the proposed development is within the Background Wider Setting Consultation Area of assessment point 5A.2 of this Protected Vista. At 75.100m AOD, the proposed development would rise above the height threshold of between 52.1m and 53.6m in this part of the Protected Vista. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.
102. The guidance for this view states that the background of St Paul's Cathedral in the view is mostly unimpeded, with a clear silhouette of the dome above the peristyle, and the western towers, and that the ability to see sky between the upper parts of the various elements is crucial to the viewer being able to recognise and appreciate St Paul's Cathedral in this panorama (para 142). The guidance goes on to say that the dome (above the peristyle) and the upper parts of the western towers of St Paul's Cathedral are well defined against their background in this view. Development that exceeds the Wider Setting Consultation Area in the background of this view should preserve or enhance this level of definition (para 147).
103. Being totally screened by existing taller buildings in the Protected Vista, it is considered that the proposed development would accord with the visual management guidance for this view and would preserve the skyline definition of the Cathedral. Regard has been had to a future hypothetical scenario in which the proposed development is visible in the Wider Setting Consultation Area and not screened by existing taller buildings. The site is located at the southern edge of the Wider Setting Consultation Area, meaning that even if the proposed development was unscreened and visible in the background of the Protected Vista it would appear at some distance away from the Cathedral. Moreover, it is considered that the height, form, massing and materiality of the proposed development would result in an understated skyline presence which would preserve the level of definition of the upper parts of the Cathedral in this view and consequently the ability to recognise the Strategically Important Landmark.

#### 16B.1 and 16B.2 – Gabriel's Wharf

104. The proposed development would be visible towards the westerly edge of this River Prospect. The relevant LVMF guidance states that both Assessment Points are orientated towards St Paul's Cathedral, the Strategically Important Landmark. It goes on to state that the river dominates the foreground of the view, while the middle ground consists

of mature trees leading from Temple towards the buildings on the Embankment near Blackfriars Bridge. Buildings between these provide a rich and intricate skyline (paras 276-277). Since the LVMF guidance was published a number of modern buildings are now visible on this skyline.

105. From both Assessment Points, the upper floors and rooftop of the proposed development would appear above the trees of the Inner Temple Garden (grade II Registered Park and Garden), directly above the unlisted Inner Temple Library and immediately east of the spire of St Dunstan-in-the-West (grade I). In the view, the proposed development would rise slightly higher than this spire with a substantive sky gap in between. The proposed development would mediate between the scale of the spire and the much taller modern buildings at No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which being the tallest building visible in this part of the panorama.
106. The Visual Management Guidance for this view states that new development should preserve or enhance the townscape setting of St Paul's Cathedral in this view (para 281). It further notes that there are several landmarks and historic buildings other than St Paul's Cathedral in the view, which aid the viewers' strategic appreciation of London. The viewer's ability to recognise these landmarks should be preserved or enhanced (para 282). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development would preserve the viewer's ability to read the riverside landmarks in the view.

### **Summary of LVMF Impacts**

107. The proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LVMF SPG.

### **Impact on significance and setting of listed buildings**

#### YRM Offices – grade II listed

##### *Significance and contribution of setting*

108. Office building of 1962 incorporating a penthouse flat, by architects Yorke, Rosenberg and Mardall as their own headquarters. This firm were ground-breaking modernists and Yorke had been one of the first British modernist architects. The building's crisp white lines, fine detailing and quality as an example of modernist architecture are all noted approvingly by the list entry. The building therefore possesses a high degree of architectural significance and a moderate degree of historical significance for its place in the history of modernist architecture and its role in the propagation of that style in Britain.
109. The building's list entry makes it clear that special interest derives from the building's setting, stating that it is 'a sensitive integration of a frankly

modern office building within an ancient street pattern, relating unusually well both to the narrow alleyways to the north and to the former churchyard with its retained boundary walls and railings to the south'. The building's relationship to these north and south features therefore contributes highly to its significance.

### *Impact assessment*

110. The massing and design of the western side of the proposed development has been shaped by the need to respect the setting of the listed building. Accordingly, the scale of the pavilion block would match that of the listed building, its smooth grey facades would complement the tiling of the listed building and the pavilion fenestration would harmonise with that of the listed building. Moving east, the green 'slice' of the development would set views of the listed building and the pavilion block against a spreading green wall, designed to play on and extend the existing greening of the burial ground; the new route skirting the eastern edge of the churchyard would widen Mac's Place and enrich the network of alleyways to the north. The proposed development would thus preserve those elements of setting to the north and south which contribute to the significance of the listed building and would enhance the eastern setting of the listed building by replacing the inactive, hard frontage of the existing building with a green new public route centered on a new cafe and sunken garden.

### Maughan Library – grade II\* listed

#### *Significance and contribution of setting*

111. Former Public Records Office of 1855 and extended in 1896. The initial part of the building was designed by Sir James Pennethorne and was extended by Sir John Taylor; the two phases are in the same Gothic style but distinguished by the use of Bath stone dressings for the former and Portland for the latter. Pennethorne's original block is aligned. The building has high architectural significance as a highly individual interpretation of the Gothic style in the early days of the Gothic revival; it was the first major public building in this style after the completion of the Houses of Parliament. It possesses further architectural significance as an early example of a purposefully fireproofed building employing iron members and forgoing heating. The building has very high historical significance for its role as the nation's archive. It has additional historic significance for its associations with Sir James Pennethorne and Sir John Taylor, both leading architects of their day. The building also holds a degree of archaeological significance for the way it incorporates part of the chancel arch of the demolished C13 Rolls Chapel.
112. The building's historical significance as a repository for the nation's records is buttressed by its setting in the City's legal quarter. The building is within the Chancery Lane conservation area and faces Westminster's Strand Conservation Area, meaning that, to the west, the building sits comfortably in a setting of masonry buildings – historic and modern – of a largely consistent scale. To the east, the building's setting has undergone greater change, chiefly due to second world war

bombing. In the approach from Fleet Street up Fetter Lane, the building is perceived amidst modern blocks of a largely sympathetic scale. It has group value with a grade II listed K2 kiosk on Fetter Lane. Further along Fetter Lane, No. 12 New Fetter Lane and No. 6 New Street Square form prominent modern elements in views of the Fetter Lane elevation of the building. As a looser and more modernised area of the City, the building's easterly setting contributes little to its significance.

### *Impact assessment*

113. The proposed development is located to the north of the Maughan Library. Currently, in views of the Maughan Library's Fetter Lane elevation looking north, the existing building on the site can just be glimpsed beyond Nos. 109-110 Fetter Lane, which sits between the two. To the east side of Fetter Lane, No. 12 New Fetter Lane and No. 6 New Street Square are dominant modern elements in the background.
114. In views of the Maughan Library looking north, the proposed development would form a prominent new modern element in the background. It would rise up behind Nos. 109-110 Fetter Lane with much of the south elevation visible. The height of the proposed development would sit between Nos. 109-110 Fetter Lane and No. 12 New Fetter Lane. The high-quality modelling and materiality of the façade of the proposed development would enrich the group of modern buildings which sit behind the Maughan Library. The proposed development would therefore not have a jarring effect on the setting of the listed building but would be perceived as an augmentation of the existing group of modern buildings in the background.

### **Impact on Conservation Areas**

#### Chancery Lane Conservation Area

115. The site of the proposed development does not lie within a conservation area but is situated near to the Chancery Lane conservation area, elements of which lie to the north, west and south.
116. The conservation area is dominated by several significant public buildings – the former Patent Office and the former Public Records Office (both grade II\*) – and a high-quality group of Victorian and Edwardian masonry buildings. It contains an exceptional span of building ages and styles, from secular medieval buildings such as Staple Inn (grade I) to well-considered 21<sup>st</sup> century insertions.
117. The proposed development would be visible in a view from within the conservation area, looking east from Chancery Lane along Breame Buildings. Within the conservation area, the historic and modern buildings along this street are characterised by red brickwork with blue brick details and stone dressings. They frame a view of the trees of St Dunstan-in-the-West burial ground. The upper storeys of No. 12 New Fetter Lane and No.6 New Street Square form the backdrop of the view. In this view, the proposed development would provide a characterful, high-quality backdrop, with its eye-catching horizontal strata of orange crushed concrete relating well to the buildings in the conservation area.

It would sit comfortably in scale with the modern buildings that can already be perceived in the background of the view.

118. The proposed development would also appear in views along the eastern periphery of the conservation area. In the view looking south from Holborn down Fetter Lane, the proposed development would form a prominent tall new element. It would appear as a bookend to the row of conservation area and non-conservation area buildings which line the northern half of Fetter Lane. Although higher in scale than them, it would be read as forming part of the taller group of modern buildings associated with New Street Square. Its crushed concrete strata would help it to relate to the varied materiality of the conservation area buildings in this view. In the view looking north from the K2 telephone kiosk on Fetter Lane, the impact of the proposed development would be much as stated in the section on the Maughan Library above.
119. In the aforementioned views, the existing White Swan public house is only glimpsed and consequently is not judged to have a visual relationship with the conservation area. Its loss as part of the proposals would therefore have no impact on the character or appearance of the conservation area.
120. The proposed development would only be visible in a limited way in relation to the conservation area – and, where visible, it would largely read as an augmentation of the modern buildings of New Street Square. It would have no specific impact on any individual building or group of buildings within the conservation area. Accordingly, it is considered that the proposed development would not be harmful to the character and appearance of the conservation area.

### **Non-designated heritage assets**

#### **The White Swan Public House**

121. The White Swan is an example of an early post-war public house. It was designed by Sidney C. Clark, chief architect to Charrington's Brewery, and comprises four-storey brick elevations with regular metal window openings and Portland stone dressings. It possesses a traditional-style public house frontage to the ground floor level on Fetter Lane. The building is reincarnation of another public house with the same name which previously existed further to the north of the site until it was destroyed in World War Two. Insurance records demonstrate that there has been a public house of this name on Fetter Lane since as early as 1815. Therefore, it is considered that the existing public house holds a moderate level of historical significance as the latest in a long lineage of public houses bearing this name. Furthermore, it is considered that the building has a degree of historical interest in the association with architect Sidney Clark, a notable and extremely prolific public house architect of the interwar years. Several of his public houses have since been listed at grade II. The White Swan is a late and possibly rare post-war work – he retired in 1959 – and the building's simple, well-executed neo-Georgian frontage to Fetter Lane is considered to hold a low level of architectural significance as a well-executed albeit simple example of the

type. The White Swan public house is thus considered to be a non-designated heritage asset for the purposes of this application.

122. Accordingly, its proposed demolition would result in a low level of less than substantial harm. It is considered that, in heritage terms, this harm would be outweighed by the provision of a new public house of significant architectural quality, bearing the same name as the existing public house and thereby continuing the long tradition on this site.
123. NPPF para 203 requires local authorities to take into account the impact of an application on the significance of a non-designated heritage asset. Para 203 further requires a local authority to make a balanced judgement in respect of the harm or loss of a non-designated heritage asset. It is considered that the loss of the existing White Swan public house and the architectural and historic values it embodies, though regrettable, would be outweighed by the provision of the new White Swan public house and the cumulative benefits accruing from this mixed-use development.

#### St Dunstan-in-the-West burial ground

124. The burial ground is a rough quadrilateral in shape, indented in the north-east corner, raised around three feet in height above street level. It is divided from the street by a brick retaining wall incorporating steps, railings and gate piers. Immediately behind the railings are three large plane trees protected by Tree Preservation Orders. The layout of lawn, planting beds and paths won a landscaping award scheme in 2006.
125. The burial ground was formed in the early modern period as an additional burial ground to serve the church of St Dunstan in the West on Fleet Street. It was used for burials between the early modern period (c.1600) and the mid-nineteenth century, meaning it possesses a high degree of historical significance for its associations with past City communities. It possesses further historical significance as a rare instance of a second graveyard serving a City church. Architecturally, the burial ground possesses a moderate degree of significance as a well-preserved example of its type retaining key features such as brickwork walls, railings and tombstones.
126. The proposed development would enhance the setting of this non-designated heritage asset by replacing the inactive, hard frontage of the existing building with a green new public route centered on a new cafe and sunken garden. The eastern setting of the burial ground would be visually enhanced through the more permeable and articulated elevation, varied material palette, greater degree of active frontage and more extensive urban greening; the latter would constitute an enhancement in biodiversity terms too. The new route provided through the site along the eastern boundary of the burial ground would provide new perspectives on the non-designated heritage asset.

#### **Protected Trees**

127. There are three London Plane trees located within St. Dunstan's burial ground that are protected by Tree Preservation Orders. The trees are

located on land under the management of City Gardens. Local Plan policy CS19 seeks to protect the amenity value of trees, retaining and planting more wherever practicable. Draft City Plan 2036 policy OS4 seeks to protect trees which are subject to a Tree preservation Order.

128. All of the trees are located outside of the application site. Tree protection measures are proposed during demolition and construction works. These would include tree protection boxes and ground protections within the Root Protection Areas (RPA) of the closest trees where necessary due to their proximity to the application site. Conditions are proposed to provide final details of these protection measures.
129. The closest tree to the site is proposed to be pruned back to the site boundary. City Gardens have reviewed the proposals and consider them to be acceptable, subject to any works to the trees being agreed in advance with the City and undertaken by City Gardens at the Applicant's expense. An informative is included to this effect.

### **Conclusion on Heritage Impact**

130. Paragraph 199 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).
131. Paragraph 200 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 202 NPPF balancing exercise
132. Paragraph 203 of the NPPF states that 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
133. Overall, the proposed development would cause a low degree of less than substantial harm through the loss of the existing White Swan public house, a non-designated heritage asset. In line with paragraph 203 of the NPPF, Officers consider that, in heritage terms, this harm would be outweighed by the provision of a new public house of significant architectural quality, bearing the same name as the existing public house and thereby continuing the long tradition on this site. It is considered that the loss of the existing White Swan public house and the architectural and historic values it embodies, though regrettable, would be outweighed by the provision of the new White Swan public house and the cumulative benefits accruing from this development.



134. The proposed development would enhance the settings of the grade II listed YRM Offices and the burial ground of St Dunstan-in-the-West, a non-designated heritage asset.
135. In all other respects the proposed development would preserve the special interest and settings of designated and non-designated heritage assets in the locality.

### **Culture**

136. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 policy S6 encourage new cultural experiences and art works. The City of London Cultural Policy seeks to improve the City's public realm, open spaces and gardens to make them more open, distinct, welcoming and culturally vibrant. The site is located close to the western edge of the City's Culture Mile and the proposal incorporates several elements which will improve the cultural enjoyment of the site.
137. The design seeks to contribute to the City's culture by creating a new pocket garden that can be enjoyed by everyone, not just the buildings' occupants. The aim of opening up the open space on the western side of the ground floor and creating a new publicly accessible sunken garden which will complement the existing public open space will provide opportunity for social engagement. The replacement of the public house use would also continue to provide a place for people to meet and socialise.
138. The design proposals include introducing embossed typeface lettering into the masonry facades of the public realm which would add visual interest and reference the historical printing use of the site.

### **Archaeology**

139. The site is in an area of archaeological potential situated outside the walled City and to the west of the now buried River Fleet. There is potential for remains from all periods to survive in this area and an Archaeological Desk Based Assessment is submitted with the application.
140. The Assessment confirms that the existing basement encompasses most of the entire area of the footprint of the site. The potential for remains to survive below the building is low due to disturbance by construction of the basement floor and foundations. There is potential for deeper cut features to survive, such as wells, pits and earlier building basements. These features may include Roman occupation, as the site is between two principal roads leading into the City, and post-medieval occupation. It is considered that there is low potential for survival of Roman burials, as burials have been recorded in the vicinity. The western section of the churchyard of St Dunstan in the West, appears to encroach into the site in the post-medieval period and there is a low potential for remains to survive within the site.
141. A condition is recommended for an archaeological watching brief to be carried out to record ground conditions and any archaeological remains revealed by the development. An informative is recommended to cover

consideration of the archaeological impact in the event that additional groundworks, outside the building footprint, such as new drainage or service connections are proposed.

### **Access and Inclusivity**

142. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.
143. The new ground floor would be lowered to pavement level allowing all pedestrian approaches to the building to be accessible from all four elevations at street footway level.
144. The new office entrance would be recessed to provide shelter from the weather, centrally located on the corner of Fetter Lane and Bream's Buildings. New revolving doors would be located centrally with a dedicated automatically opening pass door immediately adjacent to it.
145. The existing public space to the west of the site is not accessible due to the steps and higher level of the gardens. A new publicly accessible pedestrian link is proposed between Bream's Buildings and Mac's Place along the western edge of the site. This new route will provide access to a new sunken garden which will be publicly accessible.
146. Two new passenger lifts would serve all levels of the building from Basement to 12th Floor which includes an evacuation/passenger/goods lift and a fire-fighting lift. Two other passenger lifts would serve Ground to 10th floor. This provides independent and dignified access and means of escape for disabled people unable to use stairs.
147. A dedicated and prominent cyclist entrance (which would be clearly signposted) from ground floor level has been integrated into the design of the building via two dedicated entrances on Fetter Lane and Mac's Place, along with accessible amenities and facilities for cyclists including lockers, showers and WC facilities at Ground and Mezzanine level. 5% of cycle parking would be suitable for parking cycles used by disabled people.
148. Accessible roof terraces are provided at all levels from Ground, 5th to 9th and 12th floor levels for use by all office occupiers of the building.
149. Gently graded slopes (more than 1:21 gradient) are provided at ground floor level to accommodate level differences around the perimeter of the site.
150. The Access Officer welcomes the inclusive access to and within the building which would meet the requirements of Local Plan policy DM10.8 and London Plan policy D5.

## **Transportation**

### **Cycling**

151. The London Plan Policy T5 (Cycling) requires cycle parking 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.

152. The proposed cycle parking is set out below:

<b>London Plan long stay cycle parking</b>	<b>Proposed long stay cycle parking</b>	<b>London Plan short stay cycle parking</b>	<b>Proposed short stay cycle parking</b>
204	204	28	28

153. The long stay cycle parking would be accessed from Mac's Place at ground floor level. Officers consider this to be an appropriate location for the cycle parking, and being largely at ground floor, cycling will be celebrated. The new pedestrian route from Mac's Place to Bream's Buildings, would give visitors and workers arriving to the site with bicycles two options to access the cycle parking. Additional access to the cycle parking would be available from Fetter Lane, via the servicing entrance.

154. The proposed short stay cycle parking would be provided entirely within the site boundary at ground floor level. Eight spaces would be located within the new public realm (private land) adjoining the northern end of Mac's Place. One stand would be located on Greystoke Place (on private land) which will provide space for two cycles. The remaining 18 spaces would be provided within a new publicly accessible cycle store. This would be located adjoining the new pocket park and visible from Brems Buildings and the new route through the site.

155. The proposed cycle parking is compliant with the London Plan.

156. 5% of the cycle parking spaces (10 spaces) would be accessible for adapted cycles and this arrangement will be secured by planning condition (in line the London Plan Policy T5 (Cycling) with the London Cycling Design Standards 8.2.1, and the draft City Plan 2036).

157. The proposals include 22 showers, and 222 lockers, which complement the cycle parking provision. 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. Therefore, the proposals meet the London Plan recommendations.

158. The applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required, by Section 106

obligation, to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It would be required to be submitted to the City for approval in line with the London Plan Policy T4 (Assessing and mitigating transport impacts). The Cycling Promotion Plan would be expected to set out how the internal short stay cycle parking spaces will be advertised and accessed by the public.

### **Vehicular access**

- 159. 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.
- 160. The development is car free and no blue badge car parking space is proposed due to space constraints at the ground floor. The Applicant is willing to explore the provision of a Blue Badge Space within the vicinity of the site with the City Corporation. This would be secured through the S278 Agreement.

### **Servicing and deliveries**

- 161. 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.
- 162. The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street – therefore the servicing is proposed to remain as existing. The applicant has agreed on a cap for the number of vehicles servicing the development per day of 14. This would ensure the number of vehicles proposed is equal to or less than the estimated existing situation (of 14 vehicles per day).
- 163. The applicant was required to show how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, the new pedestrian route through would not be possible, due to space limitations. Therefore, on balance on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.
- 164. 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. In order to meet the cap of 14 vehicles per day the applicant has agreed to use an off-site consolidation centre.

165. 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. The applicant has agreed to a further restriction on servicing between the hours of 2300 to 0700 the next day which would be conditioned.
166. The development will be required to produce a delivery and servicing plan (DSP), and this will be secured in the Section 106 agreement.

### **Public Transport**

167. 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 Chancery Lane underground and Farringdon underground and Thameslink services. The site is close to several bus routes running close by on High Holborn and Chancery Lane (within 400m).

### **Pedestrian Comfort**

168. A PCL assessment has not been conducted for the site. A PCL assessment was not considered necessary, given the scale and location of the development. A trip generation assessment has been conducted.
169. The proposed development is predicted to result in 226 additional trips in the AM peak and 207 additional trips in the PM peak. It is predicted that the total increase in the number of trips to the development across the whole day would be 1654. The uplift is considered acceptable due to the excellent cycle parking provision, the proposed alterations to the surrounding existing public realm to be secured through a S278 agreement, and the new route through the site.
170. The submitted transport assessment indicates that the overall increase in trips across all modes would have a minimal impact on the surrounding highway and public transport network capacities.
171. The applicant has proposed to chamfer the south eastern corner of the development to improve the pedestrian comfort at the junction of Fetter Lane and Breems Buildings, this is considered a benefit of the scheme. The applicant has also proposed a new route through the development from Bream's Buildings to Mac's Place.
172. The new pedestrian route will also provide enhanced public realm, and cycle parking on private land. The new route would be permissive path and open to the public between 6am and midnight, with access secured through the S106 agreement.

## **Public Realm, Security and Hostile Vehicle Mitigation (HVM)**

173. 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.
174. 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.
175. The HVM will be mainly within the facade of the building. As part of the public realm design, we will work with the City of London Police to ensure the new public realm is safe and secure (e.g. at the entrance of Mac's Place). A condition to this effect is recommended.

## **Construction Logistics**

176. The applicant has submitted a Deconstruction Environmental Management Plan for approval as part of this application. The applicant has worked with the City's Highways team to ensure the logistics plan is acceptable and obstructions on the highway are limited. The applicant has also engaged with BT and UKPN to arrange a temporary substation on Bream's Buildings while the demolition and construction works are taking place. The Deconstruction Environmental Management Plan is considered acceptable in planning terms, however the applicant is still required to gain the necessary highway approvals and licences prior to deconstruction work commencing.

## **Section 278 Agreement**

177. A commitment to enter into a Section 278 agreement has been secured. The Section 278 agreement would comprise improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and through the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, provision of a blue badge parking space, and any cycle improvements necessary to allow access to the cycle parking. The Section 278 works will be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision. This would be secured through the Section 106 agreement.

## **Transportation Conclusion**

178. The proposal would accord with the relevant transportation related policies including London Plan policies T5 cycle parking, T6 car parking,

and D11 Safety, security and resilience to emergency. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2036 Policies AT1, AT2, AT3, SA3, and VT3. The proposals are not in line with Policy DM16.5 of the Local Plan 2015, or draft City Plan 2036 Policy VT2 – all relating to deliveries, servicing and construction. However, the proposals are considered acceptable.

179. Overall 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 which represents an increase of 226sqm of publicly accessible space.

### **Waste Storage**

180. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.
181. The proposals incorporate a bin store at ground floor level. This store would serve the office, cafe and drinking establishment uses. Prior to collection, bins would be transferred to a temporary holding area within the building, closer to the servicing entrance. Waste collections would take place from a loading bay on Fetter Lane at suitable frequencies.
182. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements.

### **Sustainability**

#### **Circular Economy**

183. 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.
184. The submitted Draft Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. The proposals to redevelop the site are a result of an assessment of opportunities to retain the building as a whole or in part.
185. The existing, original structure of the building is concrete encased steel that is extremely complicated to adapt. The structural investigation showed signs of heavy modifications due to extensions in the past, and no information is available as to whether any strengthening works have been carried out for the extensions. However, past changes to the structure have caused corrossions in the steel sections. In addition, the existing building floors are formed from hollow-pot slabs which are known to lack robustness and adaptability.
186. The foundations were researched on the basis that these should be similar to the ones found at 98 Fetter Lane which was constructed together with the building on the application site. The same engineers'

and architects' teams were involved at No 98 that carried out the investigations for the redevelopment in 2015 with the finding that the foundations had a mix of concrete encased grillage foundations and concrete rafts and included large elements of masonry foundations that were presumed to be from the pre-1940's buildings destroyed in the war.

187. The variability of construction types and materials in the original construction of the substructure would make it unsuitable to be retained as a basis for a larger development.
188. In addition, the office floor plates have very low floor to ceiling heights below 3 metres that would not provide high quality office spaces once building services within raised floors and/or below ceiling slabs have been included. The existing ground floor level is raised and cannot be adapted to provide level access from the street, surrounding pedestrian routes and gardens, without substantial demolition and strengthening works.
189. Overall, it is considered that a refurbishment and extension would require substantial demolition above and below ground with high embodied carbon emissions impact, along with considerable limitations to the achievable quality and flexibility of office floorspace.
190. However, the retention of the perimeter retaining basement walls to assist during construction and to reduce embodied carbon emissions of new construction will be considered in the detailed design phase.
191. The applicants are committed to achieve a low impact building by committing to
  - Incorporating low carbon materials, including considering recycled materials for the primary facade, e.g. rammed concrete with recycled aggregates or bricks made from recycled materials
  - Recover materials at maximum value and facilitate off-site re-use wherever possible, aiming for 95% reuse/recycling/recovery of demolition and construction and extraction waste
  - Minimising material consumption and incorporating future flexibility in the structure and configuration of internal spaces
  - Selecting materials that are easier to install and that are durable, with low wastage rate and using less energy and requiring less maintenance and replacement
  - Focussing on designing for longevity, adaptability and ease of disassembly.
192. 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 will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.



## **Energy and CO2 emissions**

193. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 59% reduction in regulated carbon emissions compared with a Building Regulations compliant building.
194. The proposed energy demand reduction strategy would reduce the building's operational carbon emissions by 16% compared to a Building Regulations compliant building and includes the following main elements:
- Designing the building with high thermal mass, creating a robust, prefabricated masonry structure with deep reveals to provide natural shading and thermal insulation, in the south-west facing facades further setbacks behind planters integrated into the facade
  - Providing additional shading fins only where necessary based on annual solar studies
  - Providing operable shading awnings on the terraces
  - Providing low level and high-level opening windows combined with a simple, mixed mode floor air distribution for zero energy cooling for large parts of the year
  - Enabling night-time ventilation to cool soffits that provide natural cooling during the day
  - Optimised daylight and thermal insulation levels within office floorspaces through optimised glazing to solid ratio.
  - Providing wastewater heat recovery for the showers.
195. The office element would operate using a Complementary Mixed Mode strategy with Concurrent operation, meaning that the background mechanical ventilation (with or without cooling) operates in parallel with natural systems. The aim is to combine active (e.g. heat pumps and active cooling systems) and passive (natural ventilation, night-time purge cooling) systems that enable occupants to open windows to control thermal comfort. Natural ventilation has been maximised and cooling loads have been kept to a minimum through the incorporation of the passive design measures. Heat recovery on the main mechanical ventilation systems will improve the overall energy efficiency of the strategy.
196. The energy strategy for the proposed public house that is designed as shell at this stage only, would be the future tenant's responsibility.
197. There is currently no available district heating network close enough to the site, however, the opportunity to connect to a future district heating network would be incorporated into the proposed development.
198. The proposed renewable energy technologies are air source heat pump systems (ASHP) and an at least 30sq.m Photovoltaic (PV) panel installation integrated into the roof plant enclosure screens on level 12

where there would be least impact of self-shading. These technologies would contribute carbon emissions savings of 44% compared to a Building Regulations compliant building. The provision of PV panels on the roof of the plant enclosure was explored, but this must be 85% free area in order to facilitate adequate air flow to the air source heat pumps.

199. The new public house element would achieve an overall 62% reduction in carbon emissions compared to a Building Regulations compliant building, 18% of which through energy demand reduction.
200. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

## **BREEAM**

201. BREEAM New Construction 2018 pre-assessments have been prepared for the office and public house (retail) uses. The strategy aims to achieve an "Outstanding" rating for the offices on the basis of a "full fit-out". The assumptions made as part of the preliminary pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted rating including a score of >85%. The pre-assessment indicates a score of 88.30% and aims to achieve a high number of credits in the City's priority categories of Energy, Water, Pollution and Materials. Further credits could be targeted in the detailed design phase and fit-out phase of the development.
202. The separately assessed new public house would achieve an "Excellent" rating with a score of 72.30%. It is anticipated that the public house will be progressed as a 'shell only' scheme and as such the number of credits available is more limited. Additionally, the scheme cannot award points for the innovative building services strategy proposed for the wider development and consequently would be unable to achieve a higher rating of "Outstanding".
203. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. Post construction BREEAM assessments are requested by condition.

## **Whole Life-Cycle carbon emissions**

204. 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.

205. Since the existing building on site has been found unsuitable for refurbishment and extension, the proposed Whole Life-Cycle carbon reduction strategy is based on reducing embodied carbon impacts of the new sub and superstructure as main contributors to the overall whole life-cycle carbon emissions of the building. This includes the rationalisation of the structure, the use of cement replacements, recycled products, robust materials and structural design as well as providing material passports for ease of extending the lifespan of the building and building parts.
206. Another important part of the strategy is providing simplicity of operation that reduces the need for extensive ductwork and services distribution and suspended ceilings, and has low maintenance requirements, and ultimately reduced whole-life carbon emissions. The design strategy offers a looser fit with robust shell and adaptable services that can be readily altered operationally or physically to suit the needs of different occupiers, activities, and even sectors over the life of the building.
207. 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 standard benchmark emissions target. It is anticipated that during the detailed design stage further improvements can be achieved, in particular in the product stages A1 – A3 of the building's life cycle. A detailed Whole Life-Cycle carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

### **Urban Greening and Biodiversity**

208. 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.
209. The development would include an extensive range of soft landscaping features with intensive green roofs, green walls, roof terraces, planters and pocket square which would enhance urban greening, biodiversity and visual interest. Greenery would be included in the publicly accessible sunken garden and continue along the western frontage with a strip of planting boxes.
210. The private terraces (700sq.m) across Levels 5, 6, 7, 8, 9 and 12 would include flowering herbaceous planting along the edge perimeter to aid biodiversity. The planting would include a mixed palette of seasonal

perennials, evergreen shrubs and grasses. Multi-stem trees would be integrated into the planting to help mitigate the wind and provide sun shelter and visual connection with nature to promote wellbeing. In addition, invertebrate, bird and bat boxes would be located in suitable locations.

211. The roof terraces would begin at Level 5 and have been designed to not immediately overlook nearby residential premises as they would be above the roof level. In addition, planters on the western edge of this terrace would provide an inaccessible area next to the balustrade to prevent direct overlooking. The outdoor private break-out areas for the occupiers on the terraces would provide important amenity spaces. A condition is proposed to restrict the hours of use of the terraces to protect the amenity of the nearby residents.
212. Local Plan Policies DM10.2 (Design of green roofs and walls), DM10.3 (Roof gardens and terraces) and DM19.2 (Biodiversity and Urban Greening) encourage the inclusion of green roofs, gardens and walls. The biodiverse features would provide a green and attractive setting as there are hard roof surfaces on the existing and some of the surrounding buildings and would result in a net gain in biodiversity value to the site. The landscaped roof terraces would serve as important amenity spaces for occupiers of the buildings with views across the City. The green walls and climbers would assist in improving air quality and appropriate plant species should be carefully selected for the living walls depending on their aspect.
213. The addition of the trees, planting, green roofs and green walls on this development are welcome not only for their aesthetic value when viewed from nearby buildings but also for their contribution to biodiversity and urban greening (Policy DM19.2), rainwater run-off, insulation and urban cooling. The proposals therefore accord with Local Plan policies DM10.2, DM10.3 and DM19.2. The proposed urban greening should be appropriately maintained for the life of the proposed development.
214. An Urban Greening Factor (UGF) calculation score has been submitted with the application along with a table providing a breakdown of the proposed urban greening. The UGF has been calculated as 0.35, which meets both the London Plan and the City's draft Local Plan UGF target score of 0.3 for commercial development.
215. Final details of the quality and maintenance of the proposed urban greening are required by condition.

## **Climate Change Resilience**

### **Water resources**

216. The submitted Sustainability Statement acknowledges that the UK will experience half as much rainfall by 2080 as a result of climate change. A range of water conservation measures have been designed into this scheme.
217. A blue roof at level 12 would be supplemented with an attenuation tank using "Smart Tank" technology at basement level for rainwater

harvesting to use for irrigation and toilet flushing. For the same purpose, the greywater from showers would be recycled.

218. Further reductions in potable water will be achieved through the specification of sanitary ware with low flow fittings and leak detection in order to achieve a 50% improvement over baseline building water consumption.

#### Flooding

219. The site is not located within the City Flood Risk Area.
220. The development aims to achieve greenfield run off rates through the incorporation of Sustainable Drainage Systems (SuDS) including a blue roof on the external terraces and an attenuation tank. The 'smart tank' technology also allows rainwater collected in the attenuation tank to be recovered for WC flushing and irrigation, further supplemented by the collection of greywater from showers.
221. Final details of the SuDS and associated components are reserved by condition.

#### Heat Stress

222. The sustainability statement outlines measures to prevent overheating by including natural ventilation openings, as part of a mixed mode system that incorporates free cooling through the exposed slab, within an optimised facade system to manage solar gain and maximise daylight access. These measures will not only reduce the need for carbon intensive air conditioning but will help to make the building resilient to higher temperatures and urban heat island effects.

#### Natural Capital and Pest & Diseases

223. The proposed development will incorporate urban greening that would improve significantly on the existing quantity and quality of urban greening on site, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases.
224. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

#### **Conclusion**

225. 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.

226. 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, and exceeds in some aspects, London Plan policies as well as Local Plan policies, and it is on track to achieve an “outstanding” BREEAM assessment rating.
227. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced in line with the GLA’s standard benchmark. The existing building has been assessed and found to be unsuitable to be transformed into a new, attractive and sustainable development. However, Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible and adaptable development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

### **Microclimatic Impacts**

#### **Wind Microclimate**

228. CFD simulation and analysis has been carried out in accordance with the City’s Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
229. 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.
230. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
231. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance - if conditions become unsafe or unsuitable for the intended use as a result of the development. If wind conditions become windier but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.
232. Assessments have been carried out for both the Windiest Season and the Summer Season.

### **Existing Baseline Conditions**

- 233. The baseline scenario indicates that the Site and nearby surrounding area has conditions ranging from suitable for frequent sitting to walking use during the windiest season. Generally during the summer season, wind conditions are one category calmer, and range from suitable for frequent sitting to standing use. No strong winds exceeding the safety threshold would occur in this configuration.
- 234. All thoroughfare locations within and around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season.
- 235. The majority of existing entrances around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season. The exception to this is at an entrance to the south of Great New Street which have walking use conditions. The entrance to the White Swan pub currently on the eastern elevation of the existing building has wind conditions suitable for occasional sitting use.
- 236. Pedestrian crossings around the Site have wind conditions ranging from suitable for occasional sitting to standing use during the windiest season.
- 237. Amenity spaces at ground level are located to the east of 110 Fetter Lane (to the south of the Site) and at St. Dunstan's burial ground to the west of the Site. The amenity space to the east of 110 Fetter Lane has wind conditions suitable for occasional sitting use during the summer season. Wind conditions at St. Dunstan's burial ground are suitable for frequent sitting use during the summer season.
- 238. Wind conditions at upper level amenity spaces directly to the north and west of the Site range from frequent sitting to standing use during the summer season, with localised area of walking use conditions at the southern edge of 98 Fetter Lane highest roof terrace.

### **Proposed Building with Existing Surrounding Buildings and Proposed Landscape**

- 239. In the presence of the Proposed Development, conditions would increase in windiness compared to the existing scenario, particularly between the Proposed Development and 12 New Fetter Lane to the east as well as on Bream's Buildings as winds get channelled between the buildings. Conditions would range from suitable for frequent sitting to standing use with localised areas suitable for walking use during the windiest season, and frequent sitting use to standing use during the summer season.

### **Thoroughfares**

- 240. The majority of thoroughfares within and around the Site would have wind conditions suitable for frequent sitting to standing use during the windiest season. Localised areas to the south-east of the Proposed Development and on Great New Street, would have wind conditions suitable for walking use. The wind conditions at Great New Street would

be consistent with the Baseline and thus are considered appropriate for the intended use.

### **Entrances**

241. The majority of existing entrances around the Site would have wind conditions suitable for frequent sitting to standing use during the windiest season. The exception to this is at an entrance to the south of Great New Street, which would have conditions suitable for walking use. These conditions are consistent with the Baseline scenario, which confirms that the conditions are not caused or adversely impacted by the Proposed Development.
242. The entrance to the White Swan pub would be relocated to the northern elevation of the Proposed Development and would have suitable wind conditions during the windiest season.

### **Pedestrian Crossings**

243. Pedestrian crossings around the Site would have wind conditions ranging from suitable for occasional sitting to standing use during the windiest season. These conditions would continue to be suitable for the intended use.

### **Amenity Spaces – Ground Level**

244. Amenity spaces at ground level are located to the east of 110 Fetter Lane (to the south of the Site), at St. Dunstan's burial ground to the west of the Site, the proposed pocket park immediately to the west of the Proposed Development and around the White Swan Pub to the north of the Proposed Development.
245. The existing amenity spaces would continue to have similar wind conditions to the existing baseline scenario and would range from suitable for frequent sitting use to occasional sitting use during the summer season. These conditions would be suitable for the intended use.
246. The proposed new pocket park and the new pub location would both have wind conditions suitable for frequent sitting to occasional sitting use during the summer season. During the winter season condition in these areas would range from occasional sitting and standing use. These conditions would be appropriate for amenity use.

### **Amenity Spaces – Upper Level**

247. With the introduction of the Proposed Development, wind conditions at the majority of upper level amenity spaces directly to the north and west of the Site would be calmer than the baseline scenario and would range from frequent sitting to standing use during the summer season. The exception to this is at a localised area of walking use conditions at the north-western edge of the terrace at 98 Fetter Lane. This north-western edge is not expected to be accessible for occupant use.
248. The Proposed Development comprises seven new roof terrace amenity spaces at levels 5-9 and 12. The majority of these roof terraces would have wind conditions suitable for frequent sitting to standing use during



the summer season. All seating areas would be located in areas suitable for frequent sitting or occasional sitting use. Localised areas of walking use conditions would occur on the 9th and 12<sup>th</sup> level roof terraces. These localised areas of walking conditions would be made inaccessible to users by design through the layout of landscaping. As such wind conditions would be appropriate for the intended use and no further wind mitigation measures would be required.

### **Strong Winds**

249. There would be no exceedance of the safety threshold at ground level and at any part of the terraces that would be accessible to users.

### **Wind Microclimate Conclusion**

250. In conclusion, with the proposed mitigation measures in place, where wind conditions become windier at ground level and upper level terraces, they remain suitable for the intended uses in the proposed scenario and so no additional mitigation above that proposed is required. The details of the proposed mitigation measures identified above will be secured by condition and will be required to be maintained throughout the life of the building.
251. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the CFD analysis against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the submitted application, and if any material adverse impacts are realised, mitigation measure would need to be explored and implemented.
252. 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 Assessment**

253. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that

buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

254. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. 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 a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

255. The Universal Thermal Climate Index (UTCI) metric will be utilized for predicting thermal comfort. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location.

<b>Usage Category</b>	<b>% of hours with Acceptable UTCI</b>	<b>Description</b>
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season.	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

256. All areas have been assessed for all hours in a year between 8:00 am and 8:00 pm (GMT), as specified by the City of London Thermal Comfort

Guidelines. This analysis was conducted for two configurations: Existing Site with Existing Surrounding Buildings and Proposed Development with Existing Surrounding Buildings and Proposed Landscaping.

## **Existing Baseline Conditions**

### **Ground Level**

257. The vast majority of the current pedestrian realm in the area surrounding the site has all season or seasonal thermal comfort conditions, with all season conditions situated to the west and seasonal conditions situated to the east. Areas of short-term conditions are also situated to the east around the northern corner of 6 New Square Street along Barlett Court, along Great New Street and along Nevill Lane. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses. The exception is at outdoor cafe seating along Nevill Lane, where short term conditions were predicted. This would be one category lower than required for ground level outdoor seating. While conditions in this space during the winter were predicted to be acceptable for less than 50% of the time, conditions were predicted to be acceptable for more than 80% of the time in the remainder of the year.

### **Off-site Terrace Levels**

258. The existing off-site terraces were predicted to have mainly all season and seasonal thermal comfort conditions. Isolated areas of short-term conditions were predicted around the eastern corner of the Rolls Building and on the corners of Chancery Lane. As none of the existing off-site podium or roof level terraces have sensitive receptors that would require long term comfort, these thermal comfort conditions are considered suitable for their current usage.

## **Proposed Building with Existing Surrounding Buildings and Proposed Landscape**

### **Ground Level**

259. With the proposed development in place, the thermal comfort conditions at ground level are predicted to remain broadly similar to the existing baseline conditions. Some areas along Bream's Buildings, the northern side of Fetter Lane and Plough Place were predicted to move from all season to seasonal thermal comfort conditions. In addition, to the south, east and north of the Proposed Development, there would now be larger areas of seasonal conditions (these areas previously were predicted to have all season conditions). The alterations to the thermal comfort conditions would still be considered to be suitable for its intended use in these areas. There would be isolated areas of short term conditions to the north and east of the proposed development and around the south eastern corner of 12 Fetter Lane.
260. The relocation of the pub to the northern side would have conditions suitable for all season use, acceptable conditions.
261. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses, with the

outdoor cafe seating along Nevill Lane remaining in the short-term category. As these conditions occur in the baseline and do not become materially worse with the introduction of the Proposed Development, mitigation measures would not be required.

#### On-Site Terrace Levels

262. The terraces on the proposed development would largely have suitable conditions (all season and seasonal thermal comfort conditions) with the proposed landscaping in situ. An isolated area of short-term conditions was predicted on the 9th level terrace around the north-western corner. As these terraces are to be used for offices, there would be no designated seating and as such this isolated area of short-term conditions can be considered acceptable.
263. The introduction of the Proposed Development was not predicted to have any material impact on the thermal comfort conditions of the existing podium and roof level amenity spaces in the local area. Thus, the thermal comfort conditions of the surrounding podium and roof terrace levels in proposed scenario would be the same as those predicted in the existing baseline scenario, which were suitable for the intended use.

#### Off-Site Terrace Levels

264. The introduction of the Proposed Development would not be predicted to have any material impact on the thermal comfort conditions of the existing podium and roof level amenity spaces in the local area. Thus, the thermal comfort conditions of the surrounding podium and roof terrace levels in proposed vs existing scenario would be the same as those predicted in the existing baseline scenario (which were suitable for the intended use).

#### **Thermal Comfort Conclusion**

265. The introduction of the proposed development would not be predicted to change the thermal comfort conditions at ground level or surrounding terraces to the point that they would be incompatible with the current use types. The terrace levels of the proposed development would largely have acceptable thermal comfort conditions for their intended use. The 9th level terrace would have short term conditions around the north-western corner. As these terraces are to be used for offices, there would be no designated seating and as such short-term conditions can be considered acceptable.

#### Air Quality

266. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Draft City Plan policy DE1 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. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

267. 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.
268. 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 mitigation measures have been submitted as part of the Demolition Environmental Management Plan. The Department of Markets and Consumer Protection have reviewed the plan and consider the proposed mitigation measures acceptable.
269. The proposed development would be car free and heating will be through an electric air source heat pump system with no onsite combustion. The number of vehicle trips associated with the development is below the threshold for requiring assessment. Therefore, the development should not have any adverse impacts on air quality.
270. The Proposed Development would be considered air quality neutral in relation to both building and transport emissions.
271. 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.
272. 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, Sunlight and Overshadowing**

#### **Assessment Context**

273. An assessment of the impact of the proposed development on the daylight and sunlight received by surrounding residential buildings and public amenity spaces, has been submitted in support of the application. The effects of the development have been 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).
274. 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.

275. The BRE guidance advises that numerical values are not to be rigidly applied but recognise the specific circumstances of each case. This is acknowledged in the supporting text to policy DM10.7 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”.
276. The assessment submitted in support of the application has assessed the impact of the proposed development on the daylight and sunlight received by the residential properties at 2 Greystoke Place and 95 Fetter Lane. Overshadowing assessments have been undertaken in respect of the private amenity spaces of 2 Greystoke Place, the public space of St. Dunstan’s burial ground, and the roof top terrace of 98 Fetter Lane.

### **Daylight**

277. 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 figure is both less than 27% and reduced by 20% (0.8 times its former value) or more than the existing level, the loss would be noticeable.
278. 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 the results should be read in conjunction with those of a second test - daylight distribution. The daylight distribution test, also referred to as the No Sky Line test (NSL), calculates the areas of a working plane inside a room (usually 0.85m above the finished floor level) that would or would not 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.
279. In addition, the Applicants have undertaken and submitted supplementary Average Daylight Factor (ADF) and Radiance Assessments of the daylighting to the affected residential apartments within 2 Greystoke Place. The radiance diagrams are contained within the plans pack.
280. The Average Daylight Factor (ADF) assessment is a measure of the overall amount of diffuse daylight within a room that is measured at a working plane 0.85m above a room’s finished floor level. The ADF can be calculated a number of ways but the most commonly used methodology is the formula set out in the BRE guidelines. This formula takes account of: the size and shape of a room and its serving window(s); the actual or reasonably assumed reflectance values of a

room's internal surfaces (walls, floors and ceiling); the diffuse transmittance of the glazing to the serving window(s); and the amount of visible sky, which is calculated through a Vertical Sky Component assessment.

281. The BRE Guidelines recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.
282. A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). Similar to measuring the ADF of a room, this method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.
283. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the BRE guidelines ADF formula or Radiance methodology, the radiance based assessments can draw upon the BRE's recommended ADF target values. Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. The average value of the individual daylight factors within a room can be expressed as an ADF percentage for the room as a whole.

## 2 Greystoke Place

284. Located to the west of the development site, this property contains commercial office space on the lower and raised ground floors and residential accommodation on the 1st to 5th floors. There are 10 flats within the building, of which 7 flats have windows to the eastern end facing toward the site. The windows which face towards the site serve dual aspect living/kitchen/dining rooms and the bedrooms are located towards the western end of the building. The main windows which serve the dual aspect living/kitchen/dining rooms are located on the north and south elevations of this building and therefore orientated perpendicular to the proposed site. The windows which face directly towards the site (on the eastern elevation) are high-level ribbon / slot windows.
285. A total of 24 windows serving 8 rooms have been assessed using the Vertical Sky Component (VSC) methodology, with the results showing that 15 of the windows would receive less than a 20% reduction in accordance with the BRE criteria and therefore the effect is considered to be negligible.
286. The seven high level slot windows located on the east elevation would experience reductions of between 53% and 78% which would be

considered to be a major adverse impact. Two windows located on the north elevation of the 2<sup>nd</sup> and 3<sup>rd</sup> floors would receive a reduction of 21%-22%, marginally over the BREs criteria of 20%, which is considered to be a minor adverse impact.

- 287. Whilst these particular windows would experience a noticeable effect, the main windows for each of these rooms on the north and south elevations would predominantly experience small reductions which are within the BRE guidelines.
- 288. The daylight distribution results using No Sky Line (NSL) calculations show that all rooms would experience small reductions in daylight distribution which are within the BRE guidelines criteria. The overall daylight effects, when using the VSC and NSL tests are therefore negligible and can be considered acceptable.
- 289. The Radiance results demonstrate where there would be a reduction in the daylight factor within the affected rooms. This reduction is most notable in the areas of the rooms directly lit by the high-level east facing window. The results also show that the principal north or south facing windows would continue to provide good levels of natural light into the rooms.
- 290. The Average Daylight Factor results show that one living / kitchen / dining room (R1/12) would experience a reduction in ADF from 2.21% to 1.96%, which would be marginally below the minimum criteria for kitchens but well within the living room criteria. The remaining rooms assessed would have an ADF in excess of 2.2% which would be above the minimum criteria for all standard room types.

#### 95 Fetter Lane

- 291. This property is located to the north of the site and contains residential accommodation. A total of 18 windows serving 15 site facing rooms have been assessed for daylight.
- 292. For the VSC assessment, three of the windows would receive no reduction as a result of the proposed development, and 15 would receive small reductions in light well within the BRE guidelines criteria.
- 293. The daylight distribution test shows that the majority of the rooms would receive no reduction in daylight distribution. One room would receive a reduction of 0.1% from existing levels, well within the BRE Guidelines criteria. The overall daylight effects for 95 Fetter Lane would be negligible and are considered acceptable.

#### 12 New Fetter Lane

- 294. An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment.
- 295. 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. 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.

296. The BRE Guidelines state that they are “intended for use in rooms in adjoining dwellings where daylight is required... The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices”.
297. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. 12 New Fetter Lane is a modern office building and already designed to rely on electric lighting.
298. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, including 12 Fetter Lane, 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 and DM10.7, or the BRE Guidelines.

### **Daylight Conclusion**

299. Overall, the assessments submitted in support of the application demonstrate that there would be some loss of amenity in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most affected rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole.

### **Sunlight**

300. 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)”. Sunlighting 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.

301. To clarify, all three of the above criteria need to be met for there to be an adverse impact in sunlight terms.

## 2 Greystoke Place

302. Of the eight rooms assessed for daylight, five have at least one site facing window which is orientated within 90 degrees of due south. The assessment demonstrates that the windows assessed would receive a reduction in APSH of less than 20%, which would be compliant with the BRE guidelines criteria, and is considered a negligible impact.

## 95 Fetter Lane

303. Of the 15 rooms assessed for daylight, one has a window which faces within 90 degrees of due south. The assessment demonstrates that this window would receive a reduction in APSH of 5.6%, well within the BRE criteria of 20% reduction, and would be considered a negligible impact.

## **Sunlight Conclusion**

304. All of the windows assessed would receive more than 0.8 times their former value and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.

## **Overshadowing**

305. The BRE guidelines suggest that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March. If as a result of the proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

306. The potential overshadowing impacts of the proposed development has been assessed on three nearby areas:

- 2 Greystoke Place private residential rooftop terrace
- St. Dunstan's burial ground
- 98 Fetter Lane

## 2 Greystoke Place

307. The results of the submitted sun on ground assessments show that the private residential rooftop terrace serving the 5<sup>th</sup> floor flat currently receives 2 hours of direct sunlight on 80% of its area on 21 March.

308. With the Proposed Development in place, this terrace would experience a slight reduction, with 72% of its area continuing to receive 2 hours of direct sunlight on the 21 March. This would be a reduction of less than 20% and therefore unlikely to be noticeable in accordance with the BRE guidelines.

#### St. Dunstan's burial ground

309. Due to the dense urban environment surrounding St. Dunstan's burial ground, the sun on ground assessment shows that the burial ground currently receives very little direct sunlight with 100% of the area receiving less than two hours of direct sunlight on 21 March. This does not change with the proposed development and the effect is therefore negligible.
310. An assessment was also undertaken for the sun on ground on 21 June. The results for 21 June show that the burial ground can continue to enjoy good levels of sunlight during the summer months, especially during the middle parts of the day which is when it is most likely to be used. For example, 96% of the area would enjoy at least 2 hours of sunlight on 21 June.

#### 98 Fetter Lane

311. This building is in commercial use, however there are two larger roof spaces (one on the eastern side and one on the western side) which are believed to be used as amenity spaces. It is unknown whether these spaces are used by the occupants of the building daily or whether they are only used for entertaining guests. However, for completeness, the applicant's consultants have assumed that they are used by the occupants on a daily basis, in particular during lunch time, and therefore ran overshadowing assessments.
312. The 2-hour assessments undertaken on 21 March showed that both spaces are likely to experience a notable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21<sup>st</sup> March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21<sup>st</sup> March.
313. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.
314. Whilst the reductions of direct sunlight would not meet the BRE guidelines, it was noted that the spaces would still be enjoyable places to use throughout the year. For example, during the summer months of May – August, when the weather conditions are more likely to mean that the occupants would like to take their lunch outside, collectively these spaces will continue to be able to enjoy direct sunlight during the typical lunchtime hours of 12pm-2pm, with 83.8% and 85.5% of the respective terraces receiving 2 hours of sunlight on 21 June.
315. It is also worth noting that although the proposed development would

reduce the amount of sunlight received on the roof terraces, the proposed development would improve the wind conditions on these terraces and therefore the thermal comfort experienced on these terraces (if they were usable) would be negligible.

### **Overshadowing Conclusion**

316. The submitted sun on ground assessment demonstrates that the nearby residential and public open spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE Guidelines.

### **Daylight, Sunlight and Overshadowing Conclusion**

317. The submitted reports demonstrate that any reduction in daylight or sunlight to surrounding residential properties and public or residential open spaces would largely be within the BRE Guidelines criteria and therefore negligible.
318. While there would be noticeable reductions in light to nine of the residential windows within 2 Greystoke Place, the dual aspect nature of the rooms those windows serve would mean that the rooms would continue to receive appropriate overall levels of light as demonstrated by the accompanying daylight distribution and ADF / radiance assessments.
319. The proposed development would be in accordance with Local Plan policy DM10.7 and draft City Plan 2036 policy DE8.

### **Solar Glare and Light Pollution**

#### **Solar Glare**

320. Local Plan policy DM10.1 requires all developments to avoid intrusive solar glare impacts on the surrounding townscape and public realm. Draft City Plan policy DE8 requires developments to incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and townscape.
321. Three key viewpoints have been identified and assessed for solar glare impacts: Fetter Lane (travelling south), Fetter Lane (travelling north-west) and Breams Buildings (travelling east).
322. The assessment results demonstrate that for all three viewpoints, either visible beyond 10° of the line of sight for limited times or experience no solar glare. The viewpoints are therefore considered to experience negligible instances of solar glare.
323. The development would be in accordance with Local Plan policy DM10.1 and City Plan 2036 policy DE8.

#### **Light Pollution**

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

325. An objection was received from a nearby commercial occupier stating that the proposed development would result in increased light pollution to the residential windows of 2 Greystoke Place.
326. The nearby residential properties at 2 Greystoke Place have been assessed for potential light trespass. Assessments have not been undertaken to 95 Fetter Lane as it is considered to be orientated away and of sufficient distance from the Site so as not to be materially affected.
327. To understand whether there is the potential for light pollution to occur, the assessment assumes that all spaces within the proposed building have the light switched on and any blinds are open (i.e. the worst-case scenario) and any other external light sources (streetlights, existing surrounding office buildings etc.) have been ignored.
328. The assessment shows that there is likely to be a material increase in the potential light pollution on the bedroom windows of 2 Greystoke Place.
329. Whilst the office would be able to be occupied 24hrs a day, it is very unlikely that the building will be fully occupied at 11pm. Mitigation measures are proposed to reduce the risk of light pollution after curfew hours. These would include an intelligent lighting system so that the lights within a space/floor of the office will automatically turn off when it is not occupied. In addition to the above, the installation of blinds to the western elevation, particularly to the areas directly opposite 2 Greystoke Place, (and with a suitable management system to ensure they are closed when the spaces are occupied post curfew hours). A condition is proposed requiring a detailed lighting strategy demonstrating the mitigation measures.
330. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

### **Fire Safety**

331. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage. Policy D5.B.5 of the London Plan requires development proposal to be designed to 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 building.
332. 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.

333. The building fire strategy comprises complaint horizontal travel distances to the nearest exits on each level. There is an escape stair, firefighting stair, and a firefighting lift with protected lobby for safe vertical escape from all the levels. The proposed evacuation strategy considers a phased evacuation with compartment floors and associated refuges in each stair on each floor. An automatic fire detection and alarm system is proposed as well as an automatic sprinkler system. The fire service vehicle access is provided through via Fetter Lane. The building is provided with firefighting shaft extending through all the levels including basement. The firefighting shaft contains firefighting stair, firefighting lift and smoke ventilated lobby for safe firefighting operations. In addition to these a dry riser on each level is also provided in the firefighting shaft to assist with the firefighting operations.
334. This fire statement outlines the minimum fire safety provisions required for the proposed development which is to be compliant with the Functional Requirements of the Building Regulations 2010 (as amended) and are to be developed through the design stages. The proposed development would meet the requirements of Policy D12 of the London Plan.

### **Health Impact Assessment**

335. Policy HL9 of the Proposed Submission 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. 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.
336. The proposed development was satisfactorily assessed against 41 criteria relevant to the City of London. The assessment concluded that there would be a positive impact for 29 of the criteria and a neutral impact for 9 of the criteria. The HIA identified two potential negative impacts which became neutral impacts with appropriate mitigation measures applied. The proposal does not include any affordable workspace so to mitigate this situation it was agreed that a S106 agreement would be drawn up to secure relevant employment and training initiatives. The HIA process also revealed that dust resulting from the construction process would have a negative impact. To mitigate this impact, the Construction Management Plan was checked to ensure that the impacts of dust arising from the construction process would be satisfactorily dealt with. The Construction Management Plan will be agreed by the City Corporation prior to commencement of construction.
337. One criterion became positive following mitigation during the course of the HIA process. The proposal will enable local people to access employment opportunities which was assessed as a neutral impact. It was decided that committing to using local suppliers and labour during the construction phase where possible, would increase this criterion to a positive impact.

## **Equality Impact**

338. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.
339. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-
- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
  - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - foster good relations between persons who share a relevant protected characteristic and persons who do not share it
340. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
341. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
342. This application has been assessed against the Equality Act 2010 and any equality impacts identified.
343. The Applicants have held a range of meetings with stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:
1. Fleet Quarter
  2. St. Dunstan's burial grounds
  3. Meetings with neighbouring occupiers including Weil Gotshal & Manages (London) LLP, MacFarlanes, Bird and Bird, The White Swan Public House and Owner/Occupiers of 2 Greystoke Place and email correspondence with other neighbouring occupiers who responded to consultation letters.
344. As set out in the submitted Statement of Community Involvement (SCI), stakeholder consultation has been an on-going part of the proposed development's design evolution. The stakeholder engagement sought to understand the needs of local community groups and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project – notably the delivery of a new publicly accessible route and new pocket square.
345. As set out earlier in the report, it is intended that the new route through and pocket park would be designed for inclusive access by all members of the community.

346. The proposed development would provide significant employment opportunities during the construction and operations phases of the development, which could benefit all groups with protected characteristics. A planning obligation for contributions towards employment and training initiatives will be secured through the Section 106 Agreement. This would provide further opportunities for priority groups.
347. The Proposed Development would offer step free access throughout and around the Site. Significant consideration has been given in the design of the scheme to ensure it is accessible and complies with Part K of the Building Regulations. All floors of the office will be served by wheelchair accessible lifts, accessible toilets and wide circulation space.
348. The design provides enhanced public realm and landscaping around the Site that will result in better connectivity through the area. The proposals provide an attractive public realm that includes new planting and a sunken garden. The public realm is fully accessible with step free access provided.
349. The design of the scheme has been informed by Secured by Design principles and in consultation with the City of London Designing Out Crime Officer. The proposal incorporates a range of design and management measures to increase security and reduce crime experienced in the area. The public realm enhancements will also help to reduce fear of crime by users and visitors to the Site. Based on this, the Proposed Development is assessed as having a direct, permanent, minor to moderate positive impact on reducing crime for identified priority groups as well as the general population.
350. Potential impacts of the proposed development on the nearby occupiers identified above, have been assessed. Officers do not consider that they would be detrimentally impacted in so far as the spaces within the development become unusable nor would it be considered that there would be disadvantages to any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

### **CIL and Planning Obligations**

351. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
352. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
353. From 1<sup>st</sup> April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for



Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

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

MCIL2

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£1,318,400	£1,265,664	£52,736

City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£537,075	£510,221	£26,854
<u>City Planning Obligations</u>			
<b>Affordable Housing</b>	£143,220	£144,788	£1,432
<b>Local, Training, Skills and Job Brokerage</b>	£21,483	£21,268	£215
<b>Carbon Reduction Shortfall (as designed) <i>Not indexed</i></b>	£392,274	£392,274	£0
<b>Section 278 (Evaluation and Design) <i>Not indexed</i></b>	£50,000	£50,000	£0
<b>S106 Monitoring Charge</b>	£3,500	£0	£3,500
<b>Total liability in accordance with the City of London's policies</b>	<b>£1,197,552</b>	<b>£1,165,551</b>	<b>£32,000</b>

### City's Planning Obligations

355. 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*)
- Travel Plan (including Cycling Promotion Plan) OR Cycling Promotion Plan
- Legible London Contribution (£20,000)
- Cycle Hire / Network Improvements Contribution

*This contribution amount is still under negotiation between the applicant and Transport for London.*

- Construction Monitoring Costs
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement (*CoL*)
- Public Route and Sunken Garden (*Specification & Access*)
- Cultural Implementation Strategy
- Wind Audit
- Solar Glare

356. 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.

357. The scope of the s278 agreement may include, but is not limited to, improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and within the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, blue badge parking provision, and any cycle improvements necessary to allow access to the cycle parking.

### Monitoring and Administrative Costs

358. 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.
359. 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

360. 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

361. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the London Plan and the draft Local Plan and considering all other material considerations.
362. The scheme delivers a high quality, office-led development, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses.
363. The scheme makes optimal use of the site and provides an increase in office and retail floorspace in accordance with the City's objective to support a thriving economy and remain the world's leading international financial and professionals services centre.
364. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including small and medium sized companies which supports post-covid recovery as identified in the 'London Recharged: Our Vision for London in 2025 report.
365. The proposal would incorporate a ground level retail unit that would enable a range of retail/restaurant/cafe uses to come forward (78sq.m (GIA), providing active frontage to the Bream's Buildings elevation, and would help enliven the new public realm between the Site and St. Dunstan's burial ground
366. The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through skilful modelling of the elevations, well-considered massing and the use of high-quality, innovative materials. The proposed new public house would be a particularly jewellike feature that would add architectural richness to the development and would be an innovative reimaging of the London public house as a type. The proposed development would be an

appropriate and sympathetic neighbour not only to the buildings immediately adjacent but also to the wider streetscape.

367. The proposed demolition of the White Swan public house would result in a low level of less than substantial harm. It is considered that, in heritage terms, this harm would be outweighed by the provision of a new public house of significant architectural quality, bearing the same name as the existing public house and thereby continuing the long tradition on this site. NPPF para 203 requires local authorities to take into account of the impact of an application on the significance of a non-designated heritage asset. Para 203 further requires a local authority to make a balanced judgement in respect of the harm or loss of a non-designated heritage asset. It is considered that the loss of the existing White Swan public house and the architectural and historic values it embodies, though regrettable, would be outweighed by the provision of the new White Swan public house and the cumulative benefits accruing from this development.
368. The proposed development is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General Wolfe statue to St Paul's Cathedral. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.
369. The proposed development would be visible towards the westerly edge of this River Prospects 16B.1 and 16B.2 (Gabriel's Wharf). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development would preserve the viewer's ability to read the riverside landmarks in the view.
370. The magnitude of change in these is considered negligible and the proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LVMF SPG.
371. The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles.
372. The scheme delivers significant public realm enhancements including a new pedestrian route linking Mac's Place with Breams Buildings to the south, widening of Greystoke Place and a new publicly accessible pocket park adjacent to St Dunstan's burial ground.
373. In order to improve the pedestrian priority of the surrounding area a section 278 agreement will be secured which would deliver

improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and within the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, provision of a blue badge parking space, and any cycle improvements necessary to allow access to the cycle parking. The proposed S278 works would be in line with the visions set out in the City of London Transport Strategy and City of London's Public Realm vision.

374. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel. The provision of both long stay and short stay cycle spaces would meet the requirements of the London Plan. Access for cyclists would be via two prominent cycle parking entrances at ground level off Mac's Place, or via a dedicated entrance off Fetter Lane.
375. The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street, therefore the servicing is proposed to remain as existing. A cap for the number of vehicles servicing the development would be no more than 14 vehicles per day which would ensure the number of vehicles proposed, is equal to or less than the estimated existing situation. The applicant was required to demonstrate how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, it would not be possible to deliver the new pedestrian route through, due to space limitations of the site. Therefore, on balance, on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.
376. The daylight and sunlight assessment demonstrates that there would be some loss of amenity in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most impacted rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole. All of the windows assessed would receive more than 0.8 times their former value and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.
377. The submitted sun on ground assessment demonstrates that the nearby residential and public open spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE Guidelines. The overshadowing assessment of 95 Fetter Lane (commercial) undertaken on 21 March showed that the eastern and western side roof terraces are likely to experience a noticeable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21st

March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21st March. However, given the spaces are in commercial use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.

378. An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. The report assesses the proposals against Strategic Policy CS10 which seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.
379. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
380. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
381. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
382. Additional material considerations are as follows:

- Securing a development within the City, that would provide land uses which support the diversification, vitality and growth of the City as a world class business destination
  - Increase in a diverse retail provision on the site, enhancing the retail offer in, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
  - Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.
  - Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
  - The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through the use of high-quality faience materials to the new public house elevation and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms.
383. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan.
384. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

## **Background Papers**

### Application Documents

Design and Access Statement, Fletcher Priest Architects, May 2021  
Planning Statement, DP9, May 2021  
Accommodation Schedule, Fletcher Priest Architects, August 2021  
Statement of Community Involvement; DP9/YardNine, May 2021  
Energy Strategy Report; Waterman, May 2021  
Smart Infrastructure and Utilities Services Report, Waterman, May 2021  
Ecological Impact Assessment, Waterman, May 2021  
Biodiversity Net Gain Assessment, Waterman, May 2021  
Preliminary Environmental Risk Assessment, Waterman, May 2021  
Health Impact Assessment, Icen Projects Ltd, May 2021  
Equalities Statement, Icen Projects Ltd, May 2021  
Acoustic Report, Waterman, May 2021  
Air Quality Assessment (and Air Quality Neutral Assessment), Waterman, May 2021  
Daylight, Sunlight and Overshadowing Report, Point 2, May 2021  
Solar Glare and Light Pollution Report, Point 2, May 2021  
Wind Microclimate Assessment, RWDI, May 2021  
Outdoor Thermal Comfort Assessment, RWDI, May 2021  
Outline Construction Environmental Management Plan including Construction Logistics Plan, Waterman, May 2021  
Healthy Streets Transport Assessment, Waterman, May 2021  
Framework Travel Plan, Waterman, May 2021  
Framework Delivery and Servicing Plan, Waterman, May 2021  
Operational Waste Management Strategy, Waterman, May 2021  
Flood Risk Assessment, Foul Water Drainage and SUDs Strategy, Waterman, May 2021  
Arboricultural Impact Assessment, prepared by Waterman, May 2021  
Public House Comparison, Fletcher Priest Architects, July 2021  
Archaeological Desk Based Assessment, Waterman, July 2021  
Radiance Based Daylight Assessment, Point 2, July 2021  
Fire Safety Statement, Sweco UK Ltd, August 2021  
Sustainability Statement & BREEAM Pre-Assessment, Waterman, August 2021  
Whole Life Carbon Assessment and Circular Economy Statement, Waterman, August 2021  
Response to Access Comments, Fletcher Priest Architects, 11/08/2021



Response to TfL Comments, Waterman, 16/08/2021

Existing Plans: FLN-FPA-XX-B1-DR-A-10001, FLN-FPA-XX-GF-DR-A-10002, FLN-FPA-XX-01-DR-A-10003, FLN-FPA-XX-02-DR-A-10004, FLN-FPA-XX-03-DR-A-10005, FLN-FPA-XX-04-DR-A-10006, FLN-FPA-XX-05-DR-A-10007, FLN-FPA-XX-06-DR-A-10008, FLN-FPA-XX-07-DR-A-10009, FLN-FPA-XX-RF-DR-A-10010, FLN-FPA-XX-ZZ-DR-A-11001, FLN-FPA-XX-ZZ-DR-A-11002, FLN-FPA-XX-ZZ-DR-A-11003, FLN-FPA-XX-ZZ-DR-A-11004, FLN-FPA-XX-ZZ-DR-A-12001.

### External

Letter Historic England 02/07/2021

Letter Tower Hamlets 21/07/2021

Letter Bird and Bird Ltd. 26/07/2021 [Objection]

Letter Southwark 30/07/2021

Letter Greenwich 30/07/2021

Letter Greater London Authority 10/08/2021

Emails DP9 21/07/2021, 27/07/2021

### Internal

Email City of London Police 29/06/2021

Memo Lead Local Flood Authority 01/07/2021

Memo Department of Markets and Consumer Protection 09/07/2021

Memo Air Quality Officer 09/07/2021

Memo Access Team 15/07/2021

Memo Contract and Drainage Service 16/07/2021

Memo District Surveyors Office 19/08/2021

Email Cleansing Team 19/08/2021

## **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

Policy CG6 Increasing efficiency and resilience

Policy SD4 The Central Activities Zone (CAZ)

Policy SD5 Offices, and other strategic functions and residential development in the CAZ

Policy D1 London's form, character and capacity for growth

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering Good Design

Policy D5 Inclusive Design

Policy D8 Public realm

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire Safety

Policy D14 Noise

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E9 Retail, markets and hot food takeaways

Policy E10 Visitor infrastructure

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy HC5 Supporting London's culture and creative industries

Policy HC7 Protecting public houses

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 SI8 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 (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)

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)

Town Centres SPG (July 2014)

Mayor's Transport Strategy (2018)

Culture 2016 strategy.

**Relevant Draft City Plan 2036 Policies**

AT1 Pedestrian movement

AT2 Active travel including cycling

AT3 Cycle parking

CE1 Zero Waste City

CR1 Overheating and Urban Heat Island effect

CR3 Sustainable drainage systems (SuDS)

CV1 Protection of existing visitor, art and cultural facilities

CV5 Public Art

DE1 Sustainability requirements  
DE2 New development  
DE3 Public realm  
DE5 Terraces and viewing galleries  
DE6 Shopfronts  
DE8 Daylight and sunlight  
DE9 Lighting  
HE1 Managing change to heritage assets  
HE2 Ancient monuments and archaeology  
HL1 Inclusive buildings and spaces  
HL2 Air quality  
HL3 Noise and light pollution  
HL4 Contaminated land and water quality  
HL9 Health Impact Assessments  
HS3 Residential environment  
OF1 Office development  
OS1 Protection and Provision of Open Spaces  
OS2 City greening  
OS3 Biodiversity  
OS4 Trees  
S1 Healthy and inclusive city  
S2 Safe and Secure City  
S4 Offices  
S5 Retailing  
S6 Culture, Visitors and the Night -time Economy  
S7 Smart Infrastructure and Utilities  
S8 Design  
S9 Vehicular transport and servicing  
S10 Active travel and healthy streets  
S11 Historic environment  
S12 Tall Buildings  
S13 Protected Views  
S14 Open spaces and green infrastructure  
S15 Climate resilience and flood risk  
S16 Circular economy and waste

S27 Planning contributions  
SA1 Crowded places  
SA3 Designing in security  
VT1 The impacts of development on transport  
VT2 Freight and servicing  
VT3 Vehicle Parking

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

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)  
City of London Thermal Comfort Guidelines (CoL 2020)  
Planning Obligations SPD (CoL, July 2014)  
Open Space Strategy (COL 2016)  
Office Use SPD (CoL 2015)  
City Public Realm (CoL 2016)  
Cultural Strategy 2018 – 2022 (CoL 2020)  
Relevant Conservation Area Summaries

## Relevant Local Plan Policies

### ***CS1 Provide additional offices***

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

### ***DM1.2 Protection of large office sites***

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

### ***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

### ***DM1.5 Mixed uses in commercial areas***

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

### ***DM3.2 Security measures***

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

### ***DM3.5 Night-time entertainment***

- 1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:
  - a) the amenity of residents and other noise-sensitive uses;
  - b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.
- 2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

### ***CS4 Seek planning contributions***

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

### ***CS10 Promote high quality environment***

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

### ***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 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.

#### ***CS11 Encourage art, heritage and culture***

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of

arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

### ***DM11.2 Public Art***

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

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

### ***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.

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

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

#### ***DM12.5 Historic parks and gardens***

1. To resist development which would adversely affect gardens of special historic interest included on the English Heritage register.
2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

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

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

#### ***CS14 Tall buildings in suitable places***

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

#### ***CS15 Creation of sustainable development***

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

#### ***DM15.1 Sustainability requirements***

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
  - a) BREEAM or Code for Sustainable Homes pre-assessment;
  - b) an energy statement in line with London Plan requirements;
  - c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

### ***DM15.2 Energy and CO2 emissions***

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
  - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
  - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
  - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
  - d) anticipated residual power loads and routes for supply.

### ***DM15.3 Low and zero carbon technologies***

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

#### ***DM15.4 Offsetting carbon emissions***

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

#### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

#### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact

assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

#### ***DM15.7 Noise and light pollution***

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

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

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

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

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

#### ***DM15.8 Contaminated land***

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

adverse impacts of the development on human and non-human receptors, land or water quality.

### ***DM16.1 Transport impacts of development***

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

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

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

### ***DM16.2 Pedestrian movement***

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

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

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

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

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

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



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

### ***DM16.3 Cycle parking***

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

### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing

areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

#### ***DM17.1 Provision for waste***

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

#### ***DM17.2 Designing out construction waste***

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

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

#### ***CS18 Minimise flood risk***

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

#### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where

feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

### ***CS19 Improve open space and biodiversity***

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

#### ***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
  - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
  - b) provide a high quality environment;
  - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
  - d) have regard to biodiversity and the creation of green corridors;
  - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

#### ***DM19.2 Biodiversity and urban greening***

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;

- e) maintenance of habitats within Sites of Importance for Nature Conservation.

### ***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.

#### ***DM20.4 Retail unit sizes***

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

### ***DM21.3 Residential environment***

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

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

## **SCHEDULE**

**APPLICATION: 21/00454/FULMAJ**

**100 And 108 Fetter Lane London EC4A 1ES**

**Demolition of 100 and 108 Fetter Lane and construction of a new building for office use (Class E) and a public house comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.**

**[For the avoidance of doubt this application relates to 'Option A' as set out in the application documents. A separate application for 'Option B' is under consideration and is the subject of separate consultation and assessment]**

## **CONDITIONS**

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Prior to 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.
- 3 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.

- 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, DM15.2, 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 Prior to the commencement of any works on site, details shall be submitted to and approved in writing by the Local Planning Authority showing the means of protection of the trees within St. Dunstan-in-the-West burial ground including their root system and the approved details shall be implemented prior to and during the course of the building works as appropriate.  
REASON: To ensure the protection of the adjacent trees in accordance with the following policies of the Local Plan: DM10.4, DM19.2. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated before the design is too advanced to make changes.

- 6 The demolition shall not be carried out other than in accordance with the Demolition Environmental Management Plan and the Construction Logistics Plan by Waterman dated August 2021 hereby approved.  
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.
- 7 Prior to the commencement of demolition the developer/demolition contractor shall sign up to the Non-Road Mobile Machinery Register. The demolition 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.
- 8 Prior to the commencement of construction the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The construction 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.
- 9 Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of



building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

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

- 10 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.

- 11 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the 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 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.

- 12 No works except demolition to basement slab level shall take place until arrangements have been made for an archaeological "watching brief" to monitor development groundworks and to record any archaeological evidence revealed. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. Details of these arrangements shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the work.

REASON: To ensure an opportunity is provided for the archaeology of the site to be investigated and recorded in accordance with the following policy of the Local Plan: DM12.4.

- 13 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 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: green roofs, blue roofs, rain gardens, attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.3 l/s from the proposed outfall and provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 132m<sup>3</sup>.
  - (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of construction work.
  - (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
- REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
- 15 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
- REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 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 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.
- 18 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.
- 19 Details of the position and size of the green roof(s)/wall(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.  
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 20 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works

thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

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

- 21 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 pocket park, pedestrian routes, and terraces. 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.

- 22 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
  - (b) details of the proposed new facade(s) and flank wall(s) including the treatment of the White Swan Public House and Greystoke Place elevation including typical details of the fenestration and entrances;
  - (c) details of the embossing, stamping and decorative elements of the development;
  - (d) details of ground floor elevations;
  - (e) details of the ground floor office entrance(s);
  - (f) details of windows and external joinery;
  - (g) details of soffits, hand rails and balustrades;
  - (h) details of the proposed external terraces (including balustrades and handrails);
  - (i) details of junctions with adjoining premises including the St. Dunstan in the West Burial Ground;
  - (j) details of the integration of window cleaning equipment and the garaging thereof, plant, plant enclosures, flues, fire escapes and other excrescences at roof level;
  - (k) details of ventilation and air-conditioning;

(l) details of all ground level surfaces including materials to be used;  
and

(m) details of the proposed public route through the development including of the proposed gates, the proposed planting layout, the proposed seating, the proposed landscaping and the proposed elevations and soffits.

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.

- 23 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.

- 24 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.

- 25 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.

- 26 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority 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.

- 27 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

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

- 28 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

- 29 Prior to the operation of the public house, a Operational Management Plan shall be submitted to further protect the amenity of local residents and surrounding area detailing:

- i. The duties of the staff employed at the premises to patrol the external perimeter of the premises in order to discourage, noise, disturbance and anti-social behaviour
- ii. Identification of an area outside the public house available for outdoor drinking to ensure access through Greystoke Place is kept clear;
- iii. No live or recorded music that can be heard outside the premises shall be played
- iv. No promoted events to be held
- v. Control of opening hours
- vi. Dispersal of patrons after closure
- vii. Review periods

REASON: To ensure good management of the venue to protect residential amenity and to ensure compliance with the following policy of the Local Plan: CS3; CS15; CS21

- 30 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.  
REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 31 (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.
- 32 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 204 long stand and 28 short stay pedal cycle spaces. 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.

- 33 A minimum of 5% of the long stay cycle spaces shall be accessible for adapted cycles.  
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling B, emerging City Plan policy 6.3.24.
- 34 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.
- 35 The threshold of the new pedestrian route 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.
- 36 The roof terraces hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 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.
- 37 No amplified or other music shall be played on the roof terraces.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 38 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

- 39 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.
- 40 The public house use hereby permitted shall not be open to customers between the hours of 23:30 and 07:00.  
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.
- 41 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety
- 42 The area within the development marked as retail on the floorplans at ground level hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020)) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.3.
- 43 The development shall provide:  
- 15,005sq.m (GEA) of office floorspace (Class E);  
- 302sq.m (GEA) of Drinking Establishment (Sui Generis); and  
- 90sq.m (GEA) flexible retail, restaurant, cafe floorspace (Class E).  
REASON: To ensure the development is carried out in accordance with the approved plans.
- 44 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: FLN-FPA-XX-XX-DR-A-01001 Rev P01; FLN-FPA-XX-XX-DR-A-01002 Rev P01; FLN-FPA-XX-B1-DR-A-20002 Rev P04; FLN-FPA-XX-GF-DR-A-20004 Rev P06; FLN-FPA-XX-M1-DR-A-20005 Rev P05; FLN-FPA-XX-ZZ-DR-A-20006 Rev P04; FLN-FPA-XX-05-DR-A-20007 Rev P04; FLN-FPA-XX-06-DR-A-20008 Rev P04; FLN-FPA-XX-07-DR-A-20009 Rev P06; FLN-FPA-XX-08-DR-A-20010 Rev P06; FLN-FPA-XX-09-DR-A-20011 Rev P05; FLN-FPA-XX-10-DR-A-20012 Rev P04; FLN-FPA-XX-11-DR-A-20013

Rev P04; FLN-FPA-XX-12-DR-A-20014 Rev P04; FLN-FPA-XX-12-DR-A-20015 Rev P04; FLN-FPA-XX-RF-DR-A-20016 Rev P05; FLN-FPA-XX-ZZ-DR-A-21001 Rev P03; FLN-FPA-XX-ZZ-DR-A-21002 Rev P04; FLN-FPA-XX-ZZ-DR-A-21003 Rev P03; FLN-FPA-XX-ZZ-DR-A-21004 Rev P03; FLN-FPA-XX-ZZ-DR-A-22001 Rev P03; Demolition Environmental Management Plan by Waterman dated August 2021; Construction Logistics Plan by Waterman dated August 2021.  
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## INFORMATIVES

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

detailed advice in the form of statutory policies in the 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.

- 2 Where groundworks not shown on the approved drawings are to take place 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.
- 3 Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, need to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being;  
**ANY BUILDING PROPOSAL WHICH INCLUDES CATERING FACILITIES WILL BE REQUIRED TO BE CONSTRUCTED WITH ADEQUATE GREASE TRAPS TO THE SATISFACTION OF THAMES WATER UTILITIES LTD OR THEIR CONTRACTORS.**

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## **Background Papers**

### Application Documents

Design and Access Statement, Fletcher Priest Architects, May 2021

Planning Statement, DP9, May 2021

Accommodation Schedule, Fletcher Priest Architects, August 2021

Statement of Community Involvement; DP9/YardNine, May 2021

Energy Strategy Report; Waterman, May 2021

Smart Infrastructure and Utilities Services Report, Waterman, May 2021

Ecological Impact Assessment, Waterman, May 2021

Biodiversity Net Gain Assessment, Waterman, May 2021

Preliminary Environmental Risk Assessment, Waterman, May 2021

Health Impact Assessment, Icen Projects Ltd, May 2021

Equalities Statement, Icen Projects Ltd, May 2021

Acoustic Report, Waterman, May 2021

Air Quality Assessment (and Air Quality Neutral Assessment), Waterman, May 2021

Daylight, Sunlight and Overshadowing Report, Point 2, May 2021

Solar Glare and Light Pollution Report, Point 2, May 2021

Wind Microclimate Assessment, RWDI, May 2021

Outdoor Thermal Comfort Assessment, RWDI, May 2021

Outline Construction Environmental Management Plan including Construction Logistics Plan, Waterman, May 2021

Healthy Streets Transport Assessment, Waterman, May 2021

Framework Travel Plan, Waterman, May 2021

Framework Delivery and Servicing Plan, Waterman, May 2021

Operational Waste Management Strategy, Waterman, May 2021

Flood Risk Assessment, Foul Water Drainage and SUDs Strategy, Waterman, May 2021

Arboricultural Impact Assessment, prepared by Waterman, May 2021

Public House Comparison, Fletcher Priest Architects, July 2021

Archaeological Desk Based Assessment, Waterman, July 2021

Radiance Based Daylight Assessment, Point 2, July 2021

Fire Safety Statement, Sweco UK Ltd, August 2021

Sustainability Statement & BREEAM Pre-Assessment, Waterman, August 2021

Whole Life Carbon Assessment and Circular Economy Statement, Waterman, August 2021

Response to Access Comments, Fletcher Priest Architects, 11/08/2021

Response to TfL Comments, Waterman, 16/08/2021

Existing Plans: FLN-FPA-XX-B1-DR-A-10001, FLN-FPA-XX-GF-DR-A-10002, FLN-FPA-XX-01-DR-A-10003, FLN-FPA-XX-02-DR-A-10004, FLN-FPA-XX-03-DR-A-10005, FLN-FPA-XX-04-DR-A-10006, FLN-FPA-XX-05-DR-A-10007, FLN-FPA-XX-06-DR-A-10008, FLN-FPA-XX-07-DR-A-10009, FLN-FPA-XX-RF-DR-A-10010, FLN-FPA-XX-ZZ-DR-A-11001, FLN-FPA-XX-ZZ-DR-A-11002, FLN-FPA-XX-ZZ-DR-A-11003, FLN-FPA-XX-ZZ-DR-A-11004, FLN-FPA-XX-ZZ-DR-A-12001.

#### External

Letter Historic England 02/07/2021

Letter Tower Hamlets 21/07/2021

Letter Bird and Bird Ltd. 26/07/2021 [Objection]

Letter Southwark 30/07/2021

Letter Greenwich 30/07/2021

Letter Greater London Authority 10/08/2021

Emails DP9 21/07/2021, 27/07/2021

#### Internal

Email City of London Police 29/06/2021

Memo Lead Local Flood Authority 01/07/2021

Memo Department of Markets and Consumer Protection 09/07/2021

Memo Air Quality Officer 09/07/2021

Memo Access Team 15/07/2021

Memo Contract and Drainage Service 16/07/2021

Memo District Surveyors Office 19/08/2021

Email Cleansing Team 19/08/2021

Gideon Stothard  
The Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Via Email Only: [Gideon.Stothard@cityoflondon.gov.uk](mailto:Gideon.Stothard@cityoflondon.gov.uk)

Dear Gideon,

**Letter of Objection to the Proposed Development at 100 and 108 Fetter Lane, London, EC4A 1ES  
– Ref. No. 21/00454/FULMAJ**

Bird & Bird LLP wish to lodge a formal objection with respect to the following planning application and proposal for 100 and 108 Fetter Lane, London, within the City of London Corporation.

<b>Application Ref:</b>	21/00454/FULMAJ
<b>Site Address:</b>	100 And 108 Fetter Lane London EC4A 1ES
<b>Proposal:</b>	'Demolition of 100 and 108 Fetter Lane and construction of a new building for office use (Class E) and a public house comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works. [For the avoidance of doubt this application relates to 'Option A' as set out in the application documents. A separate application for 'Option B' is under consideration and is the subject of separate consultation and assessment]'

**Background:**

Bird & Bird LLP lease and administer 12 New Fetter Lane, a 15-storey office building occupying a triangular site opposite to the abovementioned application site. For reference, an extract of the applicants' Design and Access Statement is attached which illustrates the location of the proposed development at 100 and 108 Fetter Lane in relation to 12 New Fetter Lane. Bird & Bird LLP would like to raise a number of objections to the application, based on the planning merits of the scheme.

The basis of this objection is set out below:

**Inappropriate Bulk, Massing and Overshadowing**

Harm to the setting of a Statutorily Listed Heritage Asset

The London Plan Policy HC1 (Heritage conservation and growth) sets out that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

The Local Plan Policy DM 12.1 (Managing change affecting all heritage assets and spaces) states that development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their setting.

Abu Dhabi & Amsterdam & Beijing & Bratislava & Brussels & Budapest & Copenhagen & Dubai & Dusseldorf & Frankfurt & The Hague & Hamburg & Helsinki & Hong Kong & London & Luxembourg & Lyon & Madrid & Milan & Munich & Paris & Prague & Rome & San Francisco & Shanghai & Singapore & Stockholm & Sydney & Warsaw  
Satellite Office: Casablanca

The Local Plan Policy DM 10.4 (Environmental enhancement) sets out that developments should have regard to the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City.

In addition, the emerging Local Plan Spatial Strategy 9 states that the City will balance growth with the protection and enhancement of the City's unique heritage assets and open spaces. The emerging Local Plan Strategic Policy S11 (Historic Environment) states that the City's heritage assets, their significance and settings will be positively managed by conserving and enhancing heritage assets and their settings to ensure that the City's townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing.

Emerging Policy HE1 (Managing Change to Heritage Assets) sets out that development should conserve and enhance the special architectural or historic interest and the significance of heritage assets and their settings.

We object to these proposals on the grounds of harm caused to the setting of a statutorily listed heritage asset. No. 100 and 108 Fetter Lane are within the immediate setting of the Grade II listed former offices of YRM (NHLE: 1242612), designated in November 1995 (amended listing description 2013) for its architectural interest. The listing description describes the setting as:

*'a sensitive integration of a frankly modern office building within an ancient street pattern, relating unusually well both to the narrow alleyways to the north and to the former churchyard with its retained boundary walls and railings to the south.'*

The existing situation sees a single-storey red brick extension to No. 100 Fetter Lane being the closest element of the building to the Grade II listed asset. The proposals seek to demolish the entire building and for the new northern elevation to be a sheer wall of six storeys imposed upon the immediate setting of the listed building. We also consider the proposed new 12-storey building to be excessively tall given its proximity to a designated heritage asset. We consider this to be an inappropriate architectural response that would erode the existing sense of relief surrounding the listed building from the dense urban grain. This would be contrary to paragraph 200 of the National Planning Policy Framework (NPPF, 2021) by not preserving the building's existing setting and we do not assess this to better reveal its significance.

We also consider No. 100 and 108 Fetter Lane to possess heritage interest of their own, and in particular the architectural interest of The White Swan Public House and the polished stone podium level of the existing building. Although not formally included on a Local List by the Local Planning Authority, we believe the existing building merits being considered a non-designated heritage asset that is worthy of retention and that any loss of it would require a balanced judgement, as per paragraph 197 of the NPPF. The buildings were constructed in 1948 by T.P. Bennett & Sons, although the Public House has existed on the site of the current White Swan since the early-19<sup>th</sup> century, and we feel they make a positive contribution to their wider setting and our understanding of the historical development of Fetter Lane.

In light of the above, we consider that this application directly conflicts with London Plan Policy HC1, adopted Local Plan Policies DM 12.1, DM 10.4 and emerging Local Plan Spatial Strategy 9 and Policies S11 and HE1.

#### Loss of Sunlight and Daylight

It is noted that the relevant Building Research Establishment (BRE) Guidance focuses on the effects to residential neighbours with non-residential uses being considered less sensitive. However, the guidance does note that it can be applied to non-domestic buildings although target values are only provided for residential uses. This point needs to be borne in mind in considering the matter further.

Whilst the Applicant's Daylight, Sunlight And Overshadowing Report does not assess the impact of the proposed development on non-domestic properties, Appendix 8 (Transient Overshadowing Analysis Plots) of the report illustrates the location of shadows caused specifically from the proposed development at different times of the day and year. For the purpose of this assessment, the overshadowing was mapped during 21<sup>st</sup> March (Spring Equinox), 21<sup>st</sup> June (Summer Solstice) and 21<sup>st</sup> December (Winter Solstice).



It is clear from this assessment that the proposed development would cause substantial overshadowing on 12 New Fetter Lane, which currently enjoys an open aspect to the West, owing to the shift in townscape character with the lower rise Conservation Area.

There is a plethora of research which has assessed the effects of exposure to natural light in the workplace which have shown that natural light improves the health and productivity of office workers and also improves the monetary value of spaces. This is reflected within both the City of London's adopted and emerging Local Plan, which sets out that appropriate levels of daylight and sunlight is important for the mental health of workers.

As such, it is considered that the proposed development at 100 And 108 Fetter Lane would unduly impact the current sunlight and daylight that 12 New Fetter Lane currently benefits from and would greatly increase the need for artificial lighting within the office environment, leading to an inferior working environment.

#### Light Pollution

Local Plan Policy DM 15.7 (Noise and light pollution) sets out that internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing. This is echoed within the City of London's emerging Local Plan.

Local Plan Policy DM 21.3 (Residential environment) states that the amenity of existing residents within identified residential areas will be protected by resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance and requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

The Applicant's Solar Glare and Light Pollution Report concludes that there is likely to be a noteworthy increase [above existing levels] in the potential light pollution on the bedroom windows of 2 Greystoke Place. The report further sets out that this was expected as the proposed development is both larger and closer than the existing building to 2 Greystoke Place.

As such, it is considered that the proposed development at 100 And 108 Fetter Lane would unduly impact residential amenity currently benefitted by residents of 2 Greystoke Place. This is considered contrary to Local Plan Policy DM 15.7 and DM 21.3.

#### **Summary**

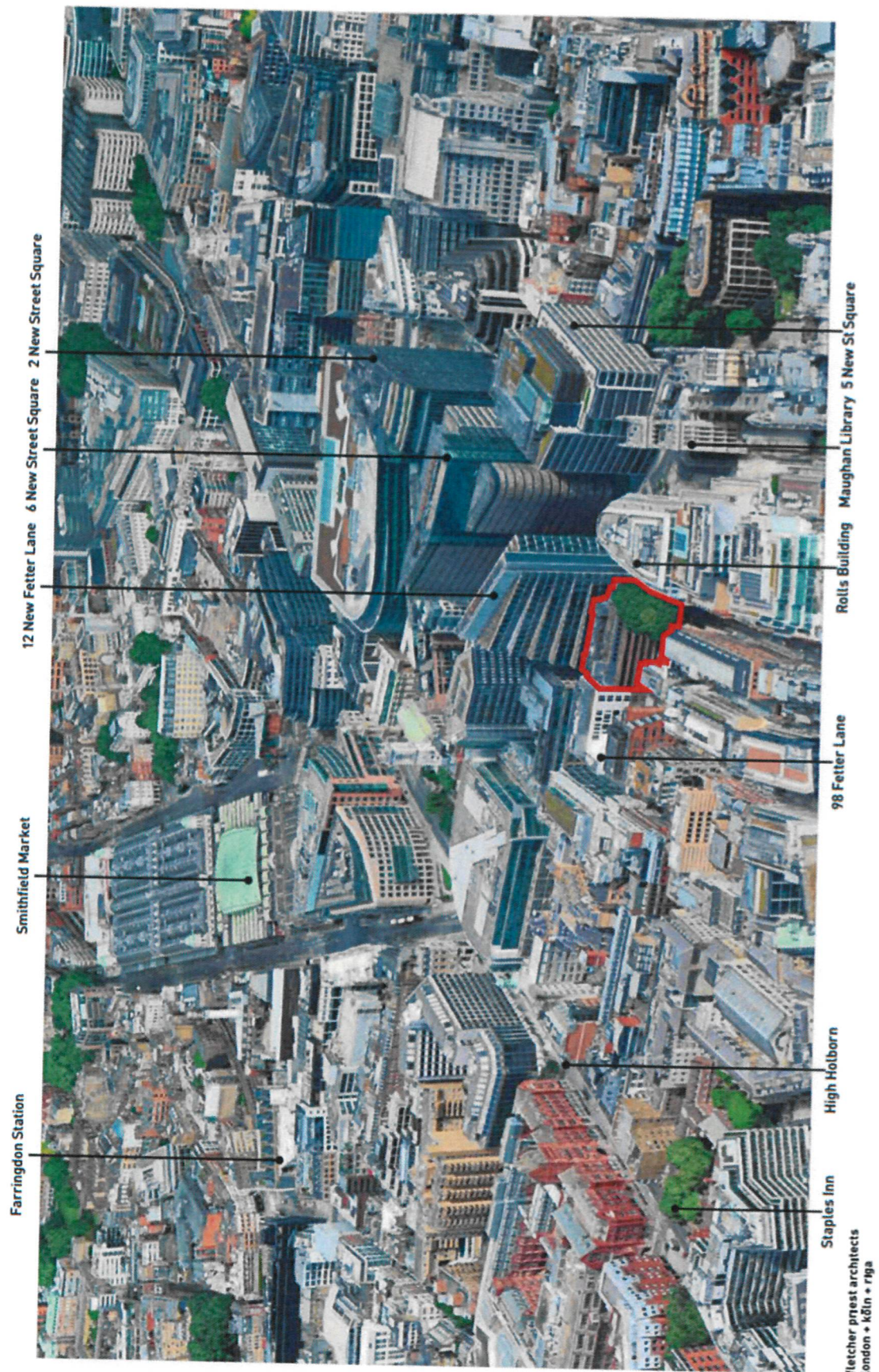
As evidenced in this letter of objection, there are serious shortfalls in the scheme proposed under ref. No. 21/00454/FULMAJ.

Whilst Bird & Bird LLP supports sustainable and well-designed development proposals within the City of London, we object to the current scheme in the strongest terms on the grounds of harm caused to the significance and immediate setting of a statutorily listed heritage asset. The proposed development is considered to be excessively tall given its proximity to this designated heritage asset and is an inappropriate architectural response that would erode the existing sense of relief surrounding the listed building from the dense urban grain. This directly conflicts with adopted and emerging national, regional and local planning policy.

Bird & Bird LLP further objects on the grounds that the proposed development would cause substantial overshadowing on 12 New Fetter Lane, which would impact the mental health of office workers and greatly increase reliance upon artificial lighting, leading to an inferior working environment.

On this basis, we recommend that the City of London refuse this planning application on the grounds that it does not comply with either National, Regional or Local Planning policy. Should any further information be submitted pursuant to the planning application at 100 And 108 Fetter Lane Bird & Bird LLP request that they are informed at all stages, and reserve the right to provide further detailed comments if and when such additional information would become available.

## Western View



The above figure was submitted as part of the Design and Access Statement, submitted in support of this application ref.no 21/00454/FULMAJ.

Yours Sincerely



Mark Malone

**Facilities Director**

For and on behalf of Bird & Bird LLP

# 100 And 108 Fetter Lane

Local Planning Authority: City of London  
local planning authority reference: 21/00534/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

This report covers two proposals (Option A - 0732 and Option B - 0738) for the same application site.

Option A (0732) - Demolition of 100 and 108 Fetter Lane and construction of a new building for office use (Class E) and a public house comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

Option B (0738) - Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)), comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

## The applicant

The applicant is **BREO Hundred Ltd** and the agent is **DP9**.

## Strategic issues summary

**Land Use Principles:** The site is located in the CAZ and within the City of London which encourages the provision of new office space. The principle of office use is supported. Subject to the assessment by the City of the value of the public house, both options with regards to the re-provision of the public house or retaining it are supported in principle. (Paragraphs 22 – 29).

**Offices:** The City of London is projecting office growth of 1,150,000sqm of office space between 2011-2026. Its proposed submission draft plan 2036 projects 2,000,000 sqm of office space between 2016 and 2036. This proposal will help support this requirement. (Paragraphs 30 – 33).

**Urban Design:** The approach to scale, massing and architecture is supported. The improved public realm increases connectivity and permeability of the area, which is



supported, however the applicant should consider ensuring access is not restricted to certain times of the day. (Paragraphs 34 – 51)

**Heritage:** The scheme is considered to have a positive impact on the setting of the nearby Grade II building. The impact on views, including strategic views, are acceptable. A watching brief during excavation is recommended in relation to archaeology remains. (Paragraphs 52 – 58)

**Transport:** An Active Travel Plan and a contribution of £220,000 for cycle hire is required. Works required should be secured under Section 278 or as part of the Section 106 Agreement. Further consideration is needed in regard to onsite disabled persons parking and short-stay cycle parking. A DSP, CLP and a cycle promotion plan are required. (Paragraphs 59 – 73)

**Sustainable Infrastructure:** Urban greening, biodiversity net gain, flood risk and sustainable drainage comply with policy requirements. Further information is required for energy, circular economy and water efficiency (for Option A). The applicant has provided additional information in relation to points raised for energy, which is currently being reviewed. The Whole Life Carbon Assessment has been re-submitted in the correct format and is currently under review. No information has been provided in relation to digital infrastructure therefore compliance with London Plan Policy SI 6 cannot be determined at this stage. (Paragraphs 74 – 101)

**Environment:** Air quality impacts are generally acceptable. Further clarification is required, and the applicant has provided additional information in relation to points raised. This is currently being reviewed. (Paragraphs 102 – 105)

### **Recommendation**

That City of London Council be advised that whilst the proposal is supported in principle, the application does not fully comply with the London Plan for the reasons set out in paragraph 110. Where the associated concerns within this report are addressed, the application may become acceptable in strategic planning terms.

## Context

1. On 01 July 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 Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
  - Part 4 - Consultation required by the Secretary of State under article 10 3 of the GDPO
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 City to determine it itself. In this case, the City 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](http://www.london.gov.uk).

## Site description

5. The 0.14 hectare site comprises 100 Fetter Lane, 108 Fetter Lane and Greystoke Place. It is bounded by Fetter Lane to the east, Bream's Buildings to the south, St Dunstan's Gardens and Mac's Place to the west and 98 Fetter Lane to the north.
6. The surrounding area is characterised by large tall steel and glass modern office buildings. To the west, there is more of a mix of uses with a much finer historical grain reflected in the narrow streets and 'passageways' of the Chancery Lane conservation area. Within close proximity there are only three residential properties with two of them not directly visible from the site due to the tight urban fabric.
7. The existing building is not listed, nor is it located within a conservation area. Immediately adjacent to the west of the site, beyond Mac's Place, is No. 2 Greystoke Place (Grade II listed). The Chancery Lane Conservation Area is located nearby to the west and north, with a buffer zone of buildings separating it from the site boundary. The whole of the City is an Archaeological Priority Zone.
8. The site is located within Flood Zone 1 and the entire City of London has been designated an Air Quality Management Area (AQMA).
9. The A201 Farringdon Road is the nearest section of the Transport for London Road Network (TLRN), approximately 300 metres east of the site. The nearest part of the Strategic Road Network (SRN) is A40 High Holborn, 180 metres north.
10. Chancery Lane Station is within 400 metres of the site and is served by Central line services. Farringdon station is also within 500 metres of the site and provides access to Circle, Hammersmith & City, Metropolitan underground lines and Thameslink rail services. From 2022 it will be served by the Elizabeth line. City Thameslink station is located 700 metres to the south east of the site.
11. The nearest bus stops are located on High Holborn, providing access to 5 bus routes.

12. The site therefore achieves a Public Transport Access Level (PTAL) of 6b, where 6b represents the highest level of connectivity

## **Details of this proposal**

13. The application is for the demolition of 100 and 108 Fetter Lane and construction of a new building for office use (Class E), creation of a new pedestrian route and pocket square.
14. The site includes an existing public house at 108 Fetter Lane which is occupied by a third party. Subject to negotiations with the third party, the applicant proposes to demolish the public house alongside 100 Fetter Lane to enable the full redevelopment of the site (Option A). In this option, a new replacement public house will be provided in the north eastern corner of the site. This is the preferred option.
15. In the case the applicant is unable to incorporate 108 Fetter Lane (public house) into the redevelopment, an alternative option (covered in a separate planning application) is proposed to retain the existing pub and build around it (Option B). In this option, a flexible commercial unit (Class E(a)(b)(c)(d)) will be provided in the north eastern corner of the site where, in Option A a new public house would otherwise be sited.
16. Both options are very similar in impacts and are therefore being considered under the same report. Any differences in relation to compliance with London Plan policies are explicitly set out in this report.

## **Case history**

17. There is no strategic planning history for the site.
18. There have been a number of pre application discussions with the City of London although none with the Mayor.

## **Strategic planning issues and relevant policies and guidance**

19. 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 (January 2015); and, the London Plan 2021.
20. The following are also relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance;
  - Proposed Submission Draft City Plan 2036 (March 2021)
21. 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
Central Activity Zone	London Plan
Culture	London Plan; Mayor's Cultural Strategy
Urban design	London Plan; Character and Context SPG; Public London Charter draft LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG
Heritage	London Plan
Strategic Views	London Plan; London View Management Framework 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;
Transport and parking	London Plan; the Mayor's Environment Strategy;
Biodiversity	London Plan; the Mayor's Environment Strategy;



## **Land Use Principles**

### Office

22. The site is within the City of London and Central Activity Zone. London Plan Policy SD4 recognises the CAZ as an internationally and nationally significant office location. London Plan Table 6.1 indicates that the CAZ [and the Northern Isle of Dogs] are projected to accommodate more than 367,000 additional office jobs with a net increase of 3.5 million sqm (GIA) of office floorspace over the period 2016-2041.
23. Policy SD4 states that the nationally and internationally significant office functions of the CAZ should be supported, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values. This is reinforced by London Plan Policy E1 that also supports the provision of new offices, especially in the CAZ.
24. The proposed development will deliver up to 13,282 sqm GIA of new office floorspace, which is equivalent to a 121% increase of the existing provision.
25. The principle of office use is therefore supported.

### Public House

26. The proposal includes two options. Option A to demolish the existing public house and to re-provide it in the north eastern corner of the site; and option B, to building around the existing pub.
27. London Plan Policy HC7 states that public houses should be protected where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. Policy HC7 also states that new public houses should be supported where they would stimulate town centres, Cultural Quarters, the night-time economy and mixed-use development.
28. The City should come to a view as to whether the pub has any heritage, economic, social or cultural value. They are advised to contact the Mayor's cultural at risk team for further information. The current condition of the pub alongside the proposal to re-provide it, however, is a material consideration.
29. Subject to negotiations with the third party, the redevelopment of the pub as part of the wider development proposals or its retention within the scheme are both supported in principle.

## **Office and business space**

30. London Plan Policy E1 states that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development; and that increases in the current stock of offices should be supported in certain locations [such as the CAZ]. Policy CS1 of the City of London Local Plan 2015 aims to increase the City's office floorspace by 1,150,000sqm between 2011-2026, to provide for an expected growth in workforce of 55,000 workers. The City's Proposed Submission Draft 2036 is currently projecting office

growth in the City of 2,000,000 sqm between 2016 and 2036. This proposal will help support those requirements.

31. London Plan Policy E2 states that development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.
32. The proposal is designed to provide both large floor plates, which would be suitable for single large occupiers, as well as locating the core at the side of the building to enable the floorspace to be used flexibly, allowing for floors to be subdivided, providing floorplates ranging from 980 sqm to 480 sqm which will be attractive to SME occupiers
33. In Option B, where the existing pub is retained and a flexible commercial floorspace is provided instead, will also provide opportunity for additional space for a range of potential occupiers.

## **Urban design**

34. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

### Optimising development capacity, layout and architecture

35. The application has undergone 7 pre application meetings with the City of London since March 2021 to develop the proposals and refine its design; and there is evidence the applicant has responded positively to these discussions. It is therefore considered the scheme has followed a design-led approach to optimising the development capacity of the site.
36. The layout is generally well considered and the increased permeability around the site with public amenity fronting onto the churchyard is welcomed.
37. The design makes a positive contribution to the streetscape and public realm with clear and well-defined entrances. The attention to detail and quality of materials is also well considered and the simple approach to the building arrangement and its architecture is supported.
38. The location of the pub in either option does not raise any strategic concerns, although Option B which retains the pub in its existing location helps to knit the scheme into the character and scale of the immediate context.

### Scale and massing

39. The City of London Plan 2015 identifies tall buildings as those that significantly exceed the height of their general surroundings with the City of London Local Plan Proposed Submission Draft March 2021 identifying them as over 75m above Ordnance Datum (AOD). The proposed development, at 13 storeys (56.9m AOD), is therefore not considered a tall building.

40. The form and massing have been considered through townscape testing and views analysis and the resulting height/mass sits comfortably with the nearby buildings on Fetter Lane (including the taller no.12 Fetter Lane). GLA officers agree that the development has been designed to respect the sensitivity of its location and acts as a transition in scale from the smaller buildings to the west within the Chancery Lane conservation area and the taller buildings to the south and east.

### Visual Impact

41. The Design and Access Statement (DAS) assessed a total of 6 local townscape views, 4 LVMF views and 2 riparian views, which were identified and agreed by the Council. The DAS only assessed the proposed development in Option A as there was no material effect on the views, except for view 4 (Fetter Lane North), view 5 (Fetter Lane South), and view 7 (Nevill Lane), and in those views, GLA officers agree that the overall effect of the development would be the same for both Option A and Option B.
42. GLA officers agree with the conclusion of the view assessment in the DAS in that, overall, in the local townscape views there is either no impact or in some cases, moderately beneficial impact. Although the DAS concludes in view 1 (along Breems Buildings from the Conservation Area looking East), view 5 (Fetter Lane (South)) and View 07 (Looking West from Nevill Lane), there is a major beneficial impact, GLA officers do not agree with the extent of those conclusions for view 5 and 7 and instead considers the impact more moderately beneficial in those cases.
43. Four LVMF views were agreed; view 5A.2 Greenwich Park, view 15B.2 Waterloo Bridge looking east, view 16B.1 Gabriel's Wharf and view 17B.1 Golden Jubilee Hungerford Footbridge. GLA officers agree with the assessment that in views 15B.2 and 17B.1, there is no impact as the development is not visible behind the existing buildings; and in view 16B.1, the impact is moderately beneficial, contributing to the cluster of existing buildings around New Square.
44. In view 5A,2 Greenwich Park, the site sits within the Background Wider Setting Consultation Area of the Protected Vista. While the overall height of the proposed development exceeds the threshold height of the Background Wider Setting Consultation Area, the proposed building sits behind the existing 6 New Street Square and 12 New Fetter Lane buildings which results in it not being visible. GLA officers therefore agree with the conclusions set out in the DAS that it therefore preserves the definition of the dome and upper parts of the western towers of St Paul's Cathedral in the context of the existing view.

### Public realm

45. London Plan Policy D8 states that development proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, easy to understand, service and maintain; and that landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. London Plan G4 also states that development proposals should, where possible, create areas of publicly accessible open space, particularly in areas of deficiency.
46. The development proposes the creation of a new publicly accessible route from Mac's Place to Bream's Buildings as well as the creation of sunken pocket garden.

In Option A, part of Greystoke Place will be widened, and in both options the building line will be stepped away from St Dunstan's Gardens to create a new pedestrian through-route linking Greystoke Place, Mac's Place and Bream's Buildings. This provides improved connectivity and permeability through the site, which is welcomed.

47. The landscaping is of high quality with a high amount of greenery. The greening and location of the amenity spaces that are accessed via the office positively adds to sense of place and provides an added degree of natural surveillance at certain times of the day. The overall design enhances the amount of active frontage, especially along Fetter Lane and Bream's building as well as opposite for St Dunstan Gardens, which is supported.
48. The pocket square, however, is proposed to be gated between 7pm and 8am. This should be publicly accessible at all times of the day in line with Policy D8 and D5.

#### Fire safety

49. In line with London Plan Policy D12, development proposals must achieve the highest standards of fire safety in relation to the building's construction; means of escape; features which reduce the risk to life; access for fire service personnel and equipment; and ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.
50. The application is supported by a Fire Safety Statement, however further information is required in relation building's construction and details of materials, means of escape, and confirmation that future modifications will take into account and not compromise the base build fire safety/protection measures set out in the Fire Statement. These measures should be secured as conditions /S106 as appropriate. In addition, the Statement is also required to include a reference to the named individual(s) and their specific qualifications to ensure that it has been prepared by a suitably qualified third party.

#### Inclusive access

51. London Plan Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design, ensuring they are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and that buildings are able to be entered, used and exited safely, easily and with dignity for all. The proposals set out a range of features that contribute to inclusiveness and accessibility, including surface level access and treatments, wayfinding, landscaping, wheelchair accessible toilets, hearing loops, lifts, appropriate circulation space, accessible roof terraces, etc.

### **Heritage**

52. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance and should avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 states that 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".

53. In addition, the NPPF states that when considering the impact of a development 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. 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. In line with case law, any harm identified must be given considerable importance and weight.
54. The NPPF also 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.
55. The building is not listed nor located in a conservation area and it is not considered to be an undesignated heritage asset. There are two conservation areas close by; Chancery Lane to the west and Fleet Street to the south, as well as a number of listed buildings; primarily 2 Greystoke Place (Grade II) immediately adjacent to the west.
56. GLA officers agree that the proposed design will complement 2 Greystoke Place without trying to compete with it architecturally and is considered an appropriate response to the heritage asset that will preserve its setting, significance and heritage value.
57. The impact on the setting of Chancery Lane Conservation Area Character is also considered less than substantial harm due to the buffer zone of buildings separating the Conservation Area from the site boundary and the stepping up effect towards to tall buildings to the south and east.
58. The whole of the City is an Archaeological Priority Zone. London Plan Policy HC1 states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. The submitted archaeological report concludes that there is low potential of prehistoric, Roman, Saxon/ early medieval, medieval remains, and low to moderate for post medieval remains. All are likely to be of local or regional significance. Due to the construction of the existing basement and the severe levels of truncation relating to previous bomb damage, the report recommends a limited watching brief during excavation below existing foundations levels. This should be conditioned.

## **Transport**

### Trip Generation and Public Transport impacts

59. In line with London Plan Policy T4, the applicant has undertaken a trip generation assessment to evaluate the impacts of the proposed development

on public transport capacity. The assessment concludes that the proposed scheme is expected to create a minor increase in trips when compared to the existing building. As the existing building is mostly vacant, the gross increase in trips should be considered.

60. Overall, it is expected that the increase in demand can be absorbed via active travel and public transport in line with London Plan Policy T4.

### Healthy Streets

61. The pedestrian route from Greystoke Place and Mac's Place to the north and west of the site will be extended by the proposed development to link to Breams Buildings which is strongly supported. Additional footway capacity will also be enabled the junction with Fetter Lane through the proposed chamfered design of the building. Whilst this is supported, the applicant should confirm that footways will be at least 2m wide and that pedestrian comfort levels (PCLs) of at least B+ during the peak periods and are in accordance London Plan Policies D8 and T2. Clarification is required on the new pedestrian route proposed, which should be publicly accessible at all times of day in perpetuity and secured as such.
62. The proposals are not supported by an Active Travel Zone (ATZ) Assessment. This should be undertaken and should consider the quality of key walking routes from the site to local transport stops and stations. The applicant does, however, identify accident data for local routes surrounding the site. This data indicates a potential safety issue at the junction of New Fetter Lane and Bartlett Court to the west and the pedestrian crossing leading to Nevill Lane. In line with the Mayor's Vision Zero ambition, improvements should be considered with the City Corporation and secured through section 278 or 106 as appropriate.
63. Such works would enable the development to support the MTS and Mayor's Vision Zero Action Plan, by designing and helping to deliver a safe, pleasant local walking environment, specifically by improving key pedestrian routes between the site and local bus stops and stations, which would be used by occupiers and visitors to the proposed development.

### Access, parking and servicing

64. There is currently no vehicle access to the site with all deliveries, servicing and refuse collection taking place on street. The constraints of the site mean that the proposed development would also be serviced on street. Whilst the car free element of the scheme is welcomed in this location, an onsite disabled parking space would usually be required. The applicant advises that the City Corporation 'red badge' scheme applies in this area; clarification is required as to the number, location and capacity of spaces.
65. Approximately 14 servicing trips per day are forecast, similar to existing. They will be managed through a Delivery & Servicing Plan that promotes offsite consolidation. This should be secured by condition or through the section 106 agreement to support London Plan Policies T2 and T7(F), which requires new development to reduce road danger from freight trips.

### Cycle Hire

66. There is a Cycle Hire docking station to the north east of the site on New Fetter Lane with 21 docking points. Cycleway 6 extends along Farringdon Road to the east.
67. The proposed development will increase demand for TfL Cycle Hire in the local area. The area already suffers from significant docking station capacity pressure. A contribution of £220,000 for either a new or expanded cycle hire station to cater for the new demand likely to be generated by this development should therefore be secured as part of the S106.

### Cycle Parking

68. The long stay cycle parking proposed would meet the minimum standards of the London Plan, which is welcomed. 28 short stay cycle parking spaces are required in connection with Option A to meet the minimum standards set out in Policy T5 (Cycling). However, only 12 short stay cycle spaces are proposed in the public realm in accordance with the London Cycling Design Standards (LCDS). The remaining short staying parking would be provided in the long stay store. Given the limitations associated with the provision of the new pedestrian route from Mac's Place, this is noted. In line with London Plan Policy T5 D, where it is not possible to provide sufficient short-stay cycle parking on-site, the applicant should work with the City Corporation to identify suitable alternative on-street locations.
69. As stated in London Plan Policy T5 (B), all cycle parking should be designed and laid out in accordance with the LCDS. 3% accessible cycle spaces will be provided from the outset with scope to increase, which is acceptable. Where two-tier racks are provided, they should have a machinal or pneumatically assisted system for accessing the upper level and the rack itself must allow for double locking.
70. Access to cycle parking is proposed from Mac's Place and set out at ground floor. The applicant should ensure that the route from Breams Buildings is step free with crossovers where necessary. End of journey facilities will be provided in accordance with London Plan Policies T1 and T5.

### Managing Travel Demand

71. An outline Construction Environmental Management Plan (CEMP) has been provided. A full Construction Logistics Plan should be submitted in line with TfL guidance and secured by condition.
72. The applicant should ensure all construction vehicle movements are safe and support the Mayor's Vision Zero approach. All construction vehicles should meet the Direct Vision Standard and HGV safety permit for HGVs as part of the Mayor of London's Vision Zero plan to eliminate all deaths and serious injuries on London's transport network by 2041 (see TfL Direct Vision Standards). The full CLP should also commit to all construction vehicles serving the site being part TfL's Freight Operator Recognition Scheme (FORS).
73. Given the context of the location of the site in the City of London, a cycle promotion plan is required and should be secured and monitored through the section 106 agreement. This should set ambitious target for cycling.

## **Sustainable development**

### Energy strategy

74. London Plan Policy SI 2 requires development proposals to reduce carbon dioxide emissions in accordance with the energy hierarchy. Energy comments, which are summarised below, have been provided to the applicant and Council in full under a separate cover. The comments relate to both Option A and Option B which are broadly the same in terms of compliance with GLA energy policy.
75. The applicant has submitted further information in response to the cover note, which is currently being assessed, however the details are set out below until that further assessment is complete. Appropriate conditions will need to be secured by the City accordingly.
76. The applicant should submit the GLA's Carbon Emission Reporting spreadsheet in excel format; this has been developed to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors.

### Be Lean

77. Based on the information provided, the non-domestic element of the proposed development is estimated to achieve a reduction of 25 tonnes per annum (16%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development for option A or 15% for option B. The proposal for Waste Water Heat Recovery system to the shower is supported.

### Overheating

78. The applicant has demonstrated that the actual building's cooling demand is lower than the notional. A mixed-mode ventilation strategy is proposed which is welcomed.

### Be Clean

79. The applicant has identified planned and existing district heating networks within the vicinity of the development but is not proposing to investigate connection. They should contact relevant stakeholders to enquire about the feasibility of connection and whether there are other local heat network connection opportunities. Evidence of the correspondence should be submitted.
80. The applicant is proposing a communal heat network supplied by a centralised energy centre. It should be confirmed that all non-domestic building uses will be connected to the heat network. A drawing showing the route of the heat network linking all buildings/uses on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre.
81. The applicant should provide a commitment that the development is designed to allow future connection to a district heating network. Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network should be provided. This should include a single point of connection to the district heating network.
82. It appears that VRF heat pumps are proposed for some elements of the proposal. The strategy should maximise the heat loads that will be connected to the communal network and so can be served district heating in future.

### Be Green



83. The applicant proposes 30m<sup>2</sup> innovative louvre PV to suitable areas of the plant enclosure. This is welcomed. Example product details should be submitted to evidence this approach.
84. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas.
85. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met. The applicant should provide the capacity (kWp), total net area (m<sup>2</sup>) and annual output (kWh) of the proposed PV array.
86. Further information on the heat pumps should be provided. Further details are set out in the cover note.

#### Carbon Off-set payment

87. The applicant should confirm the carbon shortfall in tonnes CO<sub>2</sub> and the associated carbon offset payment that will be made to the borough. This should be calculated based on a net-zero carbon target for domestic and non-domestic proposals using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the City's carbon offset price. This should be secured through the S106 agreement.

#### Post construction monitoring

88. The applicant should review the 'Be seen' energy monitoring guidance to ensure that they are fully aware of the relevant requirements to comply with the 'be seen' policy. A commitment has been provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This should be secured through the S106 agreement. The first submission of the planning stage data should be provided to the GLA through the be seen planning stage webform at the planning submission stage, alongside the energy statement, or within eight weeks of planning approval.

#### Whole Life Carbon

89. The applicant has submitted a WLC report which shows a complete WLC assessment has been undertaken. However, this was not submitted in the required format. The applicant has now re-submitted and is currently under review. Conditions should be secured requiring the submission of a post-construction assessment to report on the development's actual WLC emissions.

#### Circular Economy

90. The applicant has provided justification as to why the refurbishment of the existing building is not suitable in line with London Plan Policy D3 and SI 7. They have also provided a Circular Economy Statement in line with Policy SI 7, however further information is required in relation to the strategic approach, key commitments, bills of material, recycling and waste reporting, operational waste, plans for implementation and end of life strategy.

91. Detailed comments are set out in full in a cover note that has been sent to the applicant and the City. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the City's planning committee to ensure that any conditions can be appropriately secured. In addition, a condition should be secured to provide a Post Completion Report.

#### Urban greening

92. London Plan Policy G5 states that a target of 0.3 should be used for predominantly commercial development. Option A achieves a UGF of 0.34 which complies with the target scores set out in the London Plan. Option B has more roof terrace space than Option A and therefore achieves a greater UFG than Option A, also complying with London Plan Policy G5.

#### Biodiversity

93. London Plan Policy G6 states that development proposals should aim to secure net biodiversity gain. The proposal provides a 555.43% increase for habitats at the site which is very welcomed.

#### Flood Risk

94. The Flood Risk Assessment adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewer, groundwater, and reservoir flooding, which is considered to be low. The approach to flood risk management therefore complies with London Plan Policy SI 12.

#### Drainage

95. The drainage strategy provides an assessment of greenfield runoff rates, existing runoff rates, and attenuation storage. The strategy proposes to restrict runoff to 1.3 l/s for the 100 year event plus 40% climate change, which is supported. The drainage strategy proposes to provide the required attenuation within blue roof tanks (33m<sup>3</sup>) and within a basement tank (101m<sup>3</sup>), which doubles-up as an active rainwater harvesting tank.
96. In terms of SuDS, the drainage strategy proposes green roofs and a smart rainwater harvesting system with water to be re-used within the building, which is welcomed. The drainage strategy states that the feasibility of rain gardens would be confirmed at the detailed design stage. Every effort should be made by the design team to incorporate these to provide additional amenity, biodiversity, and water quality benefits.
97. The approach to drainage therefore complies with London Plan Policy SI 13.

#### Water Efficiency

98. The proposed development generally meets the requirements of London Plan Policy SI 5 for the proposed office uses. However, for Option A, the applicant

should confirm that the BREEAM 'Excellent' rating is targeted for Wat01 for the proposed public house.

99. Water efficient fittings, water meters, leak detection systems, and rainwater harvesting for water re-use are proposed for the office uses, which is welcomed.

### Digital Infrastructure

100. London Plan Policy SI 6 requires development proposals to ensure sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available; that expected demand for mobile connectivity generated by the development is met; and that the development proposals take appropriate measures to avoid reducing mobile connectivity in surrounding areas.
101. Currently no details have been provided in relation to digital connectivity and therefore compliance with Policy SI 6 cannot be determined at this stage. The applicant is therefore required to provide further details and the City should ensure that appropriate conditions are secured to comply with Policy SI 6.

## **Environmental issues**

### Air quality

102. The air quality impacts are considered the same for both options. The development is broadly compliant with London Plan air quality policies, although some clarifications and further details are requested.
103. The proposed development is car-free and will utilise air source heat pumps for heating and hot water, so will not have a significant impact on local air quality. The development is also considered air quality neutral.
104. Pollutant concentrations exceed the air quality objectives around the proposed development site, particularly at the kerbside of adjacent roads. The applicant was requested to provide details outlining how good air quality for future occupants of the building will be ensured, e.g. through suitable design of the ventilation system. The applicant is referred to the City of London's Air Quality SPD. Further information has now been submitted which is currently under review.
105. In order to ensure compliance with London Plan policy, the following conditions should be secured. On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards for the Central Activities Zone. In addition, measures to control emissions during the construction phase relevant to a high risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase.

## **Local planning authority's position**

106. City of London Council planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in September.

## **Legal considerations**

107. 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.
108. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application. In this case, the Council 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**

109. There are no financial considerations at this stage.

## **Conclusion**

110. London Plan policies on the CAZ, offices, public houses, urban design, heritage, transport, sustainable infrastructure and environment 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 site is located in the CAZ and the City of London. The principle of office use is supported. Subject to the assessment by the City of the value of the public house, both options with regards to the re-provision of the public house or retaining it are supported in principle. London Plan Policies SD4, E1 and HC7
  - **Urban Design:** The improved public realm increases connectivity and permeability of the area, which is supported, however the applicant should consider ensuring the access is not restricted to certain times of the day. London Plan Policies D8 and D5.
  - **Transport:** Further consideration is needed with regards to onsite disabled persons parking and short-stay cycle parking. London Plan Policies T5 and T6.5.
  - **Sustainable Infrastructure:** Further information is required in relation to energy, circular economy and water efficiency (for Option A). The applicant has provided additional information in relation to points raised for energy and water efficiency, which is currently being reviewed. The Whole Life Carbon Assessment has been re-submitted and is currently under review. No

information has been provided in relation to digital infrastructure therefore compliance with related London Plan policy cannot be determined at this stage. London Plan Policies SI 2, SI 6 and SI 7.

- **Environment:** Further clarification is required in relation to air quality. The applicant has provided additional information in relation to points raised, which is currently being reviewed. London Plan Policy SI 1.

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

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<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	7 September 2021
<b>Subject:</b> 100 And 108 Fetter Lane London EC4A 1ES  Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)), comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.  [For the avoidance of doubt this application relates to 'Option B' as set out in the application documents. A separate application for 'Option A' is under consideration and is the subject of separate consultation and assessment].	<b>Public</b>
<b>Ward:</b> Farringdon Without	<b>For Decision</b>
<b>Registered No:</b> 21/00534/FULMAJ	<b>Registered on:</b> 21 June 2021
<b>Conservation Area:</b>	<b>Listed Building:</b> NO

## Summary

The Applicant has submitted two applications with two options for the existing White Swan Public House at 108 Fetter Lane which is occupied by a third party.

Option A (21/00454/FULMAJ): Proposes to demolish this property alongside 100 Fetter Lane to enable the full redevelopment of the Site and to provide a new replacement public house in the north eastern corner of the Site.

Option B (21/00534/FULMAJ): In the event that the Applicant is unable to

incorporate 108 Fetter Lane into the redevelopment, this separate application proposes to retain the existing White Swan pub and to build around it. Option B will not provide a new public house given the existing pub will be retained, and instead will provide a flexible commercial unit (Class E(a)(b)(c)(d) in the north eastern corner of the Site where the Option A new public house would otherwise be sited.

The proposed development includes Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

The scheme delivers a high quality, office-led development that would provide a minimum of 12,731 sq.m (GIA) of new flexible office floorspace (Class E) across Level 1 to level 11, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. The scheme makes optimal use of the site and provides an uplift of approx. 6,731 sq.m (GIA) of office floorspace. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including small and medium sized companies which supports post-covid recovery as identified in the 'London Recharged: Our Vision for London in 2025 report. The proposal would also incorporate two ground level retail units that would enable a range of retail/restaurant/cafe uses to come forward (245 sq.m (GIA), providing active frontages to the Bream's Buildings and Fetter Lane elevations, and would help enliven the new public realm between the Site and St. Dunstan's burial ground.

The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through skilful modelling of the elevations, well-considered massing and the use of high-quality, innovative materials. The proposed development would be an appropriate and sympathetic neighbour not only to the buildings immediately adjacent but also to the wider streetscape.

The proposed development has the potential to impact three Assessment Points: Protected Vista 5A.2 (Greenwich Park) and River Prospects 16B.1 and 16B.2 (Gabriel's Wharf).

The proposed development is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General



Wolfe statue to St Paul's Cathedral. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.

The proposed development would be visible towards the westerly edge of this River Prospects 16B.1 and 16B.2 (Gabriel's Wharf). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development would preserve the viewer's ability to read the riverside landmarks in the view.

The magnitude of change in these is considered negligible and the proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG.

The scheme would deliver significant public realm enhancements including a new pedestrian route linking Mac's Place with Breems Buildings to the south, widening of Greystoke Place and a new publicly accessible pocket park adjacent to St Dunstan's burial ground.

A total of 204 long stay and 28 short stay cycle parking spaces would be provided at ground floor level, accessed from Mac's Place, along with associated cycling facilities including lockers and showers. Access for cyclists would be via two prominent cycle parking entrances at ground level off Mac's Place, or via a dedicated entrance off Fetter Lane. The provision of both long stay and short stay cycle spaces would exceed the requirements of the London Plan.

The proposed short stay cycle parking would be provided entirely within the site boundary at ground floor level. Eight spaces would be located within the new public realm (private land) adjoining the northern end of Mac's Place. One stand would be located on Greystoke Place (on private land) which will provide space for two cycles. The remaining 18 spaces would be provided within a new publicly accessible cycle store. This would be located adjoining the new pocket park and visible from Breems Buildings and the new route through the site.

In order to improve the pedestrian priority of the surrounding area a section

278 agreement will be secured which would deliver improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding the site to be replaced with York stone, and any cycle improvements necessary to allow access to the cycle parking.

The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street, therefore the servicing is proposed to remain as existing. A cap for the number of vehicles servicing the development would be no more than 14 vehicles per day which would ensure the number of vehicles proposed, is equal to or less than the estimated existing situation. The applicant was required to demonstrate how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, it would not be possible to deliver the new pedestrian route through, due to space limitations of the site. Therefore, on balance, on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.

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

The daylight and sunlight assessment demonstrates that there would be some loss of amenity with respect to daylight in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most impacted rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole. All of the windows assessed would receive more than 0.8 times their former value in respect of sunlight and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.

The submitted sun on ground assessment demonstrates that the nearby residential and public open spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE

Guidelines. The overshadowing assessment of 95 Fetter Lane (commercial) undertaken on 21 March showed that the eastern and western side roof terraces are likely to experience a noticeable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21st March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21st March. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight. However, given the spaces are in commercial use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.

An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. The report assesses the proposals against Strategic Policy CS10 which seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

Additional material considerations are as follows:

- Securing a development within the City, that would provide land uses which support the diversification, vitality and growth of the City as a world class business destination
- Increase in a diverse retail provision on the site, enhancing the retail offer in, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.
- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
- The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through the use of high-quality faience materials to the new public house elevation and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms.

It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan.

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

## **Recommendation**

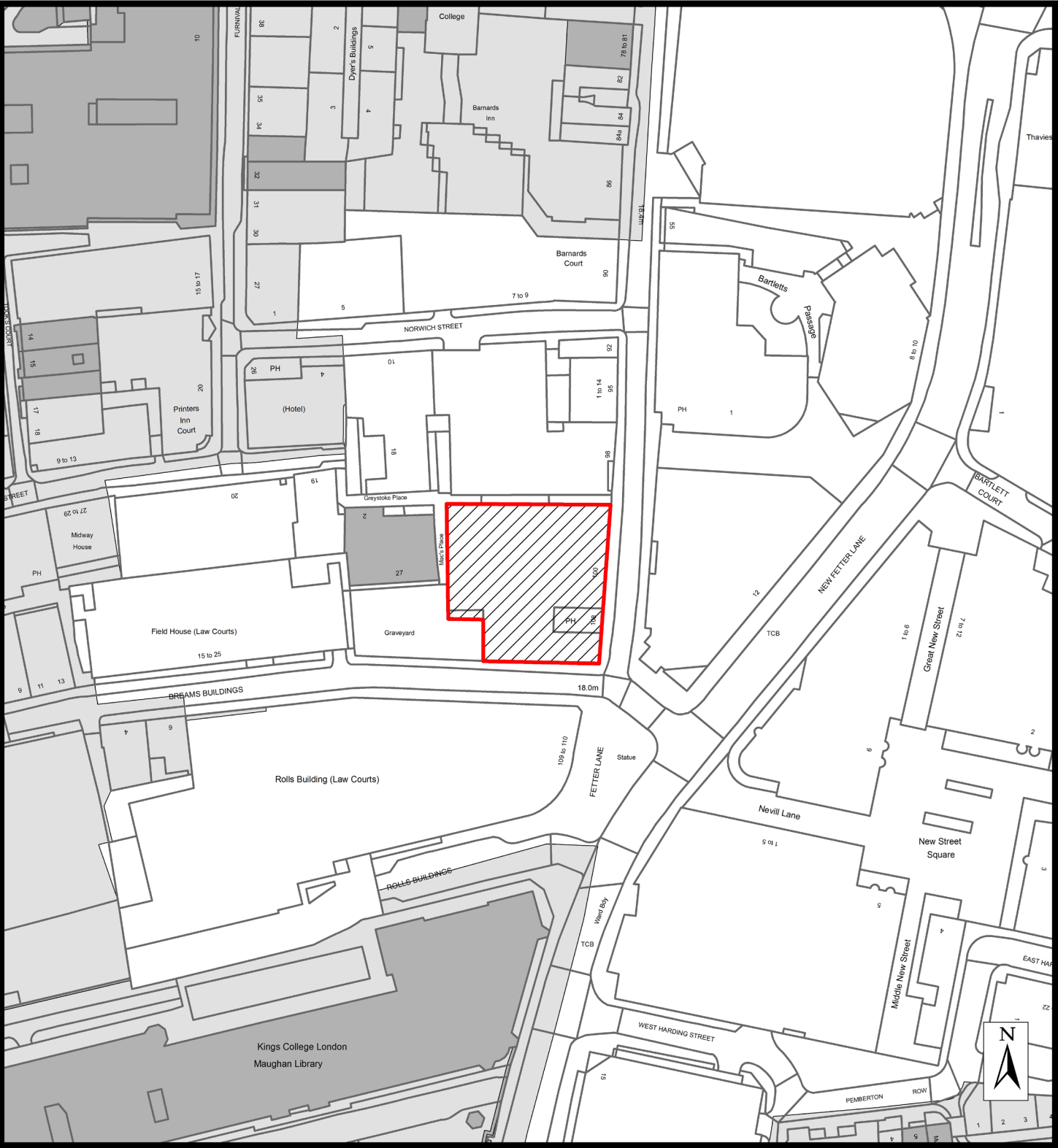
(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

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

(3) 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).

# Site Location Plan







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ADDRESS:

100 & 108 Fetter Lane  
EC4A 1ES

CASE No.  
21/00534/FULMAJ

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





Existing Building



White Swan Public House – Taken from DAS page 33





View along Greystoke Place from Fetter Lane looking west – taken from DAS page 33

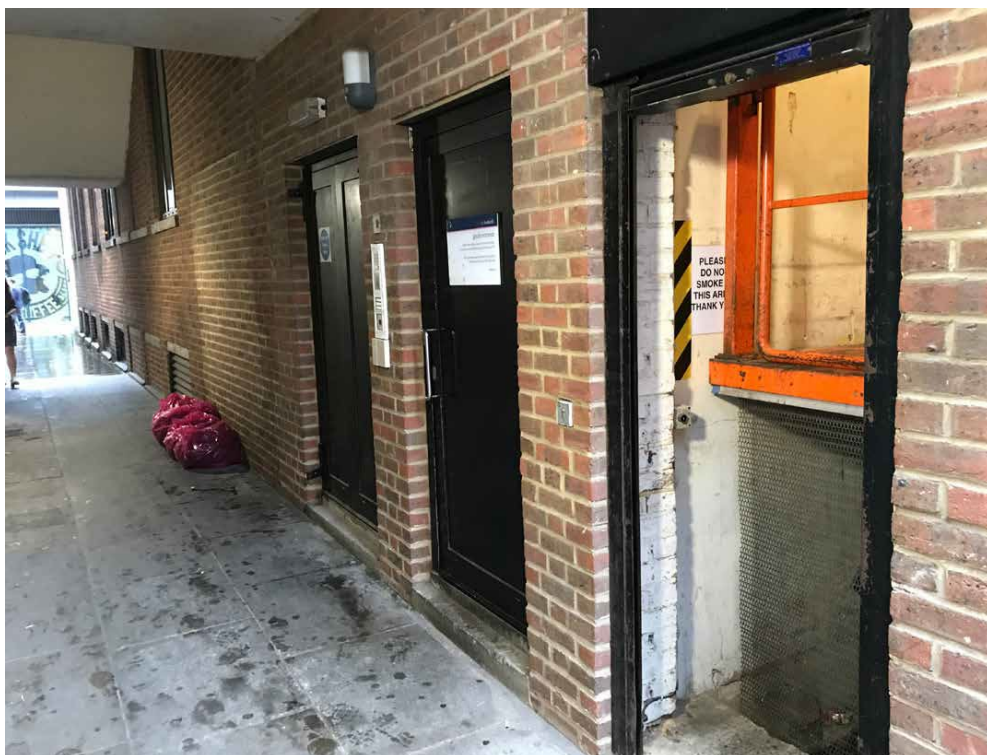


View along Greystoke Place from Mac's Place looking east – taken from DAS page 34





View along Mac's Place towards St Dunstan's Garden – taken from DAS page 34



Existing servicing entrance along Greystoke Place – taken from DAS page 41

## **Main Report**

### **Site and surroundings**

1. The site comprises 100 Fetter Lane, 108 Fetter Lane, and Greystoke Place, and is bound by Fetter Lane to the east, Bream's Buildings to the south, St. Dunstan-in-the-West burial ground and Mac's Place to the west and 98 Fetter Lane to the north.
2. 100 Fetter Lane and 108 Fetter Lane were both built at the same time in the 1950's and were originally used for printing and publishing before being converted to their current uses over time. 100 Fetter Lane provides office accommodation over basement, ground and 7 upper storeys. 108 Fetter Lane is a 4 storey plus basement public house called The White Swan.
3. A UKPN substation is also located within the basement of 100 Fetter Lane which is only accessible for maintenance purposes.
4. There is no vehicle access to either building, with all deliveries, servicing and refuse collections taking place on street, unmanaged. There is no existing car, cycle or other forms of parking on the Site.
5. Greystoke Place is also located within the Site boundary and runs along its northern edge, providing a pedestrian route through to the west from Fetter Lane, linking to Mac's Place, St. Dunstan-in-the-West burial ground and No. 2 Greystoke Place. The upper floors of 100 Fetter Lane partially oversail Greystoke Place 98 Fetter Lane. The whole of this section of Greystoke Place is adopted public highway, with the underlying land in the ownership of the Applicant and within the Site boundary.
6. The existing building comprises 6,381sq.m (GEA) of office (Class E) floorspace and 463sq.m (GEA) of drinking establishment (Sui Generis) floorspace, with 30sq.m (GEA) occupied by the UKPN substation.
7. The existing building is not listed, nor is it located within a conservation area. Immediately adjacent to the west of the Site beyond Mac's Place sits the Grade II listed 2 Greystoke Place. The Chancery Lane Conservation Area is located nearby to the south, west and north.
8. It is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General Wolfe statue to St Paul's Cathedral.
9. The surrounding area is characterised predominately by commercial office buildings. Residential units are located immediately to the west at 2 Greystoke Place, and nearby to the north at 95 Fetter Lane.
10. The former burial ground of St. Dunstan-in-the-West (also referred to as St. Dunstan's burial ground in this report), immediately to the west of the site, is an open space which is understood to be open to the public from 8am to 7pm or dusk, whichever is earlier, excluding Christmas and New Years' Day. The burial grounds are owned by the London Diocesan Fund and maintained by the City Corporation.

## **Proposal**

11. Planning permission is sought for the demolition of 100 Fetter Lane and the construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)) comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.
12. The proposed development would comprise:

<b>Use</b>	<b>Floorspace (GIA)</b>	<b>Floorspace (GEA)</b>
Office (Class E)	12,731sq.m	14,428sq.m
Cafe (Class E)	58sq.m	68sq.m
Flexible Commercial	187sq.m	244sq.m
UKPN (Sui Generis)	42sq.m	37sq.m
External publicly accessible space	226sq.m	226sq.m
Existing Public House	370sq.m	463sq.m

13. The proposed building would comprise basement (including a small sub-basement), ground, mezzanine plus 12 upper storeys and a roof plant level and would reach a maximum height of 75.1m AOD. At ground floor level, an office lobby accessed from Fetter Lane would provide entry to office floorspace located at floors 1 to 11. The basement would mainly house plant, storage, a UKPN substation and the sub-basement would house a rainwater attenuation tank.
14. The existing White Swan public house (108 Fetter Lane) would be retained.
15. The proposal includes a flexible retail unit on the north-east corner at ground level, instead of the new pub, as the existing pub would be retained in situ and built around. This new floorspace would be flexible Class E(a)(b)(c)(d) floorspace meaning it could be used for retail, a restaurant, financial or professional services or a gym (or similar uses).
16. New publicly accessible external space is proposed at ground floor level. A new pedestrian route is proposed linking Greystoke Place / Mac's Place with Breams Buildings to the south, between the proposed building and St. Dunstan's burial ground. This route would include a new pocket square adjacent to St. Dunstan's burial ground, which would be covered by the upper storeys of the proposed new building. A Cafe space (68sq.m GIA) is proposed fronting Breams Buildings and the new public realm between the site and St. Dunstan's Burial Ground, with access to both. It is also proposed to widen part of Greystoke Place and

set back the building line on the corner of Fetter Lane and Bream's Buildings. In total 226sq.m of new external publicly accessible space would be provided.

17. The pocket square is proposed to be gated for security and maintenance purposes. It would be open to the public between 6am and midnight. The opening hours and details of the management of this space and the other areas of permissive public realm within the proposed development will be secured by the S106 Agreement.
18. A total of 204 long stay and 28 short stay cycle parking spaces would be provided, with 10 of the short stay spaces provided within the new public realm. Access for cyclists would be via a dedicated cycle parking entrance at ground level off Mac's Place, with access also possible from Fetter Lane. The building is proposed to be car free as per the existing arrangement.
19. The building is proposed to be serviced from the street as per the existing arrangement. This would be subject to consolidation which would be secured via a S106 obligation.
20. The Proposed Development would include an extensive range of soft landscaping features to enhance urban greening biodiversity, including on the roof terraces, pocket square and edge planters. Where roof spaces cannot be accessed for practical reasons the surfaces would be greened where possible.
21. For the avoidance of doubt this application relates to 'Option B' as set out in the application documents. A separate application for a similar scheme which includes the demolition and relocation of the public house ('Option A') is also under consideration (app. no. 21/00454/FULMAJ).

### **Consultation**

22. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders prior to the submission of the application including extensive pre-application consultation with key decision making authorities, key stakeholders and local community (including nearby residents). Given the impact of the COVID-19 pandemic remote engagement and consultation activities were undertaken comprising:
  - A meeting with Fleet Street Quarter
  - A meeting with St. Dunstan's burial ground (With CoL Open Spaces Officers in attendance).
  - Meetings with neighbouring occupiers including Weil Gotshal & Manages (London) LLP, MacFarlanes, Bird and Bird, The White Swan Public House and Owner/Occupiers of 2 Greystoke Place.
  - Email correspondence with other neighbouring occupiers who responded to consultation letters.
23. The responses to the pre-application consultation included: some concern over reduction in pub trading area; potential for the relocated

pub causing noise and disturbance; support for the proposed public realm enhancements; and queries over landscaping treatment for public realm, and their interaction with St. Dunstan's burial ground.

24. Following receipt of the application for planning permission, the application has been consulted upon and advertised on site and in the press. One letter of objection was received from Bird and Bird LLP, 12 New Fetter Lane.
25. Copies of all received 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.

Consultation Responses	
Greater London Authority	<p><b>Land Use Principles:</b> The site is located in the CAZ and within the City of London which encourages the provision of new office space. The principle of office use is supported. the proposals are supported in principle.</p> <p><b>Offices:</b> The City of London is projecting office growth of 1,150,000sqm of office space between 2011-2026. Its proposed submission draft plan 2036 projects 2,000,000 sqm of office space between 2016 and 2036. This proposal will help support this requirement.</p> <p><b>Urban Design:</b> The approach to scale, massing and architecture is supported. The improved public realm increases connectivity and permeability of the area, which is supported, however the applicant should consider ensuring access is not restricted to certain times of the day.</p> <p><b>Heritage:</b> The scheme is considered to have a positive impact on the setting of the nearby Grade II building. The impact on views, including strategic views, are acceptable. A watching brief during excavation is recommended in relation to archaeology remains.</p> <p><b>Transport:</b> An Active Travel Plan and a contribution of £220,000 for cycle hire is required. Works required should be secured under Section 278 or as part of the Section 106 Agreement. Further consideration is needed in regard to onsite disabled persons parking and short-stay cycle parking. A DSP, CLP and a cycle promotion plan are required.</p> <p><b>Sustainable Infrastructure:</b> Urban greening, biodiversity net gain, flood risk and sustainable drainage comply with</p>

	<p>policy requirements. Further information is required for energy, circular economy and water efficiency (for Option A). The applicant has provided additional information in relation to points raised for energy, which is currently being reviewed. The Whole Life Carbon Assessment has been re-submitted in the correct format and is currently under review. No information has been provided in relation to digital infrastructure therefore compliance with London Plan Policy SI 6 cannot be determined at this stage.</p> <p>Environment: Air quality impacts are generally acceptable. Further clarification is required, and the applicant has provided additional information in relation to points raised. This is currently being reviewed.</p>
<b>Officer Response to Comments</b>	<p>Consideration of the impacts on the Design, Heritage, Sustainability are set out in the report.</p> <p>The Applicant is willing to explore the provision of a Blue Badge Space within the vicinity of the site with the City Corporation. This would be secured through the S278 Agreement.</p> <p>The applicant is willing to contribute towards a Cycle Hire / Network Improvements Contribution. This contribution amount is still under negotiation between the applicant and Transport for London.</p> <p>A DSP, CLP and a cycle promotion plan are proposed to be secured via a S106 agreement.</p>
City of London Police	Details of lighting within the proposed pocket park / public route to ensure it doesn't become a drinking hub.
<b>Officer Response to Comments</b>	<p>A secondary entrance to the pub on Greystoke Place would be provided.</p> <p>Details of external lighting and a lighting strategy for the building are proposed to be conditioned.</p>
Historic England	Responded confirming they have no comments to make.
Southwark Council	Responded confirming they have no comments to make.
Tower Hamlets	Responded confirming they have no comments to make.
Greenwich	Responded confirming they have no objections.
Camden	No response received

Lewisham	No response received
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<b>Objection from Neighbouring Residential Occupiers Representations</b>	
Bird and Bird LLP, 12 New Fetter Lane	<p>The proposals would cause harm to the setting of Grade II listed former YRM Offices. This is addressed in Heritage Assets section of the report.</p> <p>The proposals would result in the overshadowing of 12 New Fetter Lane. This is addressed in the report in the Overshadowing section of the report.</p> <p>The proposals would increase the Light Pollution to residential windows in No. 2 Greystoke Place. This is addressed in the Light Pollution section of the report.</p>
<b>Officer Response to Comments</b>	<p>The impact on the setting of Grade II listed former YRM Offices is addressed in Heritage Assets section of the report.</p> <p>The impact on overshadowing to this property is addressed in the Overshadowing section of the report.</p> <p>The impact of light pollution to the residential windows at No. 2 Greystoke Place is addressed in the Light Pollution section of the report.</p>

### **Policy Context**

26. 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.
27. 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.
28. 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.

## **Considerations**

### **Relevant Statutory Duties**

29. 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).

### **NPPF**

30. 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”. In respect of sustainable development, the NPPF states at paragraph 10 that ‘at the heart of the Framework is a presumption in favour of sustainable development.’ At paragraph 11(c) the NPPF states that for decision-making this means ‘approving development proposals that accord with an up-to-date development plan without delay...’.
31. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
1. the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
  2. 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
  3. 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)
32. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
33. Chapter 6 of the NPPF seeks to promote Building a strong, competitive economy.
34. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
35. Chapter 8 of the NPPF seeks to promote healthy and safe communities.
36. Para 92 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.



37. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 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”.
38. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
39. Paragraph 113 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”.
40. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”
41. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
42. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
43. Paragraph 154 states that new developments should avoid increased

vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

44. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
45. Paragraph 195 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.
46. Paragraph 197 of the NPPF advises, "In determining applications, local planning authorities should take account of:
  - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) the desirability of new development making a positive contribution to local character and distinctiveness."
47. Paragraph 199 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
48. Paragraph 200 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional"
49. Paragraph 202 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting.
50. Paragraph 203 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**

51. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets.

### **Considerations in this case**

52. In considering this planning application 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.
53. 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.
54. 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).
55. The principal site-specific issues in considering this application (in accordance with the over-arching issues above) are:
- Economic development and the provision of additional office accommodation.
  - The acceptability of the scheme in design and heritage terms including impact on heritage assets and an assessment of the proposed public realm alterations.
  - 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.
  - 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 solar glare and light pollution impacts of the proposal
  - Consideration as to whether fire safety has been taken into account in the design.

- The results of the Health Impact Assessment.
- The equality impacts of the proposal.
- The requirement for financial contributions

### **Economic Development and the Provision of Office Accommodation**

56. 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.
57. 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.
58. 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.
59. 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.
60. 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.

61. 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.
62. 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.
63. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
64. 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.
65. 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.
66. 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**

67. The application site currently accommodates 6,000sq.m (GIA) of office space. The application proposal would deliver 12,731sq.m (GIA) of office space on the site. This equates to a total uplift in office space across the site of 6,731sq.m (GIA).
68. Office space would be provided at 12 levels of the new building. The floorplates have been designed to have good daylight conditions, consistent floor depths and allow for a flexible multi tenancy arrangement. The terraces at levels 5-9 and 12 would provide amenity space for future occupiers.
69. 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 proposed new building is of a high quality.
70. The improved and enlarged office accommodation supports the aims of Local Plan policy CS1 and the Proposed Submission Draft City Plan 2036 policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the Proposed Submission Draft City Plan 2036.

### **Provision of retail (Class E)**

71. The proposal would incorporate two ground level retail units that would enable a range of retail/restaurant/cafe uses to come forward. A cafe would be located on the south elevation of the site, fronting Brems Buildings and the new public realm between the site and St. Dunstan's burial ground (78sq.m (GIA)). A retail unit is proposed to be created on the north east corner of the site, fronting Fetter Lane. This would provide 187sq.m (GIA) of flexible commercial floorspace (Class E (a), (b), (c), (d)) The site is not located in a Principal Shopping Centre (PSC) or Retail Link as defined by the Local Plan.
72. The introduction of these retail units is welcomed as it would provide additional active frontage to the Bream's Buildings and Fetter Lane elevations, enliven and bring vibrancy to the new public realm between the Site and St. Dunstan's burial ground and to Greystoke Place, and would provide services for workers and residents. A condition is recommended to ensure that the spaces are used for retail/restaurant/cafe use are not changed to any other use within Class E.
73. It is considered that this provision would accord with Local Plan policies CS20, DM1.5 and DM20.4 and draft City Plan policies S5 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**

### **Principle: Demolition of the existing building**

74. The site is not within a conservation area and none of the buildings are listed.
75. The existing building is the surviving half of a larger building known as Oyez House, designed by T.P. Bennett and constructed in the early 1950s for the Solicitor's Law Stationary Society. It incorporated offices, printing works and two public houses: the Printer's Devil to the north and the White Swan to the south, which bookended a loosely symmetrical brickwork composition over a Portland stone base which rose in scale towards the western end of the site. In the 1980s, Oyez House was subdivided into two distinct and self-contained halves. Subsequently in the early 21st century the northern half was redeveloped as a new office building, 98 Fetter Lane, including the demolition of the former Printer's Devil public house.
76. The surviving southern half of Oyez House (excluding the White Swan public house) is an office building rising to seven storeys over a basement at its highest level and is of brickwork with punched window openings and a Portland stone ground floor treatment. The building has been subject to alteration and partial recladding. It is considered a nondescript example of its type and date and the principle of its demolition is acceptable.
77. The White Swan public house is considered to be a non-designated heritage asset of a moderate level of historical significance and a low level of architectural significance. This element of the site would be retained and integrated into the proposed development. This principle is acceptable.

### **Height and bulk**

78. The site is located towards the west of the City. The proposed building would rise to a height of 75.1m AOD and would comprise thirteen floor levels and a plant room over a basement.

### **Design approach**

#### **Architecture**

79. Externally, the proposed development would take the form of four individual blocks, responding to the site's various townscape settings: green open space and lower-rise buildings to the west and mid-rise, taller buildings to the east. Reading as a series of different buildings, the proposed development would vary in scale, height, form and would bring a great richness of materiality and architectural exuberance to this part of the City.
80. The tallest and most prominent element would be the main block. It would present full elevations to Fetter Lane and Breems Buildings and partial elevations to the north and east. The main block facades would be arranged on a grid system with expressed metal columns carrying

thick horizontals of crushed concrete in an orange hue. These strata of solid material would give the main block a monumental, solid quality in townscape views and would frame recessed apertures shaded with aluminium fins. Brise soleils would be arranged across the south and east elevations only where required to mitigate sunlight, serendipitously expressing the sun's path across the faces of the building. The main core of the building would be located against the inner face of the stair core, allowing the staircases to be expressed through the glazing of the east elevation.

81. The main block would integrate the existing White Swan public house. Architecturally this would be honestly expressed, resulting in an unusual frisson between traditional and new materials, scale and detailing. The public house would 'interrupt' the lower levels of the main block to Fetter Lane, with the crushed concrete strata pausing and then resuming again along the elevation. To allow daylight and fresh air to reach the windows on the south elevation of the public house, the architecture of the south-east corner of the main block would be stripped back to the crushed concrete strata which would incorporate areas of planting above a terrace located on the roof of the main entrance. This would be framed by a dramatic triangular entrance with a chamfered building line, expanding the public realm and creating a dynamic focal point in townscape views. There would be a void above the retained public house. Details of all junctions between the retained public house and the proposed development would be secured via condition.
82. The double-height ground floor elevations would be of solid crushed concrete with irregular punched openings, including between the retained public house and the new blue block, playing on the forms and design of traditional frontages. At the top of the main block would be a smaller two-storey element comprising an upper plant room and lower pavilion providing access to the southerly roof terrace. The upper plant room and building crown would be of metalwork, comprising a mesh screen with wraparound aluminium fins. There would be extensive greening to the roof terrace.
83. A new, jewel-like block would be located in the north-east corner of the site, inspired by the existing White Swan and the wider typology of London public houses. It would take the form of a four-storey block with elevations to Fetter Lane and to Greystoke Place. It would be entirely constructed of shimmering glazed brick, electric-blue in colour, with a series of regular punched window openings at higher level. At ground floor level, the frontage to Fetter Lane would be an ingenious 'negative image' of the existing pub's traditional frontage, an approach carried around on the Greystoke Place elevation. The final details of the elevations, including their enrichment through the incorporation of stamped and embossed details to the punched openings, would be secured via condition.
84. To the west of the site, a pavilion block would address the burial ground. This part of the development would take the form of a six-storey block faced in smooth grey crushed concrete with regular punched window



openings. Above, its stepped roof form would provide green terraces for the building occupants, while the pavilion would be lifted off the ground floor plane to allow a new public route through the site to snake from Bream's Buildings to Mac's Place. Between the main block and pavilion would be a north-south bay of the development which would carry an extensive green walling system intended to address and complement the former burial ground. This green 'slice' would mediate between the pavilion and the main block in height and would have a stepped roof form that would provide external terraces to various floor levels of the main block. Like the pavilion, it would be lifted off the ground floor for the new public route.

### Public Realm

85. The proposals would transform the public realm around the site. Currently, the existing building offers no form of accessible public space at ground floor level and no active frontages apart from the existing public house. Contrastingly, the proposed development would create a significant amount of new publicly accessible space at ground floor level in the form of a new route between Bream's Buildings and Mac's Place. At a maximum of 3.4m wide and 5.5m high, this route would significantly enhance the locality's permeability and amenity and with the public house would incorporate a new cafe at the south entrance, fronting Breame's Buildings, to boost the quantum of active frontages offered by the proposed development. It would have the effect of significantly widening Mac's Place by setting the building line further back. The proposed new route would incorporate an attractive sunken garden as a green space for people to dwell; traversing the eastern boundary of the burial ground, it would allow for new perspectives and experiences of that important open space. Details of the junctions between the new route and the burial ground would be secured via condition.
86. The proposed development would offer further gains of public realm to the south-east corner of the site, where the proposed chamfered entrance would release more of the footway, and at the north-east corner, where the north frontage of the blue block would be set back to create a wider entrance to Greystoke Place – 3.15m instead of the existing width of 2.15. Further along its length, the height of Greystoke Place would be raised from 2.79m to 4.1m. As well as these spatial improvements, Greystoke Place would incorporate a tiled mural referencing the history of printing in the locality. This theme would also be expressed in carvings on edges, reveals and columns across the ground floor plane. Details would be secured via condition.
87. Lighting would be integrated throughout the ground floor plane, varying between wall-mounted uplighters on the elevation, feature lighting to artworks and other similar elements and luminaires integrated into the ground and soffit of the new public route. This would ensure the sophisticated architecture and spatial qualities of the development are appreciated after nightfall and final details would be secured via condition.

## **Heritage Assets**

### **Strategic views – London View Management Framework**

88. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's character and identity at a strategic level.
89. The proposed development has the potential to impact three Assessment Points: Protected Vista 5A.2 (Greenwich Park) and River Prospects 16B.1 and 16B.2 (Gabriel's Wharf). The magnitude of change in these is considered negligible and would accord with the visual management guidance for both, preserving the viewers' ability to recognise the Strategically Important Landmark (St Paul's Cathedral) and other landmarks in the views.

#### **5A.2 – Greenwich Park looking from the General Wolfe statue to St Paul's Cathedral**

90. The site of the proposed development is within the Background Wider Setting Consultation Area of assessment point 5A.2 of this Protected Vista. At 75.100m AOD, the proposed development would rise above the height threshold of between 52.1m and 53.6m in this part of the Protected Vista. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.
91. The guidance for this view states that the background of St Paul's Cathedral in the view is mostly unimpeded, with a clear silhouette of the dome above the peristyle, and the western towers, and that the ability to see sky between the upper parts of the various elements is crucial to the viewer being able to recognise and appreciate St Paul's Cathedral in this panorama (para 142). The guidance goes on to say that the dome (above the peristyle) and the upper parts of the western towers of St Paul's Cathedral are well defined against their background in this view. Development that exceeds the Wider Setting Consultation Area in the background of this view should preserve or enhance this level of definition (para 147).
92. Being totally screened by existing taller buildings in the Protected Vista, it is considered that the proposed development would accord with the visual management guidance for this view and would preserve the skyline definition of the Cathedral. Regard has been had to a future hypothetical scenario in which the proposed development is visible in the Wider Setting Consultation Area and not screened by existing taller buildings. The site is located at the southern edge of the Wider Setting Consultation Area, meaning that even if the proposed development was unscreened and visible in the background of the Protected Vista it would appear at some distance away from the Cathedral. Moreover, it is considered that the height, form, massing and materiality of the proposed development would result in an understated skyline presence which would preserve the level of definition of the upper parts of the

Cathedral in this view and consequently the ability to recognise the Strategically Important Landmark.

#### 16B.1 and 16B.2 – Gabriel's Wharf

93. The proposed development would be visible towards the westerly edge of this River Prospect. The relevant LVMF guidance states that both Assessment Points are orientated towards St Paul's Cathedral, the Strategically Important Landmark. It goes on to state that the river dominates the foreground of the view, while the middle ground consists of mature trees leading from Temple towards the buildings on the Embankment near Blackfriars Bridge. Buildings between these provide a rich and intricate skyline (paras 276-277). Since the LVMF guidance was published a number of modern buildings are now visible on this skyline.
94. From both Assessment Points, the upper floors and rooftop of the proposed development would appear above the trees of the Inner Temple Garden (grade II Registered Park and Garden), directly above the unlisted Inner Temple Library and immediately east of the spire of St Dunstan-in-the-West (grade I). In the view, the proposed development would rise slightly higher than this spire with a substantive sky gap in between. The proposed development would mediate between the scale of the spire and the much taller modern buildings at No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which being the tallest building visible in this part of the panorama.
95. The Visual Management Guidance for this view states that new development should preserve or enhance the townscape setting of St Paul's Cathedral in this view (para 281). It further notes that there are several landmarks and historic buildings other than St Paul's Cathedral in the view, which aid the viewers' strategic appreciation of London. The viewer's ability to recognise these landmarks should be preserved or enhanced (para 282). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development would preserve the viewer's ability to read the riverside landmarks in the view.

#### **Summary of LVMF Impacts**

96. The proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LVMF SPG.

#### **Impact on significance and setting of listed buildings**

##### YRM Offices – grade II listed

Significance and contribution of setting

97. Office building of 1962 incorporating a penthouse flat, by architects Yorke, Rosenberg and Mardall as their own headquarters. This firm were ground-breaking modernists and Yorke had been one of the first British

modernist architects. The building's crisp white lines, fine detailing and quality as an example of modernist architecture are all noted approvingly by the list entry. The building therefore possesses a high degree of architectural significance and a moderate degree of historical significance for its place in the history of modernist architecture and its role in the propagation of that style in Britain.

98. The building's list entry makes it clear that special interest derives from the building's setting, stating that it is 'a sensitive integration of a frankly modern office building within an ancient street pattern, relating unusually well both to the narrow alleyways to the north and to the former churchyard with its retained boundary walls and railings to the south'. The building's relationship to these north and south features therefore contributes highly to its significance.

#### Impact assessment

99. The massing and design of the western side of the proposed development has been shaped by the need to respect the setting of the listed building. Accordingly, the scale of the pavilion block would match that of the listed building, its smooth grey facades would complement the tiling of the listed building and the pavilion fenestration would harmonise with that of the listed building. Moving east, the green 'slice' of the development would set views of the listed building and the pavilion block against a spreading green wall, designed to play on and extend the existing greening of the burial ground; the new route skirting the eastern edge of the churchyard would widen Mac's Place and enrich the network of alleyways to the north. The proposed development would thus preserve those elements of setting to the north and south which contribute to the significance of the listed building and would enhance the eastern setting of the listed building by replacing the inactive, hard frontage of the existing building with a green new public route centered on a new cafe and sunken garden.

#### Maughan Library – grade II\* listed

##### Significance and contribution of setting

100. Former Public Records Office of 1855 and extended in 1896. The initial part of the building was designed by Sir James Pennethorne and was extended by Sir John Taylor; the two phases are in the same Gothic style but distinguished by the use of Bath stone dressings for the former and Portland for the latter. Pennethorne's original block is aligned. The building has high architectural significance as a highly individual interpretation of the Gothic style in the early days of the Gothic revival; it was the first major public building in this style after the completion of the Houses of Parliament. It possesses further architectural significance as an early example of a purposefully fireproofed building employing iron members and forgoing heating. The building has very high historical significance for its role as the nation's archive. It has additional historic significance for its associations with Sir James Pennethorne and Sir John Taylor, both leading architects of their day. The building also holds

a degree of archaeological significance for the way it incorporates part of the chancel arch of the demolished C13 Rolls Chapel.

101. The building's historical significance as a repository for the nation's records is buttressed by its setting in the City's legal quarter. The building is within the Chancery Lane conservation area and faces Westminster's Strand Conservation Area, meaning that, to the west, the building sits comfortably in a setting of masonry buildings – historic and modern – of a largely consistent scale. To the east, the building's setting has undergone greater change, chiefly due to second world war bombing. In the approach from Fleet Street up Fetter Lane, the building is perceived amidst modern blocks of a largely sympathetic scale. It has group value with a grade II listed K2 kiosk on Fetter Lane. Further along Fetter Lane, No. 12 New Fetter Lane and No. 6 New Street Square form prominent modern elements in views of the Fetter Lane elevation of the building. As a looser and more modernised area of the City, the building's easterly setting contributes little to its significance.

#### Impact assessment

102. The proposed development is located to the north of the Maughan Library. Currently, in views of the Maughan Library's Fetter Lane elevation looking north, the existing building on the site can just be glimpsed beyond Nos. 109-110 Fetter Lane, which sits between the two. To the east side of Fetter Lane, No. 12 New Fetter Lane and No. 6 New Street Square are dominant modern elements in the background.
103. In views of the Maughan Library looking north, the proposed development would form a prominent new modern element in the background. It would rise up behind Nos. 109-110 Fetter Lane with much of the south elevation visible. The height of the proposed development would sit between Nos. 109-110 Fetter Lane and No. 12 New Fetter Lane. The high-quality modelling and materiality of the façade of the proposed development would enrich the group of modern buildings which sit behind the Maughan Library. The proposed development would therefore not have a jarring effect on the setting of the listed building but would be perceived as an augmentation of the existing group of modern buildings in the background.

#### **Impact on Conservation Areas**

##### Chancery Lane Conservation Area

104. The site of the proposed development does not lie within a conservation area but is situated near to the Chancery Lane conservation area, elements of which lie to the north, west and south.
105. The conservation area is dominated by several significant public buildings – the former Patent Office and the former Public Records Office (both grade II\*) – and a high-quality group of Victorian and Edwardian masonry buildings. It contains an exceptional span of building ages and styles, from secular medieval buildings such as Staple Inn (grade I) to well-considered 21st century insertions.

106. The proposed development would be visible in a view from within the conservation area, looking east from Chancery Lane along Breems Buildings. Within the conservation area, the historic and modern buildings along this street are characterised by red brickwork with blue brick details and stone dressings. They frame a view of the trees of St Dunstan-in-the-West burial ground. The upper storeys of No. 12 New Fetter Lane and No.6 New Street Square form the backdrop of the view. In this view, the proposed development would provide a characterful, high-quality backdrop, with its eye-catching horizontal strata of orange crushed concrete relating well to the buildings in the conservation area. It would sit comfortably in scale with the modern buildings that can already be perceived in the background of the view.
107. The proposed development would also appear in views along the eastern periphery of the conservation area. In the view looking south from Holborn down Fetter Lane, the proposed development would form a prominent tall new element. It would appear as a bookend to the row of conservation area and non-conservation area buildings which line the northern half of Fetter Lane. Although higher in scale than them, it would be read as forming part of the taller group of modern buildings associated with New Street Square. Its crushed concrete strata would help it to relate to the varied materiality of the conservation area buildings in this view. In the view looking north from the K2 telephone kiosk on Fetter Lane, the impact of the proposed development would be much as stated in the section on the Maughan Library above.
108. The proposed development would only be visible in a limited way in relation to the conservation area – and, where visible, it would largely read as an augmentation of the modern buildings of New Street Square. It would have no specific impact on any individual building or group of buildings within the conservation area. Accordingly, it is considered that the proposed development would not be harmful to the character and appearance of the conservation area.

### **Non-designated heritage assets**

#### **The White Swan Public House**

109. The White Swan is an example of an early post-war public house. It was designed by Sidney C. Clark, chief architect to Charrington's Brewery, and comprises four-storey brick elevations with regular metal window openings and Portland stone dressings. It possesses a traditional-style public house frontage to the ground floor level on Fetter Lane. The building is reincarnation of another public house with the same name which previously existed further to the north of the site until it was destroyed in World War Two. Insurance records demonstrate that there has been a public house of this name on Fetter Lane since as early as 1815. Therefore, it is considered that the existing public house holds a moderate level of historical significance as the latest in a long lineage of public houses bearing this name. Furthermore, it is considered that the building has a degree of historical interest in the association with architect Sidney Clark, a notable and extremely prolific public house architect of the interwar years. Several of his public houses have since

been listed at grade II. The White Swan is a late and possibly rare post-war work – he retired in 1959 – and the building’s simple, well-executed neo-Georgian frontage to Fetter Lane is considered to hold a low level of architectural significance as a well-executed albeit simple example of the type. The White Swan public house is thus considered to be a non-designated heritage asset for the purposes of this application.

110. The proposed development would entirely subsume the existing public house, framing it with a new, high-quality elevation of crushed concrete, glass and metalwork elements. The juxtaposition of the existing materiality and scale of the public house with that of the proposed development would be dynamic. By setting it within a totally modern architectural form, the proposed development would draw out the architectural qualities of the existing public house. It is considered that the proposed development would provide a dramatic new context for the existing non-designated heritage asset and would not be detrimental to its historic or architectural significance.

#### St. Dunstan-in-the-West burial ground

111. The burial ground is a rough quadrilateral in shape, indented in the north-east corner, raised around three feet in height above street level. It is divided from the street by a brick retaining wall incorporating steps, railings and gate piers. Immediately behind the railings are three large plane trees protected by Tree Preservation Orders. The layout of lawn, planting beds and paths won a landscaping award scheme in 2006.
112. The burial ground was formed in the early modern period as an additional burial ground to serve the church of St Dunstan in the West on Fleet Street. It was used for burials between the early modern period (c.1600) and the mid-nineteenth century, meaning it possesses a high degree of historical significance for its associations with past City communities. It possesses further historical significance as a rare instance of a second graveyard serving a City church. Architecturally, the burial ground possesses a moderate degree of significance as a well-preserved example of its type retaining key features such as brickwork walls, railings and tombstones.
113. The proposed development would enhance the setting of this non-designated heritage asset by replacing the inactive, hard frontage of the existing building with a green new public route centered on a new cafe and sunken garden. The eastern setting of the burial ground would be visually enhanced through the more permeable and articulated elevation, varied material palette, greater degree of active frontage and more extensive urban greening; the latter would constitute an enhancement in biodiversity terms too. The new route provided through the site along the eastern boundary of the burial ground would provide new perspectives on the non-designated heritage asset.

#### **Protected Trees**

114. There are three London Plane trees located within St. Dunstan’s burial ground that are protected by Tree Preservation Orders. The trees are located on land under the management of City Gardens. Local Plan

policy CS19 seeks to protect the amenity value of trees, retaining and planting more wherever practicable. Draft City Plan 2036 policy OS4 seeks to protect trees which are subject to a Tree preservation Order.

115. All of the trees are located outside of the application site. Tree protection measures are proposed during demolition and construction works. These would include tree protection boxes and ground protections within the Root Protection Areas (RPA) of the closest trees where necessary due to their proximity to the application site. Conditions are proposed to provide final details of these protection measures.
116. The closest tree to the site is proposed to be pruned back to the site boundary. City Gardens have reviewed the proposals and consider them to be acceptable, subject to any works to the trees being agreed in advance with the City and undertaken by City Gardens at the Applicant's expense. An informative is included to this effect.

### **Conclusion on Heritage Impact**

117. Paragraph 199 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).
118. Paragraph 200 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 202 NPPF balancing exercise
119. Paragraph 203 of the NPPF states that 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
120. The proposed development would enhance the settings of the grade II listed YRM Offices and the burial ground of St Dunstan-in-the-West, a non-designated heritage asset. It would provide a dramatic new setting for the White Swan, a non-designated heritage asset.
121. In all other respects the proposed development would preserve the significance and settings of designated and non-designated heritage assets in the locality.

### **Culture**

122. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 policy S6 encourage new cultural experiences and art works. The City of London Cultural Policy seeks to improve the City's public realm, open spaces and gardens to make them more open, distinct, welcoming and culturally



vibrant. The site is located close to the western edge of the City's Culture Mile and the proposal incorporates several elements which will improve the cultural enjoyment of the site.

123. The design seeks to contribute to the City's culture by creating a new pocket garden that can be enjoyed by everyone, not just the buildings' occupants. The aim of opening up the open space on the western side of the ground floor and creating a new publicly accessible sunken garden which will complement the existing public open space will provide opportunity for social engagement. The retention of the public house use would also continue to provide a place for people to meet and socialise.
124. The design proposals include introducing embossed typeface lettering into the masonry facades of the public realm which would add visual interest and reference the historical printing use of the site.

### **Archaeology**

125. The site is in an area of archaeological potential situated outside the walled City and to the west of the now buried River Fleet. There is potential for remains from all periods to survive in this area and an Archaeological Desk Based Assessment is submitted with the application.
126. The Assessment confirms that the existing basement encompasses most of the entire area of the footprint of the site. The potential for remains to survive below the building is low due to disturbance by construction of the basement floor and foundations. There is potential for deeper cut features to survive, such as wells, pits and earlier building basements. These features may include Roman occupation, as the site is between two principal roads leading into the City, and post-medieval occupation. It is considered that there is low potential for survival of Roman burials, as burials have been recorded in the vicinity. The western section of the churchyard of St Dunstan in the West, appears to encroach into the site in the post-medieval period and there is a low potential for remains to survive within the site.
127. A condition is recommended for an archaeological watching brief to be carried out to record ground conditions and any archaeological remains revealed by the development. An informative is recommended to cover consideration of the archaeological impact in the event that additional groundworks, outside the building footprint, such as new drainage or service connections are proposed.

### **Access and Inclusivity**

128. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.
129. The new ground floor would be lowered to pavement level allowing all pedestrian approaches to the building to be accessible from all four elevations at street footway level.

130. The new office entrance would be recessed to provide shelter from the weather, centrally located on the corner of Fetter Lane and Bream's Buildings. New revolving doors would be located centrally with a dedicated automatically opening pass door immediately adjacent to it.
131. The existing public space to the west of the site is not accessible due to the steps and higher level of the gardens. A new publicly accessible pedestrian link is proposed between Bream's Buildings and Mac's Place along the western edge of the site. This new route will provide access to a new sunken garden which will be publicly accessible.
132. Two new passenger lifts would serve all levels of the building from Basement to 12th Floor which includes an evacuation/passenger/goods lift and a fire-fighting lift. Two other passenger lifts would serve Ground to 10th floor. This provides independent and dignified access and means of escape for disabled people unable to use stairs.
133. A dedicated and prominent cyclist entrance (which would be clearly signposted) from ground floor level has been integrated into the design of the building via two dedicated entrances on Fetter Lane and Mac's Place, along with accessible amenities and facilities for cyclists including lockers, showers and WC facilities at Ground and Mezzanine level. 5% of cycle parking would be suitable for parking cycles used by disabled people.
134. Accessible roof terraces are provided at all levels from Ground, 5th to 9th and 12th floor levels for use by all office occupiers of the building.
135. Gently graded slopes (more than 1:21 gradient) are provided at ground floor level to accommodate level differences around the perimeter of the site.
136. The Access Officer welcomes the inclusive access to and within the building which would meet the requirements of Local Plan policy DM10.8 and London Plan policy D5.

## **Transportation**

### **Cycling**

137. The London Plan Policy T5 (Cycling) requires cycle parking 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.
138. The proposed cycle parking is set out below:

<b>London Plan long stay cycle parking</b>	<b>Proposed long stay cycle parking</b>	<b>London Plan short stay cycle parking</b>	<b>Proposed short stay cycle parking</b>
197	204	26	28

139. The long stay cycle parking would be accessed from Mac's Place at ground floor level. Officers consider this to be an appropriate location for the cycle parking, and being largely at ground floor, cycling will be celebrated. The new pedestrian route from Mac's Place to Bream's Buildings, would give visitors and workers arriving to the site with bicycles two options to access the cycle parking. Additional access to the cycle parking would be available from Fetter Lane, via the servicing entrance.
140. The proposed short stay cycle parking would be provided entirely within the site boundary at ground floor level. 8 spaces would be located within the new public realm (private land) adjoining the northern end of Mac's Place. One stand would be located on Greystoke Place (on private land) which will provide space for two cycles. The remaining 18 spaces would be provided within a new publicly accessible cycle store. This would be located adjoining the new pocket park and visible from Breame's Buildings and the new route through the site.
141. The proposed cycle parking is in excess of the London Plan requirements.
142. 5% of the cycle parking spaces (10 spaces) would be accessible for adapted cycles and this arrangement will be secured by planning condition (in line the London Plan Policy T5 (Cycling) with the London Cycling Design Standards 8.2.1, and the draft City Plan 2036).
143. The proposals include 22 showers, and 222 lockers, which complement the cycle parking provision. 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. Therefore, the proposals meet the London Plan recommendations.
144. The applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required, by Section 106 obligation, to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It would be required to be submitted to the City for approval in line with the London Plan Policy T4 (Assessing and mitigating transport impacts). The Cycling Promotion Plan would be expected to set out how the internal short stay cycle parking spaces will be advertised and accessed by the public.

### **Vehicular access**

145. 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.
146. The development is car free and no blue badge car parking space is proposed due to space constraints at the ground floor. The Applicant is willing to explore the provision of a Blue Badge Space within the vicinity of the site with the City Corporation. This would be secured through the S278 Agreement.

## **Servicing and deliveries**

147. 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.
148. The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street – therefore the servicing is proposed to remain as existing. The applicant has agreed on a cap for the number of vehicles servicing the development per day of 14. This would ensure the number of vehicles proposed is equal to or less than the estimated existing situation (of 14 vehicles per day).
149. The applicant was required to show how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, the new pedestrian route through would not be possible, due to space limitations. Therefore, on balance on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.
150. 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. In order to meet the cap of 14 vehicles per day the applicant has agreed to use an off-site consolidation centre.
151. 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. The applicant has agreed to a further restriction on servicing between the hours of 2300 to 0700 the next day which would be conditioned.
152. The development will be required to produce a delivery and servicing plan (DSP), and this will be secured in the Section 106 agreement.

## **Public Transport**

153. 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 Chancery Lane underground and Farringdon underground and Thameslink services. The site is close to several bus routes running close by on High Holborn and Chancery Lane (within 400m).

## **Pedestrian Comfort**

154. A PCL assessment has not been conducted for the site. A PCL assessment was not considered necessary, given the scale and location of the development. The trip generation assessment conducted for Option A has been used as the basis for assessment for this application (Option B), as Option A gives the greatest trip generation and is considered the most robust assessment.
155. The proposed development is predicted to result in 226 additional trips in the AM peak and 207 additional trips in the PM peak. It is predicted that the total increase in the number of trips to the development across the whole day would be 1654. The uplift is considered acceptable due to the excellent cycle parking provision, the proposed alterations to the surrounding existing public realm to be secured through a S278 agreement, and the new route through the site.
156. The submitted transport assessment indicates that the overall increase in trips across all modes would have a minimal impact on the surrounding highway and public transport network capacities.
157. The applicant has proposed to chamfer the south eastern corner of the development to improve the pedestrian comfort at the junction of Fetter Lane and Breems Buildings, this is considered a benefit of the scheme. The applicant has also proposed a new route through the development from Bream's Buildings to Mac's Place.
158. The new pedestrian route will also provide enhanced public realm, and cycle parking on private land. The new route would be permissive path and open to the public between 6am and midnight, with access secured through the S106 agreement.

## **Public Realm, Security and Hostile Vehicle Mitigation (HVM)**

159. 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.
160. 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.

161. The HVM will be mainly within the facade of the building. As part of the public realm design, we will work with the City of London Police to ensure the new public realm is safe and secure (e.g. at the entrance of Mac's Place). A condition to this effect is recommended.

### **Construction Logistics**

162. The applicant has submitted a Deconstruction Environmental Management Plan for approval as part of this application. The applicant has worked with the City's Highways team to ensure the logistics plan is acceptable and obstructions on the highway are limited. The applicant has also engaged with BT and UKPN to arrange a temporary substation on Bream's Buildings while the demolition and construction works are taking place. The Deconstruction Environmental Management Plan is considered acceptable in planning terms, however the applicant is still required to gain the necessary highway approvals and licences prior to deconstruction work commencing.

### **Section 278 Agreement**

163. A commitment to enter into a Section 278 agreement has been secured. The Section 278 agreement would comprise improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and through the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, provision of a blue badge parking space, and any cycle improvements necessary to allow access to the cycle parking. The Section 278 works will be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision. This would be secured through the Section 106 agreement.

### **Transportation Conclusion**

164. The proposal would accord with the relevant transportation related policies including London Plan policies T5 cycle parking, T6 car parking, and D11 Safety, security and resilience to emergency. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2036 Policies AT1, AT2, AT3, SA3, and VT3. The proposals are not in line with Policy DM16.5 of the Local Plan 2015, or draft City Plan 2036 Policy VT2 – all relating to deliveries, servicing and construction. However, the proposals are considered acceptable.
165. Overall 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 which represents an increase of 226sqm of publicly accessible space.

## **Waste Storage**

166. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.
167. The proposals incorporate a bin store at ground floor level. This store would serve the office, cafe and drinking establishment uses. Prior to collection, bins would be transferred to a temporary holding area within the building, closer to the servicing entrance. Waste collections would take place from a loading bay on Fetter Lane at suitable frequencies.
168. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements.

## **Sustainability**

### **Circular Economy**

169. London Plan Policy S17 ('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.
170. The submitted Draft Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. The proposals to redevelop the site are a result of an assessment of opportunities to retain the building as a whole or in part.
171. The existing, original structure of the building is concrete encased steel that is extremely complicated to adapt. The structural investigation showed signs of heavy modifications due to extensions in the past, and no information is available as to whether any strengthening works have been carried out for the extensions. However, past changes to the structure have caused corrossions in the steel sections. In addition, the existing building floors are formed from hollow-pot slabs which are known to lack robustness and adaptability.
172. The foundations were researched on the basis that these should be similar to the ones found at 98 Fetter Lane which was constructed together with the building on the application site. The same engineers' and architects' teams were involved at No 98 that carried out the investigations for the redevelopment in 2015 with the finding that the foundations had a mix of concrete encased grillage foundations and concrete rafts and included large elements of masonry foundations that were presumed to be from the pre-1940's buildings destroyed in the war.
173. The variability of construction types and materials in the original construction of the substructure would make it unsuitable to be retained as a basis for a larger development.
174. In addition, the office floor plates have very low floor to ceiling heights below 3 metres that would not provide high quality office spaces once building services within raised floors and/or below ceiling slabs have

been included. The existing ground floor level is raised and cannot be adapted to provide level access from the street, surrounding pedestrian routes and gardens, without substantial demolition and strengthening works.

175. Overall, it is considered that a refurbishment and extension would require substantial demolition above and below ground with high embodied carbon emissions impact, along with considerable limitations to the achievable quality and flexibility of office floorspace.
176. However, the retention of the perimeter retaining basement walls to assist during construction and to reduce embodied carbon emissions of new construction will be considered in the detailed design phase.
177. The applicants are committed to achieve a low impact building by committing to
  - Incorporating low carbon materials, including considering recycled materials for the primary facade, e.g. rammed concrete with recycled aggregates or bricks made from recycled materials
  - Recover materials at maximum value and facilitate off-site re-use wherever possible, aiming for 95% reuse/recycling/recovery of demolition and construction and extraction waste
  - Minimising material consumption and incorporating future flexibility in the structure and configuration of internal spaces
  - Selecting materials that are easier to install and that are durable, with low wastage rate and using less energy and requiring less maintenance and replacement
  - Focussing on designing for longevity, adaptability and ease of disassembly.
178. 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 will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

## **Energy and CO<sub>2</sub> emissions**

179. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 59% reduction in regulated carbon emissions compared with a Building Regulations compliant building.
180. The proposed energy demand reduction strategy would reduce the building's operational carbon emissions by 16% compared to a Building Regulations compliant building and includes the following main elements:
  - Designing the building with high thermal mass, creating a robust, prefabricated masonry structure with deep reveals to provide natural shading and thermal insulation, in the south-west facing



facades further setbacks behind planters integrated into the facade

- Providing additional shading fins only where necessary based on annual solar studies
- Providing operable shading awnings on the terraces
- Providing low level and high-level opening windows combined with a simple, mixed mode floor air distribution for zero energy cooling for large parts of the year
- Enabling night-time ventilation to cool soffits that provide natural cooling during the day
- Optimised daylight and thermal insulation levels within office floorspaces through optimised glazing to solid ratio.
- Providing wastewater heat recovery for the showers.

181. The office element would operate using a Complementary Mixed Mode strategy with Concurrent operation, meaning that the background mechanical ventilation (with or without cooling) operates in parallel with natural systems. The aim is to combine active (e.g. heat pumps and active cooling systems) and passive (natural ventilation, night-time purge cooling) systems that enable occupants to open windows to control thermal comfort. Natural ventilation has been maximised and cooling loads have been kept to a minimum through the incorporation of the passive design measures. Heat recovery on the main mechanical ventilation systems will improve the overall energy efficiency of the strategy.
182. The energy strategy for the proposed flexible commercial floorspace that is designed as shell at this stage only, would be the future tenant's responsibility.
183. There is currently no available district heating network close enough to the site, however, the opportunity to connect to a future district heating network would be incorporated into the proposed development.
184. The proposed renewable energy technologies are air source heat pump systems (ASHP) and an at least 30sq.m Photovoltaic (PV) panel installation integrated into the roof plant enclosure screens on level 12 where there would be least impact of self-shading. These technologies would contribute carbon emissions savings of 44% compared to a Building Regulations compliant building. The provision of PV panels on the roof of the plant enclosure was explored, but this must be 85% free area in order to facilitate adequate air flow to the air source heat pumps.
185. The flexible commercial floorspace element of the building would achieve an overall 59% reduction in carbon emissions compared to a Building Regulations compliant building, 16% of which through energy demand reduction.
186. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion

stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

## **BREEAM**

187. BREEAM New Construction 2018 pre-assessments have been prepared for the office and retail uses. The strategy aims to achieve an "Outstanding" rating for the offices on the basis of a "full fit-out". The assumptions made as part of the preliminary pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted rating including a score of >85%. The pre-assessment indicates a score of 88.30% and aims to achieve a high number of credits in the City's priority categories of Energy, Water, Pollution and Materials. Further credits could be targeted in the detailed design phase and fit-out phase of the development.
188. The separately assessed flexible retail floorspace would achieve an "Excellent" rating with a score of 72.30%. It is anticipated that this area would be progressed as a 'shell only' scheme and as such the number of credits available is more limited. Additionally, the scheme cannot award points for the innovative building services strategy proposed for the wider development and consequently would be unable to achieve a higher rating of "Outstanding".
189. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. Post construction BREEAM assessments are requested by condition.

## **Whole Life-Cycle carbon emissions**

190. 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.
191. Since the existing building on site has been found unsuitable for refurbishment and extension, the proposed Whole Life-Cycle carbon

reduction strategy is based on reducing embodied carbon impacts of the new sub and superstructure as main contributors to the overall whole life-cycle carbon emissions of the building. This includes the rationalisation of the structure, the use of cement replacements, recycled products, robust materials and structural design as well as providing material passports for ease of extending the lifespan of the building and building parts.

192. Another important part of the strategy is providing simplicity of operation that reduces the need for extensive ductwork and services distribution and suspended ceilings, and has low maintenance requirements, and ultimately reduced whole-life carbon emissions. The design strategy offers a looser fit with robust shell and adaptable services that can be readily altered operationally or physically to suit the needs of different occupiers, activities, and even sectors over the life of the building.
193. 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 standard benchmark emissions target. It is anticipated that during the detailed design stage further improvements can be achieved, in particular in the product stages A1 – A3 of the building's life cycle. These results are based on the Option A application; however it is considered that the variations of the Option B proposals would not have any significant impact on the results. A detailed Whole Life-Cycle carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

### **Urban Greening and Biodiversity**

194. 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.
195. The development would include an extensive range of soft landscaping features with intensive green roofs, green walls, roof terraces, planters and pocket square which would enhance urban greening, biodiversity and visual interest. Greenery would be included in the publicly accessible sunken garden and continue along the western frontage with a strip of planting boxes.
196. The private terraces (700sq.m) across Levels 5, 6, 7, 8, 9 and 12 would include flowering herbaceous planting along the edge perimeter to aid biodiversity. The planting would include a mixed palette of seasonal perennials, evergreen shrubs and grasses. Multi-stem trees would be integrated into the planting to help mitigate the wind and provide sun shelter and visual connection with nature to promote wellbeing. In addition, invertebrate, bird and bat boxes would be located in suitable locations.
197. The roof terraces would begin at Level 5 and have been designed to not immediately overlook nearby residential premises as they would be above the roof level. In addition, planters on the western edge of this

terrace would provide an inaccessible area next to the balustrade to prevent direct overlooking. The outdoor private break-out areas for the occupiers on the terraces would provide important amenity spaces. A condition is proposed to restrict the hours of use of the terraces to protect the amenity of the nearby residents.

198. Local Plan Policies DM10.2 (Design of green roofs and walls), DM10.3 (Roof gardens and terraces) and DM19.2 (Biodiversity and Urban Greening) encourage the inclusion of green roofs, gardens and walls. The biodiverse features would provide a green and attractive setting as there are hard roof surfaces on the existing and some of the surrounding buildings and would result in a net gain in biodiversity value to the site. The landscaped roof terraces would serve as important amenity spaces for occupiers of the buildings with views across the City. The green walls and climbers would assist in improving air quality and appropriate plant species should be carefully selected for the living walls depending on their aspect.
199. The addition of the trees, planting, green roofs and green walls on this development are welcome not only for their aesthetic value when viewed from nearby buildings but also for their contribution to biodiversity and urban greening (Policy DM19.2), rainwater run-off, insulation and urban cooling. The proposals therefore accord with Local Plan policies DM10.2, DM10.3 and DM19.2. The proposed urban greening should be appropriately maintained for the life of the proposed development.
200. An Urban Greening Factor (UGF) calculation score has been submitted with the application along with a table providing a breakdown of the proposed urban greening. The UGF has been calculated as 0.35, which meets both the London Plan and the City's draft Local Plan UGF target score of 0.3 for commercial development.
201. Final details of the quality and maintenance of the proposed urban greening are required by condition.

## **Climate Change Resilience**

### Water resources

202. The submitted Sustainability Statement acknowledges that the UK will experience half as much rainfall by 2080 as a result of climate change. A range of water conservation measures have been designed into this scheme.
203. A blue roof at level 12 would be supplemented with an attenuation tank using "Smart Tank" technology at basement level for rainwater harvesting to use for irrigation and toilet flushing. For the same purpose, the greywater from showers would be recycled.
204. Further reductions in potable water will be achieved through the specification of sanitary ware with low flow fittings and leak detection in order to achieve a 50% improvement over baseline building water consumption.

### Flooding

- 205. The site is not located within the City Flood Risk Area.
- 206. The development aims to achieve greenfield run off rates through the incorporation of Sustainable Drainage Systems (SuDS) including a blue roof on the external terraces and an attenuation tank. The 'smart tank' technology also allows rainwater collected in the attenuation tank to be recovered for WC flushing and irrigation, further supplemented by the collection of greywater from showers.
- 207. Final details of the SuDS and associated components are reserved by condition.

### Heat Stress

- 208. The sustainability statement outlines measures to prevent overheating by including natural ventilation openings, as part of a mixed mode system that incorporates free cooling through the exposed slab, within an optimised facade system to manage solar gain and maximise daylight access. These measures will not only reduce the need for carbon intensive air conditioning but will help to make the building resilient to higher temperatures and urban heat island effects.

### Natural Capital and Pest & Diseases

- 209. The proposed development will incorporate urban greening that would improve significantly on the existing quantity and quality of urban greening on site, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases.
- 210. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

### **Conclusion**

- 211. 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.
- 212. 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, and exceeds in some aspects, London Plan policies as well as Local Plan policies, and it is on track to achieve an “outstanding” BREEAM assessment rating.

213. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced in line with the GLA’s standard benchmark. The existing building has been assessed and found to be unsuitable to be transformed into a new, attractive and sustainable development. However, Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible and adaptable development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

### **Microclimatic Impacts**

#### **Wind Microclimate**

214. CFD simulation and analysis has been carried out in accordance with the City’s Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
215. 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.
216. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
217. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance - if conditions become unsafe or unsuitable for the intended use as a result of the development. If wind conditions become windier but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.
218. Assessments have been carried out for both the Windiest Season and the Summer Season.

#### **Existing Baseline Conditions**

219. The baseline scenario indicates that the Site and nearby surrounding area has conditions ranging from suitable for frequent sitting to walking use during the windiest season. Generally during the summer season, wind conditions are one category calmer, and range from suitable for

frequent sitting to standing use. No strong winds exceeding the safety threshold would occur in this configuration.

- 220. All thoroughfare locations within and around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season.
- 221. The majority of existing entrances around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season. The exception to this is at an entrance to the south of Great New Street which have walking use conditions. The entrance to the White Swan pub on the eastern elevation of the existing building has wind conditions suitable for occasional sitting use.
- 222. Pedestrian crossings around the Site have wind conditions ranging from suitable for occasional sitting to standing use during the windiest season.
- 223. Amenity spaces at ground level are located to the east of 110 Fetter Lane (to the south of the Site) and at St Dunstan Park to the west of the Site. The amenity space to the east of 110 Fetter Lane has wind conditions suitable for occasional sitting use during the summer season. Wind conditions at Dunstan Park are suitable for frequent sitting use during the summer season.
- 224. Wind conditions at upper level amenity spaces directly to the north and west of the Site range from frequent sitting to standing use during the summer season, with localised area of walking use conditions at the southern edge of 98 Fetter Lane highest roof terrace.

### **Proposed Building with Existing Surrounding Buildings and Proposed Landscape**

- 225. In the presence of the Proposed Development, conditions would increase in windiness compared to the existing scenario, particularly between the Proposed Development and 12 New Fetter Lane to the east as well as on Bream's Buildings as winds get channelled between the buildings. Conditions would range from suitable for frequent sitting to standing use with localised areas suitable for walking use during the windiest season, and frequent sitting use to standing use during the summer season, however would still be considered to be acceptable for the intended uses.

### **Thoroughfares**

- 226. The majority of thoroughfares within and around the Site would have wind conditions suitable for frequent sitting to standing use during the windiest season. Localised areas to the south-east of the Proposed Development and on Great New Street, would have wind conditions suitable for walking use. The wind conditions at Great New Street would be consistent with the existing baseline and thus are considered appropriate for the intended use.

### **Entrances**

227. The majority of existing entrances around the Site have would have wind conditions suitable for frequent sitting to standing use during the windiest season. The exception to this is at an entrance to the south of Great New Street, which would have conditions suitable for walking use. These conditions are consistent with the Baseline scenario, which confirms that the conditions are not caused or adversely impacted by the Proposed Development.
228. The introduction of the south-eastern terrace on level one (which is not proposed in option A) would reduce the amount of high-speed winds directed to ground level and thus wind conditions would be expected to remain similar or calmer than in Option A at ground level. As such, the entrance of the White Swan Pub (in its existing location) would have standing use or calmer wind conditions during the windiest season, suitable for the intended use.

### **Pedestrian Crossings**

229. Pedestrian crossings around the Site would have wind conditions ranging from suitable for occasional sitting to standing use during the windiest season. These conditions would continue to be suitable for the intended use.

### **Amenity Spaces**

230. Amenity spaces at ground level are located to the east of 110 Fetter Lane (to the south of the Site), at St Dunstan Park to the west of the Site, the proposed pocket park immediately to the west of the Proposed Development.
231. The existing amenity spaces would continue to have similar wind conditions to the baseline and would range from suitable for frequent sitting use to occasional sitting use during the summer season. These conditions would be suitable for the intended use.
232. The proposed new pocket park would have wind conditions suitable for frequent sitting to occasional sitting use during the summer season. These conditions are appropriate for amenity use.
233. As more winds are likely to be channelled across the newly introduced terrace (on the south east corner), wind conditions would be expected to range from frequent sitting to walking use during the summer season. It would be expected that with appropriately developed dense landscaping of shrubs, hedging and trees to the windy areas of the terrace could be reduced to range from suitable for frequent sitting use to standing use during the summer season. A condition would be recommended to submit details of wind mitigation measures prior to implementation.

### **Wind Microclimate Conclusion**

234. In conclusion, with the proposed mitigation measures in place, where wind conditions become windier at ground level and upper level terraces, they remain suitable for the intended uses in the proposed scenario and so no additional mitigation above that proposed is required. The details of the proposed mitigation measures will be secured by condition and will be required to be maintained throughout the life of the building.



235. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the CFD analysis against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the submitted application, and if any material adverse impacts are realised, mitigation measure would need to be explored and implemented.
236. 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 Assessment**

237. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
238. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. 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 a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.
239. The Universal Thermal Climate Index (UTCI) metric will be utilized for predicting thermal comfort. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location.

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season.	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

240. All areas have been assessed for all hours in a year between 8:00 am and 8:00 pm (GMT), as specified by the City of London Thermal Comfort Guidelines. This analysis was conducted for two configuration; Existing Site with Existing Surrounding Buildings and Proposed Development with Existing Surrounding Buildings and Proposed Landscaping.

### Existing Baseline Conditions

241. The proposed first floor terrace space at the south-eastern corner of the Proposed Development services the adjacent office only. As such, we would apply the same thermal comfort expectations to this space as the other on-site terraces discussed previously.

### Existing Baseline Conditions

#### Ground Level

242. The vast majority of the current pedestrian realm in the area surrounding the site has all season or seasonal thermal comfort conditions, with all season conditions situated to the west and seasonal conditions situated to the east. Areas of short-term conditions are also situated to the east around the northern corner of 6 New Square Street along Barlett Court, along Great New Street and along Nevill Lane. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses. The exception is at outdoor cafe seating along Nevill Lane, where short term conditions were predicted. This would be one category lower than required for ground level outdoor seating. while conditions in this space during the winter were predicted to be acceptable for less than 50% of the time; conditions

were predicted to be acceptable for more than 80% of the time in the remainder of the year.

### **Off-site Terrace Levels**

243. The existing off-site terraces were predicted to have mainly all season and seasonal thermal comfort conditions. Isolated areas of short-term conditions were predicted around the eastern corner of the Rolls Building and on the corners of Chancery Lane. As none of the existing off-site podium or roof level terraces have sensitive receptors that would require long term comfort, these thermal comfort conditions are considered suitable for their current usage.

### **Proposed Building with Existing Surrounding Buildings and Proposed Landscape**

#### **Ground Level**

244. With the proposed development in place, the thermal comfort conditions at ground level are predicted to remain broadly similar to the existing baseline conditions. Some areas along Bream's Buildings, the northern side of Fetter Lane and Plough Place were predicted to move from all season to seasonal thermal comfort conditions. In addition, to the south, east and north of the Proposed Development, there would now be larger areas of seasonal conditions (these areas previously were predicted to have all season conditions). The alterations to the thermal comfort conditions would still be considered to be suitable for its intended use in these areas. There would be isolated areas of short-term conditions to the north and east of the proposed development and around the south eastern corner of 12 Fetter Lane.
245. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses, with the outdoor cafe seating along Nevill Lane remaining in the short-term category. As these conditions occur in the baseline and do not become materially worse with the introduction of the Proposed Development, mitigation measures would not be required.

#### **On-Site Terrace Levels**

246. The terraces on the proposed development would largely have suitable conditions (all season and seasonal thermal comfort conditions) with the proposed landscaping in situ. An isolated area of short-term conditions was predicted on the 9th level terrace around the north-western corner. As these terraces are to be used for offices, there would be no designated seating and as such this isolated area of short-term conditions can be considered acceptable.
247. The proposed first floor terrace space at the south-eastern corner of the Proposed Development would serve the office only. As such, the same thermal comfort expectations would be applied to this space as the other on-site terraces. The positioning of this space in the development would lead to the potential for breezy conditions as wind is drawn around the building from south to east. The wind speeds are likely to be tempered due to the parapet and landscaping elements shown in the plans. These are positive features. Access to direct sunlight at this terrace is expected

to be lower given the height of surrounding buildings, however, the three-story void to the underside of the fourth floor above is a positive feature which provides the space access to skylight and potentially direct sun depending on the time of year. It is expected that this space would be generally comfortable during warmer weather but during the winter conditions may be perceived as cool, particularly if the landscaping provides insufficient wind control in winter. Thus, while the space is unlikely to achieve the all-season comfort categorisation, the comfort conditions here would be expected to be appropriate for the terrace's intended use.

#### Offsite Terrace Level

248. The introduction of the Proposed Development was not predicted to have any material impact on the thermal comfort conditions of the existing podium and roof level amenity spaces in the local area. Thus, the thermal comfort conditions of the surrounding podium and roof terrace levels in proposed scenario would be the same as those predicted in the existing baseline scenario, which were suitable for the intended use.

#### **Thermal Comfort Conclusion**

249. The introduction of the proposed development would not be predicted to change the thermal comfort conditions at ground level or surrounding terraces to the point that they would be incompatible with the current use types. The terrace levels of the proposed development would largely have acceptable thermal comfort conditions for their intended use. The 9th level terrace would have short term conditions around the north-western corner. As these terraces are to be used for offices, there would be no designated seating and as such short-term conditions can be considered acceptable.

#### Air Quality

250. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Draft City Plan policy DE1 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. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.
251. 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.
252. 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 mitigation measures have been submitted as part of the Demolition Environmental Management Plan. The Department of Markets and Consumer Protection have reviewed the plan and consider the proposed mitigation measures acceptable.

253. The proposed development would be car free and heating will be through an electric air source heat pump system with no onsite combustion. The number of vehicle trips associated with the development is below the threshold for requiring assessment. Therefore, the development should not have any adverse impacts on air quality.
254. The Proposed Development would be considered air quality neutral in relation to both building and transport emissions.
255. 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.
256. 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, Sunlight and Overshadowing**

#### **Assessment Context**

257. An assessment of the impact of the proposed development on the daylight and sunlight received by surrounding residential buildings and public amenity spaces, has been submitted in support of the application. The effects of the development have been 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).
258. 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.
259. The BRE guidance advises that numerical values are not to be rigidly applied but recognise the specific circumstances of each case. This is acknowledged in the supporting text to policy DM10.7 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".
260. The assessment submitted in support of the application has assessed the impact of the proposed development on the daylight and sunlight received by the residential properties at 2 Greystoke Place and 95 Fetter Lane. Overshadowing assessments have been undertaken in respect of

the private amenity spaces of 2 Greystoke Place, the public space of St. Dunstan's burial ground, and the roof top terrace of 98 Fetter Lane.

## **Daylight**

261. 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 figure is both less than 27% and reduced by 20% (0.8 times its former value) or more than the existing level, the loss would be noticeable.
262. 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 the results should be read in conjunction with those of a second test - daylight distribution. The daylight distribution test, also referred to as the No Sky Line test (NSL), calculates the areas of a working plane inside a room (usually 0.85m above the finished floor level) that would or would not 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.
263. In addition, the Applicants have undertaken and submitted supplementary Average Daylight Factor (ADF) and Radiance Assessments of the daylighting to the affected residential apartments within 2 Greystoke Place. The radiance diagrams are contained within the plans pack.
264. The Average Daylight Factor (ADF) assessment is a measure of the overall amount of diffuse daylight within a room that is measured at a working plane 0.85m above a room's finished floor level. The ADF can be calculated a number of ways but the most commonly used methodology is the formula set out in the BRE guidelines. This formula takes account of: the size and shape of a room and its serving window(s); the actual or reasonably assumed reflectance values of a room's internal surfaces (walls, floors and ceiling); the diffuse transmittance of the glazing to the serving window(s); and the amount of visible sky, which is calculated through a Vertical Sky Component assessment.
265. The BRE Guidelines recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.
266. A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). Similar to measuring the ADF of a room, this method of assessment takes into account the total glazed

area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

267. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the BRE guidelines ADF formula or Radiance methodology, the radiance based assessments can draw upon the BRE's recommended ADF target values. Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. The average value of the individual daylight factors within a room can be expressed as an ADF percentage for the room as a whole.

## 2 Greystoke Place

268. Located to the west of the development site, this property contains commercial office space on the lower and raised ground floors and residential accommodation on the 1st to 5th floors. There are 10 flats within the building, of which 7 flats have windows to the eastern end facing toward the site. The windows which face towards the site serve dual aspect living/kitchen/dining rooms and the bedrooms are located towards the western end of the building. The main windows which serve the dual aspect living/kitchen/dining rooms are located on the north and south elevations of this building and therefore orientated perpendicular to the proposed site. The windows which face directly towards the site (on the eastern elevation) are high-level ribbon / slot windows.
269. A total of 24 windows serving 8 rooms have been assessed using the Vertical Sky Component (VSC) methodology, with the results showing that 15 of the windows would receive less than a 20% reduction in accordance with the BRE criteria and therefore the effect is considered to be negligible.
270. The seven high level slot windows located on the east elevation would experience reductions of between 53% and 78% which would be considered to be a major adverse impact. Two windows located on the north elevation of the 2<sup>nd</sup> and 3<sup>rd</sup> floors would receive a reduction of 21%-22%, marginally over the BREs criteria of 20%, which is considered to be a minor adverse impact.
271. Whilst these particular windows would experience a noticeable effect, the main windows for each of these rooms on the north and south elevations would predominantly experience small reductions which are within the BRE guidelines.
272. The daylight distribution results using No Sky Line (NSL) calculations show that all rooms would experience small reductions in daylight distribution which are within the BRE guidelines criteria. The overall daylight effects, when using the VSC and NSL tests are therefore negligible and can be considered acceptable.

273. The Radiance results demonstrate where there would be a reduction in the daylight factor within the affected rooms. This reduction is most notable in the areas of the rooms directly lit by the high-level east facing window. The results also show that the principal north or south facing windows would continue to provide good levels of natural light into the rooms.
274. The Average Daylight Factor results show that one living / kitchen / dining room (R1/12) would experience a reduction in ADF from 2.21% to 1.96%, which would be marginally below the minimum criteria for kitchens but well within the living room criteria. The remaining rooms assessed would have an ADF in excess of 2.2% which would be above the minimum criteria for all standard room types.

#### 95 Fetter Lane

275. This property is located to the north of the site and contains residential accommodation. A total of 18 windows serving 15 site facing rooms have been assessed for daylight.
276. For the VSC assessment, three of the windows would receive no reduction as a result of the proposed development, and 15 would receive small reductions in light well within the BRE guidelines criteria.
277. The daylight distribution test shows that the majority of the rooms would receive no reduction in daylight distribution. One room would receive a reduction of 0.1% from existing levels, well within the BRE Guidelines criteria. The overall daylight effects for 95 Fetter Lane would be negligible and are considered acceptable.

#### 12 New Fetter Lane

278. An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment.
279. 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. 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.
280. The BRE Guidelines state that they are “intended for use in rooms in adjoining dwellings where daylight is required... The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices”.
281. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural



daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. 12 New Fetter Lane is a modern office building and already designed to rely on electric lighting.

282. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, including 12 Fetter Lane, 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 and DM10.7, or the BRE Guidelines.

### **Daylight Conclusion**

283. Overall, the assessments submitted in support of the application demonstrate that there would be some loss of amenity in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most affected rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole.

### **Sunlight**

284. 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)”. Sunlighting 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.

285. To clarify, all three of the above criteria need to be met for there to be an adverse impact in sunlight terms.

### **2 Greystoke Place**

286. Of the eight rooms assessed for daylight, five have at least one site facing window which is orientated within 90 degrees of due south. The assessment demonstrates that the windows assessed would receive a reduction in APSH of less than 20%, which would be compliant with the BRE guidelines criteria, and is considered a negligible impact.

### 95 Fetter Lane

287. Of the 15 rooms assessed for daylight, one has a window which faces within 90 degrees of due south. The assessment demonstrates that this window would receive a reduction in APSH of 5.6%, well within the BRE criteria of 20% reduction, and would be considered a negligible impact.

### **Sunlight Conclusion**

288. All of the windows assessed would receive more than 0.8 times their former value and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.

### **Overshadowing**

289. The BRE guidelines suggest that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March. If as a result of the proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.
290. The potential overshadowing impacts of the proposed development has been assessed on three nearby areas:
- 2 Greystoke Place private residential rooftop terrace
  - St. Dunstan's burial ground
  - 98 Fetter Lane

### 2 Greystoke Place

291. The results of the submitted sun on ground assessments show that the private residential rooftop terrace serving the 5<sup>th</sup> floor flat currently receives 2 hours of direct sunlight on 80% of its area on 21 March.
292. With the Proposed Development in place, this terrace would experience a slight reduction, with 72% of its area continuing to receive 2 hours of direct sunlight on the 21 March. This would be a reduction of less than 20% and therefore unlikely to be noticeable in accordance with the BRE guidelines.

### St. Dunstan's burial ground

293. Due to the dense urban environment surrounding St. Dunstan's burial ground, the sun on ground assessment shows that the burial ground currently receives very little direct sunlight with 100% of the area receiving less than two hours of direct sunlight on 21 March. This does not change with the proposed development and the effect is therefore negligible.

294. An assessment was also undertaken for the sun on ground on 21 June. The results for 21 June show that the burial ground can continue to enjoy good levels of sunlight during the summer months, especially during the middle parts of the day which is when it is most likely to be used. For example, 96% of the area would enjoy at least 2 hours of sunlight on 21 June.

#### 98 Fetter Lane

295. This building is in commercial use, however there are two larger roof spaces (one on the eastern side and one on the western side) which are believed to be used as amenity spaces. It is unknown whether these spaces are used by the occupants of the building daily or whether they are only used for entertaining guests. However, for completeness, the applicant's consultants have assumed that they are used by the occupants on a daily basis, in particular during lunch time, and therefore ran overshadowing assessments.
296. The 2-hour assessments undertaken on 21 March showed that both spaces are likely to experience a notable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21<sup>st</sup> March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21<sup>st</sup> March.
297. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.
298. Whilst the reductions of direct sunlight would not meet the BRE guidelines, it was noted that the spaces would still be enjoyable places to use throughout the year. For example, during the summer months of May – August, when the weather conditions are more likely to mean that the occupants would like to take their lunch outside, collectively these spaces will continue to be able to enjoy direct sunlight during the typical lunchtime hours of 12pm-2pm, with 83.8% and 85.5% of the respective terraces receiving 2 hours of sunlight on 21 June.
299. It is also worth noting that although the proposed development would reduce the amount of sunlight received on the roof terraces, the proposed development would improve the wind conditions on these terraces and therefore the thermal comfort experienced on these terraces (if they were usable) would be negligible.

#### **Overshadowing Conclusion**

300. The submitted sun on ground assessment demonstrates that the nearby residential and public open spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE Guidelines.

#### **Daylight, Sunlight and Overshadowing Conclusion**

301. The submitted reports demonstrate that any reduction in daylight or sunlight to surrounding residential properties and public or residential

opens spaces would largely be within the BRE Guidelines criteria and therefore negligible.

- 302. While there would be noticeable reductions in light to nine of the residential windows within 2 Greystoke Place, the dual aspect nature of the rooms those windows serve would mean that the rooms would continue to receive appropriate overall levels of light as demonstrated by the accompanying daylight distribution and ADF / radiance assessments.
- 303. The proposed development would be in accordance with Local Plan policy DM10.7 and draft City Plan 2036 policy DE8.

### **Solar Glare and Light Pollution**

#### **Solar Glare**

- 304. Local Plan policy DM10.1 requires all developments to avoid intrusive solar glare impacts on the surrounding townscape and public realm. Draft City Plan policy DE8 requires developments to incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and townscape.
- 305. Three key viewpoints have been identified and assessed for solar glare impacts: Fetter Lane (travelling south), Fetter Lane (travelling north-west) and Breams Buildings (travelling east).
- 306. The assessment results demonstrate that for all three viewpoints, either visible beyond 10° of the line of sight for limited times or experience no solar glare. The viewpoints are therefore considered to experience negligible instances of solar glare.
- 307. The development would be in accordance with Local Plan policy DM10.1 and City Plan 2036 policy DE8.

#### **Light Pollution**

- 308. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
- 309. An objection was received from a nearby commercial occupier stating that the proposed development would result in increased light pollution to the residential windows of 2 Greystoke Place.
- 310. The nearby residential properties at 2 Greystoke Place have been assessed for potential light trespass. Assessments have not been undertaken to 95 Fetter Lane as it is considered to be orientated away and of sufficient distance from the Site so as not to be materially affected.
- 311. To understand whether there is the potential for light pollution to occur, the assessment assumes that all spaces within the proposed building have the light switched on and any blinds are open (i.e. the worst-case scenario) and any other external light sources (streetlights, existing surrounding office buildings etc.) have been ignored.

312. The assessment shows that there is likely to be a material increase in the potential light pollution on the bedroom windows of 2 Greystoke Place.
313. Whilst the office would be able to be occupied 24hrs a day, it is very unlikely that the building will be fully occupied at 11pm. Mitigation measures are proposed to reduce the risk of light pollution after curfew hours. These would include an intelligent lighting system so that the lights within a space/floor of the office will automatically turn off when it is not occupied. In addition to the above, the installation of blinds to the western elevation, particularly to the areas directly opposite 2 Greystoke Place, (and with a suitable management system to ensure they are closed when the spaces are occupied post curfew hours). A condition is proposed requiring a detailed lighting strategy demonstrating the mitigation measures.
314. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

### **Fire Safety**

315. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage. Policy D5.B.5 of the London Plan requires development proposal to be designed to 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 building.
316. 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.
317. The building fire strategy comprises complaint horizontal travel distances to the nearest exits on each level. There is an escape stair, firefighting stair, and a firefighting lift with protected lobby for safe vertical escape from all the levels. The proposed evacuation strategy considers a phased evacuation with compartment floors and associated refuges in each stair on each floor. An automatic fire detection and alarm system is proposed as well as an automatic sprinkler system. The fire service vehicle access is provided through via Fetter Lane. The building is provided with firefighting shaft extending through all the levels including basement. The firefighting shaft contains firefighting stair, firefighting lift and smoke ventilated lobby for safe firefighting operations. In addition to these a dry riser on each level is also provided in the firefighting shaft to assist with the firefighting operations.
318. This fire statement outlines the minimum fire safety provisions required for the proposed development which is to be compliant with the

Functional Requirements of the Building Regulations 2010 (as amended) and are to be developed through the design stages. The proposed development would meet the requirements of Policy D12 of the London Plan.

### **Health Impact Assessment**

319. Policy HL9 of the Proposed Submission 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. 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.
320. The proposed development was satisfactorily assessed against 41 criteria relevant to the City of London. The assessment concluded that there would be a positive impact for 29 of the criteria and a neutral impact for 9 of the criteria. The HIA identified two potential negative impacts which became neutral impacts with appropriate mitigation measures applied. The proposal does not include any affordable workspace so to mitigate this situation it was agreed that a S106 agreement would be drawn up to secure relevant employment and training initiatives. The HIA process also revealed that dust resulting from the construction process would have a negative impact. To mitigate this impact, the Construction Management Plan was checked to ensure that the impacts of dust arising from the construction process would be satisfactorily dealt with. The Construction Management Plan will be agreed by the City Corporation prior to commencement of construction.
321. One criterion became positive following mitigation during the course of the HIA process. The proposal will enable local people to access employment opportunities which was assessed as a neutral impact. It was decided that committing to using local suppliers and labour during the construction phase where possible, would increase this criterion to a positive impact.

### **Equality Impact**

322. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.
323. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-
- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
  - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- foster good relations between persons who share a relevant protected characteristic and persons who do not share it
324. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
  325. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
  326. This application has been assessed against the Equality Act 2010 and any equality impacts identified.
  327. The Applicants have held a range of meetings with stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:
    1. Fleet Quarter
    2. St. Dunstan's burial grounds
    3. Meetings with neighbouring occupiers including Weil Gotshal & Manages (London) LLP, MacFarlanes, Bird and Bird, The White Swan Public House and Owner/Occupiers of 2 Greystoke Place and email correspondence with other neighbouring occupiers who responded to consultation letters.
  328. As set out in the submitted Statement of Community Involvement (SCI), stakeholder consultation has been an on-going part of the proposed development's design evolution. The stakeholder engagement sought to understand the needs of local community groups and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project – notably the delivery of a new publicly accessible route and new pocket square.
  329. As set out earlier in the report, it is intended that the new route through and pocket park would be designed for inclusive access by all members of the community.
  330. The proposed development would provide significant employment opportunities during the construction and operations phases of the development, which could benefit all groups with protected characteristics. A planning obligation for contributions towards employment and training initiatives will be secured through the Section 106 Agreement. This would provide further opportunities for priority groups.
  331. The Proposed Development would offer step free access throughout and around the Site. Significant consideration has been given in the design of the scheme to ensure it is accessible and complies with Part K of the Building Regulations. All floors of the office will be served by wheelchair accessible lifts, accessible toilets and wide circulation space.
  332. The design provides enhanced public realm and landscaping around the Site that will result in better connectivity through the area. The proposals provide an attractive public realm that includes new planting and a

sunken garden. The public realm is fully accessible with step free access provided.

333. The design of the scheme has been informed by Secured by Design principles and in consultation with the City of London Designing Out Crime Officer. The proposal incorporates a range of design and management measures to increase security and reduce crime experienced in the area. The public realm enhancements will also help to reduce fear of crime by users and visitors to the Site. Based on this, the Proposed Development is assessed as having a direct, permanent, minor to moderate positive impact on reducing crime for identified priority groups as well as the general population.
334. Potential impacts of the proposed development on the nearby occupiers identified above, have been assessed. Officers do not consider that they would be detrimentally impacted in so far as the spaces within the development become unusable nor would it be considered that there would be disadvantages to any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

### **CIL and Planning Obligations**

335. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
336. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
337. 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).
338. CIL contributions and City of London Planning obligations are set out below.

#### **MCIL2**

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£1,231,539	£1,182,277	£49,262



### City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£498,825	£473,884	£21,941
<b>City Planning Obligations</b>			
<b>Affordable Housing</b>	£133,020	£131,690	£1,330
<b>Local, Training, Skills and Job Brokerage</b>	£19,953	£19,753	£200
<b>Carbon Reduction Shortfall (as designed)</b> <b>Not indexed</b>	£392,274	£392,274	£0
<b>Section 278 (Evaluation and Design)</b> <b>Not indexed</b>	£100,000	£100,000	£0
<b>S106 Monitoring Charge</b>	£3500	£0	£3,500
<b>Total liability in accordance with the City of London's policies</b>	<b>£1,147,572</b>	<b>£1,117,601</b>	<b>£29,971</b>

### City's Planning Obligations

339. 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*)
- Travel Plan (including Cycling Promotion Plan) OR Cycling Promotion Plan
- Legible London Contribution (£20,000)
- Cycle Hire / Network Improvements Contribution

*This contribution amount is still under negotiation between the applicant and Transport for London.*

- Construction Monitoring Costs
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement (CoL)
- Public Route and Sunken Garden (*Specification & Access*)
- Cultural Implementation Strategy
- Wind Audit
- Solar Glare

340. 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.

341. The scope of the s278 agreement may include, but is not limited to, improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and within the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, blue badge parking space provision, and any cycle improvements necessary to allow access to the cycle parking.

#### Monitoring and Administrative Costs

342. 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.

343. 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

344. 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**

345. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the London Plan and the draft Local Plan and considering all other material considerations.
346. The scheme delivers a high quality, office-led development, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses.
347. The scheme makes optimal use of the site and provides an increase in office and retail floorspace in accordance with the City's objective to support a thriving economy and remain the world's leading international financial and professionals services centre.
348. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including small and medium sized companies which supports post-covid recovery as identified in the 'London Recharged: Our Vision for London in 2025' report.
349. The proposal would incorporate a ground level retail unit that would enable a range of retail/restaurant/cafe uses to come forward (78sq.m (GIA), providing active frontage to the Bream's Buildings elevation, and would help enliven the new public realm between the Site and St. Dunstan's burial ground
350. The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through skilful modelling of the elevations, well-considered massing and the use of high-quality, innovative materials. . The proposed development would be an appropriate and sympathetic neighbour not only to the buildings immediately adjacent but also to the wider streetscape.
351. The proposed development is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General Wolfe statue to St Paul's Cathedral. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.
352. The proposed development would be visible towards the westerly edge of this River Prospects 16B.1 and 16B.2 (Gabriel's Wharf). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development

would preserve the viewer's ability to read the riverside landmarks in the view.

353. The magnitude of change in these is considered negligible and the proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG.
354. The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles.
355. The scheme delivers significant public realm enhancements including a new pedestrian route linking Mac's Place with Breems Buildings to the south, widening of Greystoke Place and a new publicly accessible pocket park adjacent to St Dunstan's burial ground.
356. In order to improve the pedestrian priority of the surrounding area a section 278 agreement will be secured which would deliver improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and within the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, provision of a blue badge parking space, and any cycle improvements necessary to allow access to the cycle parking. The proposed S278 works would be in line with the visions set out in the City of London Transport Strategy and City of London's Public Realm vision.
357. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel. The provision of both long stay and short stay cycle spaces would exceed the requirements of the London Plan. Access for cyclists would be via two prominent cycle parking entrances at ground level off Mac's Place, or via a dedicated entrance off Fetter Lane.
358. The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street, therefore the servicing is proposed to remain as existing. A cap for the number of vehicles servicing the development would be no more than 14 vehicles per day which would ensure the number of vehicles proposed, is equal to or less than the estimated existing situation. The applicant was required to demonstrate how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, it would not be possible to deliver the new pedestrian route through, due to space limitations of the site. Therefore,

on balance, on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.

359. The daylight and sunlight assessment demonstrates that there would be some loss of amenity in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most impacted rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole. All of the windows assessed would receive more than 0.8 times their former value and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.
360. The submitted sun on ground assessment demonstrates that the nearby residential and public open spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE Guidelines. The overshadowing assessment of 95 Fetter Lane (commercial) undertaken on 21 March showed that the eastern and western side roof terraces are likely to experience a noticeable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21st March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21st March. However, given the spaces are in commercial use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.
361. An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. The report assesses the proposals against Strategic Policy CS10 which seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended

occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.

362. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
363. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
364. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
365. Additional material considerations are as follows:
- Securing a development within the City, that would provide land uses which support the diversification, vitality and growth of the City as a world class business destination
  - Increase in a diverse retail provision on the site, enhancing the retail offer in, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
  - Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.
  - Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
  - The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through the use of high-quality faience materials to the new public house elevation and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms.
366. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan.

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

## **Background Papers**

### Application Documents

Design and Access Statement, Fletcher Priest Architects, May 2021  
Planning Statement, DP9, May 2021  
Accommodation Schedule, Fletcher Priest Architects, August 2021  
Statement of Community Involvement; DP9/YardNine, May 2021  
Energy Strategy Report; Waterman, May 2021  
Smart Infrastructure and Utilities Services Report, Waterman, May 2021  
Ecological Impact Assessment, Waterman, May 2021  
Biodiversity Net Gain Assessment, Waterman, May 2021  
Preliminary Environmental Risk Assessment, Waterman, May 2021  
Health Impact Assessment, Icen Projects Ltd, May 2021  
Equalities Statement, Icen Projects Ltd, May 2021  
Acoustic Report, Waterman, May 2021  
Air Quality Assessment (and Air Quality Neutral Assessment), Waterman, May 2021  
Daylight, Sunlight and Overshadowing Report, Point 2, May 2021  
Solar Glare and Light Pollution Report, Point 2, May 2021  
Wind Microclimate Assessment, RWDI, May 2021  
Outdoor Thermal Comfort Assessment, RWDI, May 2021  
Outline Construction Environmental Management Plan including Construction Logistics Plan, Waterman, May 2021  
Healthy Streets Transport Assessment, Waterman, May 2021  
Framework Travel Plan, Waterman, May 2021  
Framework Delivery and Servicing Plan, Waterman, May 2021  
Operational Waste Management Strategy, Waterman, May 2021  
Flood Risk Assessment, Foul Water Drainage and SUDs Strategy, Waterman, May 2021  
Arboricultural Impact Assessment, prepared by Waterman, May 2021  
Public House Comparison, Fletcher Priest Architects, July 2021  
Archaeological Desk Based Assessment, Waterman, July 2021  
Radiance Based Daylight Assessment, Point 2, July 2021  
Fire Safety Statement, Sweco UK Ltd, August 2021  
Sustainability Statement & BREEAM Pre-Assessment, Waterman, August 2021  
Whole Life Carbon Assessment and Circular Economy Statement, Waterman, August 2021  
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#### External

Letter Historic England 02/07/2021

Letter Tower Hamlets 21/07/2021

Letter Bird and Bird Ltd. 26/07/2021 [Objection]

Letter Southwark 30/07/2021

Letter Greenwich 30/07/2021

Letter Greater London Authority 10/08/2021

Emails DP9 21/07/2021, 27/07/2021

#### Internal

Email City of London Police 29/06/2021

Memo Lead Local Flood Authority 01/07/2021

Memo Department of Markets and Consumer Protection 09/07/2021

Memo Air Quality Officer 09/07/2021

Memo Access Team 15/07/2021

Memo Contract and Drainage Service 16/07/2021

Memo District Surveyors Office 19/08/2021

Email Cleansing Team 19/08/2021

## **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

Policy CG6 Increasing efficiency and resilience

Policy SD4 The Central Activities Zone (CAZ)

Policy SD5 Offices, and other strategic functions and residential development in the CAZ

Policy D1 London's form, character and capacity for growth

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering Good Design

Policy D5 Inclusive Design

Policy D8 Public realm

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire Safety

Policy D14 Noise

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E9 Retail, markets and hot food takeaways

Policy E10 Visitor infrastructure

Policy HC1 Heritage conservation and growth

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 SI8 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 (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)  
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)  
Town Centres SPG (July 2014)  
Mayor's Transport Strategy (2018)  
Culture 2016 strategy.

**Relevant Draft City Plan 2036 Policies**

AT1 Pedestrian movement  
AT2 Active travel including cycling  
AT3 Cycle parking  
CE1 Zero Waste City  
CR1 Overheating and Urban Heat Island effect  
CR3 Sustainable drainage systems (SuDS)  
CV1 Protection of existing visitor, art and cultural facilities  
CV5 Public Art  
DE1 Sustainability requirements

DE2 New development  
DE3 Public realm  
DE5 Terraces and viewing galleries  
DE6 Shopfronts  
DE8 Daylight and sunlight  
DE9 Lighting  
HE1 Managing change to heritage assets  
HE2 Ancient monuments and archaeology  
HL1 Inclusive buildings and spaces  
HL2 Air quality  
HL3 Noise and light pollution  
HL4 Contaminated land and water quality  
HL9 Health Impact Assessments  
HS3 Residential environment  
OF1 Office development  
OS1 Protection and Provision of Open Spaces  
OS2 City greening  
OS3 Biodiversity  
OS4 Trees  
S1 Healthy and inclusive city  
S2 Safe and Secure City  
S4 Offices  
S5 Retailing  
S6 Culture, Visitors and the Night -time Economy  
S7 Smart Infrastructure and Utilities  
S8 Design  
S9 Vehicular transport and servicing  
S10 Active travel and healthy streets  
S11 Historic environment  
S12 Tall Buildings  
S13 Protected Views  
S14 Open spaces and green infrastructure  
S15 Climate resilience and flood risk  
S16 Circular economy and waste  
S27 Planning contributions

SA1 Crowded places  
SA3 Designing in security  
VT1 The impacts of development on transport  
VT2 Freight and servicing  
VT3 Vehicle Parking

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

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)  
City of London Thermal Comfort Guidelines (CoL 2020)  
Planning Obligations SPD (CoL, July 2014)  
Open Space Strategy (COL 2016)  
Office Use SPD (CoL 2015)  
City Public Realm (CoL 2016)  
Cultural Strategy 2018 – 2022 (CoL 2020)  
Relevant Conservation Area Summaries

## Relevant Local Plan Policies

### ***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
  - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
  - b) provide a high quality environment;
  - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
  - d) have regard to biodiversity and the creation of green corridors;
  - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

### ***DM19.2 Biodiversity and urban greening***

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

### ***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.

### ***DM20.4 Retail unit sizes***

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

### ***DM21.3 Residential environment***

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

### ***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.

### ***DM1.2 Protection of large office sites***

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

### ***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

### ***DM1.5 Mixed uses in commercial areas***

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

### ***DM3.2 Security measures***

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;



f)an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

### ***DM3.5 Night-time entertainment***

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

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

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

### ***CS4 Seek planning contributions***

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

### ***CS10 Promote high quality environment***

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

### ***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 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.

#### ***CS11 Encourage art, heritage and culture***

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

#### ***DM11.2 Public Art***

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

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;

- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

### ***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.

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

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

### ***DM12.5 Historic parks and gardens***

1. To resist development which would adversely affect gardens of special historic interest included on the English Heritage register.
2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

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

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

### ***CS14 Tall buildings in suitable places***

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

### ***CS15 Creation of sustainable development***

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

### ***DM15.1 Sustainability requirements***

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
  - a) BREEAM or Code for Sustainable Homes pre-assessment;
  - b) an energy statement in line with London Plan requirements;
  - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

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

### ***DM15.2 Energy and CO2 emissions***

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
  - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
  - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
  - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
  - d) anticipated residual power loads and routes for supply.

### ***DM15.3 Low and zero carbon technologies***

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

### ***DM15.4 Offsetting carbon emissions***

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

#### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

#### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.



6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

#### ***DM15.7 Noise and light pollution***

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

#### ***DM15.8 Contaminated land***

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

#### ***DM16.1 Transport impacts of development***

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport

implications during both construction and operation, in particular addressing impacts on:

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

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

### ***DM16.2 Pedestrian movement***

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

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

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

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

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

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

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

### ***DM16.3 Cycle parking***

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

### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

#### ***DM17.1 Provision for waste***

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

#### ***DM17.2 Designing out construction waste***

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

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

#### ***CS18 Minimise flood risk***

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

#### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and

other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

***CS19 Improve open space and biodiversity***

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

## SCHEDULE

APPLICATION: 21/00534/FULMAJ

**100 And 108 Fetter Lane London EC4A 1ES**

**Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)), comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.**

**[For the avoidance of doubt this application relates to 'Option B' as set out in the application documents. A separate application for 'Option A' is under consideration and is the subject of separate consultation and assessment].**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Prior to 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.
- 3 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.

- 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, DM15.2, 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 Prior to the commencement of any works on site, details shall be submitted to and approved in writing by the Local Planning Authority showing the means of protection of the trees within St. Dunstan-in-the-West burial ground including their root system and the approved details shall be implemented prior to and during the course of the building works as appropriate.

REASON: To ensure the protection of the adjacent trees in accordance with the following policies of the Local Plan: DM10.4, DM19.2. These details are required prior to commencement in order that any changes

to satisfy this condition are incorporated before the design is too advanced to make changes.

- 6 The demolition shall not be carried out other than in accordance with the Demolition Environmental Management Plan and the Construction Logistics Plan by Waterman dated August 2021 hereby approved.  
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.
- 7 Prior to the commencement of demolition the developer/demolition contractor shall sign up to the Non-Road Mobile Machinery Register. The demolition 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.
- 8 Prior to the commencement of construction the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The construction 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.
- 9 Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the



potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

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

- 10 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.

- 11 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the 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 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.

- 12 No works except demolition to basement slab level shall take place until arrangements have been made for an archaeological "watching brief" to monitor development groundworks and to record any archaeological evidence revealed. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. Details of these arrangements shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the work.

REASON: To ensure an opportunity is provided for the archaeology of the site to be investigated and recorded in accordance with the following policy of the Local Plan: DM12.4.

- 13 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 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: green roofs, blue roofs, rain gardens, attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.3 l/s from the proposed outfall and provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 132m<sup>3</sup>.
  - (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of construction work.
  - (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
- REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
- 15 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
- REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 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 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.
- 18 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.
- 19 Details of the position and size of the green roof(s)/wall(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.  
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 20 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works

thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

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

- 21 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 pocket park, pedestrian routes, and terraces. 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.

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

- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
- (b) details of the proposed new facade(s) and flank wall(s) including the treatment of the jewel building and Greystoke Place elevation including typical details of the fenestration and entrances;
- (c) details of the embossing, stamping and decorative elements of the development;
- (d) details of ground floor elevations;
- (e) details of the ground floor office entrance(s);
- (f) details of windows and external joinery;
- (g) details of all soffits, hand rails and balustrades;
- (h) details of the proposed external terraces (including balustrades and handrails);
- (i) details of junctions with adjoining premises including the St. Dunstan in the West Burial Ground and the retained White Swan Public House;;
- (j) details of the integration of window cleaning equipment and the garaging thereof, plant, plant enclosures, flues, fire escapes and other excrescences at roof level;
- (k) details of ventilation and air-conditioning;

(l) details of all ground level surfaces including materials to be used;

(m) details of the proposed public route through the development including of the proposed gates, the proposed planting layout, the proposed seating, the proposed landscaping and the proposed elevations and soffits; and

(o) details of repairs and external refurbishment of the retained White Swan public house.

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.

- 23 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.

- 24 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.

- 25 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.

- 26 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority 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.
- 27 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.  
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.
- 28 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.  
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.  
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
- 29 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the

finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.  
REASON: REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

- 30 (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.
- 31 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 204 long stand and 28 short stay pedal cycle spaces. 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.
- 32 A minimum of 5% of the long stay cycle spaces shall be accessible for adapted cycles.  
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling B, emerging City Plan policy 6.3.24.
- 33 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.

- 34 The threshold of the new pedestrian route 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.
- 35 The roof terraces hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 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.
- 36 No amplified or other music shall be played on the roof terraces.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 37 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.  
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
- 38 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.
- 39 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety
- 40 The area within the development marked as cafe or flexible commercial unit on the floorplans at ground level hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country

Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020)) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.3.

- 41 The development shall provide:
- 14,428sq.m (GEA) of office floorspace (Class E);
  - 244sq.m(GEA) Flexible Commercial Floorspace (Class E); and
  - 68sq.m (GEA) flexible retail, restaurant, cafe floorspace (Class E).
- REASON: To ensure the development is carried out in accordance with the approved plans.
- 42 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: FLN-FPA-XX-XX-DR-A-01001 Rev P01; FLN-FPA-XX-B1-DR-A-20102 Rev P03; FLN-FPA-XX-GF-DR-A-20103 Rev P06; FLN-FPA-XX-M1-DR-A-20104 Rev P05; FLN-FPA-XX-ZZ-DR-A-20105 Rev P04; FLN-FPA-XX-04-DR-A-20106 Rev P04; FLN-FPA-XX-05-DR-A-20107 1 Rev P04; FLN-FPA-XX-06-DR-A-20108 Rev P04; FLN-FPA-XX-07-DR-A-20109 Rev P05; FLN-FPA-XX-08-DR-A-20110 Rev P05; FLN-FPA-XX-09-DR-A-20111 Rev P04; FLN-FPA-XX-10-DR-A-20112 Rev P04; FLN-FPA-XX-11-DR-A-20113 Rev P04; FLN-FPA-XX-12-DR-A-20114 Rev P04; FLN-FPA-XX-12-DR-A-20115 Rev P04; FLN-FPA-XX-RF-DR-A-20116 Rev P02; FLN-FPA-XX-ZZ-DR-A-21101 Rev P01; FLN-FPA-XX-ZZ-DR-A-21102 Rev P02; FLN-FPA-XX-ZZ-DR-A-21103 Rev P01; FLN-FPA-XX-ZZ-DR-A-21104 Rev P02; FLN-FPA-XX-ZZ-DR-A-22101 Rev P01; Demolition Environmental Management Plan by Waterman dated May 2021; Construction Logistics Plan by Waterman dated August 2021.
- 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.

## **Background Papers**

### Application Documents

Design and Access Statement, Fletcher Priest Architects, May 2021

Planning Statement, DP9, May 2021

Accommodation Schedule, Fletcher Priest Architects, August 2021

Statement of Community Involvement; DP9/YardNine, May 2021

Energy Strategy Report; Waterman, May 2021

Smart Infrastructure and Utilities Services Report, Waterman, May 2021

Ecological Impact Assessment, Waterman, May 2021

Biodiversity Net Gain Assessment, Waterman, May 2021

Preliminary Environmental Risk Assessment, Waterman, May 2021

Health Impact Assessment, Icen Projects Ltd, May 2021

Equalities Statement, Icen Projects Ltd, May 2021

Acoustic Report, Waterman, May 2021

Air Quality Assessment (and Air Quality Neutral Assessment), Waterman, May 2021

Daylight, Sunlight and Overshadowing Report, Point 2, May 2021

Solar Glare and Light Pollution Report, Point 2, May 2021

Wind Microclimate Assessment, RWDI, May 2021

Outdoor Thermal Comfort Assessment, RWDI, May 2021

Outline Construction Environmental Management Plan including Construction Logistics Plan, Waterman, May 2021

Healthy Streets Transport Assessment, Waterman, May 2021

Framework Travel Plan, Waterman, May 2021

Framework Delivery and Servicing Plan, Waterman, May 2021

Operational Waste Management Strategy, Waterman, May 2021

Flood Risk Assessment, Foul Water Drainage and SUDs Strategy, Waterman, May 2021

Arboricultural Impact Assessment, prepared by Waterman, May 2021

Public House Comparison, Fletcher Priest Architects, July 2021

Archaeological Desk Based Assessment, Waterman, July 2021

Radiance Based Daylight Assessment, Point 2, July 2021

Fire Safety Statement, Sweco UK Ltd, August 2021

Sustainability Statement & BREEAM Pre-Assessment, Waterman, August 2021

Whole Life Carbon Assessment and Circular Economy Statement, Waterman, August 2021

Response to Access Comments, Fletcher Priest Architects, 11/08/2021

Response to TfL Comments, Waterman, 16/08/2021

Existing Plans: FLN-FPA-XX-B1-DR-A-10001, FLN-FPA-XX-GF-DR-A-10002, FLN-FPA-XX-01-DR-A-10003, FLN-FPA-XX-02-DR-A-10004, FLN-FPA-XX-03-DR-A-10005, FLN-FPA-XX-04-DR-A-10006, FLN-FPA-XX-05-DR-A-10007, FLN-FPA-XX-06-DR-A-10008, FLN-FPA-XX-07-DR-A-10009, FLN-FPA-XX-RF-DR-A-10010, FLN-FPA-XX-ZZ-DR-A-11001, FLN-FPA-XX-ZZ-DR-A-11002, FLN-FPA-XX-ZZ-DR-A-11003, FLN-FPA-XX-ZZ-DR-A-11004, FLN-FPA-XX-ZZ-DR-A-12001.

#### External

Letter Historic England 02/07/2021

Letter Tower Hamlets 21/07/2021

Letter Bird and Bird Ltd. 26/07/2021 [Objection]

Letter Southwark 30/07/2021

Letter Greenwich 30/07/2021

Letter Greater London Authority 10/08/2021

Emails DP9 21/07/2021, 27/07/2021

#### Internal

Email City of London Police 29/06/2021

Memo Lead Local Flood Authority 01/07/2021

Memo Department of Markets and Consumer Protection 09/07/2021

Memo Air Quality Officer 09/07/2021

Memo Access Team 15/07/2021

Memo Contract and Drainage Service 16/07/2021

Memo District Surveyors Office 19/08/2021

Email Cleansing Team 19/08/2021

Gideon Stothard  
The Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

**Via Email Only:** [Gideon.Stothard@cityoflondon.gov.uk](mailto:Gideon.Stothard@cityoflondon.gov.uk)

Dear Gideon,

**Letter of Objection to the Proposed Development at 100 and 108 Fetter Lane, London, EC4A 1ES  
– Ref. No. 21/00454/FULMAJ**

Bird & Bird LLP wish to lodge a formal objection with respect to the following planning application and proposal for 100 and 108 Fetter Lane, London, within the City of London Corporation.

<b>Application Ref:</b>	21/00534/FULMAJ
<b>Site Address:</b>	100 And 108 Fetter Lane London EC4A 1ES
<b>Proposal:</b>	'Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)), comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works. [For the avoidance of doubt this application relates to 'Option B' as set out in the application documents. A separate application for 'Option A' is under consideration and is the subject of separate consultation and assessment].'

**Background:**

Bird & Bird LLP lease and administer 12 New Fetter Lane, a 15-storey office building occupying a triangular site opposite to the abovementioned application site. For reference, an extract of the applicants' Design and Access Statement is attached which illustrates the location of the proposed development at 100 and 108 Fetter Lane in relation to 12 New Fetter Lane. Bird & Bird LLP would like to raise a number of objections to the application, based on the planning merits of the scheme.

The basis of this objection is set out below:

**Inappropriate Bulk, Massing and Overshadowing**

**Harm to the setting of a Statutorily Listed Heritage Asset**

The London Plan Policy HC1 (Heritage conservation and growth) sets out that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

The Local Plan Policy DM 12.1 (Managing change affecting all heritage assets and spaces) states that development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their setting.

Abu Dhabi & Amsterdam & Beijing & Bratislava & Brussels & Budapest & Copenhagen & Dubai & Dusseldorf & Frankfurt & The Hague & Hamburg & Helsinki & Hong Kong & London & Luxembourg & Lyon & Madrid & Milan & Munich & Paris & Prague & Rome & San Francisco & Shanghai & Singapore & Stockholm & Sydney & Warsaw  
Satellite Office: Casablanca

The Local Plan Policy DM 10.4 (Environmental enhancement) sets out that developments should have regard to the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City.

In addition, the emerging Local Plan Spatial Strategy 9 states that the City will balance growth with the protection and enhancement of the City's unique heritage assets and open spaces. The emerging Local Plan Strategic Policy S11 (Historic Environment) states that the City's heritage assets, their significance and settings will be positively managed by conserving and enhancing heritage assets and their settings to ensure that the City's townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing.

Emerging Policy HE1 (Managing Change to Heritage Assets) sets out that development should conserve and enhance the special architectural or historic interest and the significance of heritage assets and their settings.

We object to these proposals on the grounds of harm caused to the setting of a statutorily listed heritage asset. No. 100 and 108 Fetter Lane are within the immediate setting of the Grade II listed former offices of YRM (NHLE: 1242612), designated in November 1995 (amended listing description 2013) for its architectural interest. The listing description describes the setting as:

*'a sensitive integration of a frankly modern office building within an ancient street pattern, relating unusually well both to the narrow alleyways to the north and to the former churchyard with its retained boundary walls and railings to the south.'*

The existing situation sees a single-storey red brick extension to No. 100 Fetter Lane being the closest element of the building to the Grade II listed asset. The proposals seek to demolish the entire building and for the new northern elevation to be a sheer wall of six storeys imposed upon the immediate setting of the listed building. We also consider the proposed new 12-storey building to be excessively tall given its proximity to a designated heritage asset. We consider this to be an inappropriate architectural response that would erode the existing sense of relief surrounding the listed building from the dense urban grain. This would be contrary to paragraph 200 of the National Planning Policy Framework (NPPF, 2021) by not preserving the building's existing setting and we do not assess this to better reveal its significance.

We also consider No. 100 and 108 Fetter Lane to possess heritage interest of their own, and in particular the architectural interest of The White Swan Public House and the polished stone podium level of the existing building. Although not formally included on a Local List by the Local Planning Authority, we believe the existing building merits being considered a non-designated heritage asset that is worthy of retention and that any loss of it would require a balanced judgement, as per paragraph 197 of the NPPF. The buildings were constructed in 1948 by T.P. Bennett & Sons, although the Public House has existed on the site of the current White Swan since the early-19<sup>th</sup> century, and we feel they make a positive contribution to their wider setting and our understanding of the historical development of Fetter Lane.

In light of the above, we consider that this application directly conflicts with London Plan Policy HC1, adopted Local Plan Policies DM 12.1, DM 10.4 and emerging Local Plan Spatial Strategy 9 and Policies S11 and HE1.

#### Loss of Sunlight and Daylight

It is noted that the relevant Building Research Establishment (BRE) Guidance focuses on the effects to residential neighbours with non-residential uses being considered less sensitive. However, the guidance does note that it can be applied to non-domestic buildings although target values are only provided for residential uses. This point needs to be borne in mind in considering the matter further.

Whilst the Applicant's Daylight, Sunlight And Overshadowing Report does not assess the impact of the proposed development on non-domestic properties, Appendix 8 (Transient Overshadowing Analysis Plots) of the report illustrates the location of shadows caused specifically from the proposed development at different times of the day and year. For the purpose of this assessment, the overshadowing was mapped during 21<sup>st</sup> March (Spring Equinox), 21<sup>st</sup> June (Summer Solstice) and 21<sup>st</sup> December (Winter Solstice).

It is clear from this assessment that the proposed development would cause substantial overshadowing on 12 New Fetter Lane, which currently enjoys an open aspect to the West, owing to the shift in townscape character with the lower rise Conservation Area.

There is a plethora of research which has assessed the effects of exposure to natural light in the workplace which have shown that natural light improves the health and productivity of office workers and also improves the monetary value of spaces. This is reflected within both the City of London's adopted and emerging Local Plan, which sets out that appropriate levels of daylight and sunlight is important for the mental health of workers.

As such, it is considered that the proposed development at 100 And 108 Fetter Lane would unduly impact the current sunlight and daylight that 12 New Fetter Lane currently benefits from and would greatly increase the need for artificial lighting within the office environment, leading to an inferior working environment.

### Light Pollution

Local Plan Policy DM 15.7 (Noise and light pollution) sets out that internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing. This is echoed within the City of London's emerging Local Plan.

Local Plan Policy DM 21.3 (Residential environment) states that the amenity of existing residents within identified residential areas will be protected by resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance and requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

The Applicant's Solar Glare and Light Pollution Report concludes that there is likely to be a noteworthy increase [above existing levels] in the potential light pollution on the bedroom windows of 2 Greystoke Place. The report further sets out that this was expected as the proposed development is both larger and closer than the existing building to 2 Greystoke Place.

As such, it is considered that the proposed development at 100 And 108 Fetter Lane would unduly impact residential amenity currently benefitted by residents of 2 Greystoke Place. This is considered contrary to Local Plan Policy DM 15.7 and DM 21.3.

### **Summary**

As evidenced in this letter of objection, there are serious shortfalls in the scheme proposed under ref. No. 21/00454/FULMAJ.

Whilst Bird & Bird LLP supports sustainable and well-designed development proposals within the City of London, we object to the current scheme in the strongest terms on the grounds of harm caused to the significance and immediate setting of a statutorily listed heritage asset. The proposed development is considered to be excessively tall given its proximity to this designated heritage asset and is an inappropriate architectural response that would erode the existing sense of relief surrounding the listed building from the dense urban grain. This directly conflicts with adopted and emerging national, regional and local planning policy.

Bird & Bird LLP further objects on the grounds that the proposed development would cause substantial overshadowing on 12 New Fetter Lane, which would impact the mental health of office workers and greatly increase reliance upon artificial lighting, leading to an inferior working environment.

On this basis, we recommend that the City of London refuse this planning application on the grounds that it does not comply with either National, Regional or Local Planning policy. Should any further information be submitted pursuant to the planning application at 100 And 108 Fetter Lane, Bird & Bird LLP request that they are informed at all stages, and reserve the right to provide further detailed comments if and when such additional information would become available.



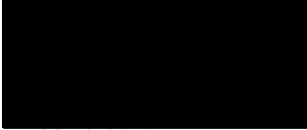
## Western View





*The above figure was submitted as part of the Design and Access Statement, submitted in support of this application ref.no 21/00454/FULMAJ.*

Yours Sincerely



Mark Malone

**Facilities Director**

For and on behalf of Bird & Bird LLP.

# 100 And 108 Fetter Lane

Local Planning Authority: City of London  
local planning authority reference: 21/00534/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

This report covers two proposals (Option A - 0732 and Option B - 0738) for the same application site.

Option A (0732) - Demolition of 100 and 108 Fetter Lane and construction of a new building for office use (Class E) and a public house comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

Option B (0738) - Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)), comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

## The applicant

The applicant is **BREO Hundred Ltd** and the agent is **DP9**.

## Strategic issues summary

**Land Use Principles:** The site is located in the CAZ and within the City of London which encourages the provision of new office space. The principle of office use is supported. Subject to the assessment by the City of the value of the public house, both options with regards to the re-provision of the public house or retaining it are supported in principle. (Paragraphs 22 – 29).

**Offices:** The City of London is projecting office growth of 1,150,000sqm of office space between 2011-2026. Its proposed submission draft plan 2036 projects 2,000,000 sqm of office space between 2016 and 2036. This proposal will help support this requirement. (Paragraphs 30 – 33).

**Urban Design:** The approach to scale, massing and architecture is supported. The improved public realm increases connectivity and permeability of the area, which is

supported, however the applicant should consider ensuring access is not restricted to certain times of the day. (Paragraphs 34 – 51)

**Heritage:** The scheme is considered to have a positive impact on the setting of the nearby Grade II building. The impact on views, including strategic views, are acceptable. A watching brief during excavation is recommended in relation to archaeology remains. (Paragraphs 52 – 58)

**Transport:** An Active Travel Plan and a contribution of £220,000 for cycle hire is required. Works required should be secured under Section 278 or as part of the Section 106 Agreement. Further consideration is needed in regard to onsite disabled persons parking and short-stay cycle parking. A DSP, CLP and a cycle promotion plan are required. (Paragraphs 59 – 73)

**Sustainable Infrastructure:** Urban greening, biodiversity net gain, flood risk and sustainable drainage comply with policy requirements. Further information is required for energy, circular economy and water efficiency (for Option A). The applicant has provided additional information in relation to points raised for energy, which is currently being reviewed. The Whole Life Carbon Assessment has been re-submitted in the correct format and is currently under review. No information has been provided in relation to digital infrastructure therefore compliance with London Plan Policy SI 6 cannot be determined at this stage. (Paragraphs 74 – 101)

**Environment:** Air quality impacts are generally acceptable. Further clarification is required, and the applicant has provided additional information in relation to points raised. This is currently being reviewed. (Paragraphs 102 – 105)

### **Recommendation**

That City of London Council be advised that whilst the proposal is supported in principle, the application does not fully comply with the London Plan for the reasons set out in paragraph 110. Where the associated concerns within this report are addressed, the application may become acceptable in strategic planning terms.

## Context

1. On 01 July 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 Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
  - Part 4 - Consultation required by the Secretary of State under article 10 3 of the GDPO
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 City to determine it itself. In this case, the City 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](http://www.london.gov.uk).

## Site description

5. The 0.14 hectare site comprises 100 Fetter Lane, 108 Fetter Lane and Greystoke Place. It is bounded by Fetter Lane to the east, Bream's Buildings to the south, St Dunstan's Gardens and Mac's Place to the west and 98 Fetter Lane to the north.
6. The surrounding area is characterised by large tall steel and glass modern office buildings. To the west, there is more of a mix of uses with a much finer historical grain reflected in the narrow streets and 'passageways' of the Chancery Lane conservation area. Within close proximity there are only three residential properties with two of them not directly visible from the site due to the tight urban fabric.
7. The existing building is not listed, nor is it located within a conservation area. Immediately adjacent to the west of the site, beyond Mac's Place, is No. 2 Greystoke Place (Grade II listed). The Chancery Lane Conservation Area is located nearby to the west and north, with a buffer zone of buildings separating it from the site boundary. The whole of the City is an Archaeological Priority Zone.
8. The site is located within Flood Zone 1 and the entire City of London has been designated an Air Quality Management Area (AQMA).
9. The A201 Farringdon Road is the nearest section of the Transport for London Road Network (TLRN), approximately 300 metres east of the site. The nearest part of the Strategic Road Network (SRN) is A40 High Holborn, 180 metres north.
10. Chancery Lane Station is within 400 metres of the site and is served by Central line services. Farringdon station is also within 500 metres of the site and provides access to Circle, Hammersmith & City, Metropolitan underground lines and Thameslink rail services. From 2022 it will be served by the Elizabeth line. City Thameslink station is located 700 metres to the south east of the site.
11. The nearest bus stops are located on High Holborn, providing access to 5 bus routes.

12. The site therefore achieves a Public Transport Access Level (PTAL) of 6b, where 6b represents the highest level of connectivity

## **Details of this proposal**

13. The application is for the demolition of 100 and 108 Fetter Lane and construction of a new building for office use (Class E), creation of a new pedestrian route and pocket square.
14. The site includes an existing public house at 108 Fetter Lane which is occupied by a third party. Subject to negotiations with the third party, the applicant proposes to demolish the public house alongside 100 Fetter Lane to enable the full redevelopment of the site (Option A). In this option, a new replacement public house will be provided in the north eastern corner of the site. This is the preferred option.
15. In the case the applicant is unable to incorporate 108 Fetter Lane (public house) into the redevelopment, an alternative option (covered in a separate planning application) is proposed to retain the existing pub and build around it (Option B). In this option, a flexible commercial unit (Class E(a)(b)(c)(d)) will be provided in the north eastern corner of the site where, in Option A a new public house would otherwise be sited.
16. Both options are very similar in impacts and are therefore being considered under the same report. Any differences in relation to compliance with London Plan policies are explicitly set out in this report.

## **Case history**

17. There is no strategic planning history for the site.
18. There have been a number of pre application discussions with the City of London although none with the Mayor.

## **Strategic planning issues and relevant policies and guidance**

19. 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 (January 2015); and, the London Plan 2021.
20. The following are also relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance;
  - Proposed Submission Draft City Plan 2036 (March 2021)
21. 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
Central Activity Zone	London Plan
Culture	London Plan; Mayor's Cultural Strategy
Urban design	London Plan; Character and Context SPG; Public London Charter draft LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG
Heritage	London Plan
Strategic Views	London Plan; London View Management Framework 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;
Transport and parking	London Plan; the Mayor's Environment Strategy;
Biodiversity	London Plan; the Mayor's Environment Strategy;

## **Land Use Principles**

### Office

22. The site is within the City of London and Central Activity Zone. London Plan Policy SD4 recognises the CAZ as an internationally and nationally significant office location. London Plan Table 6.1 indicates that the CAZ [and the Northern Isle of Dogs] are projected to accommodate more than 367,000 additional office jobs with a net increase of 3.5 million sqm (GIA) of office floorspace over the period 2016-2041.
23. Policy SD4 states that the nationally and internationally significant office functions of the CAZ should be supported, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values. This is reinforced by London Plan Policy E1 that also supports the provision of new offices, especially in the CAZ.
24. The proposed development will deliver up to 13,282 sqm GIA of new office floorspace, which is equivalent to a 121% increase of the existing provision.
25. The principle of office use is therefore supported.

### Public House

26. The proposal includes two options. Option A to demolish the existing public house and to re-provide it in the north eastern corner of the site; and option B, to building around the existing pub.
27. London Plan Policy HC7 states that public houses should be protected where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. Policy HC7 also states that new public houses should be supported where they would stimulate town centres, Cultural Quarters, the night-time economy and mixed-use development.
28. The City should come to a view as to whether the pub has any heritage, economic, social or cultural value. They are advised to contact the Mayor's cultural at risk team for further information. The current condition of the pub alongside the proposal to re-provide it, however, is a material consideration.
29. Subject to negotiations with the third party, the redevelopment of the pub as part of the wider development proposals or its retention within the scheme are both supported in principle.

## **Office and business space**

30. London Plan Policy E1 states that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development; and that increases in the current stock of offices should be supported in certain locations [such as the CAZ]. Policy CS1 of the City of London Local Plan 2015 aims to increase the City's office floorspace by 1,150,000sqm between 2011-2026, to provide for an expected growth in workforce of 55,000 workers. The City's Proposed Submission Draft 2036 is currently projecting office

growth in the City of 2,000,000 sqm between 2016 and 2036. This proposal will help support those requirements.

31. London Plan Policy E2 states that development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.
32. The proposal is designed to provide both large floor plates, which would be suitable for single large occupiers, as well as locating the core at the side of the building to enable the floorspace to be used flexibly, allowing for floors to be subdivided, providing floorplates ranging from 980 sqm to 480 sqm which will be attractive to SME occupiers
33. In Option B, where the existing pub is retained and a flexible commercial floorspace is provided instead, will also provide opportunity for additional space for a range of potential occupiers.

## **Urban design**

34. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

### Optimising development capacity, layout and architecture

35. The application has undergone 7 pre application meetings with the City of London since March 2021 to develop the proposals and refine its design; and there is evidence the applicant has responded positively to these discussions. It is therefore considered the scheme has followed a design-led approach to optimising the development capacity of the site.
36. The layout is generally well considered and the increased permeability around the site with public amenity fronting onto the churchyard is welcomed.
37. The design makes a positive contribution to the streetscape and public realm with clear and well-defined entrances. The attention to detail and quality of materials is also well considered and the simple approach to the building arrangement and its architecture is supported.
38. The location of the pub in either option does not raise any strategic concerns, although Option B which retains the pub in its existing location helps to knit the scheme into the character and scale of the immediate context.

### Scale and massing

39. The City of London Plan 2015 identifies tall buildings as those that significantly exceed the height of their general surroundings with the City of London Local Plan Proposed Submission Draft March 2021 identifying them as over 75m above Ordnance Datum (AOD). The proposed development, at 13 storeys (56.9m AOD), is therefore not considered a tall building.



40. The form and massing have been considered through townscape testing and views analysis and the resulting height/mass sits comfortably with the nearby buildings on Fetter Lane (including the taller no.12 Fetter Lane). GLA officers agree that the development has been designed to respect the sensitivity of its location and acts as a transition in scale from the smaller buildings to the west within the Chancery Lane conservation area and the taller buildings to the south and east.

### Visual Impact

41. The Design and Access Statement (DAS) assessed a total of 6 local townscape views, 4 LVMF views and 2 riparian views, which were identified and agreed by the Council. The DAS only assessed the proposed development in Option A as there was no material effect on the views, except for view 4 (Fetter Lane North), view 5 (Fetter Lane South), and view 7 (Nevill Lane), and in those views, GLA officers agree that the overall effect of the development would be the same for both Option A and Option B.
42. GLA officers agree with the conclusion of the view assessment in the DAS in that, overall, in the local townscape views there is either no impact or in some cases, moderately beneficial impact. Although the DAS concludes in view 1 (along Breems Buildings from the Conservation Area looking East), view 5 (Fetter Lane (South)) and View 07 (Looking West from Nevill Lane), there is a major beneficial impact, GLA officers do not agree with the extent of those conclusions for view 5 and 7 and instead considers the impact more moderately beneficial in those cases.
43. Four LVMF views were agreed; view 5A.2 Greenwich Park, view 15B.2 Waterloo Bridge looking east, view 16B.1 Gabriel's Wharf and view 17B.1 Golden Jubilee Hungerford Footbridge. GLA officers agree with the assessment that in views 15B.2 and 17B.1, there is no impact as the development is not visible behind the existing buildings; and in view 16B.1, the impact is moderately beneficial, contributing to the cluster of existing buildings around New Square.
44. In view 5A,2 Greenwich Park, the site sits within the Background Wider Setting Consultation Area of the Protected Vista. While the overall height of the proposed development exceeds the threshold height of the Background Wider Setting Consultation Area, the proposed building sits behind the existing 6 New Street Square and 12 New Fetter Lane buildings which results in it not being visible. GLA officers therefore agree with the conclusions set out in the DAS that it therefore preserves the definition of the dome and upper parts of the western towers of St Paul's Cathedral in the context of the existing view.

### Public realm

45. London Plan Policy D8 states that development proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, easy to understand, service and maintain; and that landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. London Plan G4 also states that development proposals should, where possible, create areas of publicly accessible open space, particularly in areas of deficiency.
46. The development proposes the creation of a new publicly accessible route from Mac's Place to Bream's Buildings as well as the creation of sunken pocket garden.

In Option A, part of Greystoke Place will be widened, and in both options the building line will be stepped away from St Dunstan's Gardens to create a new pedestrian through-route linking Greystoke Place, Mac's Place and Bream's Buildings. This provides improved connectivity and permeability through the site, which is welcomed.

47. The landscaping is of high quality with a high amount of greenery. The greening and location of the amenity spaces that are accessed via the office positively adds to sense of place and provides an added degree of natural surveillance at certain times of the day. The overall design enhances the amount of active frontage, especially along Fetter Lane and Bream's building as well as opposite for St Dunstan Gardens, which is supported.
48. The pocket square, however, is proposed to be gated between 7pm and 8am. This should be publicly accessible at all times of the day in line with Policy D8 and D5.

#### Fire safety

49. In line with London Plan Policy D12, development proposals must achieve the highest standards of fire safety in relation to the building's construction; means of escape; features which reduce the risk to life; access for fire service personnel and equipment; and ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.
50. The application is supported by a Fire Safety Statement, however further information is required in relation building's construction and details of materials, means of escape, and confirmation that future modifications will take into account and not compromise the base build fire safety/protection measures set out in the Fire Statement. These measures should be secured as conditions /S106 as appropriate. In addition, the Statement is also required to include a reference to the named individual(s) and their specific qualifications to ensure that it has been prepared by a suitably qualified third party.

#### Inclusive access

51. London Plan Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design, ensuring they are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and that buildings are able to be entered, used and exited safely, easily and with dignity for all. The proposals set out a range of features that contribute to inclusiveness and accessibility, including surface level access and treatments, wayfinding, landscaping, wheelchair accessible toilets, hearing loops, lifts, appropriate circulation space, accessible roof terraces, etc.

### **Heritage**

52. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance and should avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 states that 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".

53. In addition, the NPPF states that when considering the impact of a development 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. 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. In line with case law, any harm identified must be given considerable importance and weight.
54. The NPPF also 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.
55. The building is not listed nor located in a conservation area and it is not considered to be an undesignated heritage asset. There are two conservation areas close by; Chancery Lane to the west and Fleet Street to the south, as well as a number of listed buildings; primarily 2 Greystoke Place (Grade II) immediately adjacent to the west.
56. GLA officers agree that the proposed design will complement 2 Greystoke Place without trying to compete with it architecturally and is considered an appropriate response to the heritage asset that will preserve its setting, significance and heritage value.
57. The impact on the setting of Chancery Lane Conservation Area Character is also considered less than substantial harm due to the buffer zone of buildings separating the Conservation Area from the site boundary and the stepping up effect towards to tall buildings to the south and east.
58. The whole of the City is an Archaeological Priority Zone. London Plan Policy HC1 states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. The submitted archaeological report concludes that there is low potential of prehistoric, Roman, Saxon/ early medieval, medieval remains, and low to moderate for post medieval remains. All are likely to be of local or regional significance. Due to the construction of the existing basement and the severe levels of truncation relating to previous bomb damage, the report recommends a limited watching brief during excavation below existing foundations levels. This should be conditioned.

## **Transport**

### Trip Generation and Public Transport impacts

59. In line with London Plan Policy T4, the applicant has undertaken a trip generation assessment to evaluate the impacts of the proposed development

on public transport capacity. The assessment concludes that the proposed scheme is expected to create a minor increase in trips when compared to the existing building. As the existing building is mostly vacant, the gross increase in trips should be considered.

60. Overall, it is expected that the increase in demand can be absorbed via active travel and public transport in line with London Plan Policy T4.

### Healthy Streets

61. The pedestrian route from Greystoke Place and Mac's Place to the north and west of the site will be extended by the proposed development to link to Breams Buildings which is strongly supported. Additional footway capacity will also be enabled the junction with Fetter Lane through the proposed chamfered design of the building. Whilst this is supported, the applicant should confirm that footways will be at least 2m wide and that pedestrian comfort levels (PCLs) of at least B+ during the peak periods and are in accordance London Plan Policies D8 and T2. Clarification is required on the new pedestrian route proposed, which should be publicly accessible at all times of day in perpetuity and secured as such.
62. The proposals are not supported by an Active Travel Zone (ATZ) Assessment. This should be undertaken and should consider the quality of key walking routes from the site to local transport stops and stations. The applicant does, however, identify accident data for local routes surrounding the site. This data indicates a potential safety issue at the junction of New Fetter Lane and Bartlett Court to the west and the pedestrian crossing leading to Nevill Lane. In line with the Mayor's Vision Zero ambition, improvements should be considered with the City Corporation and secured through section 278 or 106 as appropriate.
63. Such works would enable the development to support the MTS and Mayor's Vision Zero Action Plan, by designing and helping to deliver a safe, pleasant local walking environment, specifically by improving key pedestrian routes between the site and local bus stops and stations, which would be used by occupiers and visitors to the proposed development.

### Access, parking and servicing

64. There is currently no vehicle access to the site with all deliveries, servicing and refuse collection taking place on street. The constraints of the site mean that the proposed development would also be serviced on street. Whilst the car free element of the scheme is welcomed in this location, an onsite disabled parking space would usually be required. The applicant advises that the City Corporation 'red badge' scheme applies in this area; clarification is required as to the number, location and capacity of spaces.
65. Approximately 14 servicing trips per day are forecast, similar to existing. They will be managed through a Delivery & Servicing Plan that promotes offsite consolidation. This should be secured by condition or through the section 106 agreement to support London Plan Policies T2 and T7(F), which requires new development to reduce road danger from freight trips.

### Cycle Hire

66. There is a Cycle Hire docking station to the north east of the site on New Fetter Lane with 21 docking points. Cycleway 6 extends along Farringdon Road to the east.
67. The proposed development will increase demand for TfL Cycle Hire in the local area. The area already suffers from significant docking station capacity pressure. A contribution of £220,000 for either a new or expanded cycle hire station to cater for the new demand likely to be generated by this development should therefore be secured as part of the S106.

### Cycle Parking

68. The long stay cycle parking proposed would meet the minimum standards of the London Plan, which is welcomed. 28 short stay cycle parking spaces are required in connection with Option A to meet the minimum standards set out in Policy T5 (Cycling). However, only 12 short stay cycle spaces are proposed in the public realm in accordance with the London Cycling Design Standards (LCDS). The remaining short staying parking would be provided in the long stay store. Given the limitations associated with the provision of the new pedestrian route from Mac's Place, this is noted. In line with London Plan Policy T5 D, where it is not possible to provide sufficient short-stay cycle parking on-site, the applicant should work with the City Corporation to identify suitable alternative on-street locations.
69. As stated in London Plan Policy T5 (B), all cycle parking should be designed and laid out in accordance with the LCDS. 3% accessible cycle spaces will be provided from the outset with scope to increase, which is acceptable. Where two-tier racks are provided, they should have a machinal or pneumatically assisted system for accessing the upper level and the rack itself must allow for double locking.
70. Access to cycle parking is proposed from Mac's Place and set out at ground floor. The applicant should ensure that the route from Breams Buildings is step free with crossovers where necessary. End of journey facilities will be provided in accordance with London Plan Policies T1 and T5.

### Managing Travel Demand

71. An outline Construction Environmental Management Plan (CEMP) has been provided. A full Construction Logistics Plan should be submitted in line with TfL guidance and secured by condition.
72. The applicant should ensure all construction vehicle movements are safe and support the Mayor's Vision Zero approach. All construction vehicles should meet the Direct Vision Standard and HGV safety permit for HGVs as part of the Mayor of London's Vision Zero plan to eliminate all deaths and serious injuries on London's transport network by 2041 (see TfL Direct Vision Standards). The full CLP should also commit to all construction vehicles serving the site being part TfL's Freight Operator Recognition Scheme (FORS).
73. Given the context of the location of the site in the City of London, a cycle promotion plan is required and should be secured and monitored through the section 106 agreement. This should set ambitious target for cycling.

## **Sustainable development**

### Energy strategy

- 74. London Plan Policy SI 2 requires development proposals to reduce carbon dioxide emissions in accordance with the energy hierarchy. Energy comments, which are summarised below, have been provided to the applicant and Council in full under a separate cover. The comments relate to both Option A and Option B which are broadly the same in terms of compliance with GLA energy policy.
- 75. The applicant has submitted further information in response to the cover note, which is currently being assessed, however the details are set out below until that further assessment is complete. Appropriate conditions will need to be secured by the City accordingly.
- 76. The applicant should submit the GLA's Carbon Emission Reporting spreadsheet in excel format; this has been developed to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors.

### Be Lean

- 77. Based on the information provided, the non-domestic element of the proposed development is estimated to achieve a reduction of 25 tonnes per annum (16%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development for option A or 15% for option B. The proposal for Waste Water Heat Recovery system to the shower is supported.

### Overheating

- 78. The applicant has demonstrated that the actual building's cooling demand is lower than the notional. A mixed-mode ventilation strategy is proposed which is welcomed.

### Be Clean

- 79. The applicant has identified planned and existing district heating networks within the vicinity of the development but is not proposing to investigate connection. They should contact relevant stakeholders to enquire about the feasibility of connection and whether there are other local heat network connection opportunities. Evidence of the correspondence should be submitted.
- 80. The applicant is proposing a communal heat network supplied by a centralised energy centre. It should be confirmed that all non-domestic building uses will be connected to the heat network. A drawing showing the route of the heat network linking all buildings/uses on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre.
- 81. The applicant should provide a commitment that the development is designed to allow future connection to a district heating network. Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network should be provided. This should include a single point of connection to the district heating network.
- 82. It appears that VRF heat pumps are proposed for some elements of the proposal. The strategy should maximise the heat loads that will be connected to the communal network and so can be served district heating in future.

### Be Green

83. The applicant proposes 30m<sup>2</sup> innovative louvre PV to suitable areas of the plant enclosure. This is welcomed. Example product details should be submitted to evidence this approach.
84. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas.
85. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met. The applicant should provide the capacity (kWp), total net area (m<sup>2</sup>) and annual output (kWh) of the proposed PV array.
86. Further information on the heat pumps should be provided. Further details are set out in the cover note.

#### Carbon Off-set payment

87. The applicant should confirm the carbon shortfall in tonnes CO<sub>2</sub> and the associated carbon offset payment that will be made to the borough. This should be calculated based on a net-zero carbon target for domestic and non-domestic proposals using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the City's carbon offset price. This should be secured through the S106 agreement.

#### Post construction monitoring

88. The applicant should review the 'Be seen' energy monitoring guidance to ensure that they are fully aware of the relevant requirements to comply with the 'be seen' policy. A commitment has been provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This should be secured through the S106 agreement. The first submission of the planning stage data should be provided to the GLA through the be seen planning stage webform at the planning submission stage, alongside the energy statement, or within eight weeks of planning approval.

#### Whole Life Carbon

89. The applicant has submitted a WLC report which shows a complete WLC assessment has been undertaken. However, this was not submitted in the required format. The applicant has now re-submitted and is currently under review. Conditions should be secured requiring the submission of a post-construction assessment to report on the development's actual WLC emissions.

#### Circular Economy

90. The applicant has provided justification as to why the refurbishment of the existing building is not suitable in line with London Plan Policy D3 and SI 7. They have also provided a Circular Economy Statement in line with Policy SI 7, however further information is required in relation to the strategic approach, key commitments, bills of material, recycling and waste reporting, operational waste, plans for implementation and end of life strategy.

91. Detailed comments are set out in full in a cover note that has been sent to the applicant and the City. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the City's planning committee to ensure that any conditions can be appropriately secured. In addition, a condition should be secured to provide a Post Completion Report.

#### Urban greening

92. London Plan Policy G5 states that a target of 0.3 should be used for predominantly commercial development. Option A achieves a UGF of 0.34 which complies with the target scores set out in the London Plan. Option B has more roof terrace space than Option A and therefore achieves a greater UFG than Option A, also complying with London Plan Policy G5.

#### Biodiversity

93. London Plan Policy G6 states that development proposals should aim to secure net biodiversity gain. The proposal provides a 555.43% increase for habitats at the site which is very welcomed.

#### Flood Risk

94. The Flood Risk Assessment adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewer, groundwater, and reservoir flooding, which is considered to be low. The approach to flood risk management therefore complies with London Plan Policy SI 12.

#### Drainage

95. The drainage strategy provides an assessment of greenfield runoff rates, existing runoff rates, and attenuation storage. The strategy proposes to restrict runoff to 1.3 l/s for the 100 year event plus 40% climate change, which is supported. The drainage strategy proposes to provide the required attenuation within blue roof tanks (33m<sup>3</sup>) and within a basement tank (101m<sup>3</sup>), which doubles-up as an active rainwater harvesting tank.
96. In terms of SuDS, the drainage strategy proposes green roofs and a smart rainwater harvesting system with water to be re-used within the building, which is welcomed. The drainage strategy states that the feasibility of rain gardens would be confirmed at the detailed design stage. Every effort should be made by the design team to incorporate these to provide additional amenity, biodiversity, and water quality benefits.
97. The approach to drainage therefore complies with London Plan Policy SI 13.

#### Water Efficiency

98. The proposed development generally meets the requirements of London Plan Policy SI 5 for the proposed office uses. However, for Option A, the applicant



should confirm that the BREEAM 'Excellent' rating is targeted for Wat01 for the proposed public house.

99. Water efficient fittings, water meters, leak detection systems, and rainwater harvesting for water re-use are proposed for the office uses, which is welcomed.

#### Digital Infrastructure

100. London Plan Policy SI 6 requires development proposals to ensure sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available; that expected demand for mobile connectivity generated by the development is met; and that the development proposals take appropriate measures to avoid reducing mobile connectivity in surrounding areas.
101. Currently no details have been provided in relation to digital connectivity and therefore compliance with Policy SI 6 cannot be determined at this stage. The applicant is therefore required to provide further details and the City should ensure that appropriate conditions are secured to comply with Policy SI 6.

### **Environmental issues**

#### Air quality

102. The air quality impacts are considered the same for both options. The development is broadly compliant with London Plan air quality policies, although some clarifications and further details are requested.
103. The proposed development is car-free and will utilise air source heat pumps for heating and hot water, so will not have a significant impact on local air quality. The development is also considered air quality neutral.
104. Pollutant concentrations exceed the air quality objectives around the proposed development site, particularly at the kerbside of adjacent roads. The applicant was requested to provide details outlining how good air quality for future occupants of the building will be ensured, e.g. through suitable design of the ventilation system. The applicant is referred to the City of London's Air Quality SPD. Further information has now been submitted which is currently under review.
105. In order to ensure compliance with London Plan policy, the following conditions should be secured. On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards for the Central Activities Zone. In addition, measures to control emissions during the construction phase relevant to a high risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase.

### **Local planning authority's position**

106. City of London Council planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in September.

## Legal considerations

107. 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.
108. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application. In this case, the Council 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

109. There are no financial considerations at this stage.

## Conclusion

110. London Plan policies on the CAZ, offices, public houses, urban design, heritage, transport, sustainable infrastructure and environment 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 site is located in the CAZ and the City of London. The principle of office use is supported. Subject to the assessment by the City of the value of the public house, both options with regards to the re-provision of the public house or retaining it are supported in principle. London Plan Policies SD4, E1 and HC7
  - **Urban Design:** The improved public realm increases connectivity and permeability of the area, which is supported, however the applicant should consider ensuring the access is not restricted to certain times of the day. London Plan Policies D8 and D5.
  - **Transport:** Further consideration is needed with regards to onsite disabled persons parking and short-stay cycle parking. London Plan Policies T5 and T6.5.
  - **Sustainable Infrastructure:** Further information is required in relation to energy, circular economy and water efficiency (for Option A). The applicant has provided additional information in relation to points raised for energy and water efficiency, which is currently being reviewed. The Whole Life Carbon Assessment has been re-submitted and is currently under review. No

information has been provided in relation to digital infrastructure therefore compliance with related London Plan policy cannot be determined at this stage. London Plan Policies SI 2, SI 6 and SI 7.

- **Environment:** Further clarification is required in relation to air quality. The applicant has provided additional information in relation to points raised, which is currently being reviewed. London Plan Policy SI 1.

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

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

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<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation	7th September 2021
<b>Subject:</b> Transport Strategy: Timetable for review	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1, 3, 5, 8, 9, 11 and 12
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>If so, how much?</b>	£n/a
<b>What is the source of Funding?</b>	n/a
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	n/a
<b>Report of:</b> Director of the Environment	<b>For information</b>
<b>Report author:</b> Bruce McVean, Acting Assistant Director – City Transportation	

## Summary

The City of London Transport Strategy was adopted in May 2019. The Strategy sets the framework for the design and management of transport and streets in the Square Mile over 25 years (to 2044).

The Transport Strategy is scheduled to be reviewed every three years to ensure it continues to reflect the priorities of City residents, workers and businesses, changing circumstances and developments in transport technology.

Work started earlier this year on the first review of the Transport Strategy, with the aim of submitting an updated strategy for adoption in May 2022.

It has since become clear that the current review period needs to be extended to spring 2023. This is to allow time for transport and work patterns to settle following the easing of Covid-19 related restrictions; and for engagement with individuals and organisations to be carried out in those more settled conditions.

The extension also reflects the fact that funding for the review this financial year is severely limited due to constraints on Local Implementation Plan (LIP) funds from TfL.

## Recommendation

- Members are asked to note the one-year extension of the current Transport Strategy review period to spring 2023.

## **Main Report**

### **Background**

1. The City of London Transport Strategy was adopted in May 2019. The Strategy sets the framework for the design and management of transport and streets in the Square Mile over the next 25 years.
2. The Transport Strategy is scheduled to be reviewed every three years to ensure it continues to reflect the priorities of City residents, workers and businesses, changing circumstances and developments in transport technology.

### **Current position**

3. Work started earlier this year on the first review of the Transport Strategy, with the aim of submitting an updated strategy for adoption in May 2022. The approach and timetable were outlined in a report to the Streets and Walkways Sub Committee in April 2021 (Appendix 1).
4. Since that meeting, the officer Steering Group overseeing the Transport Strategy have agreed to extend the review period to spring 2023. This is to allow:
  - a. Time for travel and work patterns to settle following the easing of Covid-19 restrictions and return to the workplace following the summer holidays.
  - b. Additional data collection and analysis to understand the implications of any changes to travel and work patterns. For example, the longer review period means that there will be the opportunity for an additional traffic survey in spring 2022 to supplement the survey already planned for autumn 2021.
  - c. Time for the public and stakeholders, including City businesses, to adjust to any changes in travel and work patterns before being invited to participate in engagement and consultation activities.
5. The extension of the review period is also necessary to accommodate a significantly constrained budget in the current financial year. Funding for the Transport Strategy review is primarily from the Local Implementation Plan (LIP). TfL have now confirmed that this funding will not be available until at least January 2022, and most of the funding required is unlikely to be available until the 2022/23 financial year. This significantly limits the ability to undertake data collection and analysis, engagement activities and impact assessments in 2021/22.
6. The extension of the Transport Strategy review period will also enable the Strategy to continue to complement any further changes to the City Plan 2036 considered necessary to address issues raised by climate action agenda, the Covid-19 pandemic and the emerging form of the post-Covid-19 recovery.
7. Extending the review period is not expected to impact on delivery of the Transport Strategy. We also do not expect that it will affect our ability to

respond in a timely manner to any strategic impacts of the Covid-19 pandemic.

8. As outlined in Appendix 1, we have undertaken an initial review of evidence to identify issues for the Strategy review. This includes potential scenarios for the return to the workplace after the easing of Covid-19 restrictions and the impact this might have on land use decisions and travel behaviour.
9. We anticipate changes in travel and working patterns, with the need to work from home over the last year accelerating trends towards flexible and hybrid working. We also anticipate a substantial return to City offices, likely beginning in September 2021, and that the City will continue to grow.
10. This analysis, together with the recommendations of the Recovery Taskforce, indicates an ongoing need for investment in high quality public realm and sustainable transport. The Transport Strategy Vision, Aims and Outcomes are still therefore considered to be relevant.
11. Extending the review period will provide more certainty as we test this approach and identify any changes to the Transport Strategy's 54 proposals through further analysis and engagement.

## **Corporate & Strategic Implications**

12. **Strategic implications** – Delivery of the Transport Strategy supports delivery of Corporate Plan outcomes 1, 3, 5, 8, 9, 11 and 12; and indirectly supports the delivery of Corporate Plan outcomes 2 and 4. It also supports delivery of other corporate strategies, such as the Climate Action Strategy, and Recovery Taskforce activities. The review will ensure the Strategy continues to deliver against existing and emerging corporate objectives and priorities.
13. **Financial implications** – There are no financial implications arising from extending the review period, although the extension is necessary to address a shortfall in TfL LIP funding this financial year. The level of LIP funding available in 2022/23 is currently uncertain, however we expect sufficient funding to be available to support the Transport Strategy review.
14. **Resource implications** – Staff resource is required to undertake the review. The Strategic Transportation team will undertake this work and liaise with other teams as appropriate.
15. **Legal implications** – None
16. **Risk implications** – Delivery of the Transport Strategy supports the mitigation of corporate risks CR20 – Road Safety and CR21 – Air Quality. Delivery of mitigation measures will not be affected by the extension of the review period.
17. **Equalities implications** – An Equalities Impact Assessment (EqIA) was undertaken during the development of the Transport Strategy. We will repeat this process as part of the review and have programmed an EqIA at early stages of the Strategy review to identify any issues and opportunities. Extending the review period will ensure the EqIA is sufficiently resourced.

18. **Climate implications** – Delivery of the Transport Strategy supports delivery of transport and on-street climate resilience measures identified in the Climate Action Strategy. Delivery of projects and programmes, including the Pedestrian Priority Programme and Cool Streets and Greening Programme, will not be affected by the extension of the review period. The Transport Strategy review will include consideration of additional measures to support climate action.
19. **Security implications** – There are no direct implications as a result of extending the review period. The Transport Strategy includes proposals to incorporate proportionate security measures on-street and in the public realm where necessary.

## Conclusion

20. It has become clear that the current review period for the Transport Strategy needs to be extended to spring 2023. This will allow time for transport and work patterns to settle following the easing of Covid-19 related restrictions; and for engagement with individuals and organisations to be carried out in those more settled conditions. The extension also reflects that fact that funding for the review this financial year is severely limited due to constraints on LIP funding.

## Appendices

- Appendix 1: City of London Transport Strategy - Review 2022, report to Streets & Walkways Sub Committee, 29 April 2021

## Background Papers

- City of London Transport Strategy  
<https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy.pdf>

## Bruce McVean

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<b>Committee(s)</b>	<b>Dated:</b>
Streets & Walkways Sub Committee	29 <sup>th</sup> April 2021
City of London Transport Strategy - Review 2022	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1, 2, 9, 11, 12.
<b>Does this proposal require extra revenue and/or capital spending?</b>	Y
<b>If so, how much?</b>	£25k
<b>What is the source of Funding?</b>	TfL - LIP/Local Risk
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	Y
<b>Report of:</b> Acting Director, Department of the Built Environment	<b>For Decision</b>
<b>Report author:</b> Samantha Tharme	

### Summary

This report sets out the context and recommended approach for a review of the 25-year City of London Transport Strategy. The Transport Strategy was adopted in May 2019. We have committed to reviewing the Strategy every three years.

We have undertaken an initial review of evidence to identify issues for the Strategy review. This includes potential scenarios for the return to the workplace after the easing of Covid-19 restrictions and the impact this might have on land use decisions and travel behaviour.

We anticipate changes in travel and working patterns, with the need to work from home over the last year accelerating trends towards flexible and hybrid working. We also anticipate a substantial return to City offices and that the City will continue to grow.

This analysis, together with the recommendations of the Recovery Taskforce, indicates an ongoing need for investment in high quality public realm and sustainable transport. The Transport Strategy Vision, Aims and Outcomes are still therefore considered to be relevant. We are proposing a review and update of the Transport Strategy rather than a wholesale revision, and that 2044 remains the end year for the Strategy.

We will test this approach and identify any changes to the Transport Strategy's 54 proposals through further analysis and engagement with stakeholders, including residents, workers and visitors.

An update on the findings of the workshops, surveys and engagement will be reported in October 2021. The draft of the changes to the Transport Strategy will be submitted to Committee for approval in December 2021. Subject to approval,

consultation on the changes will take place between January and February 2022. The final revised Strategy will be submitted for adoption in spring 2022.

A three year costed Delivery Plan will be submitted with the revised Transport Strategy.

### **Recommendation(s)**

Members are asked to:

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

### **Main Report**

#### **Background**

- 1) The City of London Transport Strategy sets the 25-year framework for future investment in, and management of, the Square Mile's streets and for improvements to transport connections. The development of the Transport Strategy was informed by extensive engagement with City workers, residents, businesses and other organisations with an interest in transport in the Square Mile.
- 2) The Transport Strategy was adopted in May 2019. At that time members asked that it be reviewed every three years. This also aligns with the Mayor for London's Transport Strategy (MTS), which is on a three year cycle for funding and target setting. Transport policy and projects delivered by the City Corporation are required to support delivery of the MTS.
- 3) The City Plan 2036 is currently being consulted on in line with formal timetable for revision and adoption. The public consultation will run until 7 May before being submitted to the Secretary of State for Housing, Communities and Local Government to appoint an independent planning inspector with the final City Plan 2036 expected to be adopted in early 2022. The Transport Strategy review timetable will allow any issues arising from this process to be reflected in updated proposals.

#### **Current Position**

- 4) The development of the Transport Strategy was informed by extensive engagement and consultation with City workers, residents, businesses and other organisations with an interest in transport in the Square Mile. Feedback from engagement on the Climate Action Strategy and Recovery Taskforce suggests the issues and priorities identified through earlier engagement remain valid.

- 5) We have also carried out an initial evidence review, this includes:
- a) Scenario Planning: We commissioned WSP to carry out a scenario planning exercise in Autumn 2020. This considered potential changes to working patterns, demand for certain land uses in the City, and people's travel choices. The report considers the extent to which the pandemic has provided an opportunity to accelerate and 'lock in' positive changes, decelerate and delay the pursuit of certain outcomes or altered the nature of potential outcomes. Overall, the report suggests a continuation of the approach set out in the Transport Strategy and identifies actions for accelerating the delivery of proposals. A copy of the report is provided in Appendix 1.
  - b) Recovery Taskforce: The Recovery Task Force has identified a number of priorities actions to ensure the Square Mile is the world's most innovative, inclusive and sustainable business ecosystem, an attractive place to work, live and visit. These include ensuring the City's streets and public spaces are attractive places to spend time; and accelerating plans to rebalance vehicle use, prioritise walking, enable cycling, improve air quality and provide more public space.
  - c) Central Activity Zone Economic Futures Research: The Greater London Authority (GLA) commissioned research on the economic future of the Central Activity Zone, which includes the City. This research considered the impact of the Covid-19 restrictions and future vulnerabilities and opportunities. The report's conclusions included the need for a high-quality office, retail and leisure offer and for and high quality public space.
  - d) Return to work surveys: A number of commercial and public organisations, including Transport for London, the Bank of England and the City Corporation, to assess anticipated work and travel behaviour in both the immediate return to work and medium-term future.
- 6) Conclusions and working assumptions from analysis to date are:
- The City and central London will return as key destinations for work, culture and leisure.
  - There will be a 'flight to quality' for office space and an expectation of high quality streets and public realm.
  - By 2022 there will be a substantial return to the office with more flexible and agile working. At least 60% of people are likely to be in the office on a typical day.
  - Public transport will remain the main way that people travel to and from the Square Mile, with continued growth in cycling (and potentially e-scooters)
  - Walking will remain the main way that people travel within the Square Mile, and issues of crowding and comfort still need to be addressed.

### **Strategic context**

- 7) The Transport Strategy review will provide an opportunity to further align the Transport Strategy with the Climate Action Strategy (CAS), which was adopted in

October 2020. The CAS includes Transport Strategy proposals and actions which lead to a reduction in carbon emissions from transport and support resilience.

- 8) The City Local Plan is currently being consulted on in line with formal timetable for revision and adoption. The City Plan 2036 is expected to be adopted in early 2022. The Transport Strategy review timetable will allow any issues arising from this process to be reflected.
- 9) The next iteration of the City Corporation's Local Implementation Plan (LIP) will be developed alongside the Transport Strategy once guidance is clarified from TfL. The current LIP period comes to an end in March 2022. We are currently awaiting further guidance from the Transport for London. This is not anticipated to be received before the May Mayoral elections.
- 10) Further forecasting of the network capacity across London has been undertaken by TfL and will inform the review of the Strategy.

### **Proposed approach.**

- 11) Given the working assumptions set out above we believe that the Transport Strategy Vision, Aims and Outcomes (Appendix 2) remain relevant and do not need to change. With that in mind a review and update of the Transport Strategy rather than a wholesale revision is proposed, with 2044 remaining the end year for the Strategy.
- 12) A comprehensive review of Transport Strategy proposals will identify amendments and consider the need for additional proposals. The programme of delivery may be recommended for change against some proposals. Targets and key performance indicators will also be reviewed. This review will be informed by further analysis of travel, work and land use patterns and trends and stakeholder and public engagement.
- 13) Engagement and consultation activities will include:
  - Stakeholder meetings and workshops
  - Public survey (online, May/June 2021)
  - Focus groups
  - Consultation on revisions to Transport Strategy (January/February 2022)

### **Governance**

- 14) The governance arrangements are summarised in Appendix 3. It is proposed to follow a similar approach to that taken in the development of the Transport Strategy.
- 15) We are intending to report to the Streets & Walkways Sub-Committee while conducting the review and updating the Transport Strategy. Previously this role was carried out by the Local Plan Sub-Committee. The change in reporting reflects the nature of the review and the existing timetable for meetings.

- 16) The draft revised Transport Strategy will be presented to the Planning & Transportation Committee prior to consultation. The final Strategy will be presented to the Planning & Transportation and Policy & Resources Committee for adoption.

### **Programme and reporting schedule**

- 17) An overview of the review programme is provided in Appendix 4. An update on the findings of the analysis and engagement will be reported to Streets & Walkways in October 2021. The draft of the changes to the Transport Strategy will be submitted to this Committee and the Planning & Transportation Committee for approval in December 2021. Subject to approval, consultation on the changes to the Strategy will take place between January and February 2022.
- 18) The final revised Strategy will be submitted for adoption by the Planning & Transportation and Policy & Resources Committee in spring 2022.

### **Corporate & Strategic Implications**

#### Strategic implications

- 19) Delivery of the Transport Strategy supports the delivery of Corporate Plan outcomes 1, 3, 5, 8, 9, 11 and 12. It also indirectly supports the delivery of Corporate Plan outcomes 2 and 4.
- 20) Delivery of the Transport Strategy also helps mitigate corporate risks CR20 – Road Safety and CR21 – Air Quality.
- 21) The Transport Strategy is required to demonstrate how it supports the Mayor's Transport Strategy, which is done through submission of the Local Implementation Plan (LIP).

#### Financial implications

- 22) A costed 3-year Delivery Plan will be provided alongside the updated Transport Strategy.
- 23) Data collection, engagement and consultation costs associated with the review will be funded through local risk budget and TfL - LIP funding.

#### Resource implications

- 24) Staff resource is required to undertake the review. The Strategic Transport Team is in place to undertake this work and will liaise with other teams as appropriate.

#### Equalities implications

- 25) A full Integrated Impact assessment including Equalities Impact Assessment was undertaken for the development of the Transport Strategy. We have programmed an EQIA at early stages of the Strategy review to inform any high priorities that need addressing.

#### Climate implications

- 26) Delivery of the Transport Strategy contributes to carbon reduction through reduction in motor vehicle use and a switch away from fossil fuel vehicles and to climate resilience. The review will consider changes required to support the delivery of the adopted Climate Action Strategy.

#### Security implications

- 27) As the Transport Strategy is relevant to the management of public space and the transport network, security implications are relevant at a detailed level and inform decision making at a scheme level.

### Conclusion

- 28) Following initial research and analysis the Transport Strategy Vision, Aims and Outcomes are considered still relevant. It is therefore recommended that the review focuses on amendments and additions to the Transport Strategy proposals. The next steps for this review are to undertake further research and analysis and stakeholder and public engagement to identify potential changes and any new issues and priorities that need to be addressed.

### Appendices:

- Appendix 1: WSP Scenario Planning Report
- Appendix 2 Transport Strategy Vision, Aims and Outcomes
- Appendix 3 Governance Structure
- Appendix 4 Programme

### Background papers:

- City of London Transport Strategy (<https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy.pdf>)
- Central Activity Zone Economic Futures Research: The Greater London Authority (GLA) ([https://www.london.gov.uk/sites/default/files/future\\_of\\_the\\_central\\_activities\\_zone.pdf](https://www.london.gov.uk/sites/default/files/future_of_the_central_activities_zone.pdf))

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# COVID-19 Effects on the City of London's Built Environment – Final Report



January 2021





	Draft 1			Final		
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## 1. INTRODUCTION

WSP have been appointed by the City of London Corporation to undertake scenario development to consider the potential implications of the COVID-19 pandemic on the Square Mile's built environment; focusing on identifying impacts on the City Corporation's Transport Strategy. Particular consideration has been given to the medium to long-term effects of COVID-19 on travel and working patterns which could require a change in strategic approach to the design and management of the built environment.

### **Purpose of the Report**

This short report presents the findings of "Task 1-4", as defined by the City Corporation, undertaken between October-December 2020.

The report outlines the scenario development approach, provides a summary of key findings from the Task 1 desktop review of key trends post-COVID 19 and analysis of three workshop outputs in the context of City of London Corporation strategies. The original outputs from the three workshops and the Task 1 desktop review are provided in the Supporting Documents, available upon request.

## 2. OUR APPROACH

The approach developed to address the four tasks initially outlined by the City of London involved:

**Task 1:** A high-level desktop review to identify potential trends in work and travel patterns for the City for London and central London, and the likely impacts of these trends.

The Task 1 working paper, summarised in Chapter Three and available in the Supporting Documents, provides a high-level summary of:

- Evidential findings from a desktop review of the current situation in the City of London
- The trends and trajectories driving changes in the Square Mile
- What the potential impacts of these changes may be in the context of established policy and strategy frameworks.

The work was undertaken to set the scene for scenario development and planning to consider the COVID-19 pandemic and the potential short, medium and long-term impacts on the Square Mile's built environment.

Potential impacts and opportunities of trends and trajectories affecting the City of London were considered in the context of:



**Task 2:** Workshop facilitation: Scenario Development & City Corporation's Scenario Response

Task 2 aimed to facilitate two workshops with the City of London Corporation in order to aid the development and discussion of four contrasting and thought-provoking future scenarios. Task 2 had three key elements:

### 1. City Corporation Scenario Input Workshop (workshop 1)

The first of the two Task 2 workshops occurred on Friday 20<sup>th</sup> November, with approximately 20 people in attendance from the City Corporation and WSP. Attendees were from a diverse range of departments within the City Corporation (from Planning & Policy to Environmental Enhancement teams) to ensure workshop input was varied.

The aim of the workshop was to understand what attendees consider to be the long to medium term impacts of COVID-19 on the City of London's built environment and ultimately map the key drivers of change so to inform the development of tailored future scenarios. The approach involved:

- A brief presentation to set the scene and display the evidential findings from Task 1
- Attendees were asked to undertake a PESTLE analysis to identify the political, economic, societal, technological, legislative and environmental drivers shaping the future policies in the City of London.
- Key drivers of change & influence were then mapped by attendees on an importance and uncertainty matrix according to their importance in relation to policies that impact the built environment in the City and how certain the outcome of each one is.
- Participants then voted on the drivers of change they considered to be most important in each PESTLE category, with regards to their impact on the future built environment in the City.
- Finally, participants had a discussion to agree on the underlying assumptions regarding the future COVID-19 situation in the medium (3-5years) to long term (5+ years) that would form the basis of the scenarios. These were agreed to be:

- There will be an effective vaccination programme in place
- Developed treatment for COVID-19 will have improved survival rates
- Social distance measures will be eased but may be different in different places

Outputs from Workshop 1 can be found in the Supporting Documents.

## 2. Scenario Development

Following Workshop 1, the outputs were collated and used to draw together four contrasting scenarios, each deliberately distinct from each other and ambitious in their aspirations. Specifically, the drivers of change that participants identified as the most important in each of the PESTLE categories were used to identify scenario 'levers' (as shown in Table 1). Note: legislative drivers were not included in the 'levers'. Low and high extremes were broadly defined for each lever (i.e. driver of change) so that these could be flexed to form a series of scenarios.

Table 1 Scenario Development 'Levers'

PESTLE	Lever	Lower Extreme (0)	Higher Extreme (10)
Social	Working from home	Ubiquitous traditional working patterns that limits worker flexibility (e.g. 9-5 for office workers).	Ubiquitous working from home that gives worker complete flexibility to work when and where suits their needs.
Economic	Change of building use	No change to existing City building use	Radical change to City building use
Technological	Data driven decision-making	No change to the decision-making process	Digitally connected city enabling data driven decision making
Environmental	Air quality focus	No change to pre-covid air quality levels as reversion to use of polluting vehicles offsets sustainable mode shift benefits	Radical air quality improvements from polluting vehicle restrictions, meaning sustainable modes dominate.
Political	Levelling up agenda	Maintaining of City position on national / international stage	Erosion of City position on national / international stage

Using the 'levers' defined Table 1, a series of four scenarios were developed based on differing intensities of each 'lever':

- Scenario 1: Working from Home Normalisation
  - Work from home becomes the predominant way of working
  - Significant impacts on building use resulting in land use changes (e.g. office space becomes retail, residential or leisure space)
  - New form and function for the City
- Scenario 2: Hybrid home/office working patterns
  - More flexible work and travel patterns require office space to cater for both individual & collaborative working, as well as social space
  - Results in increased demand for office space
  - Reduced travel peaks & less crowded conditions on the UG and Rail make it difficult to shift people to active modes
- Scenario 3: Erosion of City position on international stage
  - Less political prioritisation of the City in national and regional policy

- Focus on levelling up the UK erodes the preeminent position of the City
- Potential change to the City's core purpose & activities impacting working patterns
- Scenario 4: Active, data driven return to traditional working patterns
  - Pressures to return to 9-5 office working models that maintain property values
  - Enhanced on-street digital connectivity to facilitate prioritisation of active modes
  - Data-driven decision making ensures efficient and flexible use of the built environment

Figure 1 illustrates the numerical values applied to each scenario:

Figure 1- Future Covid-19 Scenarios



Each scenario was supported by a dashboard outlining a summary of the future vision, associated trend data, scenario levers, the hypothesised shape and scale of movements and potential outcomes for people and places in the City of London. The scenario dashboards can be found in **Appendix A**.

### 3. City Corporation's Scenario Response Workshop (Workshop 2)

The second of the two Task 2 workshops occurred on Friday 4<sup>th</sup> December, with approximately 20 people in attendance from the City Corporation and WSP (mostly the same participants from Workshop 1).

The aim of the second workshop was to understand the City Corporation's response to potential future scenarios in the medium-long term as a result of COVID-19 and the workshop involved:

- A brief presentation to recap what had been done in Workshop 1, explain how the outputs of Workshop 1 were utilised to develop four scenarios and provide a synopsis of the four scenarios using the scenario dashboards that would provide the basis of Workshop 2.
- Attendees were asked to undertake a SWOT analysis for each of the four scenarios to identify the potential strengths, weaknesses, opportunities and threats.
- Participant were then asked to identify broad City Corporation interventions needed for each scenario

Outputs from Workshop 2 can be found in the Supporting Documents.

### **Task 3: External Workshop Facilitation: External View of City Corporation's Scenario Response**

Task 3 involved the facilitation of a third and final workshop. The workshop was effectively a repeat of Workshop 2 but with a different audience, comprising mostly of the Transport Strategy Board and DBE Users Panel.

The workshop was prefaced with a short introduction outlining the purpose of the project, a summary of work undertaken so far and the workshop's context in the wider project. Other than the introduction the approach was exactly the same as outlined in Workshop 2.

Outputs from Workshop 3 can be found in the Supporting Documents.

### **Task 4: A short report capturing the key findings of the desktop exercise and outputs from the workshops.**

This report is Task 4.



### 3. KEY FINDINGS FROM TASK 1 DESKTOP REPORT

This section provides a summary of how COVID-19 has affected London and the City of London and the potential impacts of future trends as outlined in the Task 1 report (available in the Support Documents). It should be noted that this work was undertaken in October 2020 and therefore only includes insights and data up to this point.

#### How has COVID-19 affected the City of London?

Employment patterns in the City of London has been directly impacted upon by the COVID-19 pandemic, with the rapid move towards remote working and economic uncertainty having a significant effect on sectors in the Square Mile:

##### *Industries and Office Occupancy*

The City of London is resident to mostly white-collar professions with 70% of workers employed in high-skilled jobs, which were resilient to the pandemic thanks to their ability to mostly resume operations working from home.<sup>1</sup> However, this has greatly affected office occupancy rates in the Square Mile. As a result, some big companies that have long leases on space are looking to sublet it out.<sup>2</sup>

Businesses which have kept their office open have new demands of office space due to social distancing measures, requiring less hot-desking and more space per employee.

##### *Retail & Hospitality*

Retail and hospitality businesses located in the City have faced a triple hit to their customer base, with only a small resident population, a large reduction in commuters and visitor numbers being slashed. At its worst in late March, footfall was down to 89% of normal levels, recovering to only 69% by the start of September.<sup>3</sup>

##### *Coronavirus Job Retention Scheme*

Data from HMRC shows that the City of London was affected much less than the rest of the UK by the furlough measures put in place by the UK Government. Across Westminster and City of London, 26% of employees were furloughed, making it the lowest in the country. This was mostly due to the resident industries.<sup>4</sup>

##### *Business Impact*

Reporting shows that at least 143 companies either dissolved or liquidated in August 2020 and there were only 38 start-ups in the City of London, the joint lowest since the 2008 financial crash (the average usually being 82). London SMEs are particularly vulnerable in the sectors which are suffering.<sup>5</sup>

##### *Travel Demand*

- Car Use: DfT data shows that all modes of transport saw a decrease in use across London; car use dropped to 22% in April. In the City, as of October vehicle volumes were still 45% less than 2019 averages.<sup>6</sup>
- Public Transport: Public transport patronage has been the most affected and remains at lower levels in London; the Tube was running at around 35% of normal levels and buses at around 57% in October 2020.<sup>7</sup> In the City specifically, public

<sup>1</sup> ONS, Business Register and Employment Survey, 2018 (2019 release);

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/businessregisterandemploymentsurveybr> esprovisionalresults/2018

<sup>2</sup> City of London, CPAT Survey of businesses before and after being told to work at home, 11 Sep - 1 Oct 2020, received 30 Oct 2020.

<sup>3</sup> Financial Times, Cities count cost of lasting exodus from offices, <https://www.ft.com/content/d5b45dba-14dc-443b-8a8c-e9e9bbc3fb9a>

<sup>4</sup> HMRC, Coronavirus Job Retention Scheme statistics: October 2020, <https://www.gov.uk/government/statistics/coronavirus-job-retention-scheme-statistics-october-2020>

<sup>5</sup> Simply Business, Survey: the impact of coronavirus on UK small business, <https://www.simplybusiness.co.uk/knowledge/articles/2020/05/new-coronavirus-survey-69-billion-cost-for-small-businesses/>

<sup>6</sup> City of London, Transportation Covid-recovery counts - Vehicular Traffic - October 2020

<sup>7</sup> DfT, Covid-19 Transport use, <https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic>

transport usage was recorded to be even lower, with tube station entries in October 2020 recorded to be at only 21% of pre-Covid levels.<sup>8</sup>

- Active Travel: DfT data on rates of cycling in London since mid-March have been on average 150% of baseline levels and rates on some days have been in excess of 300%.<sup>9</sup> In the City, October 2020 traffic counts revealed that over a 24hr weekday period, the volume of cyclists was at 92% of pre-pandemic levels.. In the context of a substantial reduction in overall movements, this volume is significant.<sup>10</sup>
- Overall Movements: City data from October 2020, shows how the total volume of people in the city had flattened across the profile of a typical weekday, with less prominent peaks; potentially a result of workers in sectors that cannot work remotely (e.g. construction) continuing to travel into the City whilst other sectors continue with flexible working arrangements.<sup>11</sup>

### COVID-19 City Streets<sup>12</sup>

The City has developed a package of measures to facilitate social distancing by providing extra space to help ensure the gradual and safe return of people who live, work and visit. These include:

- Changes to 35 streets to facilitate active travel and the managed use of public transport
- Additional seating and green areas to support F&B businesses and create an attractive environment
- 700 temporary cycle spaces

### Air Quality

There have been significant improvements in air quality following the large reduction in traffic due to COVID-19. In just a few weeks, nitrogen dioxide levels dropped by 35% in the City of London compared to the average reading in January 2020.<sup>13</sup>

## Potential Future Impact of COVID-19?

### Workers

- A shift away from full time office-based working

A September survey of businesses in the City of London, highlighted that respondents are expecting an increasing shift away from full time office-based working once the pandemic ends.<sup>14</sup> Workers instead may continue to work remotely from home or local shared spaces, potentially from an enlarged commuter catchment or more regularly combine with extended staycations. Shifts however are likely to be sector specific.

### Businesses

- Active planning to reduce daily travel peaks but also needs to extend to combat weekly peaks

City of London survey results suggest that active planning by businesses is being undertaken to reduce rush hour travel peaks, enabling workers to work more flexibly. Management challenges around office attendance and capacity may continue. once pandemic restrictions are eased.<sup>15</sup>

- Continued public transport concern

<sup>8</sup> City of London, Tube Station Entries – October 2020

<sup>9</sup> Department for Transport, Passenger Transport by Mode (TSGB0101), <https://www.gov.uk/government/statistical-data-sets/tsgb01-modal-comparisons>

<sup>10</sup> City of London, Transportation Covid-recovery counts – Vehicular Traffic – October 2020

<sup>11</sup> City of London, O2 People Movement Data, October 2020

<sup>12</sup> City of London, Covid-19 City Streets, <https://www.cityoflondon.gov.uk/assets/Services-Environment/covid-19-city-streets-explaining-the-changes.pdf>

<sup>13</sup> London.gov, Air quality press release, <https://www.london.gov.uk/press-releases/assembly/covid-19-lockdown-and-its-impact-on-air-quality>

<sup>14</sup> City of London, CPAT Survey of businesses before and after being told to work at home, 11 Sep - 1 Oct 2020, received 30 Oct 2020.

<sup>15</sup> City of London, CPAT Survey of businesses before and after being told to work at home, 11 Sep - 1 Oct 2020, received 30 Oct 2020.



The September City of London survey also highlighted that 4 in 5 (83%) workers cite travel on public transport as their most important concern when returning to work.<sup>16</sup> Although it may change over time, workers may not rely on public transport at peak hours as much after pandemic restrictions are reduced and in turn find other ways of making their journeys.

- Changes to office space design and the way in which it is used

Shifts away from full time office working is likely to impact how office space for office-based businesses in the City is designed and the way in which they use the space. There may be new challenges in designing for different groups and attendance levels and a focus on flexibility.<sup>17</sup>

### Residents

- Enhanced sense of community

In the presence of a virus that does not discriminate and the resulting pandemic restrictions, people in the UK have been forced to spend more time in their local areas. As a result, it has been reported that 76% of people in London thought they were doing more things to help other people in their community since the pandemic.<sup>18</sup>

- Escape to the country?

According to the London Assembly Housing Committee August survey, one in seven Londoners (14%) want to leave the city as a result of the pandemic.<sup>19</sup> If this exodus materialises in the City, it could have a substantial impact on the already small resident population.

### Visitors

- UK Staycationers avoiding cities

Despite a 236% increase in online searches for 'staycation' compared to 2019, UK holiday makers chose to avoid city breaks in the midst of pandemic uncertainty due to worries of overcrowded spaces.<sup>20</sup> If concerns linger relating to visits to urban areas, tourism in the City may not improve as soon as restrictions ease.

- Business travel could return in phases, depending on proximity, reason for travel and sector.

Meeting clients in person is fundamental in building trusting relationships and therefore business travel is likely to eventually return to the City. However, regional business travel followed by wider domestic travel may recover earlier than international travel. In person sales and client meetings followed by small meetings/training sessions may recover earlier than mass gathering events.<sup>21</sup> In the long run international business travellers may be more likely to combine multiple meetings into one trip, particularly if the cost of travel increases. This could mean longer, less frequent visits to the City.

### Places

The COVID-19 City Streets interventions have closed many of the roads, imposed time-based restrictions on vehicles and created more greenspace - reclaiming the City for people rather than cars. A permanent shift in the hierarchy of modes on the streets of the City could have lasting impacts on well-being and quality of life for workers, residents and visitors and facilitate economic recovery of the area.

<sup>16</sup> City of London, CPAT Survey of businesses before and after being told to work at home, 11 Sep - 1 Oct 2020, received 30 Oct 2020.

<sup>17</sup> JLL, The Future of Office Demand: Central London after Covid-19, UK Research. November 2020

<sup>18</sup> ONS, Covid effects on communities and personal relationships,

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/coronavirusandthesocialimpactsonthecountiesandregionsofbritain/april2020#effects-on-communities-and-personal-relationships>

<sup>19</sup> London.gov, Escaping the city post-covid,

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/coronavirusandthesocialimpactsonthecountiesandregionsofbritain/april2020#effects-on-communities-and-personal-relationships>

<sup>20</sup> <https://www.schofields.ltd.uk/blog/6079/city-breaks-impact-pandemic-uk-travel/#:~:text=Staying%20in%20the%20UK%20is%20on%20the%20rise&text=There%20are%20a%20staggering%205,July%202019%20to%20July%202020.>

<sup>21</sup> McKinsey & Company, 2020. *For Corporate Travel, A Long Recovery Ahead*. [online]. Available at: <<https://www.mckinsey.com/industries/travel-logistics-and-transport-infrastructure/our-insights/for-corporate-travel-a-long-recovery-ahead>> [Accessed 13 January 2021].

## 4. POTENTIAL CITY CORPORATION RESPONSES TO FUTURE SCENARIOS

As outlined in section two, workshop participants were asked to analyse potential future scenarios and postulate potential City Corporation responses to them. The potential City Corporation responses for each scenario are summarised below:

### Scenario 1: Working from home normalisation

In this scenario, working from home is the predominant way of working for the City employees (where appropriate), having significant impacts on building use in the City and resulting in significant land use changes e.g. office conversion to retail, residential and leisure uses. This results in a new form and function for the Square Mile.

Potential City Corporation responses outlined by workshop participants included:

- A requirement to lobby for widespread flexible travel fares as a result of a huge potential reduction in demand for traditional season tickets and wider provisions to align with less traditional travel patterns.
- Active curation of public realm, retail, culture and entertainment with flexible planning policies to support new, innovative and adapted land uses e.g. flip frontages to support vibrancy through clustering of food, retail and cultural experiences - to attract people to City for reasons other than office-based work.
- Focus on becoming THE international travel hub in the region so remote workers use London as the place for meetings etc. by enabling the adaptation of workspaces to facilitate world-class social interaction and collaboration experiences.
- Capitalisation of new space available for environmental resilience measures with associated green standards.
- Capitalise upon new and existing channels of communication to publicise City changes and vision internationally.

### Scenario 2: Hybrid home/office working patterns

In this scenario, more flexible working and travel patterns means that office spaces need to offer both opportunities for individual working but also spaces designed for collaboration and social interactions. As a result, demand for office spaces increases in the City. Reduced travel peaks on the Underground and Rail makes it more difficult to shift people to active modes.

Potential City Corporation responses outlined by workshop participants included:

- Need for sophisticated data (real-time & anonymised) to understand new patterns of people and vehicle movements. This can then inform street/timed closures and how these might affect businesses when compared with pre-pandemic patterns. Potential for using personal and business incentives to spread commuting and business trips over the full working week as well as promoting/subsidising different modes of transport.
- Enable the adaptation of offices to create more space for meetings, events and creative collaboration: making the most of people's time at the office for productive and social purposes.
- Provide a high-quality leisure offer to attract workers into the City for non-commercial purposes e.g. opportunity for social interaction, exercise, retail/cultural lunchtime and evening activities that create vibrancy.

- Capitalise upon new and existing channels of communication to publicise City changes and vision internationally.

### Scenario 3: Erosion of City position on international stage

In this scenario, less political prioritisation of The City in national & regional policy/investment decisions due to agendas to level up UK erode preeminent position on national / international stage. This could change the City's core purpose and activities (consequently the form and function) and associated working patterns as a result.

Potential City Corporation responses outlined by workshop participants included:

- Prioritise accessibility and sustainability to safeguard to safeguard City reputation as relevant and responsible.
- Invest in digital and transport connectivity to better connect City business with other national and global cities
- Pro-active community focused interventions that address the dis-proportionate effect of levelling up on lower salaried workforce and lower socio-economic groups reliant on City-related employment and support.
- Active curation of public realm, retail, culture and entertainment with flexible planning policies to support new, innovative and adapted land uses and create a more diverse City.
- Capitalise upon new and existing channels of communication to publicise City changes and vision internationally.

### Scenario 4: Active, data driven return to traditional working patterns

In this scenario, pressures to return to traditional 9-5 office working models that maintain property values results in the City enhancing on-street digital connectivity to facilitates the prioritisation of active travel modes as workers return to offices. Data driven decision making ensures efficient and flexible use of the built environment that derives benefits in terms of business and asset management.

Potential City Corporation responses outlined by workshop participants included:

- Reallocate street space away from polluting, single occupancy vehicles to focus on infrastructure provision for active modes. Act as a test bed for innovative, low carbon transport, e.g. micromobility.
- Promote and facilitate agreements between landlords, tenants and City Corporation to maximise opportunities for smart systems for de-carbonisation e.g. sharing energy efficiency data, data driven last-mile logistics consolidation practices that reduce freight and servicing activity
- Ensure that principles for digital layer of City are realised e.g. protecting personal data, not let unconscious and digital bias exclude / impact minority groups etc.
- Capitalise upon new and existing channels of communication to publicise City changes and vision internationally.

## 5. CROSS CUTTING THEMES FROM WORKSHOPS

Analysis of the workshops with both the City Corporation and external stakeholders has also revealed a number of cross cutting themes that run through them. Upon considering the strengths, weakness, opportunities and threats that each future scenario poses for the City of London, common discussion points included:

### 1. Opportunity to realign City priorities

Despite the huge impact the COVID-19 pandemic has had on the City of London and UK, participants in the workshops stressed that it has provided a moment of enormous strategic opportunity to revisit and realign the ambition and priorities of the City. Participants acknowledged that the pandemic presents a window of opportunity to rethink the City from first principles, understanding people and their needs first and foremost to “change the status quo” and create meaningful change. Participants also highlighted how capitalising on the convergence of a multitude of accelerated trends has the opportunity to make the City more resilient to future shocks.

In recent years, there has been increased comprehension and support of the importance of physical and mental well-being in both work and home facets of life. Participants highlighted in the scenario analysis that a City of London that fails to promote wellbeing both in the City and within the workplace could suffer in its capacity to develop, attract, and retain talented people.

Example participant workshop inputs:

- "Chance to re-think the City from first principles"
- "Supports well-being, quiet time and busy time"
- "Lack of focus on ethics and unintended consequences if not continually interrogated by stakeholders"
- "Danger of data driven rather than people-focused, vision driven"

### 2. Land use diversity; more space for cross-sectoral businesses, culture and creativity

The theme of land use diversity also came out strongly in the workshops, with participants citing the ambition to make the City the natural home for a wider array of businesses in the future; particularly SMEs.

While it remains uncertain what the longer-term impacts of the COVID-19 pandemic will be, behaviours relating to flexible working (where it is possible) may remain to some extent. What is required of the built environment and in particular the demands for work and office space in highly commercial areas such as the City, are likely to change too. Thus, a key point raised by workshop participants was that the City should use these changing demands as an opportunity to broaden the economic base of the Square Mile. Encouraging the use of vacant spaces was highlighted as a particular prospect for attracting businesses to the area that have previously been excluded. The potential for vacant spaces to be rapidly transformed into affordable hubs for start-ups could in turn be a catalyst for innovation and facilitate the establishment of a more inclusive cross-sector business ecosystem that goes beyond the realm financial and professional services. In the context of the growing requirement for public sector professional services contracts to draw upon SME expertise, the opportunity for the City to extend SME sectoral breadth, potentially has wider benefits.

City land use beyond commercial purposes was also a theme that was commonplace in the workshops, with participants citing that the City is likely to continue to be a growing visitor and cultural destination in the medium to long term and that space should be recrafted to higher value activities that capitalise of the unique cultural heritage of the Square Mile. Participants also note however that the City Corporation is keen to diversify the City's offer however there is uncertainty about what 'cultural' spaces means specifically in the context of the Square Mile and who would bear the cost.

Although participants did also cite the changing commercial space demands as a potential opportunity for the conversion of more office space to residential uses, discussion was also highlighted that planning system changes likely to be seen elsewhere in London are improbable to be replicated in the City. However, attendee discussion did emphasise there may be a tension between choosing the new balance of land use function of City buildings in planning policies in the future.

Ultimately the workshops drew attention to the fact that there is an opportunity in the City to build resilience to future shocks and attract more talent from across the UK by diversifying land use; specifically, welcoming and enabling businesses outside financial and professional service sectors to thrive. However wider impacts of land use diversification on the City, such as a change in the way people use public realm or transport associated with different City destinations and uses should also be acknowledged.

Example participant workshop inputs:

- "Shift away from Financial Services provides opportunity for more diverse and interesting range of businesses"
- "Vacated stock provides more scope to broaden economic base"
- "Diversification supports night-time economy, hospitality, retail and culture as footfall retained"
- "Use City in conjunction with IT hub - better links with Cambridge and Silicon Fens"
- "More promotion of cultural heritage"

### 3. Flexible office stock catering for different users and use cases

Another crosscutting theme that came through in the workshops was a recognition by participants of the need to transform office stock to suit the likely continuation to some extent of working from home behaviours.

As well as industries have adapted to working from home activities resulting from the pandemic restrictions, participants emphasised that certain business pursuits will always be fundamentally face-to-face. Innovative virtual mechanisms for collaborative exercises and relationship building have aided the continuation of regular pre-pandemic business practices and in some cases actually led to unintended business benefits, but many agree that they cannot replace physical interactions. Thus assuming that although numbers may fluctuate (by sector, age, day of the week, season amongst other things), there could likely be a large return to the workplace in the City in the medium to long term and therefore office spaces would need to adapt to the changes in the way people work in them.

Participants highlighted that the continuation of home working to some extent in all scenarios means that workplaces need to transform their offer in order to attract staff. The importance of spaces that cater for socialising, networking, meeting, collaborating and sharing was emphasised, citing that more emphasis needs to be placed on the ability of buildings to adapt and change, and for both new (e.g. SMEs) and established tenants to easily re-shape their spaces. As a result, in most scenarios participants concurred that the City would retain its vibrancy as a commercial centre, but maintain it in a different way, with a focus on changing how buildings are used rather than widespread total change of use.

Example participant workshop inputs:

- "Flexible floorspace designs"
- "Smarter use of office buildings = less traditional 'desk space', more spaces for creative collaboration and mental well-being / physical health"
- "More demand for flexibility in the provision of 'third spaces' where innovation, connectivity and new ways of cross-sector working"



- "Opportunity for lower building occupation density and more social space"

#### 4. Importance of quality of experience

Expanding upon cross cutting theme number 1 (that emphasises the opportunity the pandemic has brought for the City to realign strategic built environment and transport priorities to put people first), participants also articulated the importance of the quality of experiences the City can offer in a post-pandemic world.

Differentiation between working from home environments and the working environment offered in the City is essential, capitalising on the understanding that collaborative environments facilitate innovation, networks and career progression in a way that solo homeworking cannot. In particular, participants conveyed the potential significant negative impacts of working from home trends for younger workers and graduates, who may lose out on the opportunity for side-by-side learning, exposure to senior business leaders, mentoring and experience sharing.

The quality of the built environment has a key role to play in ensuring the City is as attractive to workers and visitors as possible; bringing people together to create and add value. Interventions that can contribute to a person's overall well-being, for example through the removal of polluting, single occupancy vehicular movements to reclaim street space for enhancing public realm, rethinking green space and integrating last mile/metre active journeys, can revitalise the City experience in the new context and help bring back the City's 'buzz'.

Example participant workshop inputs:

- "Re-invent the City as a place of quality, experience and innovation"
- "Impetus by the City to radically enhance the attractiveness of the Square Mile to attract more use"
- "Want people to be so glad they schlepped into the City that they appreciate what they have been missing and are keener to 'get involved'"
- "Lack of appeal to young professionals - reduced side by side learning, social interaction and lost 'buzz'"

#### 5. Sustainability at the heart of City reactivation

Participant discussion of the four potential future scenarios also highlighted the opportunity for the City to continue its support for climate action and placing sustainability as the centre of the Square Miles' built environment. Opportunities for more sustainable agglomeration, reduction in carbon emissions from transport, uplift in green infrastructure, provision of more green space and commitments to sustainable re-development of flexible office spaces were a few of ideas highlighted.

Example participant workshop inputs:

- "Significant increase in open space and urban greening"
- "Huge uplift in green infrastructure, extensive SUD investment, and civic amenity"
- "Commitments to ensure new construction is held to high sustainability standards"
- "Reduced carbon emissions from transport, improved air quality"

## 6. Reclaiming of street space away from vehicles

Following on from number 5, a more specific sustainability theme that participants in the workshops identified, was the opportunity for the City to permanently reclaim street space away from vehicles, to support and prioritise active, shared and zero emission modes whilst further activating the City's streets.

Discussion in the workshops highlighted the opportunity the City has to rethink longer term street space allocations and the potential to significantly accelerate the delivery of elements of the City of London Transport Strategy. The City Streets package of measures that have been implemented in the City to facilitate social distancing by providing extra space for people walking and active travel modes during the pandemic have temporarily reclaimed street space for walking, cycling and public realm. Participants reasoned that making the changes that limit vehicular traffic permanent, would facilitate cleaner air, promote active travel and (re)activate/animate streets; providing the footfall to support a variety of land uses. It would also aid the continuation of the City's realignment of the transport hierarchy in the Square Mile, whereby human powered interventions (such as walking, wheeling, cycling and scooting) are prioritised above e-mobility and shared zero emission public transit, and private polluting vehicles given the least precedence. Incorporating innovative modes of transport in the hierarchy is essential to prevent modal shift away from non-motorised travel (e.g. walking, wheeling cycling and scooting).

Example participant workshop inputs:

- "Reclaim space and innovate with new transport modes e.g. micromobility"
- "Need for high quality public space as part of City's offer and attractiveness supports delivery of traffic reduction measures and pedestrian priority"
- "Reclaim street space for walking, cycling and public realm, including play"
- "Reduced vehicular traffic: cleaner air quality and opportunity to animate streets (with the footfall to support exciting uses e.g. arts, culture, experiential retail)"
- "Increased movement efficiency"

## 7. Data driven solutions for social utility

Another crosscutting theme that came through in the future scenario workshop analysis was a recognition by participants that the City of London should continue to pioneer data-driven initiatives that bring social utility but ensure that outcomes remain vision driven. Balancing City vibrancy and serendipity with data driven efficiencies is key.

The pandemic has proven on a large scale how important data is in enabling individuals and organisations to respond to changing circumstances. However, it has also revived discussions on the perceived compromises that need to be made between data privacy and data sharing. Both themes were highlighted by participants as a potential opportunity and threat to the City of London in the future across the scenarios, indicating that there is a requirement for the City to review what data may benefit the Square Mile in combating future challenges (e.g. climate change) but also revisiting safeguards and data transparency.

Weaknesses associated with the crosscutting data theme were also pointed to by participants, whereby increased data driven processes could for example increase the City's reliance on external data processing, increase the impact of cyberattacks and endure digital exclusion.

Example participant workshop inputs:

- "Open source data drives wider innovations"
- "Danger of data driven rather than vision driven"
- "Smart technology can help with variety of land management needs"
- "Still a way to go before we really become a data driven organisation"

## 8. Maintenance of the City's world-class business ecosystem

The final crosscutting theme that emerged from the workshops, was the importance of maintaining the City's world-class international status. Participants made it clear that the City should continue to capitalise on the 2000 years of history and globally academic and cultural institutions that are unique to this part of the world. Participants also stated that adaptation of City functions in line with post-pandemic trends (particularly work and travel behaviours) that are harmonised with revised communications and branding is essential for maintaining the City's international status.

As the City adapts to a post-pandemic situation, it should be noted that the definition of 'world-class' and how it changes to encompass and embrace trends that have resulted from COVID-19 (such as working from home patterns & workplace flexibility demands) is likely to have consequences for the City as a place and associated transport systems. Types of user may vary more significantly in the City and their needs and expectations of a first-class urban commercial hub may diverge from established pre-pandemic standards.

Example participant workshop inputs:

- "Ideas for future activation of the City are not necessarily unique and therefore others could potentially start pushing the access, innovation and well-being agenda faster"
- "Business survey showing City address still valued despite virtual working"
- "City could lose status and pull as global business centre, with knock on effects to wide range of City functions"
- "Threat to City Corporation as an entity if international status not maintained"



## 6. POTENTIAL IMPACT OF COVID-19 ON THE CITY OF LONDON TRANSPORT STRATEGY

This section of the report considers the potential impacts of the COVID-19 pandemic, as identified by the desktop review and workshop participants, in the context of the City of London Transport Strategy ahead of the 2022 revision exercise. Each of the ten Transport Strategy outcomes outlined by the City Corporation have been considered to examine the extent to which the pandemic has provided an opportunity to accelerate and 'lock in' positive changes, decelerate and delay the pursuit of certain outcomes or altered the nature of potential outcomes. This chapter provides an independent view of what actions the City Corporation should consider when re-examining the City of London Transport Strategy.

### **Outcome: The Square Mile's streets are great places to walk and spend time**

#### *Needs / Possibility:*

The COVID-19 pandemic could provide the impetus for the City Corporation to accelerate their pursuits in making more of the Square Mile's streets great places to walk and spend time in. The increasing importance of quality of experience has been cited by workshop participants across diverging future scenarios, as a key impact of the pandemic. There is now a greater importance on differentiating working from home environments and the environment offered in the City; and this extends to the City's streets. Streets that are places in their own right, where users can stop, rest, relax or socialise offer something beyond that available to most who work from home.

#### *Action:*

Accordingly, the City Corporation should facilitate, built environment improvements that rebalance space to focus on pavement users, reduce loud polluting vehicles and provide more quality green spaces that promote socialising and bolster well-being. This could help bring back the City's 'buzz' in the short term and revitalise the City experience in a new context in the longer term.

In conjunction with public realm improvements, should actively enable and promote increased flexibility and diversity in land use and working patterns in order to potentially to improve pedestrian comfort levels in the Square Mile. Any reduction in travel peaks, whether by time of day but also week and season, has the potential of making walking on streets in the City much more enjoyable.

### **Outcome: Street space is used more efficiently and effectively**

#### *Needs / Possibility:*

The COVID-19 City Streets interventions have closed many of the roads, imposed time-based restrictions on vehicles and created more greenspace - reclaiming the City for people walking, cycling and travelling by bus, as well as commercial and community functions.

#### *Action:*

The pandemic has provided the City with a unique opportunity to pilot ways in which to push forward this outcome and therefore the City Corporation should consider maintaining street space reallocations in the long term. The importance of improving the quality of place and experience in the City to attract worker and visitors back, is likely to help provide support and impetus for these changes. Additionally, as people return to the City on a regular basis, a more permanent reallocation of street space has the potential to facilitate a more permanent shift away from private vehicles.

Any enduring and future street space efficiency improvements are likely to have lasting impacts on well-being and quality of life for all users and facilitate economic recovery of the area.

**Outcome: The Square Mile is accessible to all***Needs / Possibility:*

Based on desktop review and workshop outputs, a number of the potential future impacts of COVID-19 on the City could change who works, visits and lives in the Square Mile (for example provision of more space for a larger proportion of cross-sectoral businesses, culture and creativity). Participants also cited that the pandemic gives the City of London the opportunity to realign Square Mile priorities that put users first and enhance their quality of experience.

*Action:*

The City Corporation should ensure that the Square Mile is accessible to a wider breadth of people with different pain points and expectations when supporting accessibility for 'all' in Transport Strategy proposals. For example, the City Corporation could consider opportunities to aid and enhance the finding and understanding of the City's assets, culture and heritage through fixed and digital wayfinding techniques.

The City should in turn capitalise upon the current opportunity to accelerate the implementation of interventions which enable easy, comfortable and confident travel to and around the Square Mile. In removing obstacles to walking, cycling, wheeling and using public transport through vehicle restrictions and reclaiming street space to improve public realm and create routes that are suitable for all including people using cycles as mobility aids, mobility scooters, power wheelchairs & prams.

**Outcome: People using our streets and public spaces are safe and feel safe***Needs / Possibility:*

Ensuring that people using the streets and public spaces in the City are safe and feel safe is crucial in creating a positive user experience that attracts workers and visitors back into the City post-pandemic. Based on workshop outputs, the potential for more flexibility and diversity in building and land uses as a result of pandemic trends, has the potential to increase footfall and street activity outside traditional 9-5 weekday working hours; enhancing the night-time and weekend economy of the Square Mile. These changes could alter perceptions of safety both positively and negatively depending on the circumstances.

*Action:*

The City Corporation should continue to reinforce a shift in modal hierarchy's post-pandemic as they have the potential to have a positive impact on the safety and security in the City. Interventions to reduce carbon emissions and improve air quality, could result in fewer vehicles on City streets and remaining vehicles could move at slower speeds. This could have positive impacts on perceived and actual road danger, aiding the City to deliver Vision Zero. Reclamation of street space for public realm renewal could also facilitate the incorporation of security features into the streetscape that could help make streets more attractive places to use and spend time.

**Outcome: More people choose to cycle***Needs / Possibility:*

The short term COVID-19 City Streets interventions that increased cycle parking provision, enhance cycle lanes, reduced speed limits and closed streets to through vehicular traffic all have the potential to have a longer-term positive impact on cycling and perceptions of cycling in the City.

Based on workshop outputs, the impacts of the pandemic have the potential to put sustainability at the heart of future City reactivation and provide further impetus of the

City Corporation to pursue ambitions to actively prioritise and promote active travel over other modes (through the reallocation of street space etc.).

The desktop review and workshop outputs also highlighted that a number of the potential future impacts of COVID-19 on the City could change who works, visits and lives in the Square Mile (for example provision of more space for a larger proportion of cross-sectoral businesses, culture and creativity).

*Action:*

The City Corporation should maintain pandemic initiated interventions that reduce traffic and speeds and provide an easily comprehensible network of cycle friendly streets, as they have the potential to accelerate the Transport Strategy aim to get more people to choose cycling as means to get around.

The City should ensure that cycle infrastructure and network (e.g. routes and parking) in the Square Mile caters for a wider array of cycles (e.g. cycles as mobility aids, (e-)cargo bikes), business models for access (e.g. short- and longer-term rentals) and use cases (e.g. commuting, leisure, deliveries).

It should also be noted that the City is due to participate in the London e-scooter trial that is scheduled to commence in Spring 2020. Subject to the outcome of the scheme, the City Corporation should consider enabling e-scooters alongside a growth in cycling. The accommodation of e-scooters as equivalent users of cycle infrastructure in the City thus may require the reframing of this outcome in a refreshed Transport Strategy.

### **Outcome: The Square Mile's air and streets are cleaner and quieter**

*Needs / Possibility:*

Outputs from the workshops indicate that COVID-19 impacts on the City of London have the potential to aid the Corporation's ambition for the Square Mile to have the some of the cleanest urban air in the world and streets that are quieter more relaxing places.

As differing factors potentially become more pertinent in ensuring that the City maintains its world-class business ecosystem and international status as a result of changing work patterns (e.g. financial services firms choosing an office location with increasing attention paid to factors such as the quality of the surrounding built environment rather than to the City address), measures to improve the quality of the City environment are likely become more important.

*Action:*

The City Corporation should continue to adapt and enhance the City user experience through public realm and active travel space reallocations and temporal/geographical vehicle restrictions. Such interventions are likely to reduce polluting vehicle numbers and facilitate uptake of zero emission technologies in the Square Mile which in turn can reduce noise and air pollution and thus have positive impacts on the quality of place and health and well-being.

### **Outcome: Delivery and servicing are more efficient, and impacts are minimised**

*Needs / Possibility:*

The City Corporation aims to meet delivery and servicing needs of the area using fewer, quieter, safer and cleaner vehicles. Whilst some impacts of the COVID-19 pandemic have the potential to accelerate achieving this outcome, other impacts may alter requirements, slowing the process down.

*Action:*

As a result of the pandemic, the City Corporation should consider maintaining its implementation of street space reallocation schemes to improve the quality and quantity of public realm and execute modal hierarchy priorities to improve wider user experiences. Such actions have the potential to accelerate the use of last mile delivery hubs and (e-)

cargo bikes for freight and delivery services, whereby access and loading restrictions limit other freight vehicles.

If the COVID-19 pandemic leads to increased diversity and flexibility in land and space use in the City however, the City Corporation should consider how diverging needs may make Transport Strategy proposals for improved consolidation and sustainable procurement practices more difficult to achieve. Continuation of temporal working flexibility however may reduce personal deliveries to workplaces (despite them already being banned in many cases).

### **Outcome: Our street network is resilient to changing circumstances**

#### *Needs / Possibility:*

The COVID-19 pandemic has highlighted the importance of street resilience to changing circumstances and the crucial role streets play in facilitating resilience of the wider built environment. The pandemic however potentially broadens the definition of 'changing circumstances' in the specific context of this Transport Strategy outcome, to not only direct disruptions such as that caused by construction, breakdowns or severe weather but also disruptions that have indirect implications for the City's streets.

The pandemic also has proven on a large scale how important data is in enabling individuals and organisations to respond to changing circumstances and going forward highlights the potential that data may have in aiding the City Corporation combat future challenges effectively (e.g. climate change).

#### *Action:*

The City Corporation should aim to maintain and increase the level of granular monitoring of travel behaviour and asset use that has resulted from the pandemic as it has the potential to increase the resilience of the City's street network in the long term.

Consideration should be given to how the City understands movement (people walking and cycling and vehicles) in a near real-time manner to help with more agile planning to maximise the value of its infrastructure. Such an approach (with support flexibility through supporting TROs and parking) could allow for much more flexible city streets that could serve flexing needs.

The City Corporation should also consider how streets can be repurposed to support wider City functions and communities in future pandemics and other 'changing circumstances' within the Transport Strategy. Pre-emptive consideration of how the City could give more public space to support businesses for example, could help enhance the resilience of the Square Mile in future situations.

### **Outcome: Emerging transport technologies benefit the Square Mile**

#### *Needs / Possibility:*

The pandemic has provided the City of London with a unique opportunity to fast-track the piloting of some emerging transport technologies. Potential future changes to the streetscape driven by the ambition to improve user experiences across a broadening array of use cases has the potential to accelerate the City's desire of becoming a testbed for urban transport innovation. Workshop outputs however stress that 'benefits' should not solely be driven by data-led efficiencies but instead be outcome driven so that City vibrancy is not impacted.

#### *Action:*

Given the ongoing and rapid changes in technology (ranging from "invisible" sensor technologies to help manage assets more effectively through to the on-demand forms of transport and ultimately, automated solutions) it is suggested that the City of London develops a future mobility strategy focused on place and population needs and its

overarching vision and objectives for the City. This could provide context and a blueprint to aid the City's transportation objectives. Planning for the future, in terms of new modes, services and underlying technology could help deliver better places, improved asset resilience and agility. For example, identifying the potential of new modes to improve user experience or air quality in the City, or digitally enabled kerbside management to improve the efficiency and reduce impact of freight and deliveries.

### **Outcome: The Square Mile benefits from better transport connections**

#### *Needs / Possibility:*

Based on workshop outputs and desktop trend review, the impacts of the COVID-19 pandemic have the potential to alter how the City endeavours to improve transport connections. The pandemic and the potential ensuing trends (such as the importance of the quality of place and experience, active travel priorities), has the potential to refocus the pursuit of the 'better transport connections' outcome towards accessibility, and in particular active modes, where networks are intrinsically linked to surrounding boroughs. There is also a need for the City Corporation to work collaboratively with Transport for London and businesses to help restore confidence in public transport and ultimately understand whether 'better transport connections' in the future should be considered against a modified set of intentions compared to that of today..

#### *Action:*

In light of opportunities for the City to capitalise upon COVID-19 street reallocations and enhancing the built environment user experience, the City Corporation should aim to support to similar interventions beyond the Square Mile's boundary. For example, the City Corporation should support and champion improvements to accessible walking, cycling and wheeling travel connections to the Square Mile from neighbouring boroughs. The delivery of high-quality infrastructure routes to and through central London is critical in building city wide resilience.

## 7. CONCLUSION

In conclusion, this report has presented the findings of a desktop study into the impacts of COVID-19 on the City of London and three scenario development workshops. Analysis has identified a number of key cross-cutting themes when considering how The City Corporation might respond to future situations and examined how these themes could impact the desired outcomes defined in the City of London's Transport Strategy.

When considering the analysis, the key insights gained are:

- The COVID-19 pandemic has had wide ranging impacts on the City of London and there is a consensus that these impacts have changed the future trajectory of the City. Behaviours, particularly travel and working patterns, are unlikely to return to the way they were before the crisis, in turn impacting how workers, businesses, residents and visitors use the Square Mile, thus presenting a range of challenges and opportunities for the City Corporation.
- The City Corporation recognises change is coming, however endeavours to use the Transport Strategy as a mechanism to ensure that change is facilitated in a controlled way and driven by an ambition to achieve strategic outcomes.
- Given the potential blending of home / remote and office-based working, the City Corporation needs to consider how to ensure the City remains an anchor for networking, events, cultural and leisure activities. This is particularly the case at the "shoulders" of the traditional working day to retain the socio-cultural link between businesses, their employees and the City's vibrancy and offer.
- Making the COVID-19 enabled street space reallocations permanent has huge potential to improve the quality and quantity of public realm and execute modal hierarchy priorities to improve wider user experiences.
- From a transport perspective, the existing strategic position and desired outcomes outlined in the City of London's Transport Strategy remains relevant in a post-pandemic context. The overarching approach to reduce private motorised transport and increasing the prominence of street space for people to walk and cycle continues to hold true. It is understood that there might be extremes in specific use cases and contexts but ultimately the impacts of COVID-19 have not hugely skewed the desired outcomes of the Transport Strategy; in turn in some cases they have provided the opportunity for the acceleration of interventions to achieve outcomes more quickly.
- The uncertainty surrounding the extent of future changes in the City of London has highlighted the importance of resilience and agility in accommodating and responding to changing circumstances. Thus, the Transport Strategy must not be a static document, but needs to be revisited regularly so that it is able to adapt and nimble in delivery in pursuit of desired outcomes. A review of the Transport Strategy is recommended every three years with systematic sprint reviews of KPIs more frequently.
- Having a clear vision for the future that is outcomes led, also creates an environment through which the City Corporation can make use of new modes, services and underlying technology to help deliver better places, improved asset resilience and agility.
- Ultimately the Transport Strategy should enable the City Corporation to capitalise upon assets in a flexible way which service business, employee, visitor and resident needs as circumstances change.



## APPENDIX A – SCENARIO DASHBOARDS

### Scenario 1: Working from Home Normalisation

- 1 -

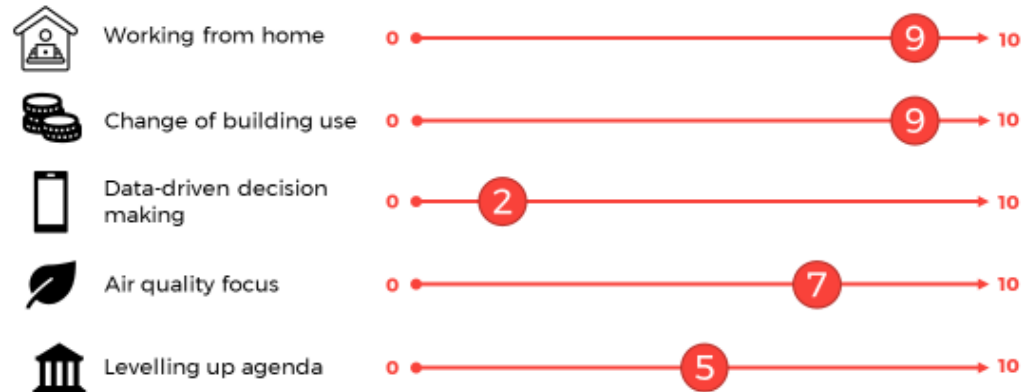
#### Scenario Summary:

- Work from home becomes the predominant way of working
- Significant impacts on building use resulting in land use changes (e.g. office space becomes retail, residential or leisure space)
- New form and function for the City

#### Associated Trend Data

- 83% of City workers cite travel on public transport as their most important concern when returning to work
- 71% of City employees work in the sectors with the highest propensity / ability to work from home (69.6% doing some homeworking before the pandemic)

#### Scenario Levers:



#### Hypothesised Shape & Scale of Movements:



#### Potential Outcomes

Residents	Businesses	Workers	Visitors	Places
<ul style="list-style-type: none"> <li>• Office space could be repurposed as residential space</li> <li>• Some people living in the City for proximity to work may choose move resulting in a new resident population</li> </ul>	<ul style="list-style-type: none"> <li>• Unneeded office space could be sublet out at discounted rates leading to a new mix of potentially smaller businesses in the City</li> <li>• New digital ways of working emerge</li> </ul>	<ul style="list-style-type: none"> <li>• Redefined workplace interactions create new demands for socialising</li> <li>• Corporate culture becomes more laissez faire and offers more flexibility</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced need for business travel due to remote working</li> <li>• Arts and cultural spaces could replace space once occupied by offices, improving the tourism offering</li> </ul>	<ul style="list-style-type: none"> <li>• A reduction in vehicular traffic will improve air quality, allow road space to be reallocated as greenspace and create more room for travel by active modes</li> </ul>

## Scenario 2: Hybrid Home/Office Working Patterns

- 2 -

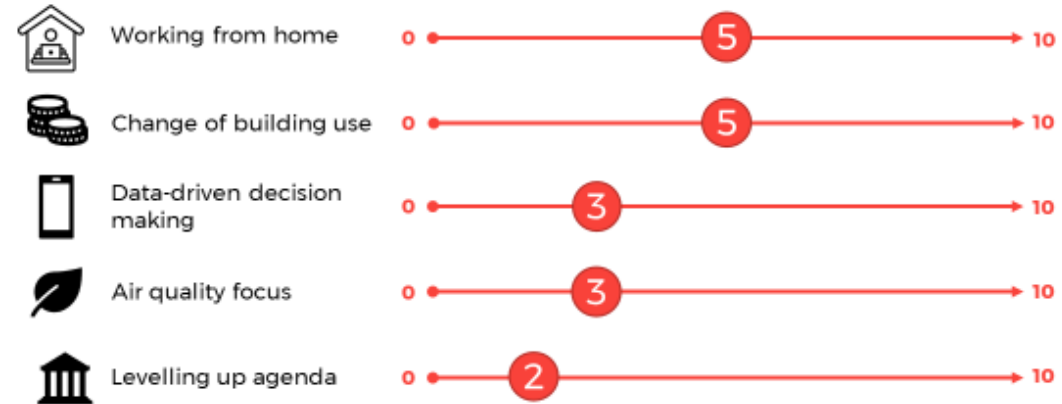
### Scenario Summary:

- More flexible work and travel patterns require office space to cater for both individual & collaborative working, as well as social space
- Results in increased demand for office space
- Reduced travel peaks & less crowded conditions on the UG and Rail make it difficult to shift people to active modes

### Associated Trend Data

- 34% of companies surveyed said all staff were in the office for more than 3 days week, down to 12% after the pandemic
- 83% of City workers cite travel on public transport as their most important concern when returning to work

### Scenario Levers:



### Hypothesised Shape & Scale of Movements:



### Potential Outcomes

- | Residents  | Businesses   | Workers   | Visitors  | Places  |
|--|--|---|---|---|
| <ul style="list-style-type: none"> <li>• Residents may move further out of the City to prioritise space at home over proximity to work with less frequent commutes.</li> <li>• Commutes may be less stressful thanks to lower</li> </ul> | <ul style="list-style-type: none"> <li>• More office space required with greater flexibility to cater for variable demands</li> <li>• Businesses may face higher rents with less productive space</li> </ul> | <ul style="list-style-type: none"> <li>• Workers are able to split their time between the home and office as is convenient</li> <li>• Greater emphasis on social interactions when in the office</li> </ul> | <ul style="list-style-type: none"> <li>• Meeting face-to-face may return as a renewed priority after reduced social interaction through the pandemic, encouraging more business travel</li> </ul> | <ul style="list-style-type: none"> <li>• More focus may be needed on promoting travel by active modes as public transport becomes more competitive</li> </ul> |



## Scenario 3: Erosion of City Position on the International Stage

- 3 -

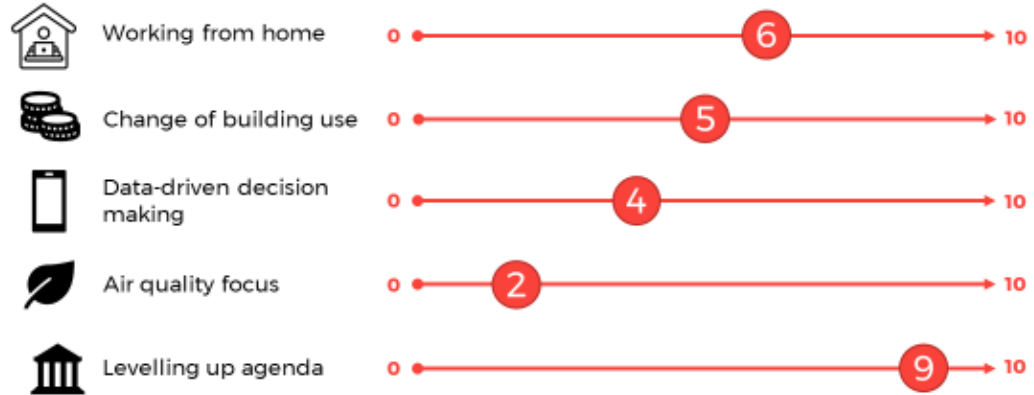
### Scenario Summary:

- Less political prioritisation of the City in national and regional policy
- Focus on levelling up the UK erodes the preeminent position of the City
- Potential change to the City's core purpose & activities impacting working patterns

### Associated Trend Data

- 14% of residents want to leave the City as a result of the pandemic
- 15% of City businesses will be subletting out office space that is no longer needed
- Business travel in white collar sectors expected to return more slowly than sectors with more tangible outputs

### Scenario Levers:



### Hypothesised Shape & Scale of Movements:



### Potential Outcomes

- | Residents  | Businesses   | Workers  | Visitors  | Places   |
|--|--|--|---|--|
| <ul style="list-style-type: none"> <li>• Fewer residents may be prepared to pay the premium prices for central residences leading to a decline in the resident population</li> </ul> | <ul style="list-style-type: none"> <li>• Trends for company HQs in northern cities may be accelerated, leading to a redistribution of labour markets away from the City</li> </ul> | <ul style="list-style-type: none"> <li>• Elevated London salaries may become eroded as opportunity moves elsewhere</li> <li>• New roles may emerge in other sectors such as leisure and tourism</li> </ul> | <ul style="list-style-type: none"> <li>• The relocation of company HQs may mean that meetings occur in other cities.</li> <li>• The City's excellent international links may prevent this to some degree</li> </ul> | <ul style="list-style-type: none"> <li>• A reduced standing on the international stage may mean the City becomes less busy, allowing space to be transformed for alternative purposes</li> </ul> |

## Scenario 4: Active, Data-Driven Return to Traditional Working Patterns

- 4 -

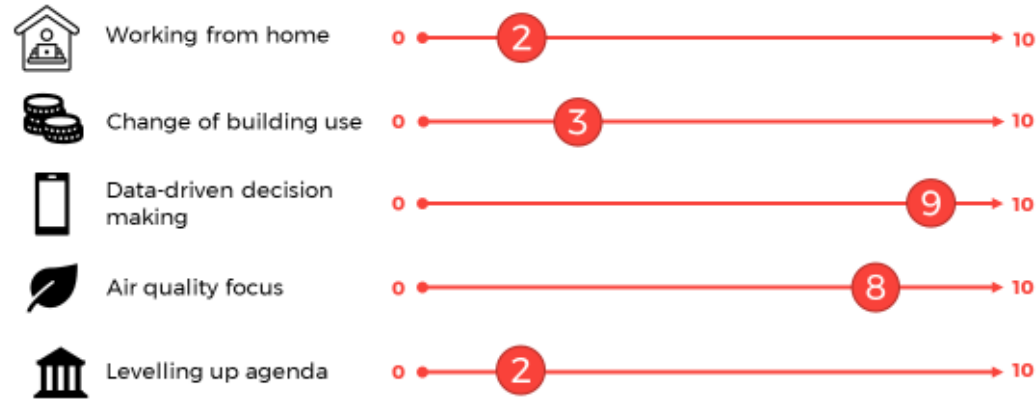
### Scenario Summary:

- Pressures to return to 9-5 office working models that maintain property values
- Enhanced on-street digital connectivity to facilitate prioritisation of active modes
- Data-driven decision making ensures efficient and flexible use of the built environment

### Associated Trend Data

- 44% of people in the UK reported worsened workplace interactions, rising to 50% among those who do not attend their usual place of work
- In April, 32% of workers were struggling to fulfil their work commitments, compared to 24% in January before the pandemic.

### Scenario Levers:



### Hypothesised Shape & Scale of Movements:



### Potential Outcomes

- |   |  |  |   |   |
|---|--|--|---|---|
| <br><b>Residents</b> <ul style="list-style-type: none"> <li>• Residents to continue to want to live close to central locations</li> <li>• Renewed demand for premium residence in the City</li> </ul> | <br><b>Businesses</b> <ul style="list-style-type: none"> <li>• Businesses will have to grapple with reigning in the freedom that working from home offered to workers</li> <li>• Retail and hospitality will see a resurgence from increased footfall</li> </ul> | <br><b>Workers</b> <ul style="list-style-type: none"> <li>• There may be reluctance amongst many workers to return to crowded commutes</li> <li>• Workplace interactions will improve and as will worker's social lives as a result</li> </ul> | <br><b>Visitors</b> <ul style="list-style-type: none"> <li>• Business travel will return but perhaps only where necessary</li> <li>• The leisure economy will benefit from greater numbers in the City</li> </ul> | <br><b>Places</b> <ul style="list-style-type: none"> <li>• Digitally connected spaces will allow for dynamic management of the built environment to ensure that the return to work is managed to be safe as possible</li> </ul> |
|---|--|--|---|---|



## **Transport Strategy Vision, Aims and Outcomes**

As adopted in 2019 these are the Vision, Aims, and outcomes for the Transport Strategy.

### **Vision**

- Streets that inspire and delight, world-class connections and a Square Mile this is accessible to all.

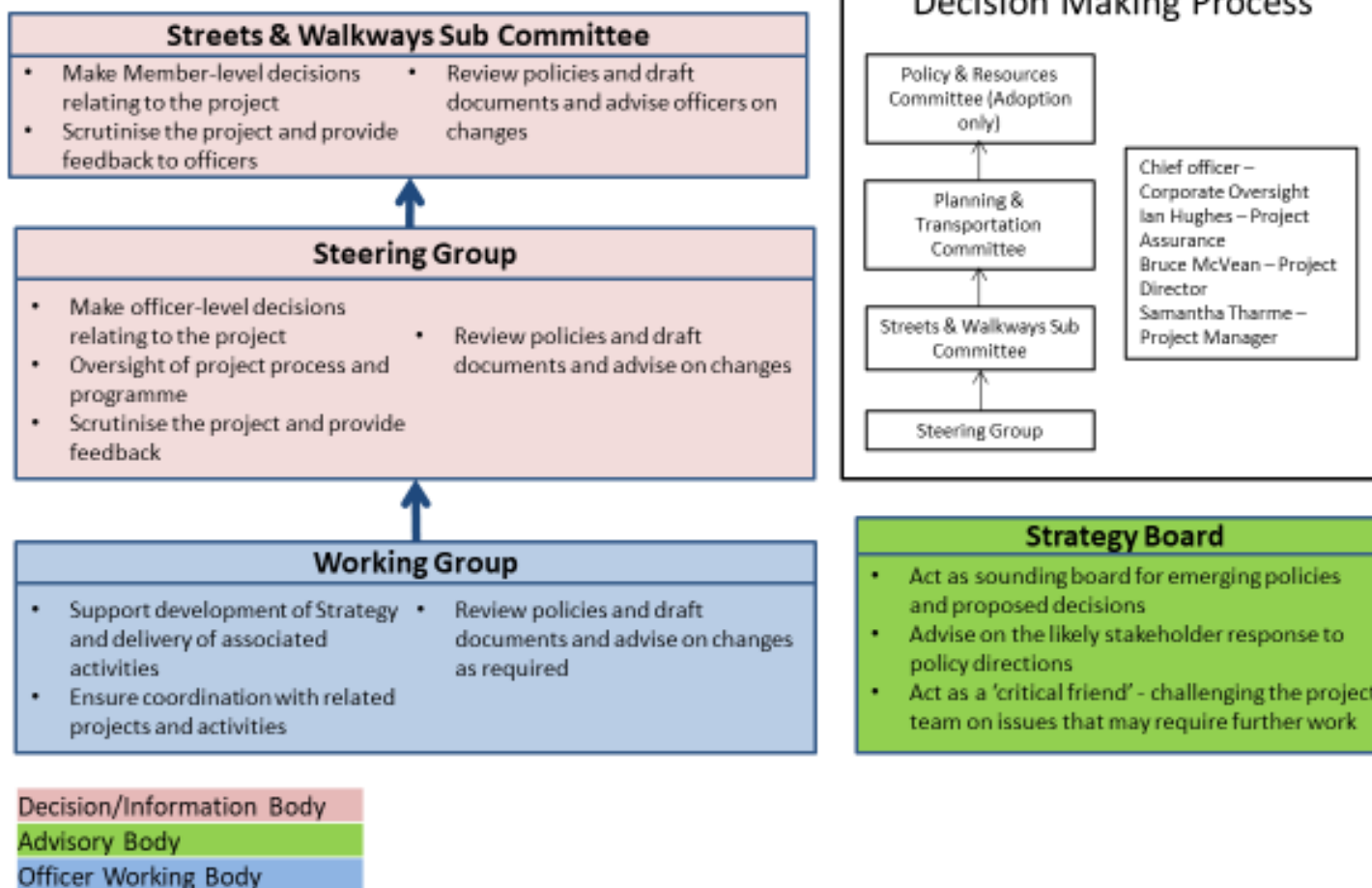
### **Aims**

- Ensure the Square Mile is a healthy, attractive and easy place to live, work, learn and visit.
- Support the development of the Square Mile as a vibrant commercial centre and cultural destination and protect and enhance its unique character and heritage

### **Outcomes**

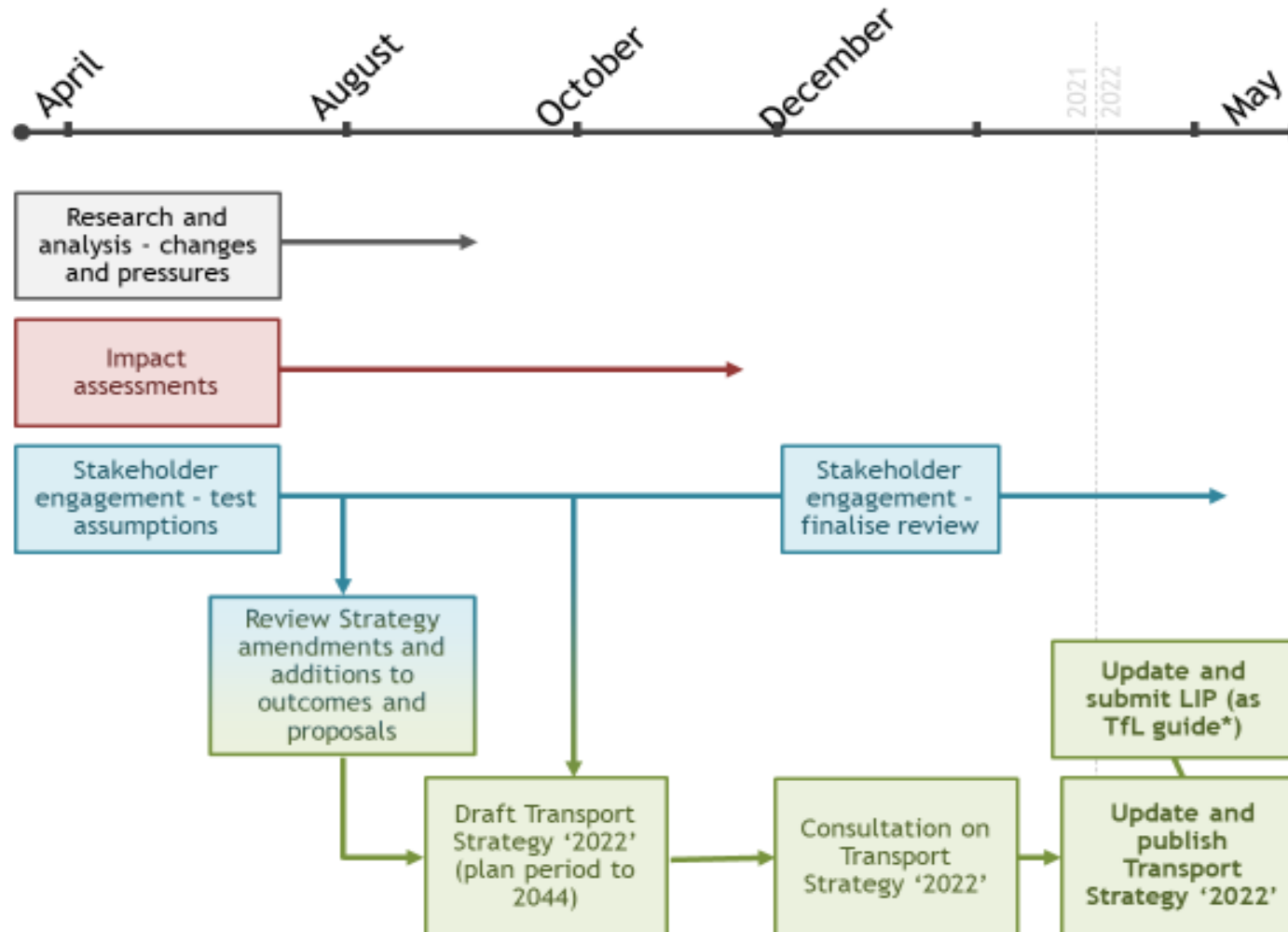
- The Square Miles streets are great places to walk and spend time
- Street space is used more efficiently and effectively
- The Square Mile is accessible to all
- People using our street are safe and feel safe
- More people choose to cycle in the city
- The Square Mile's air and streets are cleaner and quieter
- Delivery and servicing needs are met more efficiently, and impacts are minimised
- Our street network is resilient to changing circumstances
- Emerging transport technologies benefit the Square Mile
- The Square Mile benefits from better transport connections

## Transport Strategy Governance Structure



## Transport Strategy Programme

Appendix 4



<b>Committee(s)</b>	<b>Dated:</b>
Planning & Transportation Committee	07 September 2021
<b>Subject:</b> Department of the Built Environment Risk Management – Quarterly Report	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	<b>N/A</b>
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>No</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Executive Director, Environment	<b>For Information</b>
<b>Report author:</b> 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, which will be the subject of a deep dive by the Audit and Risk Committee this autumn:

- 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 continue to be reported to 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. Risk owners are consulted, and risks are routinely reviewed with the updates recorded in the Corporate (Pentana) system.
3. 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

4. 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.
5. 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).
6. 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

7. 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 (June 2021) is included. Note that this is a snapshot comparison of our risk profile.

14/06/2021		Impact			
Likelihood		Minor	Serious	Major	Extreme
	Likely				
	Possible		2	1	1
	Unlikely		1	1	
	Rare				2

17/08/2021		Impact			
Likelihood		Minor	Serious	Major	Extreme
	Likely				
	Possible		2	1	1
	Unlikely		1	1	
	Rare				1

### Summary of Key Risks

8. The Department of the Built Environment is responsible for one Corporate Risk, this risk is also reported to Audit & Risk Sub Committee and will be looked at in depth this Autumn as part of the regular deep dive programme.

### 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 Possible (3) and an Impact of Extreme (8). This is above the Target Risk score of 16 and unchanged since June 2021.

The following mitigation measures are currently being implemented:

- Continuing to progress All Change at Bank, with a report due to committee in September
- Work on pedestrian priority programme continues with the first tranche of experimental schemes to retain temporary Covid-19 measures due to go to Committee in October
- Proposals for Healthy Streets minor schemes on Golden Lane have been developed and alternative funding sources are being investigated following confirmation that TfL LIP funding will not be available this calendar year.
- Continuing to promote cycle skills training, both online and in-person.

### COVID-19 Risks

9. 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.

### **Significant Risk changes and other items of particular interest to Members**

10. Regular review of risks has identified no Departmental Level risk where the Current Risk score has changed.
11. The Target Risk Ratings/Scores have also been reviewed since the last report to Members and no changes have been identified.
12. It is worth noting that risk DBE-TP-11 regarding the Beech Street roofing panels has been removed from the risk register as the tiles have now been removed therefore the risk is no longer live.

### **Risk Management Process**

13. 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.
14. 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**

15. 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)	<b>Service delivery/performance:</b> Minor impact on service, typically up to one day. <b>Financial:</b> financial loss up to 5% of budget. <b>Reputation:</b> Isolated service user/stakeholder complaints contained within business unit/division. <b>Legal/statutory:</b> Litigation claim or find less than £5000. <b>Safety/health:</b> Minor incident including injury to one or more individuals. <b>Objectives:</b> Failure to achieve team plan objectives.
Serious (2)	<b>Service delivery/performance:</b> Service disruption 2 to 5 days. <b>Financial:</b> Financial loss up to 10% of budget. <b>Reputation:</b> Adverse local media coverage/multiple service user/stakeholder complaints. <b>Legal/statutory:</b> Litigation claimable fine between £5000 and £50,000. <b>Safety/health:</b> Significant injury or illness causing short-term disability to one or more persons. <b>Objectives:</b> Failure to achieve one or more service plan objectives.
Major (4)	<b>Service delivery/performance:</b> Service disruption > 1 - 4 weeks. <b>Financial:</b> Financial loss up to 20% of budget. <b>Reputation:</b> Adverse national media coverage 1 to 3 days. <b>Legal/statutory:</b> Litigation claimable fine between £50,000 and £500,000. <b>Safety/health:</b> Major injury or illness/disease causing long-term disability to one or more people <b>Objectives:</b> Failure to achieve a strategic plan objective.
Extreme (8)	<b>Service delivery/performance:</b> Service disruption > 4 weeks. <b>Financial:</b> Financial loss up to 35% of budget. <b>Reputation:</b> National publicity more than three days. Possible resignation leading member or chief officer. <b>Legal/statutory:</b> Multiple civil or criminal suits. Litigation claim or find in excess of £500,000. <b>Safety/health:</b> Fatality or life-threatening illness/disease (e.g. mesothelioma) to one or more persons. <b>Objectives:</b> Failure to achieve a major corporate objective.

### (C) Risk scoring grid

Likelihood	Impact				
	X	Minor (1)	Serious (2)	Major (4)	Extreme (8)
	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)

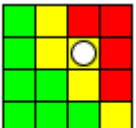
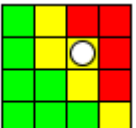
Generated: 17 August 2021



Rows are sorted by Risk Score

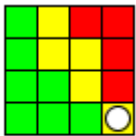
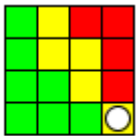
Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Flight path
<b>CR20 Road Safety</b>  Page 347  23-Oct-2015 Ian Hughes	<b>Cause:</b> Limited space on the City's 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. <b>Event:</b> The City Corporation's statutory duties and the measures outlined in the Transport Strategy are not fully and effectively implemented. <b>Effect:</b> <ul style="list-style-type: none"> <li>•The number of casualties occurring on the City's streets rises or remains unchanged instead of reducing</li> <li>•The safety and feeling of safety of the City's communities is adversely affected (Corporate Plan Outcome 1)</li> <li>•Physical or mental harm suffered by those involved in collisions and their associates</li> <li>•Economic costs of collisions impact on individuals, City businesses and wider society</li> <li>•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</li> </ul>	 Likelihood Impact	<b>24</b>	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: Continuing to progress All Change at Bank, with a report on the consultation due to go to Committees in September. Work on the Pedestrian Priority programme continues with the first tranche of experimental schemes to retain temporary Covid-19 measures due to go to Committee in October. Proposals for Healthy Streets minor schemes on Golden Lane have been developed and alternative funding sources are being investigated following confirmation that TfL LIP funding will not be available this calendar year. Continuing to promote cycle skills training, both online and in-person.  <b>03 Aug 2021</b>	 Likelihood Impact	<b>16</b>	31-Mar-2022	
							Reduce	

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"> <li>• Bank on Safety and All Change at Bank</li> <li>• RDR engineering programme</li> <li>• 15mph traffic limit</li> <li>• Ludgate Circus (lead by TfL)</li> </ul>	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"> <li>• Active City Network</li> <li>• User and stakeholder liaison</li> <li>• Schools programme</li> </ul>	Opportunities for campaigns, training and engagement have been limited due to ingoing 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
<b>DBE-PP-01</b> <b>Adverse planning policy context</b>  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	<b>Likelihood</b>  <b>Impact</b>	<b>12</b>	Additional risk from national changes to permitted development rights have been mitigated by the preparation of a replacement Article 4 Direction finalised July 2021, to be implemented August 2022. Risk to City Plan preparation timetable due the Mayor of London's consultation response will be mitigated by liaison with GLA to agree suitable refinements to the Plan.  <b>17 Aug 2021</b>	<b>Likelihood</b>  <b>Impact</b>	<b>12</b>	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

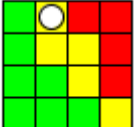
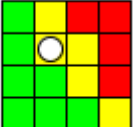

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Flight path
<b>DBE-02 Service/Pipe Subways</b> 02-Dec-2015 Ian Hughes; Giles Radford	<p>Cause: Provide safe access and egress for utilities and maintenance functions, whilst having operatives entering the confined space to undertake checks.</p> <p>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.</p> <p>Impact: Fatality / Major Injury / Illnesses</p>	 <p>Likelihood</p> <p>Impact</p>	8	<p>No further update</p> <p>17 Aug 2021</p>	 <p>Likelihood</p> <p>Impact</p>	8	<p>31-Mar-2022</p> <p>Accept</p>	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
DBE-02a Business As Usual Mitigations	<p>Confined space working is avoided when possible.</p> <p>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</p> <p>All openings are controlled through a central booking system. A subway must not be entered if permission to do so has been refused.</p> <p>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 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>	All business as usual mitigations have been reviewed, they are very much current and continue to work effectively.	Giles Radford	19-Feb-2020	31-Mar-2022



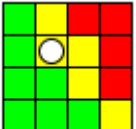
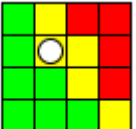
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Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
DBE-DS-01a Business as usual mitigating controls	(1) Continue to provide excellent services [evidenced by customer survey]; (2) Maintain client links with key stakeholders; (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-03 Major Projects and 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		8	The likelihood has increased from 3 (possible) to 4 (likely) this reflects recent confirmation that very limited funding will be received this year from TfL. Some projects or programmes will be paused or delayed as a result, but all major projects are expected to be able to progress. Alternative funding sources, including s106, are being explored for some projects and programmes.  03 Aug 2021		6	30-Nov-2021  Reduce	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
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DBE-TP-03a Annual Spending Submission	Send Annual Spending Submission to TfL	Annual Spending Submission will be submitted once TfL have issued revised guidance for 2022/22. This is likely to be in Q3 2021/22.	Bruce McVean	03-Aug-2021	30-Nov-2021
DBE-TP-03b TfL meetings	Conduct quarterly meetings with TfL-	Regular meetings not currently required due to limited funding provided this year.	Bruce McVean	03-Aug-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
<b>DBE-PL-02</b> <b>Not being alive to the needs/requirements of the world business centre and the political environment</b>  23-Mar-2015 Gwyn Richards	Cause: Staff are badly briefed in relation to the planning development needs of the City as a world business centre  Event: Perception that we are not responsive to the planning development needs of the City as a world business centre  Impact: The City's reputation suffers and we fail to deliver buildings that meet the needs of the City as a world business centre	Likelihood  Impact	<b>6</b>	The risk has been reviewed and although there continues to be a degree of uncertainty regarding the wider economic situation, post-Brexit and COVID-19 the likelihood and impact are largely unchanged even if there are tentative signs of recovery. 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 in particular to better understand the emerging economic trends and signs of recovery.  <b>13 Aug 2021</b>	Likelihood  Impact	<b>6</b>	31-Dec-2021	
							Accept	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
DBE-PL-02a Business as usual mitigating controls	<p>(1) Continue to work closely with other parts of the department; the City Property Advisory Team; other City of London Departments; &amp; the Greater London Authority.</p> <p>(2) To work closely with the development industry, the City Property Association and hold regular meetings with City agents.</p> <p>(3) Participation at MIPIM.</p> <p>(4) Co-ordination with the Recovery Taskforce</p>	<p>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.</p> <p>MIPIM 2020 was cancelled and MIPIM 2021 has been postponed until June 2021 in Cannes.</p> <p>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.</p> <p>The (non-MIPIM) controls, which have been implemented, are appropriate and effective.</p>	Gwyn Richards	05-Mar-2021	31-Dec-2021

[illegible]

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-2022

## BE COVID-19 Risks

**Generated on:** 17 August 2021



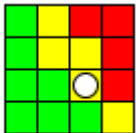
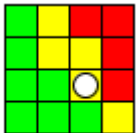
Appendix 3

Rows are sorted by Risk Score

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Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
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CVD19 SGPS 24a Utilising Alternative Resources	Officers have put in place a robust process for 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.	No need to use contingencies yet but as highlighted there is a national shortage of HGV drivers which is being monitored	Jim Graham	12-Aug-2021	31-Dec-2021
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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
<b>CVD19 SGPS 25 Failure by BRONZE to deliver the Highways, Parking &amp; Enforcement service required by SILVER (DBE) RECOVERY</b> 17-Apr-2020 Ian Hughes	<b>Cause:</b> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>The pandemic leads to a critical number of City of London staff being unable to attend work due to illness/self-isolation/caring responsibilities.</li> <li>The pandemic leads to a failure of the supply chain of our highway term contractor (J B Riney)</li> </ul> <b>Event:</b> Our contractors and/or City of London staff are unable to provide a highway maintenance and/or parking service. <b>Impact:</b>	 Likelihood Impact	8	All temporary Covid-19 measures that were agreed for removal have now been removed. The remainder are under review for retaining long term, initially as experiments, under the wider Pedestrian Priority programme.  Services are operating as BAU following release from lockdown restrictions. Monitoring of resilience issues continues re positive tests and self-isolation requirements. No significant issues to this point.  <b>28 Jul 2021</b>	 Likelihood Impact	8	31-Dec-2021	
							Accept	


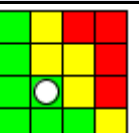


	<ul style="list-style-type: none"> <li>• Failure to maintain the highway in a safe state leading to personal damage injuries. (1, 3 and 4)</li> <li>• Increased inability to manage car parks leading to increases potential for crime and anti-social behaviour, increased fire risk and associated loss of income (2 and 3).</li> <li>• Failure to manage on-street parking leading to loss of access by emergency services to residential and business premises (2 and 3).</li> <li>• Failure to monitor 3rd party on-street activities licenced by the City of London leading to unsafe systems of work.</li> </ul>							
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Action no, title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
Page 357 CVD19 SGPS 25a Contractor resilience	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	28-Jul-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.	Staff monitoring on-street activities by developments, utilities and City contractors continues. Staff have been reminded to continue to follow best practice guidelines including protocols at Guildhall. Risk assessments up to date. Planning for staff 2 day minimum return from Sept as per request by Town Clerk.	Ian Hughes	28-Jul-2021	31-Dec-2021
CVD19 SGPS 25c Saba staff resilience	Enforcement of the Bank on Safety scheme traffic order transferred to working from home. Appropriate policies and procedures have been put in place to ensure compliance with data protection legislation.	Normal services for both enforcement of on-street parking/moving traffic contraventions and car parks (off street parking).	Ian Hughes	28-Jul-2021	31-Dec-2021
CVD19 SGPS 25e Public communication of change	Where there are alterations to services have been authorised by Members/GOLD we are issuing clear public communications on the City website, social media and email to interest groups.	The City's website continues to be updated throughout the Covid-19 period	Ian Hughes	28-Jul-2021	31-Dec-2021




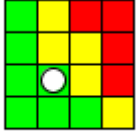
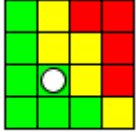
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Risk no., Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Flight path
<b>CVD19 SGPS 27 Failure to deliver the New DBE - Finance (DBE) (RECOVERY )</b>  17-Apr-2020 Paul Beckett; Elizabeth Hannah; Ian Hughes	<b>Cause:</b> The pandemic has changed the traffic (both people and vehicular) of the working City <ul style="list-style-type: none"> <li>• drastically reducing the number of visitors and workers making trips</li> <li>• closing down building sites for periods of time until safe working practises can be established</li> <li>• reduction in development activity</li> </ul>	Likelihood  Impact	4	Ongoing monitoring with the support of the Chamberlains team	Likelihood  Impact	4	31-Mar-2022	
				17 Aug 2021			Accept	

	<b>Event:</b> Departmental income reduced by approximately £8.4m and approx. £800k in project recoverable charges.  <b>Impact:</b> 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.						
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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 27d Recovery (First Half 21/22)	Focus on recovery in the first half of 21/22 in relation to departmental budgets, the wider economy and the pace of recovery	Risk reviewed as part of BAU and will be monitored in the context of service savings necessary to deliver a balanced budget for 2021/22, continued budget monitoring, the impact of the current wave of COVID-19 and the pace towards recovery.		05-Jul-2021	30-Sep-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 28 Failure to deliver the New DBE – Business Plan (DBE)	<b>Cause:</b> The pandemic has transformed the look and feel of the working City and will likely mean the City will look a different place when recovery is finished.		4	Regular and Ongoing monitoring by SLT		4	31-Dec-2021	

(RECOVERY) 17-Apr-2020 Paul Beckett; Elizabeth Hannah	<b>Event:</b> Considerable uncertainty of the future needs of City. Department unable to deliver 20/21 Business Plan aims and objectives as agreed by Committee's. Business Plan will be out of date with what a 'new' City needs for recovery and growth.  <b>Impact:</b> Realign Member expectations of the Business Plan, and expectation of the 'new future City'. Establish change ready, flexible staff and services.	 Likelihood Impact		28 Jul 2021	 Likelihood Impact			
							Accept	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CVD19 SGPS 28c Development	Regular reviews with City Property Association to facilitate growth.	We continue to conduct regular reviews with City Property Association to facilitate growth	Gwyn Richards	16-Mar-2021	31-Dec-2021

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## STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Thursday, 8 July 2021

Minutes of the meeting of the Streets and Walkways Sub (Planning and Transportation) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Thursday, 8 July 2021 at 11.00 am The meeting was held virtually using MS Teams

### Present

#### Members:

Graham Packham (Chairman)  
Shravan Joshi (Deputy Chairman)  
Peter Bennett  
Oliver Sells QC  
William Upton QC  
Christopher Hill (Ex-Officio Member)  
Paul Martinelli (Ex-Officio Member)

#### Officers:

Ian Hughes	- Department of the Built Environment
Olumayowa Obisesan	- Chamberlain's Department
Leah Coburn	- Department of the Built Environment
Shani Annand-Baron	- Town Clerk's Department
Melanie Charalambous	- Department of the Built Environment
Clarisse Tavin	- Department of the Built Environment
Tom Noble	- Department of the Built Environment
Simon Glynn	- Department of the Built Environment
Bruce McVean	- Department of the Built Environment
Gillian Howard	- Department of the Built Environment

#### 1. APOLOGIES FOR ABSENCE

Apologies for absence were received from Randall Anderson, Marianne Fredericks, and Deputy Jamie Ingham Clark.

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

There were no declarations.

#### 3. MINUTES

The Chairman raised a point in respect of item 14 of the agenda of the meeting of 29 April 2021, 'Highway Construction & Maintenance Term Contract Tender' and confirmed that a 50/50 quality-price split had been adopted to reflect the wishes of the Sub Committee, incorporating the consideration that quality be a key consideration alongside increasing cost pressures.

**RESOLVED** – That the public minutes and non-public summary of the meeting held on 29 April 2021 be agreed as a correct record.

4. **BANK JUNCTION IMPROVEMENTS PROJECT: ALL CHANGE AT BANK**

The Sub Committee considered a report of the Director of the Built Environment on the Bank Junction Improvements Project.

**RESOLVED** – That the Streets & Walkways Sub Committee:

1. Approve an additional budget of **£151,323** to reach the next Gateway as explained in section 3; and that this be funded from the already approved Central funding (total approved budget of £2,074,733);
2. Approve a revised Costed Risk Provision of **£93,000**, (previously £95,000), to be drawn down via delegation to Chief Officer;
3. Agree the approach set out in section 4 to delay the consultation findings report until September 2021 to provide additional time to analyse and consider the responses fully; and,
4. Note the delay to the programme which will mean that, if approved, construction work for the project would not start until at least January 2022.

5. **MOORGATE CROSSRAIL STATION LINKS**

The Sub Committee considered a report of the Director of the Built Environment on the Moorgate Crossrail Station Links.

With regard to the report, the Sub Committee was advised that there was an outstanding claim against Crossrail in respect of settlement due to tunnelling under the highway, and that efforts were being made to progress the scheme alongside that claim to avoid the project being held up any more than necessary. A Member emphasised the importance of consistency in respect of the timing of temporary planned street closures across the City. The Chairman commented that he would further discuss the use of central medians at police check points in the City with the City of London Police Commissioner to ensure they were genuinely needed.

**RESOLVED** – That the Streets & Walkways Sub Committee:

1. Approve further scheme development at the Moorgate/Ropemaker Street junction to progress design work and traffic modelling;
2. Approve the pausing of further substantive scheme development at the Moorgate/London Wall junction and on the Moorgate corridor until there was more certainty on the progress of interdependent projects and post-COVID traffic flows; and
3. Approve the project budgets and funding allocations detailed in Appendix 2.



6. **LEADENHALL STREET TRAFFIC MANAGEMENT - EASTERN CITY CLUSTER**

The Sub Committee considered a report of the Director of the Built Environment on Leadenhall Street Traffic Management.

**RESOLVED** – That the Streets & Walkways Sub Committee:

1. Approve the budget of **£218,000** to reach the next Gateway for Leadenhall Street (Phase 1);
2. Note the total estimated cost of the project between £480-£550K; and,
3. Agree the funding strategy included at Appendix 3 including the allocation of S106 funding from 40 Leadenhall Street development.

7. **CLIMATE ACTION STRATEGY - COOL STREETS AND GREENING PROGRAMME**

The Sub Committee considered a report of the Director of the Built Environment on the Cool Streets and Greening Programme of the Climate Action Strategy.

**RESOLVED** – That the Streets & Walkways Sub Committee:

1. Approve **Option 1** Redesign of 6 existing projects to include climate resilience measures for implementation in Year 1 with individual Gateway 5 reports to be prepared for each project;
2. Approve a budget of **£660K** in principle for the design and installation of climate resilience measures on Year 1 projects to enable redesigns to be progressed;
3. Note that revenue costs of £114K associated with additional maintenance and monitoring will be funded from Climate Action Strategy (CAS) revenue budget;
4. Note the revised project budget for Year 1 of **£980K** (excluding risk) which was made up of £320K for evaluation and programme development approved at Gateway1/2 and £660K for design and implementation. In addition, revenue budgets of 114K over a period of 5 years for maintenance and monitoring of Year 1 projects would be required;
5. Note that progress has been made on other elements of the Cool Streets and Greening programme since the Gateway 2 approval in April and costs would be incurred during the remainder of 2021; and,
6. Note the total estimated cost of the project at £6.8M (excluding risk).

8. **GREENING CHEAPSIDE: SUNKEN GARDEN (PHASE 1B)**

The Sub Committee considered a report of the Director of the Built Environment on Greening Cheapside – Sunken Garden (Phase 1B).

In considering the report, a Member commented that the project was a good example of joint initiatives with private enterprise, and that further such projects involving local businesses would be welcomed and should be encouraged.

**RESOLVED** – That the Streets & Walkways Sub Committee:

1. Approve the additional external funding secured from Cheapside Business Alliance of £50,000;
2. Approve the additional funding from City's Climate Action 'Cool Streets and Greening Programme', subject to approval of a specific allocation to the Greening Cheapside project sought in the Cool Streets and Greening Programme Gateway 3 report;
3. Approve the revised total project cost range of £358,000-£530,000; and,
4. Authorise officers to progress the "silver" design option (option 2) and note that the next stage would be Gateway 4/5 to be approved under Delegated Authority as the project was on the "regular" route of the Corporate Projects Procedure.

9. **CITY PUBLIC REALM GUIDANCE REVIEW**

The Sub Committee considered a report of the Director of the Built Environment on the City Public Realm Guidance Review and heard a presentation on the subject from the Assistant Director, Public Realm.

With regard to the Review, a Member commented that the developments were welcome but that there were still a significant number of streets where greening could still be done. The Member requested a focus on action over documentation.

**RESOLVED** – That the Streets & Walkways Sub Committee:

1. Note this update and the completion of Stage One; and,
2. Agree to proceed with Stage Two with the release of £50,000 S106 funding previously allocated for this work

10. **CITY STREETS: TRANSPORTATION RESPONSE TO SUPPORT COVID-19 RECOVERY - PHASE 3 ISSUES REPORT**

The Sub Committee considered a report of the Director of the Built Environment on the transportation response to support Covid-19 recovery.

In considering the report, the Sub Committee expressed its support for the proposed greening and seating measures. A Member queried whether costings related to street cleaning had been incorporated and was advised that cleaning and maintenance costs formed part of the budget.

**RESOLVED** – That the Streets & Walkways Sub Committee:

1. Note the progress to date on the implementation of the Covid-19 street recovery project (Phase 3);
2. Approve the delivery of additional seating and greening measures as described in the report;

3. Approve the budget adjustment and increase as set out in Section 3 - Table 2, at a total project cost of £580,500 to continue the management and delivery of the project;
4. Note the approval, in principle, of the 'asphalt art' initiative from Cultural, Heritage and Library Committee on 14<sup>th</sup> June for up to 5 sites, subject to funding and the required highway approvals, overseen by this Sub Committee; and,
5. Approve the addition of the 'asphalt art' initiative within this Covid-19 recovery Phase 3 project, to be progressed with a separate Gateway 5 report, submitted under delegated authority. The delivery of the asphalt art is externally funded at a cost of £220,000.

**11. CITY CYCLEWAYS PROGRAMME - PHASE 1 (Q11 UPGRADE AND OTHER QUICK WINS)**

The Sub Committee considered a report of the Director of the Built Environment on the City Cycleways Programme.

**RESOLVED** – That the Streets & Walkways Sub Committee note the contents of this report and authorise closure of Phase 1 of the project.

**12. CITY LIGHTING STRATEGY - UPDATE**

The Sub Committee received a report of the Director of the Built Environment on the City Lighting Strategy.

The Sub Committee was advised that a Gateway 6 Report would be submitted to the Projects Sub Committee in relation to the City Lighting Strategy in Autumn 2021.

In response to a Member's question about continuity of street lighting in the event that a new organisation moved into a building, the Director of the Built Environment reassured the Committee that safeguards had been built in should the occupants of the Bloomberg building change to ensure the street would remain appropriately lit.

**RESOLVED** – That the report be noted.

**13. CITY CLUSTER HEALTHY STREETS PLAN**

The Sub Committee received a report of the Director of the Built Environment on the City Cluster Healthy Streets Plan.

**RESOLVED** – That the report be noted.

**14. OUTSTANDING REFERENCES**

The Sub Committee received a list of outstanding references and the following points were made:

Dockless vehicles

The Sub Committee heard that the e-scooter trial launch began on 5<sup>th</sup> July.

One dockless cycle operator (Lime) was operating in the City, and HumanForest was expected to begin operating again in August 2021. A third dockless cycle operator was reviewing its position.

Beech Street transport and public realm improvements

The Sub Committee heard that monitoring and consultation tasks on the Experimental Traffic Order were set to resume following a judicial review on 29-30 June 2021. The current Experimental Traffic Order was scheduled to end in September. No decisions had yet been made on future plans for Beech Street, and the commitment to the improvement of air quality in the public realm remained.

**RESOLVED** – That the list of outstanding references be noted.

15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**  
No questions were raised on matters relating to the work of the Sub Committee

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

The Sub Committee considered a request for delegated authority to the Chairman and Deputy Chairman to approve a Gateway 2 report relating to highway and public realm works in the vicinity of the development at 40 Leadenhall Street, and noted that future Gateway reports will be submitted to the Sub Committee for approval.

**RESOLVED** – That the Sub Committee approve the request for delegated authority.

17. **EXCLUSION OF THE PUBLIC**

**RESOLVED** – That under Section 100A 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.

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

No questions were put on matters relating to the work of the Sub Committee.

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

There was no other business.

**The meeting ended at 12.10pm**

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Chairman

**Contact Officer: Jayne Moore**  
**tel. no.: 020 7332 1480**  
**Jayne.Moore@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><b><u>Daylight/Sunlight – Alternative Guidelines</u></b></p> <p><b>Chief Planning Officer and Development Director</b></p> <p>A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight, and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.</p>	UPDATE (20 July 2021) – see action 1a)

	30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021		
1a)	5 March 2020 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021	<p style="text-align: center;"><b><u>Radiance Studies</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director</b></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><b>UPDATE (20 July 2021)</b> - Officers confirmed that they would be requesting radiance assessments from applicants for all future applications where a BRE assessment had been submitted. Members were also informed that Officers continued to discuss the use of radiance assessments with developers at the pre-application and application stage and were also in discussions with the BRE as to the emerging amendments to their daylight/sunlight assessments. It was confirmed that it was ultimately for the BRE to decide whether radiance was a useful tool and to endorse it if they saw fit through their review of national guidelines.</p> <p><b>To be completed: Further report to Committee setting out/providing updates on these points by Autumn 2021.</b></p>
2	18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019 28 Jan 2020 18 Feb 2020	<p style="text-align: center;"><b><u>Construction Works</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director</b></p> <p>A Member referred to the many construction sites within her Ward that were causing noise/disturbance issues. She asked if officers could look at how this matter might be improved and more effectively controlled and questioned whether</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>

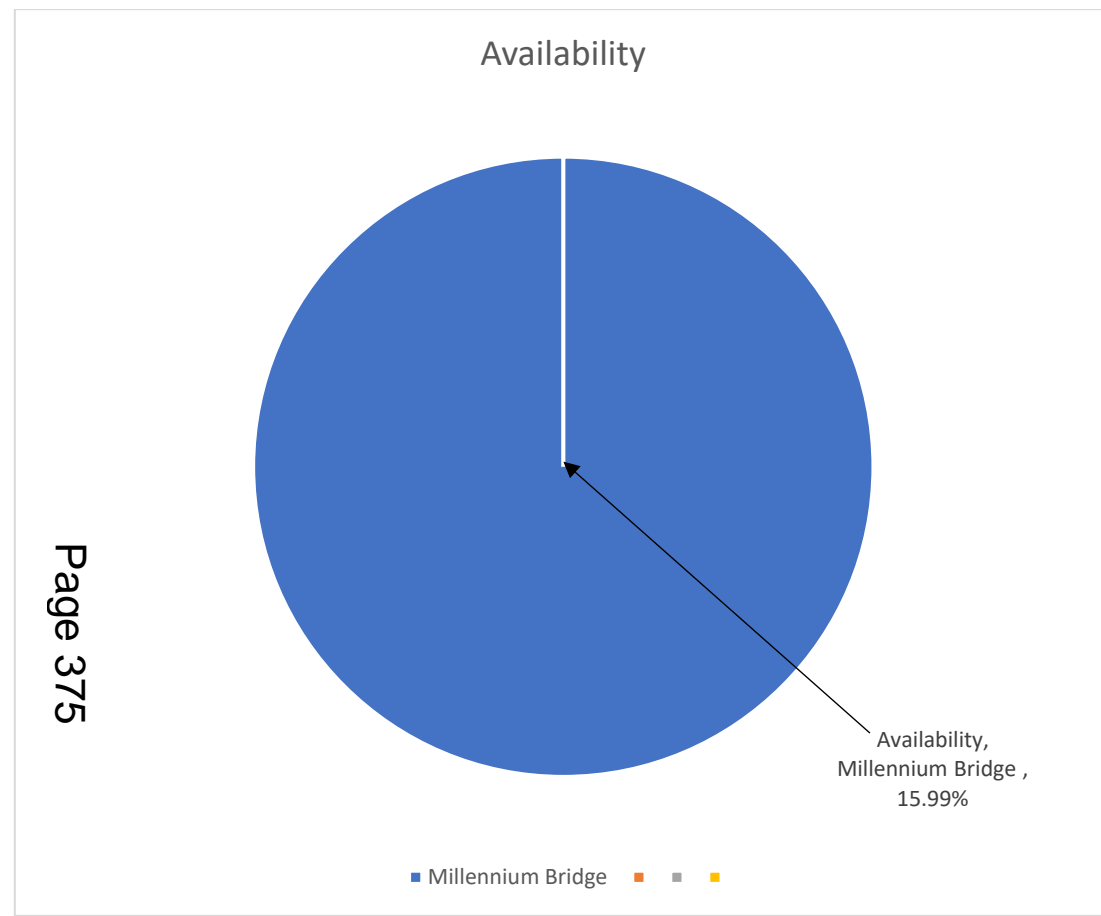
	6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021	<p>any restrictions could be placed on construction when applications were first approved/granted consent.</p> <p>The Chair reiterated that Members had also requested, at the last meeting of this Committee, that Officers consider what powers, if any, might be used with regard to construction time periods and how construction in any given area might 'dovetail'.</p>	<p><b>FURTHER UPDATE (30 March 2021):</b> 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><b>To be completed: Summer 2021</b></p>
3	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	<p style="text-align: center;"><b><u>Member Training</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director / Director of the Built Environment</b></p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p>	<p>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><b>To be completed: Training offering for new Members to be considered in 2021 with a view to implementing this for the new municipal year.</b></p>

	22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021	The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning & 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 29 June 2021 20 July 2021	<p><b><u>Barbican and Golden Lane Conservation Area SPD</u></b></p> <p><b>Chief Planning Officer and Development Director</b></p> <p>A Member highlighted that a Conservation Management Plan was still awaited for this area in the form of a Supplementary Planning Document. He added that this was originally approved by this Committee in October 2018 and that he had requested an update on progress on several occasions since. He asked that this also now be included within the list of Outstanding Actions so that it was not lost sight of entirely.</p>	<p><b>UPDATE (29 June 2021)</b> - The Chief Planning Officer and Development Director reported that the Barbican and Golden Lane Conservation Area SPD would now be submitted to this Committee in September 2021 as the consultation period had now been extended from 9 July – 30 July 2021.</p> <p><b>To be completed: Amended draft document to Committee for final approval by September 2021.</b></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 29 June 2021	<p><b><u>Whole Life Carbon Guidelines</u></b></p> <p><b>Chief Planning Officer and Development Director</b></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><b>UPDATE (30 March 2021):</b> 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</p>



	20 July 2021		<p>Members around this which would be led by Kerstin Kane.</p> <p><b>To be completed: Training to be offered by June 2021.</b></p>
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Code	Name	Time OOS	Availability
0924	Duchess Walk Public Lift CL24	0 00:00	100%
0976	Pilgrim Street SC6458969	0 00:00	100%
0978	Atlantic House SC6458966	0 00:00	100%
7345	Speed House Public Lift SC6459146	0 00:00	100%
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%
7998	Tower Place Public Lift SC6458962	0 00:00	100%
7999	Tower Place Scenic Lift SC6458963	0 00:00	100%
7740	Moor House SC6458968	0 06:25	99.45%
7960	London Wall West SC6458965	0 18:59	98.39%
0944	London Wall Down Escalator SC6458958	0 22:49	98.06%
7964	Blackfriars Bridge SC6462771	1 01:07	97.86%
7997	33 King Williams Street SC6462850	1 20:20	96.23%
0916	Glass South Tower SC6459244	2 01:59	95.75%
0945	London Wall Up Escalator SC6458959	2 09:21	95.12%
0929	Millennium Bridge Inclinator SC6459245	41 03:59	15.99%

Points to Note:

- There are 17 Public Lifts/Escalators in the City of London estate. The report below contains details of the 1- public escalator/lift that was not operationally for 95% of the time or less.
- The report was created on 23 August 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 03/07/2021 – 20/08/2021

Location	Status as of 20/08/2021	% of time in service Between 03/07/2021 and 20/08/2021	Number of times reported Between 03/07/2021 and 20/08/2021	Period Not in Use Between 03/07/2021 and 20/08/2021	Comments Where the service is less than 95%
Millennium Bridge Inclinator SC6459245  <div style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 376</div>	In Service	15.99%	2	969 hours	<p>1 – The safety edge protection for the car doors were damaged due to water ingress. Upon inspection the original edges were not of a sufficient design and rating for the amount of water the Inclinator is usually exposed to. The edges were upgraded but as these are a more bespoke item they had to be made specifically for the Inclinator, hence there was a much longer lead time on the parts.</p> <p>2 – The landing door rollers seized due to water ingress, in addition there was an intermittent safety circuit fault which was traced to a damaged door controller. The door controller has now been changed and refitted to a dryer area of the lift to avoid future problems.</p>

<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation	7 <sup>th</sup> September 2021
<b>Subject:</b> Delegated decisions of the Chief Planning Officer and Development Director	<b>Public</b>
<b>Report of:</b> Chief Planning Officer and Development Director	<b>For Information</b>

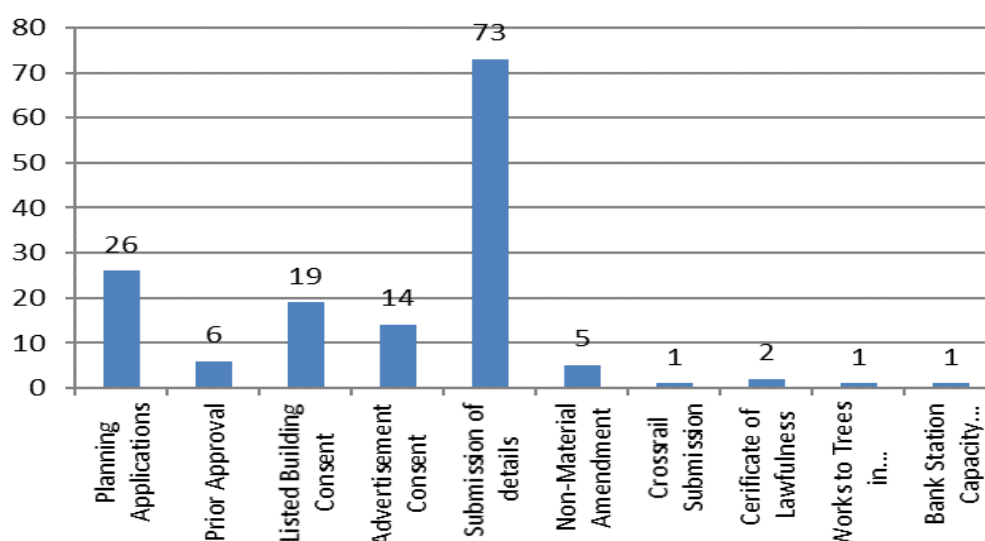
## Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since my report to the last meeting.

In the time since the last report to Planning & Transportation Committee One Hundred and Forty Eight (148) matters have been dealt with under delegated powers. Nineteen (19) relate to works to Listed Buildings, Fourteen (14) applications for Advertisement Consent, Seventy Three (73) relate to conditions of previously approved schemes, Five (5) applications for Non-Material Amendments, One (1) Crossrail Submission application, Two (2) Certificates of Lawfulness application, Six (6) Determination whether prior app required, One (1) Application for works to trees in a Conservation Area, and One (1) Bank Station Capacity upgrade application

Twenty Six (26) Full applications for development have been approved including Five (5) changes of use and 27641sq.m of created floorspace.

### Breakdown of applications dealt with under delegated powers



Any questions of detail arising from these reports can be sent to [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk).

### Details of Decisions

Registered Plan Number & Ward	Address	Proposal	Decision & Date of Decision	Applicant/ Agent name
21/00399/LBC Aldersgate	392 Lauderdale Tower Barbican London EC2Y 8NA	Internal refurbishments including alterations to non-structural walls and doors and installation of a shallow false ceiling.	Approved  19.08.2021	Thomson Brothers (London) Ltd
21/00523/LBC Aldersgate	183 Shakespeare Tower Barbican London EC2Y 8DR	Internal Refurbishments including removal and installation of several internal walls and full height doors to amend room layouts including making a new door/hatch opening between the kitchen and living room; installation of shallow suspended false ceilings with inset spot lighting throughout.	Approved  24.08.2021	Thomson Brothers (London) Ltd
21/00561/DPAR Aldersgate	45 Beech Street London EC2Y 8AD	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 as to whether prior approval is required for the upgrade of an existing telecommunications base station, comprising of the mounting of 3 no. existing antennas and removal and replacement of 3 no. antennas on 3 no. replacement antenna support poles (2 no. 6m tall poles to a height of 32.5m and 1 no. 5.2m tall pole to a height of 32.0m), supporting 4 no. antennas at 32.5m to top and 2 no. antennas at 30.0m to top and mounting of a GPS	Prior Approval Given  24.08.2021	Galliford Try Telecoms

		module on the top of one of the support poles; the siting of one new rooftop cabinet and relocation of 1 no. existing rooftop cabinet and ancillary works.		
20/00718/FULL Aldgate	Flat 8 27 - 31 Mitre Street London EC3A 5BZ	Replacement of ten existing timber casement windows to the front and rear elevation at fourth and fifth floor level.	Approved  22.07.2021	Steve Bertenshaw
21/00280/LBC Aldgate	6 Lloyd's Avenue London EC3N 3AX	Installation of AV equipment, access controls and signage to the second floor interior.	Approved  08.07.2021	Mrs Jody Gater
21/00369/FULL Aldgate	6 Lloyd's Avenue London EC3N 3AX	Installation of two external condenser units within the lightwells of the building.	Approved  05.08.2021	Daniel Watney LLP
21/00370/LBC Aldgate	6 Lloyd's Avenue London EC3N 3AX	Erection of internal partitions and installation of two ceiling air conditioning units in the rear units of the second floor; and installation of two external condenser units within the lightwells of the building.	Approved  05.08.2021	Daniel Watney LLP
21/00481/MDC Aldgate	70 St Mary Axe London EC3A 8BA	Details of fume extract arrangements from the retail use pursuant to condition 14 of planning permission (application no. 08/00739/FULEIA) dated 10th June 2010.	Approved  05.08.2021	101 Architecture + Design

21/00506/LBC Aldgate	19 - 21 Billiter Street London EC3M 2RY	Application under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to vary condition 8 of Listed Building Consent (application no. 20/00445/LBC) to refer to a revised list of drawings amended to reflect minor internal and external alterations to the building as a result of further detailed design and survey information.	Approved 24.08.2021	DP9 Ltd
21/00519/NMA 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	Non-Material Amendment under Section 96A of the Town and Country Planning Act 1990 to planning permission (application no. 13/01004/FULEIA) dated 29th May 2014 to amend the approved plans listed in Condition 47 in regard to 19-21 Billiter Street to allow for: amendments to all floor levels; internal alterations, external alterations to the facades; changes to the roof materials ; a minor increase in the height of the services at roof level; replacement of rooflights; and the removal and reconstruction of the existing chimneys.	Approved 24.08.2021	DP9 Ltd
21/00389/MDC Bassishaw	St Mary Staining Churchyard Staining Lane London EC2V 7DE	Submission of details of the proposed lighting scheme and cable runs pursuant to part (a); and particulars and samples of the brick and mortar to be used in the ramp's boundary walls pursuant to part (b) of condition 4 of planning permission 20/00864/FULL dated 19 January 2021.	Approved 15.07.2021	Edwards Wilson



21/00471/NMA Billingsgate	10 Lower Thames Street London EC3R 6EN	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 to planning permission (application number 20/00533/FULL) dated 12th November 2020 to amend the approved plans to allow for amendments to the ground floor entrance door on Lower Thames Street elevation.	Approved 05.08.2021	DP9 Ltd
18/00928/MDC Bishopsgate	Site Bounded By Stone House And Staple Hall Bishopsgate, Devonshire Row London, EC2	Details of alterations to retained facades and treatment of original fabric, junctions with retained facades, and junctions between the new elevation at the rear of the Devonshire Row building and the rear of 150 Bishopsgate pursuant to Conditions 18(i), 18(j) and 18(k) of planning permission 21/00061/FULL dated 30.03.2021.	Approved 17.08.2021	DP9 Ltd
20/00555/MDC Bishopsgate	150 Bishopsgate London EC2M 4AF	Details of ventilation, air conditioning, external plant, ductwork and methods of odour control for the hotel ballroom, conference, catering and gym/spa leisure facilities submitted pursuant to Condition 38 of planning permission 21/00061/FULL dated 30.03.2021	Approved 08.07.2021	DP9 Ltd
20/00578/MDC Bishopsgate	150 Bishopsgate London EC2M 4AF	Submission of an Air Quality Report detailing how the finished development will minimise emissions and exposure to air pollution during its operational phase pursuant to Condition 34 of planning permission 21/00061/FULL dated 30.03.2021.	Approved 08.07.2021	DP9 Ltd

21/00136/CLOPD Bishopsgate	10 Exchange Square London EC2A 2BR	Application for a Certificate of Lawful Development for proposed alterations to the Appold Street and Exchange Square entrances at lower and upper ground floor levels.	Approved  05.08.2021	DP9 Ltd
21/00217/MDC Bishopsgate	1 - 2 Broadgate London EC2M 2QS	Details of the proposed SuDS system components, details of measures to be taken to prevent flooding and evidence pursuant to condition 10 of planning permission 20/00462/FULL dated 30/03/2021.	Approved  27.07.2021	DP9 Ltd
21/00221/MDC Bishopsgate	222 Bishopsgate London EC2M 4QD	Submission of details of a scheme for mechanical plant is used on the premises to be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building pursuant to condition 5 of planning permission dated 7th July 2020 (20/00081/FULL).	Approved  29.07.2021	Daniel Watney LLP
21/00293/PODC Bishopsgate	1-2 Broadgate London EC2M 2QS	Submission of Utility Connection Requirements and Programme pursuant to Schedule 3 Paragraph 13.1 of the Section 106 Agreement dated 28 March 2019 (Planning Application Reference 18/01065/FULEIA as amended by 20/00462/FULL).	Approved  13.07.2021	DP9 Ltd
21/00300/FULL Bishopsgate	Eldon House 2 - 3 Eldon Street London EC2M 7LS	Change of use of basement level B1, parts of basement level B2, ground and first floors from Sui Generis to Class E (Office) use (919sq.m); reconfiguration of mansard roof to sixth floor and addition of glazed mezzanine pavilion and external terrace area at roof level (seventh floor);	Approved  19.08.2021	DP9 Ltd

		formation of new entrance courtyard on Wilson Street elevation and reinstatement of pavement lights within the site area on Wilson Street; alterations to the ground floor facade on Wilson Street; insertion of new windows on north elevation within existing brickwork panels; alterations to windows on east elevation; new roof terrace atop Eldon Street building; and associated internal alterations and ancillary external works.		
21/00343/MDC Bishopsgate	222 Bishopsgate London EC2M 4QD	Submission of details of a scheme noise impact assessment (post installation) pursuant to condition 6 of planning permission dated 7th July 2020 (20/00081/FULL).	Approved 19.08.2021	Daniel Watney LLP
21/00352/ADVT Bishopsgate	17 St Helen's Place London EC3A 6DG	Installation and display of 2 non-illuminated brass plaques 0.5m by 0.25m, either side of the main entrance.	Approved 06.07.2021	Douglas Signs And Design UK Ltd
21/00380/MDC Bishopsgate	222 Bishopsgate London EC2M 4QD	Submission of a Servicing and Delivery Plan pursuant to condition 4 of planning permission dated 7th July 2020 (20/00081/FULL).	Approved 03.08.2021	Daniel Watney LLP
21/00423/MDC Bishopsgate	1 - 2 Broadgate London EC2M 2QS	Details of the proposed piling and associated piling method statement (including measures to prevent and minimise the potential for damage to subsurface water infrastructure) pursuant to condition 9 of planning permission 18/01065/FULEIA dated 28/03/2019.	Approved 17.08.2021	DP9 Ltd

21/00447/ADVT Bishopsgate	10 Exchange Square London EC2A 2BR	Installation and display of one non-illuminated hoarding advertisement measuring 22m total length and 2.44m in height.	Approved  20.07.2021	DP9 Ltd
21/00452/ADVT Bishopsgate	27 Liverpool Street London EC2M 7PD	Installation and display of one non-illuminated fascia sign measuring 0.35m high by 4.62m wide at a height above ground of 3.2m.	Approved  24.08.2021	KW Projects Ltd
21/00459/ADVT Bishopsgate	Great Eastern House 152 - 154 Bishopsgate London EC2M 4LN	Installation and display of: i) two internally-illuminated fascia signs, measuring 1.55m (w) by 0.36m (h); ii) one internally-illuminated fascia sign, measuring 1.29m (w) by 0.3m (h); iii) two internally-illuminated projecting signs, measuring 0.4m by 0.4m, at heights of 3.59m and 3.98m above the pavement.	Approved  24.08.2021	Greggs Plc
21/00473/MDC Bishopsgate	100 Bishopsgate London EC2N 4JL	Submission of noise report associated with new plant pursuant to condition 15 (in part) of planning permission dated 30th March 2012 (12/00129/FULL).	Approved  06.07.2021	Avison Young
21/00542/MDC Bishopsgate	155 Bishopsgate London EC2M 3TQ	Details of sound insulation measures pursuant to condition 8 of planning permission ref 19/00837/FULL dated 3rd December 2019.	Approved  05.08.2021	DP9 Limited
20/01008/MDC Bread Street	25 Cannon Street London EC4M 5TA	Submission of details pursuant to the following parts of Condition 6 of planning permission 20/00602/FULL dated 12 November 2020: a) Particulars and samples of the materials to be used on all external faces of the building including external ground and upper level	Approved  22.07.2021	Gerald Eve LLP

		surfaces; b) Details of the proposed new facade interventions including typical details of the fenestration, entrances and new 5th floor facade; c) Details of a typical bay of the development; d) Details of the metal and stone decorative elements to applied to the building including the main entrance portal, window surrounds and spandrel panels, service entrance doors and vents; e) Details of ground floor elevations; f) Details of the ground floor office entrance; g) Details of new dormer windows; h) Details of soffits, handrails and balustrades; and i) Details of alterations to the existing facade.		
21/00390/MDC Bread Street	Christchurch Court 10 - 15 Newgate Street London EC1A 7HD	Submission of particulars and samples of external materials and details of facades, plant enclosures, greening and roof terrace of the new roof extension pursuant to condition 4(a) and 4(b) of planning permission dated 02/11/2020 (app. no. 20/00179/FULL).	Approved 08.07.2021	Gerald Eve LLP
21/00518/ADVT Bread Street	1 Paternoster Row London EC4M 7DX	Installation and display of: (i) 2 non-illuminated projecting signs measuring 0.7m in diameter situated at a height of 2.7m above ground; (ii) 1 A3 sized non illuminated menu board measuring 0.4m by 0.52m.	Approved 10.08.2021	Monmouth Planning Ltd

21/00286/ADVT Broad Street	83 Old Broad Street London EC2M 1PR	Installation and display of: (i) one non-illuminated fascia sign measuring 0.45m high by 1.935m wide at a height above ground of 3.645m; (ii) one non-illuminated projecting sign measuring 0.5m high by 0.5m wide at a height above ground of 3.35m.	Approved 08.07.2021	Greggs Plc
21/00432/LBC Broad Street	Livery Hall Drapers Hall Throgmort on Avenue London EC2N 2DQ	The erection of a carved Portland Stone plaque to commemorate Grinling Gibbons to the exterior wall of the Warden's Room within the Drapers Garden, measuring approximately 700x200x580mm.	Approved 05.08.2021	Purcell
21/00530/LBC Broad Street	Retail Unit 78 Old Broad Street London EC2M 1QP	Internal alterations comprising (i) removal of a modern staircase between ground and first floor levels to form a self-contained retail unit at ground floor level and (ii) stripping of the existing wall linings and installation of fire rated plasterboard to the soffit.	Approved 17.08.2021	CS2
21/00641/PODC Broad Street	1 - 14 Liverpool Street And 11-12 Blomfield Street London EC2M 7AW	Submission of the Highway Schedule of Condition Survey pursuant to Schedule 3 Paragraph 6.1 of the S106 Agreement dated 07th July 2021 in relation to Planning Permission Ref: 19/00466/FULEIA	Approved 12.08.2021	DP9

21/00200/MDC Candlewick	68 King William Street London EC4N 7HR	Submission of samples and sample panels of all materials, details of pergola, construction details of the proposed flank elevation and details of cresting, balustrade and windows and doors of the bar structure pursuant to partial discharge of condition 5 (a), (b), (c), (e) and (g) of planning permission dated 28 January 2021 (20/00802/FULL).	Approved 15.07.2021	DP9
21/00382/MDC Candlewick	Sherborne House 119 - 121 Cannon Street London EC4N 5AT	Submission of details of particulars and samples of the materials to be used on all external faces of the building including external ground and upper level, pursuant to Condition 5 of planning permission ref. 18/01370/FULL and pursuant to Condition 2 of Listed Building consent ref. 18/01371/LBC.	Approved 15.07.2021	Gerald Eve LLP
21/00387/MDC Candlewick	68 King William Street London EC4N 7HR	Submission of a post construction BREEAM assessment pursuant to condition 18 of planning permission 20/00802/FULL dated 28 January 2021	Approved 15.07.2021	DP9
21/00409/MDC Candlewick	68 King William Street London EC4N 7HR	Submission of sample and details of the oriel window detail and hard landscaping pursuant to condition 5 (a), (d) and (f) of planning permission dated 28 January 2021 (20/00802/FULL).	Approved 15.07.2021	DP9
21/00486/FULL Candlewick	21 St Swithin's Lane London EC4N 8AD	Insertion of bi-fold doors to the front facade to replace existing windows and insertion of a new door to the side of the property in location of existing window.	Approved 19.08.2021	USL Architects

20/00711/TTT Castle Baynard	Tideway Working Area Blackfriars Bridge Foreshore Victoria Embankment London EC4Y 0DR	Partial discharge of Schedule 3 requirement relating to operational lighting pursuant to BLABF 23 of the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended.	Approved 05.08.2021	Mrs Rachel Devine
20/00996/LBC Castle Baynard	Robert Waithman Obelisk Salisbury Square London	Dismantling, relocating and reconstruction of the Grade II listed obelisk within Salisbury Square.  This application has been submitted alongside an application for planning permission (20/00997/FULEIA) and another application for listed building consent (20/00998/LBC).	Approved 30.07.2021	Gerald Eve
20/00998/LBC Castle Baynard	2 - 7 Salisbury Court London EC4Y 8AA	i) Part demolition of 2-7 Salisbury Court (Grade II listed; ii) remodelling at roof level; iii) formation of new facade to south elevation, and part new facade to west elevation; iv) replacement fenestration; v) new plant; and vi) associated internal alterations.  This application has been submitted alongside an application for planning permission (20/00997/FULEIA) and another application for listed building consent (20/00996/LBC).	Approved 30.07.2021	Gerald Eve



21/00443/MDC Castle Baynard	Boswell House 8 - 9 Gough Square London EC4A 3DG	Details of a Scheme of Protective Works pursuant to condition 8 of planning permission 20/00925/FULL dated 07 May 2021.	Approved 22.07.2021	Hybrid Planning & Development
21/00444/MDC Castle Baynard	Boswell House 8 - 9 Gough Square London EC4A 3DG	Details of a Scheme of Protective Works pursuant to condition 2 of planning permission 20/00882/FULL dated 07 May 2021.	Approved 22.07.2021	Hybrid Planning & Development
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.	Approved 03.08.2021	Caroe Architecture Ltd
21/00500/MDC Castle Baynard	Boswell House 8 - 9 Gough Square London EC4A 3DG	Details of proposed planting for balustrade pursuant to condition 5 of planning permission 20/00925/FULL dated 07.05.2021.	Approved 05.08.2021	Hybrid Planning & Development
21/00501/MDC Castle Baynard	Boswell House 8 - 9 Gough Square London EC4A 3DG	Details of proposed planting for balustrade pursuant to condition 7 of planning permission 20/00882/FULL dated 07.05.2021.	Approved 05.08.2021	Hybrid Planning & Development
21/00552/FULL Castle Baynard	St Andrew's House 35 St Andrew's Hill London EC4V 5DE	Installation of new external flue to the rear elevation at lower ground floor level.	Approved 24.08.2021	ATP Architects + Building Surveyors Ltd

21/00553/LBC Castle Baynard	St Andrew's House 35 St Andrew's Hill London EC4V 5DE	Removal of a floor mounted boiler and installation of a new wall mounted boiler to lower ground floor, and installation of new external flue to the rear elevation at lower ground floor level.	Approved 24.08.2021	ATP Architects + Building Surveyors Ltd
21/00671/MDC Castle Baynard	61 Fleet Street London EC4Y 1JU	Submission of details of the plaques including materials, dimensions and content pursuant to condition 2 of planning permission dated 17/12/2019 (app. no. 19/00987/FULL).	Approved 24.08.2021	Fleet Street Sundial CIC
21/00121/MDC Cheap	Dauntsey House 4A & 4B Frederick's Place London EC2R 8AB	Submission of a facade method statement identifying those elements that are to be retained and reinstated pursuant to condition 5 of planning permission dated 14/05/2020 (app. no. 17/01057/FULMAJ).	Approved 22.07.2021	DP9 Ltd
21/00135/NMA Cheap	81 Newgate Street London EC1A 7AJ	Non-material amendment under Section 96A of the Town and Country Planning Act to planning permission dated 11th September 2020 (20/00311/FULMAJ) to amend the wording of condition 26 construction works distances for both distribution and trunk mains.	Approved 19.08.2021	MONTAGU EVANS LLP
21/00213/MDC Cheap	2 Gresham Street London EC2V 7QP	Details of balustrades, plant, flues and other excrescences at roof level pursuant to condition 11(b) of planning permission 19/00772/FULL dated 05/11/19.	Approved 12.08.2021	Willmott Dixon Interiors

21/00294/PODC Cheap	Dauntsey House 4A & 4B Frederick's Place London EC2R 8AB	Submission of the Utility Connection Requirements and Programme pursuant to Schedule 3 Paragraph 11.1 of the Section 106 Agreement dated 14 May 2020 (Planning Application Reference 17/01057/FULMAJ).	Approved 15.07.2021	DP9 Ltd
21/00428/MDC Cheap	Dauntsey House 4A & 4B Frederick's Place London EC2R 8AB	Submission of details of ground conditions and site investigations pursuant to condition 3 of planning permission dated 14/05/2020 (app. no. 17/01057/FULMAJ).	Approved 22.07.2021	DP9 Ltd
21/00435/MDC Cheap	81 Newgate Street London EC1A 7AJ	Submission of details of the contaminated land site investigation to determine the potential for pollution of the water environment pursuant to condition 5 of planning permission dated 11 September 2020 (20/00311/FULMAJ).	Approved 29.07.2021	Montagu Evans
21/00479/MDC Cheap	81 Newgate Street London EC1A 7AJ	Details of a site survey and survey of highway and other land at the perimeter of the site pursuant to condition 7 of planning permission dated 11 September 2020 (20/00311/FULMAJ).	Approved 15.07.2021	Montagu Evans
21/00490/PODC Cheap	81 Newgate Street London EC1A 7AJ	Submission of the Highways Schedule of Condition Survey pursuant to Schedule 3 Paragraph 6.1 of the Section 106 Agreement dated 11 September 2020 (Planning Application Reference 20/00311/FULMAJ).	Approved 15.07.2021	Montagu Evans LLP

21/00492/NMA Cheap	81 - 90 Cheapside London EC2V 6EB	Non-Material Amendment under Section 96A of the Town and Country Planning Act 1990 to amend condition 8 (approved drawings) of planning permission (application no. 15/01248/FULL) dated 18th February 2016 to reflect minor detail alterations to the entrance and facade on Ironmonger Lane.	Approved 03.08.2021	DP9 Limited
21/00395/MDC Coleman Street	41 Moorgate London EC2R 6PP	Details of materials and external lighting pursuant to Condition 2 of planning permission (application no. 20/00684/FULL) dated 23rd October 2020.	Approved 13.07.2021	Avison Young
20/00325/FULEIA Coleman Street	101 Moorgate London EC2M 6SL	Erection of a new building for office (Class B1) and retail/cafe (Class A1/A3) uses comprising part basement, ground, mezzanine and eight upper floors plus rooftop plant enclosure and roof terrace. Creation of new public thoroughfare.	Approved 28.07.2021	Savills
20/00759/FULMAJ Coleman Street	74 Moorgate London EC2M 6SE	(i) Change of use from Class F1 (Education) to Class E (Office) use at basement, part ground and first floor; (ii) partial demolition and redevelopment of floors two to seven for Class E (office) use; (iii) infilling the light well and recessed corner; (iv) erection of a mansard roof; (v) infilling of the undercroft at ground floor to create a new entrance; (vi) associated external refurbishments including a new facade; and (vii) installation of a plant enclosure at roof level.	Approved 08.07.2021	Rolfe Judd Planning

21/00544/FULL Coleman Street	55 Moorgate London EC2R 6BH	Change of use of part ground floor and lower ground floor levels from Class E to a drinking establishment with an ancillary restaurant area (sui generis) use (965sq.m).	Approved  20.08.2021	Ince
21/00474/DPAR Cordwainer	Pavement Outside 1 Poultry London EC2R 8EJ	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) as to whether prior approval is required for the installation of one equipment housing cabinet and ancillary development thereto.	Prior Approval Given  30.07.2021	Waldon Telecom
21/00475/DPAR Cordwainer	Pavement Outside 1 Poultry (Queen Victoria Street) London EC2R 8EJ	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) as to whether prior approval is required for the installation of one equipment housing cabinet and ancillary development thereto.	Prior Approval Given  30.07.2021	Waldon Telecom
21/00476/DPAR Cordwainer	Pavement Outside 41 Queen Victoria Street London EC4N 4SF	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) as to whether prior approval is required for the installation of one equipment housing cabinet and ancillary development thereto.	Prior Approval Given  30.07.2021	Waldon Telecom

21/00477/DPAR Cordwainer	Pavement Outside 68 Queen Victoria Street Opposite 61 - 62 Watling Street London EC4N 4SJ	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) as to whether prior approval is required for the installation of one equipment housing cabinet and ancillary development thereto.	Prior Approval Given  30.07.2021	Waldon Telecom
21/00478/DPAR Cordwainer	Pavement Outside 53 Queen Victoria Street London EC4N 4SG	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) as to whether prior approval is required for the installation of one equipment housing cabinet and ancillary development thereto.	Prior Approval Given  30.07.2021	Waldon Telecom
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.	Approved  15.07.2021	GL Hearn
21/00325/LBC Cripplegate	Barbican Estate London EC2	Replacement of 30no. behaviour signs, measuring 300mm x 600mm, in locations across the Barbican Estate.	Approved  06.07.2021	City of London Corporation
21/00426/LBC Cripplegate	95 Speed House Barbican London EC2Y 8AU	Removal of non load-bearing partition walls between kitchen and hallway, and between kitchen and living room.	Approved  22.07.2021	David and Radmila Alcock

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.	Approved 17.08.2021	Studio Partington
21/00463/LBC 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.	Approved 17.08.2021	Studio Partington
21/00532/LBC Cripplegate	209 Ben Jonson House Barbican London EC2Y 8DL	Internal Refurbishments including new shallow false ceiling throughout to allow the installation of inset spot lighting. Making all internal doors full height. Moving the position of the bathroom door and associated frame to allow for new bathroom fittings.	Approved 24.08.2021	Thomson Brothers (London) Ltd
20/00054/FULL Farringdon Within	68 Long Lane London EC1A 9EJ	Installation of an air conditioning unit on the rear elevation.	Approved 10.08.2021	Boyer Planning
20/00487/FULL Farringdon Within	7 Newgate Street London EC1A 7NX	External alterations including, facade and fenestration replacement and replacement office entrance; part demolition and extension at roof level to create a roof top pavilion for Class E use and reconfigure the plant room; creation of roof terrace at 7th floor and associated hard and soft landscaping; provision of cycle parking and associated facilities; and other ancillary works.	Approved 15.07.2021	Gerald Eve LLP

20/00623/MDC Farringdon Within	8 - 10 Half Moon Court London EC1A 7HE	Submission of details of the front entrance door, the creation of the bin store including the bin store opening, ventilation, doors, and louvres; all new windows and alterations to existing windows; particulars and samples of the zinc cladding to the 4th and 5th floors and the roof, details of the fourth floor dormers; the balcony and roof terrace balustrades; particulars and samples of proposed bricks and mortars for new construction and works of making good and details of the refuse storage facilities pursuant to conditions 1 (a), (b), (c), (d), (e), (f) and 2 of planning permission dated 09.07.2020 (20/00258/FULL).	Approved 13.08.2021	Leith Planning Ltd
20/00702/FULL Farringdon Within	City Temple 31 Holborn Viaduct London EC1A 2DE	Application under Section 73 of the Town & Country Planning Act 1990 to vary condition 9 (Approved drawings) of planning permission ref: 17/00781/FULL dated 24th October 2017 to enable minor material amendments to the approved scheme including: (1) 4 no. replacement ventilation louvres on the Shoe Lane elevation; (2) Roof level concrete and glass brick skylights to be refurbished or replaced with polycarbonate roof-lights; (3) New roofing replacing existing felt with single ply membrane and insulation; and (4) Installation of fall arrest system including rail and ladder.	Approved 14.07.2021	Planning Resolution Ltd



20/00706/MDC Farringdon Within	Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA	Submission of an acoustic report and mechanical plant mounting specifications pursuant to conditions 22, 29 (part a), 30 and 31 of planning permission 17/01207/FULMAJ, dated 13th February 2019.	Approved 05.08.2021	DP9
20/00870/FULL Farringdon Within	11 Pilgrim Street London EC4V 6RN	(i) Refurbishment of the building and extension at levels 6 and 7; (ii) creation of a new plant enclosure at level 8; (iii) replacement of the office entrance; (iv) relocation of existing ground floor cafe (Class E) use and associated external alterations; (v) creation of roof terraces and associated hard and soft landscaping; (vi) provision of cycle parking and associated facilities; (vii) and other ancillary works.	Approved 29.07.2021	Gerald Eve LLP
20/00943/ADVT Farringdon Within	Site Boundary 1 Creed Lane London EC4V 5BR	Installation and display of: (i) one non-illuminated hoarding advertisement to Ludgate Hill measuring 2.44m high by 23.57m wide; (ii) one non-illuminated hoarding advertisement to Creed Lane measuring 2.44m high by 48.14m wide; and (iii) one non-illuminated hoarding advertisement to Ludgate Square measuring 2.44m high by 49.25m wide; all at ground floor level (associated with the redevelopment of Creed Court (pp ref: 14/00300/FULMAJ as amended)).	Approved 05.08.2021	Dominvs Group

20/00945/MDC Farringdon Within	Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA	Submission of an Air Quality Technical Note pursuant to condition 17 of planning permission 17/01207/FULMAJ, dated 13 February 2019.	Approved 13.07.2021	DP9
21/00099/MDC Farringdon Within	33 - 37 Charterhouse Square London EC1M 6EA	Submission of details of particulars and samples of the materials to be used on all external faces of the building; including external ground and upper level surfaces; details of the proposed glazed enclosures, fenestration and all entrances; details of the mesh barrier; details of the graphic design for the glazing and balustrade; details of any external service equipment rising above the fascia pursuant to condition 5 (parts a, c, d, e) of planning permission 20/00568/FULL dated 16.12.2020.	Approved 20.07.2021	Macdonald Planning Consultancy
21/00236/MDC Farringdon Within	8 - 10 Half Moon Court London EC1A 7HE	Submission of details for a landscaping scheme pursuant to condition 3 of permission ref. 20/00258/FULL dated 09.07.2020.	Approved 12.08.2021	The Leith Group
21/00274/PODC Farringdon Within	Stonecutter Court 1 Stonecutter Street London EC4A 4TR	Submission of the Local Training, Skills and Job Brokerage Strategy (Demolition) pursuant to Schedule 3 Paragraph 4.1 of the Section 106 Agreement dated 28 March 2019 (Planning Application Reference 18/00878/FULMAJ).	Approved 10.08.2021	Montagu Evans LLP

21/00261/MDC Farringdon Within	Stonecutte r Court 1 Stonecutte r Street London EC4A 4TR	Submission of a site investigation to establish if the site is contaminated and to determine the potential for pollution of the water environment pursuant to condition 2 of planning permission 18/00878/FULMAJ dated 28th March 2019.	Approved  03.08.2021	Montagu Evans
21/00266/FULL Farringdon Within	25 Cloth Fair London EC1A 7JQ	(i) Removal of garage door and installation of new windows; (ii) repositioning of rear door and windows; (iii) removal of ladder access to roof terrace and installation of stairs; (iv) installation of railings to roof terrace; and (v) replacement of six cooling units at roof level with one new unit.	Approved  19.08.2021	Helen J Bowers Architect
21/00287/FULL Farringdon Within	10 Fleet Place London EC4M 7RB	Installation of secure gated access off Old Seacoal Lane at ground floor level, installation of 2.4m high security fence and provision of additional cycle parking facilities at basement level.	Approved  29.07.2021	Iceni Projects
21/00288/ADVT Farringdon Within	10 Fleet Place London EC4M 7RB	Installation and display of: four internally illuminated fascia signs measuring: (i) 0.87m high by 3.5m wide at a height above ground of 5.05m; (ii) 2.97m high by 0.6m wide at a height above ground of 0.84m; (iii) 2.8m high by 1m wide at a height above ground of 0.79m; and (iv) 3.5m high by 0.6m wide at a height above ground of 0.96m.	Approved  29.07.2021	Iceni Projects

21/00341/ADVT Farringdon Within	44 - 46 Ludgate Hill London EC4M 7DE	Installation and display of: (i) two internally illuminated fascia signs to the lettering only measuring 0.35m high by 2.416m wide at a height above ground of 3.486m; (ii) two internally illuminated wall mounted menu signs measuring 0.75m high by 0.29m wide adjacent to the main entrance doors.	Approved 08.07.2021	Creative Signmakers Ltd
21/00342/ADVT Farringdon Within	64 - 65 Long Lane London EC1A 9EJ	Installation and display of: one internally illuminated fascia sign measuring 1.91m by 0.82m at a height above ground of 2.86m and one externally illuminated projecting sign measuring 0.5m by 0.5m.	Approved 15.07.2021	My Smile Dental Ltd
21/00356/FULL Farringdon Within	Harp House 83 - 86 Farringdon Street London EC4A 4BL	Installation and replacement of a chiller unit at roof top level and replacement of external gas pipe work on rear and side elevations.	Approved 22.07.2021	PSAO Ltd
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.	Approved 13.07.2021	DP9 Limited
21/00440/MDC Farringdon Within	New Bridge Street House 30 - 34 New Bridge Street London EC4V 6BJ	Details of tree protection pursuant to condition 4 of planning permission 20/00560/FULL, dated 13 November 2020.	Approved 20.07.2021	Turley

21/00485/PODC Farringdon Within	Stonecutte r Court 1 Stonecutte r Street London EC4A 4TR	Submission of the Local Procurement Strategy (Demolition) pursuant to Schedule 3 Paragraph 3.1 of the Section 106 Agreement dated 28 March 2019 (Planning Application Reference 18/00878/FULMAJ).	Approved  03.08.2021	Montagu Evans LLP
21/00446/LBC Farringdon Within	Magnesia House 6 Playhouse Yard London EC4V 5EX	Installation of 4 x terracotta airbricks on rear external wall and 1 x condenser unit to the courtyard with associated cabling and infrastructure.	Approved  20.07.2021	TR Projects
21/00456/FULL Farringdon Within	Magnesia House 6 Playhouse Yard London EC4V 5EX	Installation of 4 x terracotta airbricks on rear external wall and 1 x condenser unit to the courtyard with associated cabling and infrastructure.	Approved  20.07.2021	Mrs Shelley Maude
21/00520/PODC Farringdon Within	Stonecutte r Court 1 Stonecutte r Street London EC4A 4TR	Submission of the Utility Connection Requirements and Draft Programme pursuant to Schedule 3 Paragraph 13.1 of the Section 106 Agreement dated 28 March 2019 (Planning Application Reference 18/00878/FULMAJ)	Approved  20.07.2021	Montagu Evans LLP
21/00617/MDC Farringdon Within	Stationers Hall Stationers Hall Court London EC4M 7DD	Submission of details of brickwork and mortar sample panel and slab to the west of the kitchen below the Card Room pursuant to conditions 2(b) (in part) and 3 of planning permission dated 17 October 2019 (application number 19/00521/FULL)	Approved  05.08.2021	Peregrine Bryant Architects

19/01153/NMA Farringdon Without	St Bartholomews Hospital West Smithfield London EC1A 7BE	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 16/01311/FULL dated 31 May 2018, for (i) additional rear ramp to Pathology Block, (ii) new stone facade to rear of Old Pathology Building, (iii) added balustrades on RSQ and modern Pathology Building roofs, (iv) amended external landscaping, (v) increased height of North Stair and amended pediments, (vi) Robin Brooks steps removal on RSQ; and other works/clarifications to approved drawings.	Approved 27.07.2021	GL Hearn
20/00416/MDC Farringdon Without	Old Pathology Building & Residential Staff Quarters Building St Bartholomew's Hospital West Smithfield London EC1A 7BE	Details of soffits, balustrades and handrails pursuant to Condition 2 (f) of planning permission 16/01311/FULL dated 31.05.2016	Approved 15.07.2021	GL Hearn
20/00417/MDC Farringdon Without	Old Pathology Building & Residential Staff Quarters Building St Bartholomew's Hospital West Smithfield London EC1A 7BE	Details of the plant, flues, fire escapes and other excrescences at roof level pursuant to Condition 2(h) of planning permission 16/01311/FULL dated 31.05.2016	Approved 15.07.2021	GL Hearn

20/00418/MDC Farringdon Without	Old Pathology Building & Residential Staff Quarters Building St Bartholomew's Hospital West Smithfield London EC1A 7BE	Details of fume extract arrangements pursuant to Condition 19 of planning permission 16/01311/FULL dated 31.05.2016	Approved 15.07.2021	GL Hearn
20/00419/MDC Farringdon Without	Old Pathology Building & Residential Staff Quarters Building St Bartholomew's Hospital West Smithfield London EC1A 7BE	Details of landscaping, details of all ground levels surfaces including materials to be used and external seating; details of external surfaces within the site boundary including hard and soft landscaping pursuant to Condition 2j), 2k) and 24 of planning permission 16/01311/FULL dated 11.06.2018.	Approved 29.07.2021	GL Hearn
20/00424/MDC Farringdon Without	Old Pathology Building & Residential Staff Quarters Building St Bartholomew's Hospital West Smithfield London EC1A 7BE	Details of the treatment of the new roof including dormers and plant enclosures pursuant to Condition 2i) of planning permission 16/01311/FULL dated 11.06.2018.	Approved 29.07.2021	GL Hearn

20/00693/FULL Farringdon Without	North Wing St Bartholom ews Hospital West Smithfield London EC1A 7BE	Change of use of the North Block to a function venue, museum, office space and archive store (Sui Generis) with associated external repairs and alterations including: (i) window alteration and replacement, (ii) rooftop alterations including the formation of a rooftop plant enclosure and (ii) the formation of an access ramp.	Approved 03.08.2021	Donald Insall Associates
20/00694/LBC Farringdon Without	North Wing St Bartholom ews Hospital West Smithfield London EC1A 7BE	Internal and external alterations associated with the conversion of the North Block to a function venue, museum, office space and archive store (Sui Generis) including: (i) repair works; (ii) window alteration and replacement; (iii) rooftop alterations including the formation of a rooftop plant enclosure; (iv) the formation of an access ramp; (v) internal reconfiguration to include the removal and insertion of partitions.	Approved 03.08.2021	Donald Insall Associates
20/00909/FULL Farringdon Without	Chancery House 53 - 64 Chancery Lane London WC2A 1QS	Alterations to the existing car park to form a pedestrianised landscape including the provision of new access gates, external lighting and planting. (ii) Alterations to existing light wells at lower ground floor level including new decking, planters and external lighting. (iii) Alterations to existing ground floor and lower ground floor windows to lower existing sill heights and replacement with larger windows and doors.	Approved 27.07.2021	DP9 Ltd



21/00215/FULL Farringdon Without	Land Outside Maggie's Centre And The North Wing, St Bartholomew's Hospital West Smithfield London EC1A 7BE	Provision of level access to the main entrance of the Maggie's Centre and the east wing entrance of the North Block of St Bartholomew's Hospital, including installation of new stone ramp, steps and railings, regrading, paving and other associated works.	Approved 13.07.2021	DP9 Ltd
21/00216/LBC Farringdon Without	Land Outside Maggie's Centre And The North Wing, St Bartholomew's Hospital West Smithfield London EC1A 7BE	Provision of level access to the main entrance of the Maggie's Centre and the east wing entrance of the North Block of St Bartholomew's Hospital, including installation of new stone ramp, steps and railings, regrading, paving and other associated works.	Approved 13.07.2021	DP9 Ltd
21/00344/TCA Farringdon Without	Middle Temple Gardens Middle Temple Lane London	Pruning works to three London Plane trees.	No objections to tree works - TCA 29.07.2021	The Honourable Society of The Middle Temple

21/00415/FULL Farringdon Without	9 Holborn London EC1N 2LL	Installation of: (i) a pair of entrance doors at street level comprising a single glazed door and fixed side panels; and (ii) creation of private terrace with freestanding green wall to the party wall with 10 Furnival Street at rooftop level; and (iii) Alterations to the existing access door at level 3 comprising replacement with a set of glazed bifold doors.	Approved 05.08.2021	MiU Design Limited
21/00508/MDC Farringdon Without	1 & 2 Garden Court & 3 Garden Court (Blackstone House) Middle Temple London EC4Y 9BL	Submission of details pursuant to condition 2 parts (d) and (e) of 17/00937/FULL, dated 27/03/2018, comprising; details of plant and ductwork to serve the premises and; details of alterations to the west elevation of 1 and 2 Garden Court, including new openings, and details of all junctions with the link structure.	Approved 15.07.2021	WSP UK Ltd
21/00509/LDC Farringdon Without	1 & 2 Garden Court & 3 Garden Court (Blackstone House) Middle Temple London EC4Y 9BL	Submission of details pursuant to condition 2 parts (d) and (e) of 17/00938/LBC, dated 27/03/2018, comprising; details of plant and ductwork to serve the premises and; details of alterations to the west elevation of 1 and 2 Garden Court, including new openings, and details of all junctions with the link structure.	Approved 15.07.2021	WSP UK Ltd

21/00595/MDC Farringdon Without	West Smithfield London EC1A 9NB	Details of the proposed dismantling, storage and reinstatement (including timescales) of the shopfronts to the east elevation of the General Market, the junctions between the new structure and overburden and the existing elevations of the General Market and Poultry Market, the proposed repair works to the east elevation of the General Market and the removal and storage of historic cobbles and features recovered during excavation works pursuant to condition (5) (a), (b), (c) and (d) of planning permission dated 26 February 2021 (ref: 19/01215/FULL).	Approved 19.07.2021	GERALD EVE LLP
21/00088/MDC Lime Street	Leadenhall Court 1 Leadenhall Street London	Submission of Piling Method Statement pursuant to condition 7 of planning permission 18/00740/FULEIA dated 28th March 2019.	Approved 03.08.2021	DP9
21/00219/MDC Lime Street	Leadenhall Court 1 Leadenhall Street London	Details of a Construction Logistics Plan pursuant to Condition 10 of planning permission dated 28.03.2019 (18/00740/FULEIA).	Approved 20.07.2021	DP9
21/00332/MDC Lime Street	Leadenhall Court 1 Leadenhall Street London EC3V 1PP	Submission of details of water saving measures pursuant to condition 15 of planning permission 18/00740/FULEIA dated 28th March 2019.	Approved 20.07.2021	DP9
21/00442/ADVT Lime Street	22 Bishopsgat e London EC2N 4BQ	Installation and display of one illuminated hanging sign measuring 0.4m high by 1.76m wide by 0.15m deep at a height above ground of 3.12m fixed behind the shopfront glazing.	Approved 29.07.2021	DP9 Ltd

21/00460/MDC Lime Street	3 St Helen's Place London EC3A 6AB	Submission of particulars and samples of materials; details of the proposed new facades and roof including typical details of the fenestration; a typical bay of the new rear wall; soffits, handrails and balustrades; all alterations to the existing facade; details of the integration of window cleaning equipment and other excrescences at roof level pursuant to conditions 11 (a) (in part); (b); (c); (e); (f) and (h) of planning permission dated 8th October 2019 (18/01336/FULMAJ).	Approved 17.08.2021	DP9 Ltd.
21/00464/PODC Lime Street	Leadenhall Court 1 Leadenhall Street London EC3V 1PP	Submission of the Utility Connection Requirements and Draft Programme pursuant to Schedule 3 Paragraph 13.1 of the Section 106 Agreement dated 28 March 2019 (Planning Application Reference 18/00740/FULEIA).	Approved 20.07.2021	DP9
20/00895/MDC Portsoken	15-16 Minories 62 Aldgate High Street London EC3N 1AL	Details of the biodiverse roof on the residential building pursuant to Condition 36 (in part) of planning permission 15/01067/FULL dated 19.08.2016	Approved 03.08.2021	Tom Eyres
21/00378/ADVT Portsoken	Lamp Column Outside 75 Middlesex Street London	Installation and display of one non-illuminated banner on lamp column 352/EL12 measuring 2m high, 0.785m wide, at a height above ground of 2.8m.	Approved 06.07.2021	City of London Corporation
21/00453/LBC Portsoken	The Aldgate School St James's Passage London EC3A 5DE	Replacement of existing cast iron radiators and heating pipework throughout the building.	Approved 27.07.2021	Wilby & Burnett LLP

21/00204/MDC Queenhithe	Millennium Bridge House 2 Lambeth Hill London EC4V 4AG	Submission of a Deconstruction Logistics Plan and details for a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects for the demolition process pursuant to conditions 2 and 3 of the planning permission ref. 20/00214/FULMAJ.	Approved  19.08.2021	Gerald Eve LLP
21/00548/MDC Queenhithe	62 Upper Thames Street London EC4V 3EH	Details of the fume extract arrangement to avoid noise penetration to the upper floors from the restaurant use on the ground floor pursuant to condition 6 of planning permission (application no. 15/01015/FULL) dated 5th November 2015.	Approved  24.08.2021	Gerald Eve
20/00867/PODC Tower	76 - 86 Fenchurch Street, 1 - 7 Northumbe rland Alley & 1 & 1A Carlisle Avenue London EC3N 2ES	Submission of the Second Interference Survey pursuant to Schedule 3 Paragraph 12.3 of the Section 106 Agreement dated 11 November 2014 (Planning Application Reference 08/00824/FULMAJ as amended by 15/00702/FULMAJ).	Approved  15.07.2021	Gerald Eve LLP
21/00021/MDC Tower	Emperor House 35 Vine Street London EC3N 2PX	Submission of details of hard and soft landscaping pursuant to condition 5(k) of planning permission 18/00193/FULMAJ dated 26.07.2018.	Approved  10.08.2021	Apt

21/00022/MDC Tower	35 Vine Street London EC3N 2PX	Submission of details of the means of enclosure to the pedestrian route between Vine Street and Jewry Street; measures to secure access overnight and details of the times when access would be closed pursuant to condition 5(l) of planning permission 18/00193/FULMAJ dated 26.07.2018.	Approved 10.08.2021	Apt
21/00065/MDC Tower	35 Vine Street London EC3N 2PX	Submission of detailed elevations, cross sections and plans for the inset terrace facade to the north and south end elevations and the setback facade on Crosswall Building including a typical detail of the external inclined corners pursuant to condition 5 (b) (in part) of planning permission 18/00193/FULMAJ dated 26.07.2018.	Approved 10.08.2021	Apt
21/00185/MDC Tower	Emperor House 35 Vine Street London EC3N 2PX	Details of the Roman Wall exhibition space pursuant to conditions 11 (c) (d) (e) (f) (g) and (h) of planning permission dated 26.07.2018 (18/00193/FULMAJ).	Approved 03.08.2021	Apt
21/00206/MDC Tower	100 Minories London EC3N 1AP	Submission of an acoustic survey report pursuant to condition 19 of planning permission dated 14/02/14 (12/00263/FULMAJ).	Approved 06.07.2021	Buchanan Hartley Architects Limited
21/00223/MDC Tower	100 Minories London EC3N 1AP	Submission of an acoustic and noise insulation survey report pursuant to condition 20 of planning permission dated 14/02/14 (12/00263/FULMAJ).	Approved 06.07.2021	Buchanan Hartley Architects Limited

21/00270/MDC Tower	100 Minories London EC3N 1AP	Submission of an Accessibility Management Plan pursuant to condition 27 of planning permission dated 14/02/14 (12/00263/FULMAJ).	Approved  06.07.2021	Buchanan Hartley Architects Limited
21/00401/CLOPD Tower	1 America Square London EC3N 2LS	Application for a Certificate of Lawful Development for confirmation that the use of part of the ground floor of the building as a drinking establishment does not amount to development, following the transition of the existing use class A4 to Sui Generis under the Use Classes Order 2020 amendment.	Grant Certificate of Lawful Developme nt  13.07.2021	Gerald Eve
21/00421/MDC Tower	Emperor House 35 Vine Street London EC3N 2PX	Details of reflected ceiling plans of the ground floor and upper level inset terraces, (in part) details of soffits (in part), details of the external lighting calculation and details of two external street lights pursuant to Condition 5(a) (in part) and Condition 5 (f) (in part) of planning permission dated 26.07.2018 (18/00193/FULMAJ).	Approved  24.08.2021	Apt
21/00422/MDC Tower	Emperor House 35 Vine Street London EC3N 2PX	Details of louvres at 1:10 scale pursuant to 5 (d) (in part) and Condition 5 (e) (in part); details of the balustrade and railings on ground floor pursuant to condition 5 (f) (in part) of planning permission dated 26.07.2018 (18/00193/FULMAJ).	Approved  24.08.2021	Apt

21/00429/ADVT Tower	80 Fenchurch Street London EC3M 4BT	Installation and display of : one internally illuminated fascia lettering measuring 0.506m height by 1.689m wide at 3.150m above ground floor level; an internally illuminated projecting sign measuring 0.9m height by 0.92 wide at 2.93m above the ground floor level.	Approved 20.07.2021	Heavy & Bros
21/00431/MDC Tower	Ibex House 42 - 47 Minories London EC3N 1DY	Submission of details of a Construction Logistics Plan and a Construction Management Plan pursuant to conditions 2 and 3 of planning permission dated 12/05/2021 (app. no. 20/00989/FULL).	Approved 05.08.2021	Savills
21/00529/FULL Tower	Lutidine House 3 - 5 Crutched Friars London EC3N 2HT	Removal of seven air conditioning units and installation of six new air conditioning units and erection of louvred enclosure.	Approved 19.08.2021	Zentura Ltd
21/00639/MDC Tower	Emperor House 35 Vine Street London EC3N 2PX	Submission of details of drainage and SUDS strategy pursuant to condition 15 of planning permission 18/00193/FULMAJ dated 26.07.2018.	Approved 24.08.2021	Apt
21/00649/MDC Tower	Emperor House 35 Vine Street London EC3N 2PX	Submission of details of the CHP emissions test pursuant to condition 26 (b) of planning permission 18/00193/FULMAJ dated 26.07.2018.	Approved 24.08.2021	Apt



21/00094/BANK Walbrook	Bank-Monument London Underground Station Complex King William Street London EC3V 3LA	Details of a) the proposed new facades including typical details of the fenestration, entrances, doors, canopy, external louvres, rain screens, manifestations to the glazing and expansion joints, and details of junctions with adjoining premises; b) materials (including samples) to be used on all external facades of the new station entrance on Cannon Street and the retail unit; c) the location of street lighting, historic plaques and other signs to be fixed to the elevations pursuant to condition 2 (a), (b) and (c) of planning permission under Section 90(2A) of Transport Works Act Order dated 15/12/15 (TWA/14/APP/05).	Approved 10.08.2021	Transport For London
21/00450/FULL Walbrook	Selbourne House 11 Ironmonger Lane London EC2V 8EY	Installation of one AC condenser unit to the north east corner of the ground floor level, with associated fixtures, containment and pipework.	Approved 22.07.2021	Partager Limited
21/00451/LBC Walbrook	Selbourne House 11 Ironmonger Lane London EC2V 8EY	Installation of one AC condenser unit to the north east corner of the ground floor level, with associated fixtures, containment and pipework.	Approved 22.07.2021	Partager Limited
21/00493/ADVT Walbrook	107 Cannon Street London EC4N 5AF	Installation and display of: i) one internally-illuminated projecting sign, measuring 0.9m (w) by 0.6m (h) by 0.18m (d), at a height of 3.7m from the pavement; and ii) a fascia sign comprising of individual internally-illuminated lettering and logo, measuring 2.25m (w) by 0.38m (h).	Approved 10.08.2021	Avon Signs Limited

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<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation	7 <sup>th</sup> September 2021
<b>Subject:</b> Valid planning applications received by Department of the Built Environment	<b>Public</b>
<b>Report of:</b> Chief Planning Officer and Development Director	<b>For Information</b>

## Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development applications received by the Department of the Built Environment since my report to the last meeting.

Any questions of detail arising from these reports can be sent to [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk).

## Details of Valid Applications

<b>Application Number &amp; Ward</b>	<b>Address</b>	<b>Proposal</b>	<b>Date of Validation</b>	<b>Applicant/ Agent name</b>
21/00622/FULEIA Aldgate	115 - 123 Houndsditch, London, EC3A 7BU	Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development. (The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA	19/07/2021	Cutlers Houndsditch Unit Trust

		<p>of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD).</p> <p>(The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)</p>		
21/00651/FULL Aldgate	6 Lloyd's Avenue, London, EC3N 3AX	Installation of one new external condenser unit within the lightwell of the building.	30/07/2021	CLS Lloyds Avenue Limited
21/00678/FULL Bassishaw	2 London Wall Place, London, EC2Y 5AU	Change of use of the first floor of 2 London Wall Place from Class A3 restaurant to offices within Use Class E (902m2 GIA).	06/08/2021	Two London Wall Place Limited
21/00563/FULL Bishopsgate	155 Bishopsgate, London, EC2M 3TQ	Placement of external furniture including tables, chairs and planters associated with adjacent retail operations.	01/07/2021	Black Sheep Coffee
21/00433/FULL Bishopsgate	186 - 190 Bishopsgate, London, EC2M 4NR	Alterations to the shopfront	06/07/2021	Five Guys JV Ltd

21/00594/FULL Bishopsgate	63 St Mary Axe, London, EC3A 8AA	Shopfront works comprising alterations to the window sill and head heights and the replacement and installation of new shopfront windows and doors at ground floor level with fixed glazing on the elevations; and other associated and ancillary works.	09/07/2021	Arcium B.V C/o AXA Real Estate Investment
21/00599/FULL Bishopsgate	The Arcade, Liverpool Street, London	External refurbishment comprising: (i) replacement of existing windows with double glazed units (ii) reinstatement of metal balconettes (iii) reroofing works including replacement of rooflights, roof coverings, steel walkways, balustrades and railings and (iv) other general works of repair and building cleaning.	13/07/2021	Transport For London
21/00603/FULL Bishopsgate	150 Bishopsgate, London, EC2M 4AF	Change of use of part of first floor of 150 Bishopsgate from retail use to office use (Class E).	15/07/2021	UOL
21/00596/FULL Bishopsgate	155 Bishopsgate, London, EC2M 3TQ	Change of use of private land to which the public have access (Sui Gen) to class E for the setting out of a fixed seating area, retractable butterfly awnings, waitress station and planting ancillary to the class E unit at the ground floor level of 155 Bishopsgate.	27/07/2021	Urban Pubs & Bars

21/00663/FULL Bishopsgate	150 Bishopsgate, London, EC2M 4AF	Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 22 of planning permission 21/00061/FULL (dated 30/03/2021) to facilitate a change of use of the Class A3 premises at 3rd floor level of Devonshire House to Class A3 (Restaurants and Cafes) and/or a Bar (Sui Generis).	04/08/2021	Pan Pacific London Hotel Ltd
21/00698/FULL Bishopsgate	Open Space And Events Area, Broadgate Circle, London	Proposed use of Broadgate Circle for a temporary Christmas forest installation with pergola, seating and ancillary facilities.	16/08/2021	Exchange Square Management Limited
21/00633/FULL Bread Street	Paternoster Lodge, 2 Paternoster Square, London, EC4M 7DX	Temporary installation of a London mural art installation on the front facade of the building, to be installed on 06 September 2021 and taken down on or before 08 October 2021.	22/07/2021	Hansell
21/00623/FULL Bread Street	Warwick Court, 5 Paternoster Square, London, EC4M 7DX	Lowering of the existing stone wall to the Warwick Lane entrance, relocation of oil and foam inlet to serve the existing oil store on Warwick Lane, and new air intake louvres to the level 7 roof.	09/08/2021	Mitsubishi Estates London Limited

21/00554/FULL Broad Street	23 Great Winchester Street, London, EC2P 2AX	Proposal to segregate 3, 5 and 7 Throgmorton Avenue from 23 Great Winchester Street and 15, 17 - 19 Throgmorton Avenue. Works are to include the removal of an existing link bridge and associated stairs, internal works and works to the existing facade where the link bridge has been removed.	28/06/2021	Deutsche Bank AG
21/00556/FULL Broad Street	23 Great Winchester Street, London, EC2P 2AX	Proposal to segregate 3, 5 and 7 Throgmorton Avenue from 23 Great Winchester Street and 15, 17 - 19 Throgmorton Avenue. Works are to include the retention of an existing link bridge, internal works and associated works to facilitate the separation of existing units.	28/06/2021	Deutsche Bank AG
21/00670/FULL Candlewick	Capital House, 85 King William Street, London, EC4N 7BL	Minor external alterations at sixth floor level to provide access to the terrace.	05/08/2021	Barings Real Estate.
21/00354/FULL Castle Baynard	Hamilton House, 1 Temple Avenue, London, EC4Y 0HA	Installation of replacement timber framed windows and doors at fifth floor level and associated external refurbishment works.	08/06/2021	Dorrington Plc

21/00384/FULL Castle Baynard	Hamilton House, 1 Temple Avenue, London, EC4Y 0HA	External alterations, including: (i) creation of terrace area at third floor level and associated access door; (ii) replacement of existing balustrade and fire staircase on third floor terrace fire escape route; (iii) installation of new windows and green wall within the rear lightwell; (iv) installation of replacement timber framed windows and replacement fire escape door at fifth floor level; (v) reconstruction of the main entrance steps; (vi) installation of replacement glazed timber entrance doors; (vii) erection of a platform lift and associated alterations to the forecourt, including soft landscaping; and (viii) associated external refurbishment works.	08/06/2021	Dorrington Plc
21/00538/FULEIA Castle Baynard	120 Fleet Street, London, EC4A 2BE	Demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement and the erection of a new building comprising two basement levels and ground floor plus 20 upper storeys (93.15m AOD) including retail, commercial, office and service use (Class E). Creation of new pedestrian routes.	21/06/2021	River Court Properties Limited



		<p>Change of use of Daily Express Building from office (Use Class E) to learning and non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E), Alterations to and refurbishment of the existing Grade II* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront and associated works.</p> <p>(The proposal would provide 61,135sq.m GIA of Class E offices, 2,051sq.m GIA of flexible retail use (Class E), 2,748sq.m GIA of Sui Generis public roof terrace, 1,331sq.m GIA of learning and non-residential institution use (Class F1), 2,776sq.m GIA of flexible and non-residential</p>		
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		institutions/commercial business and service; Total floorspace 78,456sq.m GIA. Overall height 93.15m AOD). The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)		
21/00661/FULL Castle Baynard	5 - 6 Crane Court, London, EC4A 2EJ	Removal of external mechanical plant equipment and replacement equipment provided on the main roof of 6 Crane Court and the lightwell of 5 Crane Court, and alterations to the existing plant room within the lightwell of 5 Crane Court including new flat roof and provision of new terrace area.	04/08/2021	Red Lion Chambers
21/00544/FULL Coleman Street	55 Moorgate, London, EC2R 6BH	Change of use of part ground floor and lower ground floor levels from Class E to a drinking establishment with an ancillary restaurant area (sui generis) use (965sq.m).	24/06/2021	Snellock

21/00694/FULMAJ Coleman Street	63 - 66 Coleman Street And 35-39 Moorgate, London, EC2R 5BX	Demolition of the three existing buildings (with the exception of the front facade of 63 Coleman Street) and erection of a new building comprising lower ground, ground and eight upper storeys for predominately office (Class E) use with associated flexible retail/office (Class E) use at ground floor, ancillary plant and other associated works. (5,904sq.m GEA)	16/08/2021	CLI-Dartriver
21/00571/FULL Farringdon Within	2 King Edward Street, London, EC1A 1HQ	Demolition of twin walkway bridges linking the West and Main buildings with associated alterations to building fenestrations and ground floor layout to West Building, and installation of generator at roof level.	02/07/2021	Bank of America
21/00545/FULL Farringdon Within	Fleet Place House, 2 Fleet Place, London, EC4M 7RF	Alterations and extension of existing building to include removal and replacement of the main entrance doors on the front elevation, change of colour of the existing exoskeleton, over cladding of the granite plinths at ground floor, upgraded lighting to the ground floor under croft and a single storey extension to the reception at ground floor level.	09/07/2021	Heron Trustees 1 & 2 Ltd As Trustees of The Unit

21/00550/FULL Farringdon Within	Flat 16 & 17, St Bartholomew House, 58 West Smithfield, London, EC1A 9DS	Amalgamation of flats 16 and 17 to create a single residential unit.	10/08/2021	Keith Dawkins
21/00631/FULL Farringdon Without	Middle Temple Hall, Middle Temple Lane, London, EC4Y 9AT	Formation of new fire escape stair to Middle Temple Hall, including formation of fire lobby at lower ground floor and creation of new egress door on West elevation.	22/07/2021	The Honourable Society of The Middle Temple
21/00559/FULL Lime Street	35 Great St Helen's, London, EC3A 6AP	Alterations to the existing building, including: (i) installation of metal infill panels to the base of the existing bay windows at first, second and third floor levels; (ii) recladding of the main entrance reveals; (iii) installation of lighting to the existing entrance canopy; and (iv) other associated works.	22/07/2021	Matt Doyle
21/00430/FULL Portsoken	50 Aldgate High Street, London, EC3N 1AL	Construction of a glazed, timber seating and dining structure, measuring 3m high x 6m wide and 5m deep together with the use of land for restaurant (Class E(b)) purposes (35sqm) for a temporary period until the end of the lease (2025).	13/07/2021	MK WINE ART LTD

21/00271/FULMAJ Portsoken	15-16 Minories, 62 Aldgate High Street, London, EC3N 1AL	<p>Application under S73A and S73 of the Town and Country Planning Act 1990 for the retention of the development comprising the 'Demolition of 15 Minories and 62 Aldgate High Street and Redevelopment to provide a Class B1 office building with Class A1 retail. Extension and recladding of 16 Minories and change of use from offices (Class B1) to a hotel (Class C1), Class A3 restaurant and Class D1 (health)/ Class D2 (community) use. Erection of new residential building (Class C3) providing 87 units. Relandscaping of open space and public realm improvements' carried out under planning permission 15/01067/FULL dated 19th August 2016 without complying with conditions 3, 4, 7, 15, 16, 34, 35, 36, 37, 38, 62, 67 and continuation of works in accordance with revised conditions. The variation of conditions 4, 12, 15, 16, 38, 39, 40, 67 of planning permission 15/01067/FULL dated 19 August 2016 to enable each of the residential, hotel and office elements to be delivered separately</p>	22/07/2021	4C Hotels (2) Ltd
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21/00527/FULL Portsoken	Middlesex Street Estate, London, E1	Instillation of pipe and ductwork within the under croft of existing balconies on fourth floor level, boxed in and painted to match existing materials. Distribution pipe work for White Kennett Street to run within the basement and rise up the library end of the building before distributing around the back of the building.	23/07/2021	City of London Housing
21/00406/FULL Queenhithe	60 Upper Thames Street, London, EC4V 3EH	Application under S.73A of the Town and Country Planning Act 1990 for the retention and detailed alteration of a safety gantry oversailing the public highway on the east facade of the development. The works to be retained having been carried out without the benefit of planning permission.	13/07/2021	Pinboard Ltd
21/00660/FULL Tower	St Clare House, 30 - 33 Minories, London, EC3N 1DD	Temporary meanwhile use comprising the installation of shipping container units (creating 13 lettable units for microbusinesses) and conversion and repurposing of a small part of the existing lower ground floor of St. Clare House to create an additional 5no units.	03/08/2021	Hemmingway Jersey Trustee Limited

21/00510/FULL Vintry	Offices, Walbrook Wharf, 79 - 83 Upper Thames Street, London, EC4R 3TD	Change of use of part ground floor reception area at west end of building to UKPN electrical substation room (Sui Generis Use Class) (25.0 sq.m); and alterations to west facade for the installation of two new vents and steel door in association with proposed electrical substation.	14/06/2021	City of London Corporation
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