



Planning and Transportation Committee

Date: TUESDAY, 26 OCTOBER 2021

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

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

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

Accessing the virtual public meeting

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

<https://youtu.be/rfwDozi7Fp0>

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.

Lunch will be served in Guildhall Club at 1PM

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes and summary of the meeting held on 5 October 2021.

For Decision
(Pages 5 - 38)

4. **CUSTOM HOUSE 20 LOWER THAMES STREET & RIVER WALL, STAIRS AND CRANE, CUSTOM HOUSE QUAY LONDON EC3R 6EE**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 39 - 444)

4a. **CUSTOM HOUSE 20 LOWER THAMES STREET & RIVER WALL, STAIRS AND CRANE, CUSTOM HOUSE QUAY LONDON EC3R 6EE - LISTED BUILDING CONSENT**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 445 - 560)

5. **120 FLEET STREET LONDON EC4A 2BE**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 561 - 866)

5a. **120 FLEET STREET LONDON EC4A 2BE - LISTED BUILDING CONSENT**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 867 - 894)

6. **31 BURY STREET - REASONS FOR REFUSAL**

Joint report of the Chief Planning Officer and Development Director and Comptroller and City Solicitor.

For Decision
(Pages 895 - 898)

7. **RECOVERY TASKFORCE - FINAL REPORT**
Report of the Deputy Town Clerk.

For Information
(Pages 899 - 908)
8. **TRANSPORT STRATEGY UPDATE: QUARTER 1 2021/22**
Report of the Executive Director, Environment.

For Information
(Pages 909 - 924)
9. **STREETS AND WALKWAYS SUB-COMMITTEE - PUBLIC MINUTES**
To receive the public minutes of the Streets and Walkways Sub-Committee meeting held on 10 September 2021.

For Information
(Pages 925 - 932)
10. **OUTSTANDING ACTIONS**
Report of the Town Clerk.

For Information
(Pages 933 - 936)
11. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**
Report of the Chief Planning Officer and Development Director.

(Pages 937 - 952)
12. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**
Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 953 - 958)
13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
15. **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

16. **CUSTOM HOUSE LOWER THAMES STREET LONDON EC3R 6EE - TPO**
Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 959 - 970)
17. **CIVIL PARKING & TRAFFIC ENFORCEMENT - OFF STREET CAR PARKS
MANAGEMENT AND BARRIER EQUIPMENT REPLACEMENT; PROVISION OF
CCTV ENFORCEMENT CAMERAS; AND SUPPORT SERVICES FOR
COLLECTING PAYMENTS AND ISSUING NOTICE. PROCUREMENT STAGE 2 -
CONTRACT AWARD REPORT**
Report of the Department of the Chief Operating Officer.

For Decision
(Pages 971 - 980)
18. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE
COMMITTEE**
19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND
WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE
PUBLIC ARE EXCLUDED**

Any drawings and details of materials submitted for approval will be available for inspection by Members in the Livery Hall from Approximately 9:30 a.m.

PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 5 October 2021

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

Present

Members:

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

Officers:

Douglas Trainer	- Deputy Town Clerk & Chief Executive
Angela Roach	- Assistant Town Clerk
Gemma Stokley	- Town Clerk's Department
Leanne Murphy	- Committee and Member Services Officer
Christopher Rumbles	- Committee and Member Services Officer
Shani Annand-Baron	- Media Officer
Bukola Soyombo	- Technology Support Partner
Aqib Hussain	- Technology Support Partner
Dipti Patel	- Chamberlain's Department
Deborah Cluett	- Comptroller and City Solicitor's Department
Gwyn Richards	- Chief Planning Officer and Development Director
Juliemma McLoughlin	- Executive Director, Environment
David Horkan	- Department of the Built Environment
Bhakti Depala	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Bruce McVean	- Department of the Built Environment
Neel Devlia	- Department of the Built Environment
Elisabeth Hannah	- Department of the Built Environment
Gordon Roy	- Department of the Built Environment
Gemma Delves	- Department of the Built Environment
Caroline O'Donoghue	- Department of the Built Environment
Rosalina Banfield	- Department of the Built Environment

Toni Bright	- Department of the Built Environment
Kerstin Kane	- Department of the Built Environment
Kieran Mackay	- Department of the Built Environment
Tom Nancollas	- Department of the Built Environment
Emmanuel Ojugo	- Department of the Built Environment
Amrith Sehmi	- Department of the Built Environment
Kathryn Stubbs	- Department of the Built Environment
Clarisse Tavin	- Department of the Built Environment
Rachel Pye	- Department of Markets and Consumer Protection
Robin Whitehouse	- Department of Markets and Consumer Protection

Also Present:

- Rabbi Shalom Morris – Rabbi for Bevis Marks synagogue - Objector
- Sarah Sackman – Barrister, Matrix Chambers - Objector
- Robin Makin – E Rex Makin & Co. Solicitors - Objector
- Alexander Morris – Welput – for the applicant
- Gordon Ingram – Gordon Ingram Associates – for the applicant
- Paul Littlefair – Building Research Establishment (BRE) – for the applicant
- Daniel Campbell - Stiff + Trevillion – for the applicant
- David Taylor – Montagu Evans – for the applicant
- Juliette Callaghan – Trium – for the applicant
- Dominic Mirepoix – DP9 – for the applicant
- Elva Phelan – Quod – for the applicant
- Matthew Booley – Steer – for the applicant
- Merrich Baggallay – Welput – for the applicant
- Peter Twemlow – DP9 – for the applicant
- Simon Gartshore – Kanda Consulting – for the applicant
- Simone Pagani - Gordon Ingram Associates – for the applicant

Introductions

The Town Clerk opened the meeting by introducing herself.

A roll call of Members present was undertaken.

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

The Town Clerk also reminded Members, and any members of the public observing the meeting on-line, that this was an informal meeting and that any views reached by the Committee today would therefore have to be considered by the Director of Markets and Consumer Protection or those deputising for him after the meeting in accordance with the Court of Common Council’s COVID

Approval Procedure and that they would make a formal decision having considered all relevant matters. The Town Clerk highlighted that this process reflected the current position in respect of the holding of formal Local Authority meetings and the Court of Common Council's decision of 15th April 2021 to continue with virtual meetings and take formal decisions through a delegation to the Town Clerk and other officers nominated by him after the informal meeting has taken place and the will of the Committee was known in open session. Details of all decisions taken under the COVID Approval Procedure would be available online via the City Corporation's webpages.

1. **APOLOGIES**

Apologies for absence were received from Mark Bostock, Deputy Keith Bottomley, Peter Dunphy, Tracey Graham, Christopher Hayward, Alderman Alastair King and Alderman Bronek Masojada.

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

There were no declarations.

3. **MINUTES**

The public minutes and summary of the informal, hybrid meeting held on 21 September 2021 were considered and approved as a correct record.

4. **BURY HOUSE, 31 BURY STREET LONDON EC3A 5AR**

The Committee considered a report of the Chief Planning Officer and Development Director regarding Bury House, 31 Bury Street London EC3A 5AR – specifically, demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.

The Town Clerk introduced the item referring to a late addendum that Members should also have received this morning, containing a number of late representations received, in addition to the main agenda pack and copies of the Officer presentation slides.

The Chief Planning Officer and Development Director presented an overview of the scheme stating that the site was located in Bury Street. In terms of its wider context, it was reported that this was not in a conservation area but that it did directly join the Grade II* Holland House and, critical to this application, the Grade I listed Bevis Marks synagogue sat just 20 metres to the north. It was noted that there were also other listed buildings in close proximity, with the report addressing the impact on these heritage assets. Members were shown images of the existing building which they were informed dated from 1967 and was a somewhat dated building now coming to the end of its useful life, especially in terms of the external cladding. Officers reported that the reuse of the structure had been explored by the applicant in detail but was found not to

be feasible. The Committee were informed that the site was located almost in the heart of the Eastern Cluster Policy Area as well as within the Replacement City Cluster Policy Area with both policies identifying the cluster as the preferred location for siting tall buildings where suitable or appropriate. Officers underlined that the expectation was that this area would deliver the majority of the floorspace that the City required to maintain its international position. Members were shown images of the other consented schemes within this area – some of which were being built out at the present time and included 6-8 Bishopsgate, 1 Leadenhall Court, and 40 Leadenhall Street to the immediate south of this site. This provided an overview of the relationship of this site with all of these consented schemes as the cluster continued to consolidate and intensify.

Members were shown images of the existing and proposed ground floor plans for the building with Officers highlighting that the proposal involved more than a 230% increase in public realm. The existing offer was approximately 95 square metres with a small pocket park to the south which would be increased to over 300 square metres, primarily by virtue of a new pocket park to the south, but also in terms of the new north-south route at Heneage Lane. It was highlighted that Heneage Lane was a historical route in the City which had originally gone to the south and these proposals would reinstate the line of Heneage Lane. There would also be a net gain of 7.8 square metres of public highway despite some stopping up. Members were also shown images of the new arcade proposed at Heneage Lane, the pocket park to the south and the entrance to the new arcade to the east. The arcade would be open from 07:00-23:00 daily which would be secured under Section 106. Officers reported that there was precedent for arcades within the City and central London which offered shelter during inclement weather as well as in hot summers and were also a vital part of increasing permeability through the City streets. Members were informed that the arcade was of a generous scale – between 5-8 metres wide with a 7-metre ceiling height and eye-catching ribs in the soffits to visually draw pedestrians through. A key part of the scheme was also the provision of York stone paving to ensure that this area was able to seamlessly merge into the City's public realm. Members were shown various images of the entrance to the arcade from different vantage points. Officers reported that there was no retail on the existing site, but the proposal included 60 square metres of retail floorspace which would be secured by condition. The retail units would be designed to be small, flexible, and adaptable, responding to the changing retail market. Vitrines displaying artwork, local community information, products of local artisans and reference to the important history of the site were also proposed here. There was sufficient flexibility to also allow these spaces to be used as small workshops and retail units for emerging local businesses and in particular craft and culture. Officers reported that the intention was that they would help to foster and support emerging local talent and provide space to create, make, display, and sell their creations. The space would feature a curated, cultural programme in collaboration with craftspeople studying at the City and Guilds School and Sculpture in the City. This cultural programming would also be secured by a Section 106. The intention therefore was that Heneage Lane would become not only a cultural destination but also contribute to supporting education in the area.

Officers went on to report that to the south of the site was James' Court where an extended pocket park was proposed which would be accessible 24 hours a day and feature a 9 storey, 32-metre-high green wall. Members were informed that servicing would be via a dedicated off-street service area at ground floor level on the north side of the site. There would be off-site consolidation which would be secured by a Section 106 agreement and there would be a cap limiting the number of deliveries to 22 a day and no servicing permitted during peak hours. A Delivery Management Plan would be developed to be bespoke in order to avoid any disturbance to the synagogue services. Members were informed that the scheme would involve 443 long stay cycle parking spaces which was policy compliant with access through a prominent cycle parking entrance on Creechurch Lane, featuring a dedicated lift. In terms of the provision of short stay cycle parking, this was also policy compliant with 26 spaces located in a cycle hub at basement level and a concierge service provided at ground floor level with two lifts and prominent signage which would be conditioned. This would be free for the public to use.

At first floor level, a large community space of over 500 square metres and capacity for up to 480 people would be provided. This had been christened as 'Creechurch Hall' by the applicants and was intended to be a flexible space for large gatherings to smaller meetings and would be available to pre-book, free of charge from 10:00-21:00 weekdays and 09:00-17:00 Saturdays. Access to this space would be via a dedicated lift and staircase and the space would also feature an external terrace to the south side. Local communities including those from diverse communities and networks in the east, some of whom were probably amongst the most economically deprived within the City and beyond, would be able to make use of the area leading Officers to describe this as a very socially and economically inclusive space for all. Local non-profit organisations, schools such as the Aldgate School and other local community groups including the synagogue community would be able to make use of this space and a programme would be developed in consultation with potential operators, community partners and other institutions which would, again, be secured through a Section 106 agreement. There would be a strong emphasis on education, skills, training, and culture with this space serving as a portal for those communities within and outside of the City to provide an economically and socially inclusive space to enable them to benefit from the opportunities that the City provide.

Officers went on to report that a public space would also feature at mezzanine level that could be used by local communities and would measure approximately 421 square metres. This would be open from 07:00-23:00. In terms of office floorspace, 25,460 square metres was proposed from level 2 – level 45 of the building which was an uplift of 22,000 square metres compared with the existing offer. Officers reported that the floorplates varied from approximately 350 to 500 square metres and were well designed/flexible to appeal to SME businesses. It was highlighted that the application included affordable workspace of 640 square metres at level 2, available at 50% market rate for 15 years which would assist SMEs and start-ups to recover in the post-pandemic world. Officers felt that this was important in terms of kickstarting

small business recovery and encouraging start-ups in the City. The building in its entirety was forecast to generate 1200-1600 jobs which would be a very strong catalyst for the local economy. The proposed development would also provide a different option to potential SME office tenants who were looking for smaller areas but were not keen to occupied shared space in co-working environments. This would diversify the appeal of the City for SMEs. On the 20th floor would be something called the Creechurch Hive – a shared office community area, accessible to all occupiers, providing an informal area for occupiers of the building to come together, a place where staff can meet, socialise, share, collaborate and innovate.

Officers drew Members' attention to the bevelling of the building from the 21st floor which they reported was an amendment to reduce the bulk of the building in terms of views of the World Heritage Site and also views looking south from the courtyard of the synagogue. In design terms, the proposal at 48 storeys would mediate the height of the cluster stepping down to the east. Officers reported that the design was considered to be of the highest quality and refined with a well-proportioned and elegant building with accomplished modelling and detailing the scalloped and ribbed spandrels formed by smooth columns. It was reported that the building would draw inspiration from the listed Holland House to the west with the colour of the faience carefully selected to contrast with the masonry of the White Tower of the Tower of London in views from the south and the east. Officers were of the view that the design approach would contribute positively to the variety and architectural quality of the City Cluster, reinforcing and consolidating the form of the Cluster. Members were also informed that the scheme had excellent sustainability credentials and was on track to achieve BREAM 'outstanding'. Members were shown images of the proposed scheme from various elevations as well as a CGI of the aerial view with consented and existing schemes in the Cluster also highlighted.

Officers stated that one of the key considerations in this application was the view of the World Heritage Site from the North Bastion of Tower Bridge which was a recognised view in the London View Management Framework (LVMF) and a key view in terms of the appreciation of the World Heritage Site. The Committee were shown images of the existing view alongside the proposed view of the new tower surrounded by all of the consented schemes. It was acknowledged that the proposal would, to a limited degree, challenge the physical dominance of the Tower of London, its visual separateness from the City and its landmark setting on the river. It would also, to a degree, undermine the presence of the White Tower although Officers stated that they thought that this would only be to a very limited degree. Members were informed that the scheme was amended so that the easternmost area of the building would be bevelled away to provide a visual separation to the White Tower which was considered to be a beneficial change. Officers were of the view that the degree of harm caused was very much on the lower level and, in mitigation of this harm, the tower did reinforce the form of the Cluster, stepping up from the Tower and retained open sky between the Tower and the White Tower and the Cluster and, critically, did not breach the crenulations of the White Tower. Members were reminded that this limited degree of harm clearly needed to be balanced against the wider public benefits of the scheme. Officers went on to

explain that views from Queen's Walk were not considered to be harmed. The scheme would not be visible from the Scaffold site but, stepping back from here, it would become visible above the chapel, however, not in a way that was considered to be harmful. Officers shared images of the existing and proposed situation from other local views such as the view from Aldgate Square with St Botolph's Church in the foreground (where it was not considered to cause harm) and the view from Holland House. Officers highlighted that concerns had been raised in terms of the relationship of the new tower to this very impressive Grade II * listed building. Members were shown images of the tower in faience behind this building with Officers commenting that it would borrow some of the aesthetic qualities of the faience of Holland House although not in a way that would ape it. Officers underlined that they did not consider that this would harm the setting of Holland House and highlighted that 100 Leadenhall Tower would be significantly taller and therefore more visible from here. Officers went on to comment on the view from Bury Court, looking east, stating that Holland House had never been intended to be visible from this view but had become so as a result of the redevelopment of the Gherkin and the loss of the Baltic Exchange. From this view the tower would be visible behind Holland House. It was noted that the broadest part of the development would be visible from Leadenhall Street.

Officers went on to state that a key consideration in this application was the impact on the Bevis Marks synagogue – a hugely significant historic building in the City and beyond, dating from 1701 and Grade I listed. Members were informed that this was the oldest synagogue in the country and home to the unique and rich religious traditions of the Sephardic Jewish community in Britain. It was reported that the synagogue is of outstanding architectural, artistic, communal, historic, and archaeological significance as set out within the report. A thorough assessment of the impact on the significance of the synagogue had been carried out as well as an overarching Equality Assessment in terms of the impact on the Jewish community and the synagogue (again, as detailed within the report). In terms of its setting, integral to the historical and architectural significance of the synagogue was its discreet location in an intimate courtyard. Within the courtyard, the synagogue held the eye as depicted in images shared with the Committee. However, the more distant background was characterised by modern City buildings, with the Gherkin and 6 Bevis Marks to the west and Creechurch Lane to the east. Officers highlighted that a significant number of other consented towers would join this dynamic backdrop in the coming years and that this relationship with modest scale, historic buildings seen within a backdrop of the modern City was not only a prevailing townscape characteristic of this unique part of the City but also a defining and distinctive character of the City Cluster as an urban typology. Officers went on to state that the juxtaposition visually reinforced the appreciation of the synagogue's secluded location in the heart of the modern City. It was underlined that there were numerous examples of other Grade I listed religious buildings within the Cluster which shared such a setting such as St Andrew's Undershaft and St Ethelburga. The juxtaposition of the old City and the ever-changing modern City skyline as a backdrop defined the Cluster and was, today, an integral and exciting part of the setting of its historic buildings including the synagogue. This dynamic frisson between the old and the new,

heritage and modernity, gave greater potency, richness and depth to the setting of these historic buildings and was a uniquely positive element of the setting of the historic buildings within this specific and localised urban context of the Cluster according to Officers. Members were informed that, within this distinct and unique context, no harm was found to the setting of the listed synagogue from the proposal. Images of the impact of the scheme were shown with Officers reminding the Committee that they would also have seen the fly-through animations of the various scenarios featuring consented schemes. Officers commented that the Scalpel was visible from the existing view from the synagogue courtyard to the south, with 40 Leadenhall (a consented scheme) now also starting to rise up in this same view. Images of the proposed view from here featuring the proposed development alongside 100 Leadenhall, and also 40 Leadenhall. Here, the bevelling back of the building also reduced the impact on this view as well as the view of the World Heritage Site. Officers went on to share various images of the historic interior of the synagogue which was described as a very fine and exceptional interior with huge religious and communal significance. Officers spoke on the impact in terms of daylight and sunlight on this historic interior and courtyard and reported that this was also a key consideration for the Committee today. The assessment of daylight and sunlight impacts had to be based upon objective and quantifiable evidence, with established quantitative methods developed over time, prescribed by the BRE, and applied in the consideration of planning applications as was the case in this instance. Officers went on to state that to deviate from this quantifiable assessment in the context of the BRE guidelines would be subjective and a matter of conjecture and would not therefore be a sound basis for a decision. The impact on light entering the synagogue in considering this implication had been assessed at an unprecedented level of thoroughness – a rigour of assessment that was possibly unmatched in any other planning scheme, utilising new, ground-breaking technological methods. In particular, the advice of five or six leading experts in the field were sought and, despite the highly technical nature of the assessment, there was a broad consensus amongst the expertise on the quantifiable impact with the report setting out the daylight and sunlight impacts in accordance with BRE methodology. Officers reported that it was primarily at balcony level where there would be a change in daylight and sunlight under the proposed scheme. It was highlighted that the synagogue had large windows on all four elevations and that, in considering the cumulative impact, the proposed development and other consented schemes, would mean that 23 of the 28 windows assessed would experience a negligible impact, 2 windows would experience a minor, adverse impact and 3 would experience a moderate, adverse impact. The absolute alteration to the light for the affected windows ranged from 1.2 and 1.8% and it was considered that these were very small reductions which would be minimally noticeable to users of the synagogue. It was noted that there was some debate from some of the daylight consultants who suggested that this was imperceptible although Officers stated that they were more comfortable with the term minimally noticeable. The absolute reductions experienced as a result of the proposed development for sunlight was considered to be very low. In the annual period, reductions ranged between 7 and 13%, however, the existing sunlight levels experienced by the synagogue were already low meaning that any diminishment, however fractional, was considered to have an adverse impact in BRE methodology's

definition. Despite this, Officers reported that the impact would be generally minimally noticeable to the human eye. The existing lighting conditions within the synagogue were such that supplementary electric lighting was already necessary and in use. Use of electric lighting applied generally throughout the synagogue and it was reported that there was potential to improve the internal electric lighting further with Historic England and the City Corporation happy to engage the synagogue to improve the lighting of the sensitive interior as had recently been the case in St Paul's and Westminster Abbey. Officers reiterated that the difference between the existing and proposed condition for daylight and sunlight was very small and would be minimally noticeable to the human eye with some experts arguing that it would be imperceptible. In particular the impact in light levels at the principal ground floor level was very low with localised areas of daylight diminishment on the southern balcony which were, again, considered to be minimally noticeable. Officers stated that they considered that such a fractional light alteration in real terms would not affect the ability to read or visually appreciate internal features of religious significance or religious ceremonies and had therefore concluded that this would not harm the ability to continue to use the building for religious use. In addition, the marginal changes in light entering the synagogue's interior would not cause harm to the heritage significance of the synagogue or the visual appreciation of the significance of the historic interior.

Officers went on to report that Members had recently expressed an expectation of Officers that radiance studies would be requested for schemes which may have an impact on daylight and sunlight. Though the methodology underpinning radiance studies continued to be refined, Officers had committed to doing so and the applicant for this scheme had commissioned radiance studies which assisted in the visualisation of the changes in light to the synagogue's interior. It was underlined that these radiance studies were a material consideration but that the conclusions within the Officer report were based on the BRE methodology of assessing daylight and sunlight changes. The radiance studies commissioned illustrated a very small reduction in light levels on the southern part of the balcony area with the ground floor largely unaffected. Diminishment to light levels on the northern balcony were also shown. Officers shared Human Visual Response images of the existing and proposed scheme with the Committee which was intended to convey how the human eye would perceive these changes in light levels. In terms of the courtyard, there would be a diminishment in sunlight entering this area with the total loss of sunlight to a very small area of some 5 square metres immediately joining the entrance gate. Officers reported that they were of the view that the overshadowing impact would not be such that it would cause a material impact in the ability to manifest religious use and worship or other communal activities in the Bevis Marks courtyard. Therefore, in conclusion, following rigorous assessment including review by numerous independent experts, Officers stated that they did not believe that there were any planning grounds to refuse this application in terms of the impact of the daylight and sunlight to the synagogue or the courtyard.

Turning to microclimatic impacts, the Committee were informed that the impact to the microclimatic quality of the courtyard resulting from the development was acceptable with the wind and thermal comfort levels remaining in the most

favoured and comfortable category. The courtyard would therefore remain conducive for comfortable, external use throughout the year. The Thermal Comfort Analysis being rolled out by the city which combined wind, sunlight, temperature, and climatic data showed that the courtyard remained within the top category even with the cumulative impact of surrounding buildings and this proposed scheme and was, again, therefore conducive to year-round activity. Officers reported that a large number of objections received referred to the demolition of the synagogue, but the Chief Planning Officer and Development Director clarified that there were no such proposals around this with the application site situated 20 metres to the south of the synagogue. Members were assured that rigorous conditions would be applied to ensure that the demolition and construction of this scheme would not jeopardise the structural integrity of the synagogue and that the City's district surveyors had already assessed any impacts and were comfortable with the proposals.

In summary, Officers underlined that the report considered that the impact on the setting and significance of the synagogue in thorough detail and with an unprecedented thoroughness and rigour in terms of daylight and sunlight impacts. No harm was found to its significance or setting of the synagogue and, although there was a slight diminishment in daylight and sunlight levels within the synagogue and its courtyard this was considered to be very minor and marginally noticeable. It was not considered to compromise the appreciation of the historic interior or the ability to maintain the religious and community use and key activities of this very important historical building within the City. The report before the Committee concluded that there was no planning ground to refuse the application in terms of the impact on the synagogue. On the merits of the scheme, Officers stated that it was considered to be of strategic significance to the City Cluster where sites were limited, and demand remained strong. This scheme would deliver significant additional floorspace to maintain the City's international position and help aid its post-Covid resurgence. An uplift of 22,000 square metres of flexible floorspace appealing to SMEs and encouraging collaboration and innovation would generate 1,600 jobs and prove to be a real catalyst to the local economy. It would provide affordable workspace which was important in terms of kickstarting small business recovery and encouraging start-ups post-Covid. There would be a 230% increase in public realm (300 square metres of new public realm) which would maximise permeability and be culturally curated. There would be new flexible retail units where none existed at present. Officers highlighted that the scheme was policy compliant in both long and short-term cycle parking and would incorporate off-site consolidation with no peak time deliveries and a cap on daily deliveries, bespoke to avoid disturbance to the services of the synagogue. The design was considered to be refined and accomplished and was on track to achieve BREAM 'outstanding' with excellent sustainability credentials. Critically, a key public benefit of the scheme was the new, generous community use for the rich diversity of often economically deprived communities within and outside the City as part of making the City a more economically and socially inclusive place for all – a portal into the City and the opportunities it has to offer for those communities with education, skills, training, and culture at its heart. Officers were of the view that these benefits

clearly outweighed the very low level of harm identified to the World Heritage Site and the scheme was therefore recommended to Members.

The Town Clerk introduced three speakers addressing the Committee in objection to the application – Sarah Sackman of Matrix Chambers, Rabbi Shalom Morris, Rabbi for Bevis Marks synagogue and Robin Makin of E. Rex Makin & Co Solicitors.

Ms Sackman stated that whilst she was a planning barrister, she spoke today in a personal capacity having been married at Bevis Marks synagogue and her family praying here. She explained that thousands of British Jews were concerned about the impact of this application and made three preliminary points on the approach. First – plan led development with Ms Sackman remarking that we were operating in what was supposed to be a plan-led system with parliament according a statutory presumption in favour of the local plan yet the developer was asking the Committee to approve a development which their own Officers recognised was in fundamental conflict with the City's own plan. Secondly, Ms Sackman referred to cumulative impact, remarking that the applicant asked Members to focus solely on their scheme and to seemingly shut their eyes to the impact of the schemes already consented to in the Cluster as well as those in the pipeline such as 33 Creechurch Lane. This meant that the true extent to the harm to Bevis Marks was being missed. Considered both individually and cumulatively, the impact of this scheme in terms of light and heritage were unacceptable with 31 Bury Street described as 'the straw that would break the camel's back'. Thirdly, Ms Sackman referred to equalities which the Rabbi would speak further on and stated that the Equalities Assessment referred to earlier as detailed within the Officer's report was, in fact, perfunctory. It stated that there was no impact on the synagogue because the synagogue because the space within it would not become unusable, but Ms Sackman was of the view that Officers had not asked themselves the correct question in law and had also completely underestimated the significance of the Bevis Marks synagogue to the Jewish community.

Turning to the planning merits, Ms Sackman highlighted that the synagogue's professional team had circulated draft reasons for refusal and added that she hoped that the Committee would follow these. She made four key points – firstly, the unjustified harm to the Tower of London world heritage site. She stated that there was no agreement on what had been described earlier by Officers as being 'harm to a very limited degree' and that the government's own statutory conservation body, Historic England, described the level of harm to the World Heritage Site as being a 'high level of harm'. The synagogue agreed with Historic England, the GLA and the London Borough of Tower Hamlets that consent should be refused for this reason alone. Ms Sackman went on to state that some of the images shared as part of the Officer presentation showed transparent building outlines only and suggested that this was therefore somewhat misleading in terms of the impact on views and the World Heritage Site. Second, Ms Sackman stated that the proposal would harm the historic courtyard setting of Bevis Marks which was not just her view but also that of the synagogue's heritage experts Caro, the view of Historic England and the GLA, all of whom identified harm to Bevis Marks. Historic England had stated that the

proposals encroach on the secluded courtyard setting of the synagogue. Members were informed that the courtyard had already been significantly impacted by tall buildings in the vicinity with this proposal, which was much closer to the synagogue, reaching a tipping point. Ms Sackman commented that any harm, even less than substantial harm, must attract great weight in law and that if the Committee found harm against the synagogue, then they must presume against the grant of planning permission. Thirdly, Ms Sackman spoke on the unacceptable loss of daylight and sunlight to Bevis Marks. She noted that the meeting had been told that there were lots of studies around this and what all of these recognised was that there would be at least some adverse effect on the synagogue's light, it was a question of to what degree. Ms Sackman commented that there was also common ground in terms of the cumulative scenario where, as Dr Littlefair pointed out, there would be major, adverse effects on the synagogue's daylight and sunlight with objectors told that the most significant of these would be in the ladies' gallery where Jewish women pray which was another equalities impact which had not been taken account of. Ms Sackman went on to draw out just one point from the evidence of Dr Cannon Brook Smith, the synagogue's lighting expert who explained that the daylight illumination inside the synagogue was almost entirely from reflected sunlight and skylight, an element that was completely ignored by the standard assessment that the Committee had been provided with. In short, objectors were of the view that the daylight and sunlight losses inside the synagogue were being understated. Outside in the courtyard there would also be adverse effects on amenity which was acknowledged by Officers although they concluded that these would not adversely impact on the use of the synagogue. Ms Sackman questioned how Officers could know this and underlined that worshipers respected this religious space, its beauty, seclusion, and sense of separateness from the surrounding, bustling modern City – a vital part of the Bevis Marks experience with the community in no doubt that this scheme would add to the degradation of the courtyard, reducing it to a mere functional entrance. Ms Sackman stated that this would be a failure of planning and a failure to discharge the PSED. Fourthly, Ms Sackman was of the view that Officers had overstated that public benefits of this scheme which were mostly modest and generic and was principally a market scheme for office space. She went on to comment that its main benefits were private in nature. The meeting had been told about a small amount of affordable workspace that would only be secured for 15 years, a pocket park and some community space but no meaningful proposal for how the village hall would be used. She added that it would be ironic if such a space were used to justify the harm to an actual, living community space for one of the oldest communities in the City. Ms Sackman suggested that Members should attach modest weight to these benefits which did not justify the heritage harm.

Ms Sackman concluded by stating that the Committee had been presented with expert evidence on both sides and that, ultimately, it was now for Members to decide. She recognised that this was difficult in a technical application of this nature to convey just what this space meant for British Jews and non-Jewish visitors alike to the synagogue. Ms Sackman spoke of the transition from the austere sanctuary of the synagogue to the lightness of the courtyard which, in many ways, mirrored what Bevis Marks meant for British Jews – the nation's

oldest living synagogue, symbolising the re-birth of Jewish life in this country after years of expulsion. Ms Sackman added that the proposal before the Committee threatened this experience, was in overall conflict with the City's development plan and would cause harm which was not justified by the modest public benefits of this scheme. For these reasons, she respectfully asked that this application be refused.

Rabbi Morris spoke to underline that the Jewish community strongly believed that the very future of Bevis Marks synagogue, their cathedral synagogue, was at risk if this scheme were to be approved. The Rabbi continued by stating that it was the lived experience of those worshipping in the synagogue daily that informed their keen awareness that placing a 48-storey tower to the southern exposure of the synagogue, would cause harm and significantly harm the intentionally private, historic setting of the 18th century courtyard, block views of the sky that were so important to Jewish ritual and diminish the spiritually uplifting and practically necessary light that filtered into the synagogue as it reflected off of the walls of the low buildings that line the courtyard. Rabbi Morris stated that he had detailed these concerns in a Community Impact Study and had presented this in detail to the Committee yesterday. He continued by underlining that there were so many ways in which Bevis Marks would be harmed by this scheme that he was almost in disbelief that this meeting was happening. Rabbi Morris stated that all Members were aware of the cumulative impact issue arising from the sheer number of tall buildings already built, consented to, or proposed around the synagogue. He referred specifically to 1 Creechurch which had already been built and 100 Leadenhall which had previously been consented and stated that the synagogue was already at the tipping point in terms of cumulative impact and could not withstand any more tall buildings to its all-important immediate east and south. Furthermore, Members were aware that they must exercise their planning judgement in accordance with the public sector equality duty which meant having due regard to the need to promote good relations between different group with protected characteristics such as Jewish people as well as having due regard to the differential impact of their decisions on protected groups. In practice, in this instance, this meant recognising that approving this scheme which would diminish light, and harm local heritage would have a disproportionate effect on Jewish people. Rabbi Morris added that, as there were so many questions and concerns with respect to this proposal, he found it difficult to see how Members could approve it. Finally, he remarked that the City of London rightfully prided itself on promoting diversity, particularly as the City historically was the first place in England where Jewish people could live, worship, and hold public office. However, if this application were approved today, it would knowingly cause harm in so many ways to Bevis Marks synagogue, the only non-Christian house of worship in the City and the very monument to the City's history of diversity and make a mockery of the City's claim of championing this. The Rabbi also concluded by asking the Committee to refuse the application.

Mr Makin began by stating that he had hoped that his time to address the meeting could have been extended given the rare circumstances and unusually high number of issues. He also expressed concern that a letter of his dated 30 September 2021 and some other responses did not appear to be available on

the City Corporation's website. He added that a consultation period during the Jewish high holy days inevitably impacted adversely on the Jewish community and questioned whether a multi-faith calendar had been consulted. He stated that the lack of appreciation of this was further evident from the request to speak forms being emailed out on the Jewish sabbath with a response required back on a Jewish holy day. Mr Makin commented that the procedurally flawed consultation was compounded by other errors – there was very little on equalities and human rights within the report and the assessment referred to in paragraph 676 of the report had not been produced. Records showing a real knowledge, collation of sufficient information and real consideration were simply not available. Mr Makin underlined that the Jewish community was both a religion and a race for equality purposes, that its preeminent heritage asset was in issue and that information that ought to have been gathered and/or made available was absent. Mr Makin commented that it was indisputable that the opposite of fostering good relations would occur if this application were to be approved. He reiterated that no expert report was available on the complex equalities and human rights issues and that the brief reference to articles 8 and 9 without any detail was insufficient. He questioned article 1 to the first protocol and the consideration of provisions in conjunction with each other as well as the case law. He went on to state that the likely reasons to call in under Section 77 had been appreciated for some time yet there was nothing provided to the Committee on this. He felt that this application could not be dealt with by disregarding heritage and the future and hoped that the applicant team, in their address to the Committee, would respond to his letter of 30 September as well as these comments.

The Chair thanked the objectors for their contributions and welcomed any questions that Members might now have of them.

A Member referred to the term 'tipping point' used by the objectors and sought further clarity and context on this. Ms Sackman responded by stating that it was recognised that Bevis Marks was located in an urban context and that objectors also recognised the City's own ambition to develop its Eastern Cluster. She added that there were already a number of tall buildings that had been built and/or consented that were part of the context. In particular, there were a number of tall buildings that had been consented which had added to the sense of overshadowing and enclosure in the courtyard and had incrementally detracted from the synagogue's light which the report recognised were already low and which was a direct consequence of other planning decisions taken by the City. If this scheme were to be added to what had already been permitted, it would take the level of harm over the edge both in terms of harm to the setting (the degradation of the courtyard) and to the daylight taken away. Ms Sackman underlined that the courtyard was an integral part of the synagogue and performed part of its religious function for wedding and other religious ceremonies and where men and women who were otherwise seated separately were able to mingle at the synagogue. Ms Sackman also referred to the fact that she was aware that there were further applications in the pipeline which could further impact directly on the synagogue. The Rabbi added that those who attended the recent site visit would appreciate that any tall buildings that had already been approved or built were essentially on the wings of the site

with the immediate backdrop to the synagogue still remaining open at present. This scheme would, however, negate this and have a more immediate and direct impact. Mr Makin added that the approval of this scheme would result in a loss of the sky view from the courtyard which would diminish the experience of this space for weddings and other religious events.

Another Member questioned the effect on light inside the synagogue and how this would impact upon certain rituals and asked the Rabbi to expand further on this. He also questioned the equalities aspect touched upon by the Rabbi and sought advice on the extent to which this and regard to protected characteristics needed to be taken into account. The Rabbi commented to state that in Jewish ritual everyone read the prayers which were approximately 150 pages of small print for a typical Sabbath service meaning that light levels were incredibly important. Any further diminishment of light would negatively impact upon this and other activities within the synagogue including circumcision which was essentially a medical procedure and a key ritual for which light levels were extremely important. If such rituals were no longer possible inside Bevis Marks, this would fundamentally spell the end of the synagogue.

Another Member noted that the Chief Planning Officer had made it clear that there were ways in which the City Corporation could assist the synagogue in increasing and improving the existing electrical lighting inside the building and asked the Rabbi to comment on this proposal. With regard to the courtyard, he recognised that there would be a diminishment of light here but added that there would still be access to and view of sunlight/daylight and of the sky and that it would therefore still be a useable space. He sought the Rabbi's comments on this point also. The Rabbi stated that it was clearly preferable to use the space with natural light as opposed to shadows and that this came down to a fundamental human right and the rights of people to have meaningful access to light. The Member responded to state that he did not feel that the change in daylight/sunlight levels would be as dramatic as the objectors today had suggested. Rabbi Morris disagreed with this assertion and reported that, should this application be approved, for several hours each day the main part of the courtyard would be blocked by the proposed tower and that, in the Summer, when this area was primarily used, it would be significantly impacted. Ms Sackman spoke to state that, as regards artificial, electrical lighting, there were issues round the extent to which this could be improved due to the sensitive and protected nature of the listed building. She added that it was also fair to say that when the building had been designed and built it had been done with the intention of relying on daylight/sunlight which was evident from the installation of the large windows particularly those serving the ladies gallery. She also questioned whether any additional artificial lighting could be installed without detracting from the historic significance of the building. In relation to the courtyard, Ms Sackman felt that it was important to note that the synagogue were not suggesting that Bury House alone would lead to a total obliteration of the light here but, because of its due south location, it would be much closer to the area than any of the previously consented schemes and therefore have a greater impact in terms of the sense of enclosure and overshadowing that that brings and making this a less attractive space. Whilst this might fall short of rendering the courtyard totally unusable it was questionable whether it would

still make it a space where many would want to hold religious celebrations, certainly not if looked at cumulatively with other schemes that were both already present, consented or coming forward. Ms Sackman added that the courtyard was a space which allowed people to stand back and appreciate the setting of the synagogue and provided a space for all of these religious and communal activities. On equalities, Ms Sackman stated that it was absolutely fundamental that Members had due regard to the impact on groups with protected characteristics as per Section 149 of the Equality Act and that in order to do so they needed to be properly informed about what those impacts were going to be. She stressed that there was a duty of inquiry upon the City itself to find out what those impacts were going to be in accordance with their duties. She used the disproportionate effect that these proposals would have on the ladies gallery where there was an intersection of equalities impacts as a specific example that had not been looked at.

The Town Clerk introduced Alexander Morris of Welput to address the meeting on behalf of the applicant. Mr Morris began by stating that the advent of the virtual world had created efficiencies for the future office but that one thing had been made clear – that this could not replace personal interaction, collaboration, talent retention and team building and that the office space needed to respond to these requirements in addition to the high demand for high quality and best-in-class sustainable offices. With all of the current positive messages about the economy, the recovery and return to work, the applicant was proposing to commit £350 million in capital investment in the City that would also provide a £4.4 million annual spend within the eastern cluster. KPMG were predicting an increase of 100,000 people in the City and the BBC were reporting that a thousand new financial services applications to work in London had been received since Brexit. Based upon these statistics alone, Mr Morris argued that London needed in excess of 10 million square feet of additional office space – a requirement that the applicants were seeking to respond to and, as investors and developers in central London offices, it was reported that they had over one and a quarter million square feet of pipeline in central London. With regard to Bury House, Mr Morris reported that the brief to the design team was to provide a best-in-class sustainable building, targeting 99% of all employers in the City or SMEs as well as including a significant, affordable workspace mixed with community accessible space which would be enhanced further through the conversation with the City Corporation and the GLA Officers. Mr Morris noted that the GLA had stated that the proposals would cater for small and medium enterprises not usually found in the eastern cluster and would complement the existing offer of this part of the City. The design was described by Officers as slender and sophisticated. Mr Morris reported that extensive consultation had been carried out to help shape the proposals by way of social media, virtual meetings, virtual exhibitions, and letter drops with those in the City of London and neighbouring boroughs. Consultees had included the Bevis Marks synagogue and many other key stakeholders such as Aldgate and Portsoken Ward Councillors, the Middlesex Street Estate, all of the Creechurch Lane residents, City Corporation and GLA Officers, local schools, theatre trusts and Aldgate Bid – all of whom had provided letters of support alongside two Russian supporters too. The Museum of London, Sculpture in the City, and local churches such as St Helen's Bishopsgate had also shown support. Mr

Morris acknowledged that a large number of objections had been received as part of the formal public consultation with the vast majority coming from the international Jewish community. As Members might expect, Mr Morris reported that the applicant had had more meetings with the synagogue than any other consultee including presentations to all of the trustees and meetings with Rabbi Morris all of which had been civil, open, and respectful as recognised in their representations to the City. In order to assist the synagogue, the applicant had submitted a lot of additional studies to provide further assurances, had provided financial support to them to employ consultants to review and comment on the application documents and still remained committed to working with them in the future. Mr Morris went on to highlight that these studies included additional cumulative assessments of emerging developments and the commissioning of a specific radiance study. Whilst there had been a significant amount of media coverage on these proposals, the applicant had remained silent.

Mr Morris went on to comment that the current climate crisis was strongly influenced by the built environment and that the number one consideration for all of the applicant's developments was therefore good, sustainable design. Ultimately, good design created stunning results as shown within the application CGI's but this commitment to sustainable design could also be seen and evidenced by the applicant's 105 Victoria Street project in Westminster which would start on site in July 2022. Whilst BREAM 'outstanding' and EPCA were advertised as the sustainable benchmarks which the applicant would achieve, they were focused on designing the building to minimise the embodied and operational carbon to be truly sustainable. By removing all the fossil fuels from the building and supplying 100% electricity from renewable sources, the applicant would provide a net zero operational carbon building at practical completion. Whilst this was a simple but important commitment, Members were informed that the applicant was also working very hard to minimise the embodied carbon within the new build, looking at innovative ideas and considerations. Operationally, they were also developing designs to minimise the use of electricity, including natural ventilation. They also sought to provide a building with an urban greening factor in excess of current GLA policy. Whilst whole life carbon profiling was the only way to truly assess the sustainability of the built environment, the applicant recognised that they had to continue to push these opportunities, highlighting that their project was achieving the industry targets set by the RBA in response to the 2050 Paris Agreement. Mr Morris underlined that the applicant's submitted lifecycle carbon analysis to the GLA was ahead of their benchmark team but that the team were seeking to go further still and achieve the GLA aspirational targets.

Mr Morris recognised that another important commitment was the consolidated servicing strategy which ensured that there would be no increase in trips to the site compared to the current use of 31 Bury Street. Mr Morris reported that he personally cycled to work five days per week and actively supported and promoted sustainable travel to all of the applicant's developments across London. It was underlined that the 31 Bury Street scheme would provide enough bike spaces for a third of tenants to cycle to work. There would be traffic calming and public realm improvements in addition to new cycle stations as well as the restriction of deliveries to 31 Bury Street outside the morning,

lunchtime, and evening peak periods. Mr Morris reported that the entrance to the cycle parking would connect perfectly with the existing cycle lanes on Creechurch Lane from the east and west of the building.

Next, Mr Morris spoke on the substantial benefits of this development to the wider community which were clearly highlighted within the Officer report. He highlighted that the introduction of Creechurch Hall which would provide public access akin to a Village Hall at the base of the building and would be the hub for the wider community benefits would be open from 10:00-21:00 weekdays and 09:00-17:00 Saturdays although also suggested that this could be tailored to adjust the offer to meet future demands. It was highlighted that the applicant had committed to providing this space free of charge for the community, charities, and local residents and that 20% was dedicated to career opportunities in the City.

In conclusion, Mr Morris stated that the applicant was pleased to see the positive recommendation made by Officers. He reiterated that the application responded to current and emerging policies and stated that 31 Bury Street would provide an office designed to support and respond to 50% of the employees in the City working for SMEs. Mr Morris reported that the applicant believed that 31 Bury Street aligned with the aspirations and targets of the City as well as ambitions around the City's recovery and future 'to create the world's most innovative, inclusive and sustainable business ecosystem as an attractive place to invest, work, live and visit'.

The Chair thanked Mr Morris for his contribution and invited any questions that Members may have of him and the applicant team.

A Member commented that some submissions had referred to light reflected from nearby buildings being significant to the lighting in the synagogue, something that was also evident from a recent site visit undertaken by Members. He therefore questioned whether any of the analysis submitted as part of this application had factored in this element. Mr Ingram responded to state that the radiance analysis and methodology did include the reflection of daylight from neighbouring buildings. He added that he suspected that the comments made by the objectors today were in relation to sunlight reflection which was not picked up as part of radiance analysis. However, he commented that the limited amount of sunlight would be negligible in any event but that the radiance studies which were primarily all about daylight did pick up on these reflections.

Another Member questioned the sustainability credential assertions made by the applicant and the total annual carbon emissions from the proposed development compared with those from the existing one. She referenced a document shared with Members shortly before the meeting this morning and sought confirmation that the difference would be such that there would be a 28% increase in total annual carbon emissions from the approval of this development. Mr Morris confirmed that this was correct but reported that the 28% referred to was an estimate based on using electricity only and did not take into consideration the fact that there would be renewable energy delivered

which would then make it 0% in terms of use. The Member subsequently questioned the renewable energy point further and suggested that, if the aim was for all of Britain's energy to be green by 2035 then this would be true of the existing building as well as the new development. Mr Morris confirmed that this was also correct but stated that, unfortunately, the existing building had fossil fuels in it whereas the new building would not.

A Member asked if the applicant team could talk further on the daylight impact to the synagogue given that, to his mind, this appeared to be critical to the Committee's decision making today. Mr Ingram reported that there had been a full environmental statement undertaken in relation to this project which had been prepared by Everson Young and considered the development alone but also considered it cumulatively with other consented schemes. The daylight analysis had been undertaken by reference to the BRE guidelines which suggested that the effect on the synagogue (including the cumulative elements) would be minor. The City had requested that the applicant provide a much deeper dive in relation to daylight and radiance, and this confirmed the original surveyor's report and the BRE view. He added that sunlight was a very minor contribution to the synagogue and agreed with the Officer's earlier assertion that most people would be challenged to notice any change whatsoever to the levels of daylight and sunlight inside the synagogue. He confirmed that the scheme was therefore fully compliant with policy in relation to daylight/sunlight impact.

Another Member was keen to revisit the issue of emissions and questioned whether the 28% increase referred to by Mr Morris was absolute frequency or in terms of per square metre of space given that the new building was to be substantially bigger than the old one. Mr Morris clarified that, if you took an absolute area (a floor) of the existing building and a floor of the new building, emissions would be reduced by 80%. If the total of the seven storeys of the existing building and the approximately seven times height by the reduced, then the net result was an overall increase of emissions. He also took the opportunity to stress the quality of the product being proposed here which would incorporate natural ventilation, night-time cooling activities and the provision of fresh air to every tenant that they were able to control themselves. He stressed the need to look at sustainability in the wider context. He recognised that the point around decarbonisation and the reduction of emissions was incredibly important but underlined that the applicant would be driving different opportunities to reduce embodied carbon in delivering the new building which was equally important for the built environment.

Another Member posed further questions on the radiance studies. She questioned whether it was correct that the study had been undertaken on a cloudy day and therefore presented a worst-case scenario. She went on to state that when she had visited the site, on an overcast day, it was very obvious that the light was reflecting off of the surrounding buildings into the synagogue and stated that she was therefore struggling to understand whether the applicant's experts really understood the importance of this. She also questioned whether the applicants felt it was fair that their building which was pitched as environmentally friendly would cast such a shadow over surrounding

buildings and thereby increase their emissions as a result of them needing to use more electricity to light their space. Mr Ingram responded to confirm that the radiance study had been undertaken on an overcast day but did pick up all of the reflections observed by Members on their recent site visit. He added that the idea behind the studies was to mimic in so far as possible the everyday experience within the synagogue. He stressed that the key part about the daylight element was that not only did all parties agree upon the impact and there being hardly any change to the daylight/sunlight levels but that this had also been independently verified by the BRE. Mr Ingram went on to state that the vast majority of redevelopment projects in the City involved the construction of buildings that were taller than those they replaced and therefore created additional shadowing. The important question to ask therefore was whether this additional shadowing was creating a material impact on the use and energy of neighbouring properties and Mr Ingram stated that he was very clear that neither the way in which the synagogue was used today, nor its current energy bills would alter as a result of 31 Bury Street.

The Chair invited any questions that Members might now have of Officers and also invited the Committee to debate the application.

The Chair reminded Officers that a Member had questioned what regard the Committee ought to have to protected characteristics in taking their decision. The Comptroller and City Solicitor stated that there was a right to hold and manifest religion which should not be infringed except in particular circumstances and that there was also Public Sector Equality Duty to eliminate discrimination, advance equality of opportunity and foster good relations between people with different protected characteristics and those who aren't of any protected characteristic. She went on to state that Members had a large volume of information before them to properly consider whether there were infringements and whether their duties were being properly discharged. She made particular reference to paragraphs 682-684 of the Committee report where criticism was made of the summary of the Human Rights Act responsibilities being rather brief but clarified that the human rights issues had been addressed throughout the body of the report as a fundamental part of the evaluation. For example, within the tables detailing consultation responses, Officers had sought to address some of these in the consultation feedback and how this impacted upon human rights issues. Members were referred to page 185 of the agenda pack in particular where the analysis of planning impacts had been carried out and where the extent to which the evaluation bears on the human rights issues was also addressed. Paragraph 431 for example informed Members that, having analysed the issues, Officers were of the view that the impact on daylight would not be such as to cause a material impact on the ability to manifest religion or worship in the Bevis Marks synagogue. Officers noted that there had also been reference to usability and the Comptroller and City Solicitor commented that the normal reading of the advice to the Committee on usability should be read as being specific to the particular use of the synagogue. She went on to reference paragraph 434 which provided an example of where this analysis had been carried out and where Officers particularly referred to the effect of daylight in the area of the mezzanine floor on the south side which was an area understood to be used by female

members of the congregation. Members were also reminded that there was an opportunity to visit the site to enable them to better understand the particular characteristics of the synagogue and to better aid their consideration which had been proposed when this report was last brought to the Committee in April 2021. The Comptroller and City Solicitor confirmed that, all in all, Members would need to have regard to all of these issues in their consideration and stated that she believed that they should be comfortable that they had before them all of the information needed to ensure that the equalities impacts had been assessed and reach an appropriate view as to whether they felt that there was an article 9 infringement and to properly discharge their public sector equality duty.

A Member remarked that Officers were of the view that the heritage harm that this development would cause was outweighed by its public benefits. He stated that the Officer's report made a persuasive case that the development would not materially affect the number of listed buildings in its vicinity only if you allowed yourself to be distracted by the details on which the report focused. If one focused instead on a 48-storey office tower being built 20 metres from the 320-year-old synagogue then, in his view, a problem of colossal proportions arose where the tower would inevitably have an overwhelming effect of this Grade I listed building and its courtyard. The report, however, dismissed this, stating that developments would 'preserve the special architectural and historic significance of the synagogue and its setting'. The Member added that this extraordinary statement reflected the Officers' views that 'the presence of tall buildings in the courtyard was not shocking or in principle incongruous but was understood as part of the character of the place – another layer of history and change – with the main impact being one of the qualities of the juxtaposition'. The Member went on to suggest that most people outside of the Guildhall would find the statements that he had just quoted to be shocking and incongruous as their logical extrapolation was that building a 48-storey tower 20 metres away from a Wren church for example or even St Paul's Cathedral was acceptable because it would add 'another layer of history and change' and the juxtaposition could be celebrated. The ultimate logic of this approach appeared to be that any heritage asset could be degraded by being overwhelmed by a tall building which amounted to putting a line through the City's entire Heritage Policy. The Member continued by stating that the heritage harm caused by this development was claimed to be outweighed by its public benefits but remarked that the development consisted mostly of offices which produced a private benefit. He noted that the alleged public benefits amounted to a short arcade with 60 square metres of retail space, a pocket park, community space of 500 square metres, mezzanine amenity space of 400 square metres and nothing more. He went on to state that the pocket park was a misdescription for a space that was smaller than the public realm in front of the existing building and was needed for fire access to a neighbouring building with some token greening. He also highlighted that the City was not short of community space having many underused churches with residents in the east now having their own community centre. Members had been told that the community space proposed within the building could be used by school children, something which developers of new buildings in the City frequently stated to contrive a public benefit. He went on to suggest that he was of the view that all of the supposed

public benefits for this development were contrived to enable the applicant to claim that these outweighed the real heritage harm that the development would do. He claimed that this was a trick successfully employed by the developers of many applications that had recently come before this Committee where a major office development application had not been refused for many years. He stated that, if the majority of Members today were to vote in favour of this application, he would support the objectors in requesting a call-in because he was strongly of the view that the City's heritage was worth protecting.

Another Member spoke to say that what was being proposed was a very large building which did not comply with the City Plan which had been widely consulted on before being amended and approved by the City Corporation. She noted that these proposals would have an impact on many listed buildings including most notably Bevis Marks and the Tower of London. She stated that it was very difficult to imagine how this development would look on the ground when visiting the existing site. She noted that report went into much detail on the many benefits of the scheme, and she acknowledged that there would be some benefits to the community but also stressed that these were not, in her view, exclusive to this building. She questioned whether the building could not therefore be more compliant whilst also providing these benefits.

Another Member spoke to endorse the points already made. She felt that what was described within the report as 'generous' community space was conjecture and asked that Members instead be presented with facts in terms of a community space of a certain size going forward. She commented that it appeared that 1-2% of floorspace would be given over to community space and that, similarly, less than 2% given over to affordable workspace. With this in mind, she agreed that the public benefits were generic and minor with most of the benefits seeming to be private in nature and asked Officers to comment on this. She also questioned the benefit of the scheme in terms of demand for office space and was conscious that a distinction had been drawn between the 28% real and now provided increase in total annual carbon emissions which was clearly moving in the opposite direction to the City's Scope 3 commitment in terms of carbon emissions being reduced. She was conscious that the question had been posed as to emissions per square metre but noted that it was a fact that this would be a less sustainable decision in terms of increasing carbon emissions annually. The Member went on to remark that the harm done to the Tower of London by this proposal had barely been commented upon today, yet noted that Historic England, the London Borough of Tower Hamlets and Historic Royal Palaces had all objected on the basis of this which was also in line with the City's planning policies. In summary, the Member felt that the public benefits of this scheme fell far short of outweighing or making a clear and convincing case to justify the harm to heritage assets. Finally, the Member sought clarity as to changes in public highway and stated that, as she understood it, these plans would result in a slight reduction in the public realm open to the sky in the area promoted as the 'pocket park'. The Chief Planning Officer and Development Director reported that the proposed Community Hall would amount to just short of 1,000 square metres which was a very generous space with an external terrace which would be flexible and capable of sub-division and was in a very prominent location. He added that the entire scheme

was 25,000 square metres. In terms of the demand for office space, it was noted that this was a recurring theme in recent meetings of this Committee and Officers underlined that they were increasingly seeing signs of an increasing optimism and positivity in the office sector in terms of office demand in the City. It was felt that this type of offer that was very nuanced to SMEs who wanted smaller, more flexible floorspace did address this real demand. With regard to the public space proposed, Officers reported that 100 square metres of this would be covered and 74 square metres open. The space was also very generous in terms of height, something which, increasingly, in terms of healthy streets and climate resilience, the shelter afforded by the covered spaces was of value.

A Member spoke to note that the City was a very crowded environment in which to live and work and that Bevis Marks was very much a part of this. He added that it was true that many Christian churches of the same period were very much overlooked by taller buildings including St Helen's Bishopsgate which was also close to this development. He commented that this part of the City was almost lifeless at present and that this development would breathe new life into the area. With regards to daylight, he stated that he was persuaded by the expert's conclusion that this would be just marginally and almost imperceptibly changed and that he was therefore inclined to support this application.

Another Member commented that this application was bringing some very important matters to the forefront, not least its impact on important heritage assets. He commended the strong case that the objectors today had made against the application and agreed with them on the importance of looking at the impact on heritage assets cumulatively as opposed to in isolation. He stated that the heritage damage both in terms of the Tower and the synagogue had already been well articulated by other Members. He noted that the proposals were also in conflict with the City Plan and asked Officers to comment on the extent to which this was the case. Finally, the Member questioned whether this Committee might approach this application differently were it to impact upon a heritage asset of Christian background and argued that he did not think it was fair to argue that the City's churches had the same significance to the Christian faith as this particular synagogue did to the Jewish faith. He went on to ask himself whether this application was of crucial significance to the City at this time given the damage it would do to heritage assets and was of the view that, at present, it was not.

A Member questioned the Chief Planning Officer as to deviation from the City Plan. He noted that some Members had criticised the benefits of this application for being mostly private but noted that there were, to his mind, substantial benefits that would filter through to the public purse in terms of jobs and tax revenues. He questioned Officers as to whether this could be factored into considerations when looking at whether the benefits of the scheme would outweigh the harm.

The Chief Planning Officer and Development Director commented on the degree of policy breach and noted that very few, if any, applications brought to

this Committee were entirely in accordance with all policies. He noted that the particular policy breach here was the policy in terms of the view of the World Heritage Site and the fact that it would cause a degree of harm. However, he conditioned this by reporting that the degree of harm was at a very low level in his view and that the policy breach was a marginal one. Taking the City Plan as a whole, Members were informed that the vast majority of policies were adhered to and fulfilled. With regard to public benefits, paragraphs 650-653 of the report weighted the various public benefits of the scheme and Officers agreed that the benefits of the scheme to the economy also needed to be considered when balancing this against what was, in their view, a very limited degree of harm.

A Member praised the efforts of the applicant to address the various issues associated with this application but added that, for him, they ultimately failed on this front for a variety of reasons. The Member commented that he was fairly certain that he had approved all of the applications that the Royal Palaces had objected to for harming the Tower as he had felt that these were adding to the central mass of the Eastern Cluster. However, he was of the view that this scheme was too close to the Tower and too separate to the Cluster and would therefore cause much more substantial harm. He went on to state that he also felt that the harm caused to Bevis Marks would be too great. Firstly, this tower would dominate the view of the synagogue for those entering the courtyard and would also block most of the daylight and view of the sky from here. He noted that the applicant's own analysis demonstrated that, in the summer, daylight to the courtyard would be reduced for 2 $\frac{3}{4}$ hours to less than an hour, with the Committee already hearing from the objectors how important the courtyard was for religious purposes. The Member added that his final concern was around the Equalities Analysis as he felt that the report did not go into anywhere near enough depth on the use of the synagogue for religious purposes. For all of these reasons, he suggested that the application today had to be opposed.

Another Member spoke on the considerable heritage harm that she felt that this proposal would cause and not just to the synagogue but also to a number of other listed buildings in the vicinity including Holland House, local churches and even the Lloyds building. She also felt that this building would be a notable outlier to the Eastern Cluster in terms of encroaching upon the views of the White Tower. Members were told that the level of harm caused would be outweighed by the public benefits of the scheme, but it was difficult to imagine that these were really of any great value. She commented that the economic benefits would be a benefit to the City and the country as a whole and not just to the public. In terms of the retail offering, the Member commented that there were already many empty coffee shops around the Eastern Cluster and suggested that a rolling programme of artwork and local information would be of little value to those passing by to reach their destination. With regards to the public realm offering, she noted that plans for the space underneath the 'Cheesegrater' had failed and that this area was now occupied by AstroTurf and bike racks and questioned how successful the proposed 'pocket park' which would be half shadowed would be. Secondly, Members had been informed that the Section 278 agreement would contribute towards the delivery of pedestrian priority streets but would not go as far as providing funding for these per se

meaning that the narrow streets and pavements would continue to be narrow streets and pavements. The Member added that she was of the view that the social and community benefits were very minimal and also questioned the purported environmental benefits of the scheme given that the calculations explored today proved that the building would be contributing more carbon than the existing building. The carbon emissions resulting from the construction of the new building were not taken into account and neither was the embodied carbon from the demolition of the existing building. In summary, the Member felt that this application would constitute considerable harm to a number of heritage assets whilst offering less than substantial public benefit to a small area of the City and being non-compliant with the City's own Climate Action Strategy. For these reasons, she intended to oppose this application.

A Member spoke to thank Officers for their very thorough efforts in analysing this application. He argued that he felt that it would be very difficult to see any difference to the synagogue based solely on the effect of this proposed building. He went on to state that the City needed to reduce the operational carbon per metre as an average across the whole City in order to fulfil its own Climate Action Strategy and this building offered an 80% reduction in terms of operational carbon which was what was needed and was of universal public benefit. The Member went on to note that the synagogue had shown considerable flexibility towards their own listed building status as demonstrated by their current building programme. He reported that, at present, there was an area in the south courtyard which would be redeveloped as a Heritage Centre and consume one third of the courtyard and questioned whether they could show this same flexibility in terms of making improvements to the synagogue's electrical lighting as suggested. With regard to harm to views, the Member also noted that the London Borough of Southwark who currently enjoyed views across the river, considered the change to these views to be minor.

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.

A Member commented that there were many buildings in the City which needed to keep their lights on throughout the day. She stated that she still felt very conflicted on this application but added that she was of the view that she liked seeing tall buildings as a backdrop to the Tower of London and felt that they appeared more protective than oppressive and enhanced its setting. Officers had highlighted that Members should give some consideration to other applications currently in the pipeline and added that she would be more concerned if this and 33 Creechurch were both consented. She questioned however how much weight should be given to any future cumulative effect.

Another Member spoke to underline the emotive nature of this application, describing it as one of the most difficult decisions he had ever had to take on this Committee. He thanked the applicant and Officers for the great amount of work carried out in terms of analysing the application, particularly with regard to the effect on light. He stated that, on one level, he supported this very innovative design and the City encouraging more office space and more people

in this area, he was concerned as to the various planning conflicts at local and national level and found this difficult to resolve in his own mind. He clarified that he was not so much opposed to the scheme on the matter of daylight but was more concerned as to the presence/view of sky from the courtyard. He underlined that the history and heritage aspects were huge and that he felt that the City Corporation should have spent more time looking at these. He went on to speak of the immense, pan-European importance of the synagogue to Judaism which was evident from the sheer number of objections received. He was strongly of the view that the cumulative effect of other schemes in the pipeline should also be taken into consideration and stated that he could not support this application today.

Another Member stated that he was of the view that the plans put forward by the applicant were of very high quality and congratulated them on their work with others, in particular the synagogue, where they had gone so far as funding the advice provided to them. He also commended Officers on their report and the very high standard of advice provided to Members. With regard to equalities, he was of the view that the Committee had enough information available to them to discharge their statutory duties. However, he noted that this was ultimately a matter of judgement as to the effects on the synagogue both internally and externally and both physically and psychologically as he personally was not persuaded against the scheme on the basis of harm caused to the World Heritage Site. He clarified that he would be voting against this proposal.

The Chief Planning Officer and Development Director interjected to clarify that it was a material consideration that the Committee needed to take into account the cumulative scenarios of schemes that were coming forward but not yet consented to such as 33 Creechurch and The Tulip. He added, however, that it would be legitimate and reasonable for Members to give less weight to these schemes because they had not yet been decided upon.

A Member spoke of the difficulty in deciding upon this application, particularly given that the site in question was within his own Ward. He commended the applicant on the scheme put forward but stressed that, sadly, he felt that this was a good building but in the wrong place. He stated that he did not feel that the City had afforded enough importance to the synagogue in this scenario and that if a building of this stature was being proposed within 20 metres of St Paul's Cathedral it would not have even progressed this far. He underlined that Bevis Marks was unique in so many ways and of huge importance to the entire Jewish community and was unique in so many ways. He stressed that he had not been persuaded by the arguments of the objectors with respect to the impact on daylight in the synagogue which he believed would be almost imperceptible but that he did have concerns as to the massing of buildings surrounding the synagogue where he believed that a 'tipping point' had already been reached. He concluded by stating that he would be voting against this application.

Another Member also took the opportunity to thank the applicant and Officers for the work carried out on what would be a quality public building with

commendable public realm plans. However, on balance and when weighing up the benefits against the harm, one also had to consider the sensitivity of the receptors and he did not feel that he was able to support the proposals with this in mind.

A Member spoke to state that he accepted that the design of the building did present real advantages in terms of public benefits and economic benefits and the real debate was clearly how far this stood against the potential harm caused to the synagogue in particular. He went on to say that he looked at this in the context of the City as a whole which was home to over 600 listed buildings and had over two thirds of its space covered by Conservation Area provisions. He noted that his needed to be balanced against the commercial needs of a modern, efficient City, particularly one where there were clearly changes in demand going forward. He noted that the 'secret space' of the synagogue would be substantially retained in what was being proposed and stated that he felt that, on balance, this redevelopment proposal would meet commercial needs and meet demand whilst also enabling the synagogue and courtyard to be retained, maintaining this balance between secret, enclosed spaces and big commercial buildings that was so common throughout the City. He clarified that, whilst he understood the concerns raised, he was supportive of the application.

Another Member commented that the City of London was incredibly lucky to have such a unique and rich heritage but that with this came the responsibility to protect, preserve and enhance these assets and their settings for the future. Members had been separately informed that just 1% of the City's buildings were Grade I listed and 4% Grade II* listed. It was noted that Grade I meant that an asset was of national importance and that the Tower of London, with numerous Grade I listed assets was also a World Heritage Site. Whilst the Eastern Cluster was identified in the Local Plan as an area suitable for tall buildings, this did not mean that every site was suitable of appropriate for this. She continued by underlining that this site was one such unsuitable location. The Member noted that the Local Plan included a raft of policies to protect heritage assets, as did the London Plan and national policy and that these simply could not be ignored. However, this application did seem to ignore these policies and would do harm to numerous heritage/protected assets of national and international importance. The Member went on to state that she shared the concerns of other speakers as to the public benefits of the scheme, suggesting that the use of the word 'pocket park' was a misdescription when the open space offered would actually be smaller than the existing public realm and was required to maintain clear access and egress for Holland House, thereby making it a planning necessity - not a genuine benefit and certainly not a park. With regard to the impact on daylight and radiance, Members were told that the studies were not an exact science and that these needed to be weighed up against the degree of acceptable harm. The Member went on to state that, in her view, no degree of harm was acceptable in this instance. She described the application as a risk too far, stating that the purported public benefits did not outweigh the detrimental harm that this application would cause to numerous Grade I listed buildings, their setting, and the World Heritage Site alongside the long list of other listed heritage that would be affected. Alongside the City's

desire to provide more office space, it also needed to maintain and protect its heritage to retain its nationally important position. The Member added that it was possible to replace an old building with a new one without creating a detrimental impact and harm and that she would not be supporting this application.

Another Member responded to comments made earlier around a Heritage Centre being built in the courtyard of the synagogue. She praised this project as an important means by which to celebrate and recognise the rich heritage and history of the site and clarified that the site proposed for this was currently occupied by an annex. She also took the opportunity to emphasise the fact that this Committee should be taking steps to meet the needs of protected groups and that she intended to oppose this application

The Chair spoke to state that he had engaged with both the applicant and the objectors on many occasions and recognised that this was an extremely contentious, emotive, and difficult application. He praised the professionalism of all sides in dealing with this and thanked Members for such a thorough debate. The Chair went on to state that he was of the view that Officers had made the correct recommendation and emphasised the Chief Planning Officer's view that there were no planning grounds on which to refuse this application. He added that he felt it was the duty of the Committee to act fairly, to have due regard to the protected characteristics of the synagogue and other affected heritage assets and was of the view that Members and Officers had made huge efforts to have regard to these and understand what the effects on them of this application would be. The Chair recognised that leading experts on light both for the objectors, for the applicant and for the City Corporation had concluded that this application would have a very minimal effect. He felt that the proposals offered tangible and authentic benefits to public and that the effect on the Tower of London setting and on the synagogue were outweighed by these. He clarified that, for these reasons, he would be voting in favour of the application.

The Deputy Chairman reported that he had listened to the debate today with great care, had attended a recent site visit and read a vat amount of paperwork and shared the views of the Chair.

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

Votes were cast as follows: IN FAVOUR – 7 Votes
OPPOSED – 14 Votes
There were no abstentions.

The Chair reported that, with the majority having refused the application, it was now important for the Committee to register their reasons for this. The Comptroller and City Solicitor reported that she had been keeping a careful note of the reasons given by Members and, on the basis of this, felt that there were three potential reasons for refusal. However, she sought further clarity as

to whether the Committee as a whole, or at least a majority, wanted to offer all three reasons. These were around the bulk and massing of the proposal as regards its effects on the setting and amenities of the synagogue, not so much in terms of daylight and sunlight but more generally. There was, however, also a separate angle focusing on daylight and the impact on the special characteristics of the synagogue and a third ground relating to the impact on the Tower of London and reliance on Historic England's concerns which were most significantly focused on View 10A of the LVMF from the North Bastion of Tower Bridge and how this would be affected.

The Chair questioned whether anything in relation to the fact that the majority of Members opposing the application did not feel that the benefits of the scheme would outweigh the disbenefits should also be explicitly added rather than just implied.

A Member disagreed that comments around the one view from Tower Bridge should not be included in his view and that refusal should focus more on the impact upon the synagogue. The Chair and other Member disagreed and felt that this had been referenced by the majority of those speaking in objection to the application. Another Member suggested that some also opposed on the basis of severe harm that would be caused not only to the synagogue and the World Heritage Site but also to other listed assets including Holland House and that she would prefer to also see this encapsulated within the reasons for refusal. Another Member referenced the fact that the Chief Planning Officer himself had recognised that this proposal was not in accordance with the City Plan which she felt was also a very important point. Another Member spoke to agree with this and felt that it should also be referenced within the refusal letter. The Chief Planning Officer responded to state that there was a breach in policy in terms of the impact on the World Heritage Site which was clearly articulated within the report but reiterated that it was rare to find an application that was totally in accordance with all policies and that this needed to be weighed up against any benefits. The Chair clarified that a reason for refusal would be around the impact on the World Heritage Site which appeared to be sufficient.

Another Member spoke to note that the refusal point around the bulk and massing of the building was in the context of non-compliance with the City's Heritage Policy which, in the majority view, was not outweighed by the public benefits. He also underlined that several members had referred to a number of other listed assets in the vicinity of the development and felt it appropriate to also reference these in the refusal letter, although with particular reference to the synagogue. The Comptroller and City Solicitor commented that her notes suggested that only a minority had referred to wider heritage assets but that she was happy to prepare reasons for refusal concerning the setting of the synagogue, the loss of daylight with regard to the characteristics of the use of the synagogue and also the view of the Tower of London mentioned. She commented that she was less confident about being able to pull together a reason which reflected the views of the majority of the Committee in relation to other listed buildings. The Chair noted that the derivation from policies would also be linked into this.

RESOLVED – That the application be refused, and that Officers be instructed to prepare a report detailing reasons for refusal reflecting the Committee’s discussion today for submission to the next meeting of this Committee for formal approval.

5. **CR20: ROAD SAFETY RISK DEEP DIVE**

The Committee received a report of the Executive Director, Environment concerning CR20: Road Safety Risk Deep Dive.

Officers underlined that they took the approach to vision zero and road danger reduction extremely seriously and highlighted that this report would also be considered by the Audit and Risk Management Committee later today.

A Member stated that he felt that the risk needed to be updated and increased given the introduction of electric scooters and a significant increase in irresponsible cycling witnessed by many in the City recently. He went on to mention that there had been increased focus on the speed of motor vehicles and not on cycles or electric scooters which were now often travelling faster than cars and therefore of greater concern. He felt that there was a real enforcement issue around these vehicles and identifying their users.

Another Member spoke to echo these sentiments and referred specifically to electric bicycles, the speed of which could often be misjudged by pedestrians. She went on to refer to particular concerns around delivery drivers and suggested that Officers might look to engage directly with specific companies on this point and adequate training.

A Member commented that the table featured at paragraph 7 of the report highlighted that, even despite the lockdown period, there had still been 41 serious injuries reported in 2020. With regard to electric scooters, she stated that she understood that the ones available for hire in the City were geofenced and limited to a certain speed – she asked if Officers could clarify this point. The Member went on to express concerns around private e-scooters being used illegally in the City and expressed the need for greater enforcement and awareness here.

Officers reported that it was important to differentiate between the e-scooters that were part of the hire trial and those that were privately owned and therefore not legal to use on the streets. It was confirmed that the maximum speed limit for those scooters available to hire was set at 12.5mph. Officers stated that, as far as they were aware, no speed limits were set for privately owned e-scooters but they stressed that they were sure that the Department for Transport would be bringing forward legislation around this in due course. It was highlighted that the trial would help inform national legislation going forward. Officers appreciated the concerns raised with regard to enforcement and undertook to raise this further with the City of London Police to see what improvements could be made.

With regard to electric bicycles, Members were informed that the maximum speed for these should be set at 15.5mph and that enforcement measures

could be taken against any moving faster than this with the motor running. It was reported that speed limits applied only to motor vehicles at present and not pedal cycles. Officers explained that part of the reason that they were keen to secure a 15mph speed limit in the City was to try and establish a slower speed culture for all. Members were informed that the letter seeking support for this change had now been submitted to the Secretary of State and that, in due course, there would be engagement, education and enforcement campaigns around this. Officers reported that one of the campaigns that they were keen to reinvigorate was the 'Be Brake Ready' campaign.

With regard to the kind of vehicles involved in collisions, Officers reported that they were currently in the process of commissioning some analysis of the data collected over the past few years. This would help focus campaigns and assist enforcement further. Whilst previous analysis had suggested that 90% of collisions involved a motor vehicle, the concerns around bicycles and e-scooters were well understood with Members informed that the last fatal collision reported in the City was as a result of someone being hit by a cyclist.

Another Member referred to the City's cycle training and suggested that this looked to be very limited compared to that offered by other boroughs – she asked Officers to comment on this. Officers undertook to look into this further but highlighted that take up of cycle training offered by the City was currently very good. Members were informed that it had been difficult to engage City workers in particular in the past as many preferred to undertake training closer to home. Members were also informed that bike maintenance sessions were also offered on-street. The Chair confirmed that he was also aware of a Comms strategy being worked up around this training offering.

Members asked that an amended version of this paper be brought back to this Committee for further discussion in due course. Officers undertook to do so and underlined that they did provide updates on measures to mitigate CR20 within the quarterly updates on the Transport Strategy and wider Risk Register reports. Members were also assured that the risk score was regularly reviewed and could be revised as and when necessary.

RESOLVED – That Members note the report.

6. DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR

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

RESOLVED - That the report be noted.

7. 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.

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

Committee Papers

A Member commented that it could often be difficult to navigate this volume of papers electronically. She questioned whether some thought could be given to producing background papers as separate packs in future where papers were this extensive.

Another Member highlighted that the Mod.Gov app made it easy to edit and comment upon electronic papers and championed the use of this by Members.

Another Member thanked Officers for publishing and circulating the transcript of the meetings that Members were invited to attend with the applicant and the objector for today's application. She suggested that it would be helpful to continue to provide this to all going forward and also to place this on the Planning Portal. Another Member echoed this point. The Chair also recognised the usefulness of this but underlined the resource implications. He undertook to discuss this matter further with Officers and the Deputy Chairman so that a proportionate approach could be taken.

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

Next Meeting of the Committee – 26 October 2021

The Chair reported that the next meeting, scheduled to take place on 26 October 2021, would require all Members to attend in-person and underlined that those who did not would not be able to speak or vote.

10. **EXCLUSION OF THE PUBLIC**

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

Item No(s)

Paragraph No(s)

11
12 – 13

3

-

11. **NON-PUBLIC MINUTES**

The Committee considered the non-public minutes of the informal, hybrid meeting held on 21 September 2021 and approved them as a correct record.

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

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

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

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

The meeting closed at 1.53 pm

Chair

Contact Officer: Gemma Stokley
gemma.stokley@cityoflondon.gov.uk

This page is intentionally left blank

Agenda Item 4

Committee:	Date:
Planning and Transportation	26 October 2021
<p>Subject:</p> <p>Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE</p> <p>Change of use from office to hotel with ground floor internal north/south public route (sui generis), ground floor museum (Class F1 (c)), flexible ground floor and roof level retail/restaurant/bar floorspace and public viewing terrace (Classes E & Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Class E) and new riverfront public realm including Water Lane, Old Billingsgate Walk and Lower Thames Street (Sui Generis / C1 Hotel); works of demolition, alteration, extension and refurbishment: i.) removal of railings around riverside car park, (ii) demolition and re-building behind the retained facade of the 1960s East Block iii) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions to provide hotel rooms, plant and roof level retail; iv) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access (south elevation); v) alterations to and raising of the flood defence wall; vi.) facade alterations and associated works to create a first floor terrace at on the Centre Block (south elevation) and reinstated door and new ramped entrance access to West Block (west elevation); vii.) removal of railings on Lower Thames Street and alterations to Centre Block entrance on Lower Thames Street providing step free access; viii.) works to the river wall ix) other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a vehicular drop off on Lower Thames Street.</p> <p>The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.</p>	Public
Ward: Billingsgate	For Decision
Registered No: 20/00631/FULMAJ	Registered on: 8 September 2020
Conservation Area:	Listed Building: Grade I

Summary

The proposed development seeks to convert and change the use of the existing Grade I listed building Custom House, formally the HM Revenue and Customs Offices (Use Class E), to a hotel (Use Class C1), with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E), a ground floor museum (Use Class F1 (c)) and ancillary riverfront public realm.

This includes an application for planning permission (20/000631/FULMAJ) and an application for Listed Building Consent (20/000632/LBC).

The proposals would retain the existing building, Custom House, but to facilitate the conversion of the building associated works including demolition, alteration, extension, and refurbishment of the building. Internally works would include the demolition and rebuilding behind the eastern facade, demolition of the East Block roof and part demolition and alteration of existing West Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar pavilions and associated roof terraces at 5th floor. Works internally would also include the partial demolition and reconfiguration of the West Block courtyard, to include new service core and other works, demolition and alteration of existing walls and ceilings across all floors to accommodate hotel bedrooms and associated facilities, the installation of new M&E services and alterations to provide acoustic and fire protection.

Externally works would include the demolition of the Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); the partial demolition and replacement, alterations to and raising of the flood defence wall, facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation), the creation of a new Museum entrance and provision of a ramp to provide an alternative Museum entrance on the west elevation, the removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street, the removal of railings to riverside quay and the replacement of railings to the Grade II* river wall. Other external alterations include elevational alterations, alterations to the existing service ramp, regrading and resurfacing of the Quayside, along with hard and soft landscaping.

The proposal would provide 14,276 sqm of hotel floor space, providing 200 bedrooms, function rooms and meeting rooms (Class C1), 1587 sqm cafe/restaurant /bar use (Class E and sui generis), 457 sqm Museum (Class F1(c)), 504 sqm spa and leisure facilities (Class E (d)) and 2800 sqm external public realm.

During the course of the determination of the application various amendments

to the scheme have been submitted by the applicant to try and overcome issues raised. Amendments have been made in relation to the two roof top extensions to reduce their size by removing the green roofs, changes to the balcony detail for the first-floor terrae and creation of a museum space with access from land adjacent to Old Billingsgate. Towards the end of the determination period the applicant submitted further information to enable the hotel operator to close off all or part of the Quayside (new area of public realm alongside the river) for private managed events, for a significant duration of time over the course of each year.

61 objections have been received from third parties relating to a range of issues which include, but not exclusively, concerns regarding: public access, the proposed use, harm to the Grade I listed building, urban greening, and access. 16 letters of support have been received in support of the scheme, 2 letters of general comment and 1 letter withdrawing an earlier objection.

The GLA have provided a Stage 1 letter and report in relation to this scheme which states that they would support the principle of development to provide a hotel with publicly accessible internal and external spaces, subject to the submission of a final curation and public access plan that fully aligns with the principles and objectives set out in the Mayor's The Case for a River Thames Cultural Vision and his draft Public London Charter. The applicant has not submitted a curation and public access management plan; therefore, officers have notified the GLA but are awaiting comment on this matter.

TFL have provided further comment on this application during the final round of consultations to update their earlier advice regarding the acceptability of the proposal. They state that as identified in the GLA Stage 1 report should the development fail to genuinely safeguard and enhance the Thames Path, and fail to provide genuinely permanent, high quality and exemplar public access not only to the existing river path south of the site, but also to the new public realm area proposed adjacent to Custom House itself, the exceptional need to deliver public realm enhancements that significantly upgrade the Thames Path at this location may then no longer be fulfilled. In such circumstances, the proposed development would then no longer justify Mayoral and TfL support for any vehicular access from the TLRN rather than only within the site, including pick-up and drop-off facilities for taxis and coaches on Lower Thames Street. TFL also draw attention to the need to provide Pedestrian Comfort Levels in relation to the scheme, which have not been submitted.

Historic England raised no objection to this scheme but identify that the proposed works would cause some harm to the building's significance, in their view this would be less than substantial harm. They note it will be important for the City of London to be confident that this harm can be justified in accordance with the NPPF when balanced against the public benefits of the scheme.

The Georgian Group, London and Middlesex Archaeological Society (LAMAS), Society for the Protection of Ancient Buildings (SPAB), Ancient Monuments Society and SAVE Britain's Heritage all strongly object to the proposed development.

The City of London Access Group (CoLAG) have also raised concerns regarding the accessibility of the scheme for those with identified needs.

Custom House currently provides 19,698 sqm GIA of office and ancillary floorspace, this proposal would result in the loss of office floor space within the city. The applicant has provided viability assessments to demonstrate that office floor space is unviable in the longer term on this site. Officers have had this independently evaluated and the report has been agreed. Therefore, the loss of office floor space would be acceptable in this instance and the development would accord with Local Plan Policy DM1.1.

It is considered that the proposed change of use to a hotel would not be acceptable as the proposal would not accord with Policy DM11.3 of the Local Plan as it would not ensure the continued beneficial use for a historic building, and it has not been demonstrated that the proposal would conserve the amenity of existing neighbouring occupiers or provide satisfactory or safe arrangements for servicing vehicles.

This scheme would incorporate 1,474 sqm. (GIA) of flexible retail (Use Classes E) and Sui Generis (Drinking Establishment) which comprises two internal restaurant/ bar units (Use Class E(b) / Sui Generis) and two rooftop restaurants / bars with terraces (also Class E(b) / Sui Generis) and a basement Gym/Spa. In principle officers would support proposals for incorporating retail uses within the scheme as they would contribute to creating a mix of uses on the site and would provide ancillary uses to the guests of the hotel. However, officers have concerns that the proposed uses in their current form could not be run independently of the hotel function. Furthermore, officers consider that the scheme would not provide genuine activation or vibrancy at street level. The only area of activation would be the small terraces atop the grand stairs and due to the closure of the Quayside for private events and the extent of these closures the small amount of activation provided could be diminished by the fencing in of the building and Quayside, creating an extremely inward-looking environment.

The proposals include a ground floor museum situated in the north-west corner of the building and covers an area of 422 sqm (1.86% of the total building) comprising five individual rooms and an atrium with a lift up to the roof terrace area. The Museum would be accessible to the public free of charge. It would be open to the public between 10.00 and 17.00 hours, for 6 days a week.

The provision of a cultural community use celebrating the important history of

this building would be an asset to this part of London, providing local and wider communities free access to heritage and cultural information. However, due to the location of the museum in the northwest corner of the building, divorced from the river and Quayside, and from other historical areas of the building, it is not considered to be located within the optimal area of the site for a new cultural and community use. It is proposed that a Heritage Partner, appointed by the hotel, would curate, and run the museum. It is unclear how the museum would be secured in perpetuity to ensure its long-term viability and further detail is required to ensure it would be an inclusive environment independent of the hotel function, as a pure community asset.

Officers consider that the scheme does not respond to, and build upon, its key riverside location. The site also falls within a Key Area of Change, the Pool of London. The scheme would not enhance public access or provide a genuinely publicly accessible and inclusive scheme that would bring diverse vibrancy to the riverside. The proposal would not conserve or enhance a significant Grade I listed building and it has not been demonstrated that it would provide a credible cultural use, with a wider public remit, that would engage with a diverse audience to assist in the appreciation and understanding of the area. It is therefore considered contrary to Policy CS9, emerging Policies S17 and S19 of the draft City Plan, the Riverside Walkway Enhancement Strategy, or the Mayor of London's River Thames Cultural Vision.

The proposal would cause, in the language of the NPPF 'less than substantial', harm to the significance of important heritage assets, including The Grade I listed Custom House. As the statutory duties imposed by sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 are engaged, considerable importance and weight must be given to the desirability of preserving the special interest and setting of listed buildings. The general duty applies with particular force if harm would be caused, as in this case, to the setting or significance of a Grade I listed building. The more important the asset the greater the weight that should be given to the asset's conservation. The effect of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is to create a statutory presumption against granting planning permission for development which fails to preserve a listed building or its setting. The presumption, which is not irrebuttable, is engaged in this case. On the basis of the analysis set in the report, it is not considered that the statutory presumption has been rebutted.

The proposal would not safeguard the London Custom House and the River Wall, Stairs and Cranes as Grade I and II* listed buildings, failing to preserve or enhance their significance. As a result of development within their setting, the proposal would fail to safeguard the settings of the Monument (grade I and scheduled ancient monument), Old Billingsgate (grade II), St Dunstan in the East (grade I), All Hallows by the Tower (grade I) and the Eastcheap, Tower

Bridge and Tooley Street Conservation Areas. The degree of less than substantial harm caused to the significance of these assets is considered to fall lower on the spectrum than the harm to The Custom House, albeit to heritage assets of high to outstanding national interest.

The proposals at roof level would fail to protect and enhance significant local views of and from the Monument, drawing some conflict with Local Plan Strategic Policy CS13(2), emerging City Plan Policy S13(bullet 2) and guidance in the Protected Views SPD. That slight harm caused to Tower Bridge, All Hallows by the Tower and St Dunstan in the East (through development within their setting) would draw some further conflict by failing to protect and enhance these identified City Landmarks and Skyline Features.

The application site is a prominent contributing key element/feature to the characteristics of LVMF strategic River Prospects from Tower Bridge (10A.1) and London Bridge (11.B1-2) and the Townscape View from Queen's Walk by City Hall (25A.1-3). The proposal would result in development which is intrusive, harming the characteristics of the Views, in conflict with Local Plan Policy CS 13(1), City Plan Policy S13 and London Plan Policy HC 4.

The scheme proposes a significant new public open space in a highly accessible, south facing, riverside location. However, the development proposal would allow the hotel operator to close all or part of the Quayside for managed events for a significant amount of time over the course of each year. Therefore, the proposed development would not result in inclusive access (as a result of closure wholly and partly for events on the Quayside) and would limit the internal public permeability of the whole building, which in turn would limit the interpretation and enjoyment of this seminal heritage asset.

Public access would be provided to the Long Room through 1 monthly tour and the opportunity for the Heritage Partner to use it for 24 times slots per year. The restricted opportunities for members of the public to access the Long Room and the disconnected location of the Museum from the rest of the building, the river and the Quayside fails to fully achieve the aims of adopted and draft development plan policy which seeks improved public access to heritage assets and enhanced interpretation of the City's heritage.

The management of the spaces internally and externally, curtailed pedestrian movement through the building and across the Quayside, along with the detailed curation, design and look-and-feel of the internal and external public realm, including the interface created between these would result in a non-inclusive form of public realm. The vibrancy and animation of the riverside for public use due to the limited active frontages and restricted publicly accessible open space would fail to deliver a fairer, more equitable and inclusive place which is welcoming to all communities and therefore conflicts with the spatial aspirations of Core Strategic Policy CS9 and the Pool of London Key Area of change Policy S19, along with guidance in the Riverside Enhancement

Strategy, City Public Realm SPD, the Mayor's draft Public London Charter and 'Expanding London's Public Realm' document.

The proposal would not comprise the highest standard of accessible inclusive design, failing to meet the access needs of all of the City's communities, including the particular needs of disabled people.

The proposal would fall very short of the minimum Urban Greening Factor and, accounting for the evident site constraints, has not demonstrated or justified that it has delivered the highest feasible amount of essential green infrastructure as a fundamental element of building and site design.

Whilst the development proposal would be in line with a number of transportation and highway policies within the Development Plan, Officers consider that due to insufficient information being provided as part of this submission, it is not demonstrated that the development would provide adequate and safe servicing, acceptable PCLs, and unfettered access to cycle and blue badge parking.

It has not been demonstrated that the proposed development would not cause undue harm to the amenity of neighbouring occupants. Insufficient information has been provided in support of the proposal to allow Officers to assess the impact of the development in relation to noise and overlooking.

As such, officers consider that the current application would not accord with the Development Plan, therefore unless other material considerations indicate otherwise, permission is to be refused.

It is considered the proposed development would provide a new hotel within the City of London which would contribute to the economic prosperity of London. However, the proposal is not considered to support strong, vibrant or healthy communities by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Furthermore, officers do not consider that the scheme would protect and enhance the built and historic environment.

It is considered the scheme would not represent sustainable development that is socially, economically and environmentally in accordance with the NPPF.

The proposal would not conserve an irreplaceable resource in a manner appropriate to its significance, contrary to paragraph 189 of the NPPF. In accordance with paragraph 199 of the NPPF great weight should be given to the conservation of the asset, the greatest of weight, given that it is a Grade I Listed Building, a designated heritage asset of the highest order. It has been identified that less than substantial harm would be caused, therefore, in accordance with paragraph 202 of the NPPF any harm should be outweighed by the public benefits of the scheme. In terms of the combined impact on the Custom House (and Quay) and the River Wall, Stairs and Cranes and the

failure to preserve the contribution setting makes to the significance of a number of other designated heritage assets, then very considerable weight is attached which far outweighs the wider public benefit. It follows, then, that there is no material consideration to override the indication given by the Development Plan.

The public benefits of the proposal are not sufficient to outweigh the less than substantial harm to the significance of designated heritage assets. Therefore, as the development does not accord with the Development Plan, and other material considerations also indicate that planning permission should be refused, the proposal is unacceptable, and refusal of this application is recommended.

Recommendation

That the Committee resolves to inform the Planning Inspectorate that were it empowered to determine the application for planning permission the Council would have REFUSED permission for the reasons set out below:

1. The proposed development would not ensure the continued beneficial use for a historic building. It has not been demonstrated that the proposal would conserve the amenity of existing neighbouring occupiers due to noise and overlooking or provide satisfactory or safe arrangements for servicing vehicles. The proposed development for the change of use of the existing building to a hotel (Use Class C1) would therefore not accord with, Local Plan Policy, CS10, CS11, DM3.5, DM11.3, DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3, DE5, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14.

Heritage

2. The proposed development would fail to preserve the special architectural and historic interest and setting of the London Custom House (Grade I) and the River Wall, Stairs and Cranes (Grade II*), causing less than substantial harm to their heritage significance the result of direct and in-direct impacts on setting, resulting from external and internal alterations, extensions, loss and de-contextualisation of historic fabric, plan form and character. The harm would not be outweighed by public benefits. The proposal is not in accordance with policies: London Plan Policy HC1; Local Plan Policies CS 12, DM 12.1, DM 12.3; HE1; Draft City Plan Policies S11 and HE1 and the NPPF.
3. The proposed development would fail to preserve the settings of Old Billingsgate (grade II), St Dunstan in the East Ruin (Grade I) and by association its Walls, Gates and Railings to the Churchyard (Grade II), the Monument to the Great Fire (Grade I and Scheduled Ancient

Monument), All Hallows by the Tower (Grade I), Tower Bridge (Grade I), the Eastcheap Conservation Area, the Tower Bridge Conservation Area and the Tooley Street Conservation Area, causing harm to their heritage significance and an appreciation of it by way of contribution made by elements of setting.

The harm would not be outweighed by public benefits. The development would not be in accordance with Local Plan Policies: CS 12, DM 12.1, DM 12.3; London Plan Policy HC1; City Plan Policies S11 and HE1; and policies and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance.

Design

4. The proposed development would not comprise a high standard of design as a result of its architecture, in particular the roof extensions, which by virtue of their siting, height, massing, appearance and detailed design, by day and night, would fail to be visually integrated into the overall design of the building when seen from street and higher level view, which would not be sympathetic and contextual to character or history, adversely affecting the character and appearance of the host building, contrary to Local Plan Policies CS 10, DM 10.1, Emerging City Plan Policies and the NPPF and National Design Guide.

Strategic Views (London):

5. The proposed development would comprise an intrusive form of development causing harm to the characteristics of London View Management Framework (LVMF) designated River Prospects from London Bridge (11B.1-2) and Tower Bridge (10A.1) including impact on the setting of the Monument as a landmark element and the Townscape View from the Queen's Walk at City Hall (25A.1-3). The development is not in accordance with Local Plan Policies: Local Plan CS 13(1); London Plan HC4; City Plan S13 and guidance contained in the LVMF SPG.

Strategic Views (Local):

6. By virtue of the height, bulk, massing and appearance of the roof extensions, associated terraces and alterations to roof level, the proposal would fail to protect and enhance significant local views of and from the Monument, and would fail to protect and enhance views of identified historic city landmarks and skyline features, namely Tower Bridge, St Dunstan in the East and All Hallows by the Tower. The development is not in accordance with Local Plan Policies: Local Plan CS 13(2); City Plan Policy S13 and guidance in the Protected Views SPD.

Public Realm

7. The proposed development would not result inclusive access by closure wholly and partly for events on the Quayside and limited internal public permeability which would limit the interpretation and enjoyment of a seminal heritage asset. The management, pedestrian movement, curation, detailed design and look-and-feel of the internal and external public realm, including the interface created between these would result in a non-inclusive form of public realm. The vibrancy or animation of the riverside for public use with limited active frontages and restricted publicly accessible open space would fail to deliver a fairer, more equitable and inclusive place which is welcoming to all communities whilst conflicting with the spatial aspirations of the emerging Pool of London Key Area of change. The proposal would not be in accordance with Local Plan Policies CS9, CS10, CS19, DM10.4 the overarching good growth objectives in the London Plan, London Plan policies D5, D8, S4, SI14 and SI16, Draft City Plan S17, S19, DE3, S14, OS1, CV2, HL1, the aspirations of the Riverside Walkway Enhancement Strategy SPD 2015, Mayor's Public Charter.

Accessible Design

8. It has not been demonstrated that the proposed development would provide highest standard of accessible design including disabled access provisions or facilities both within the hotel development and externally within the Quayside area or adjacent areas of Public Highway. The development would not meet the highest standard of accessibility and inclusive design and would not be in accordance with Local Plan policies CS10, DM10.1, DM10.5 and DM10.8, policies D5 and E10 of the London Plan or policies S1 and S8 of the draft City Plan.

Highways

9. The lay-by would result in the width of the pavement being reduced on Lower Thames Street therefore not promoting active travel by walking and diminish pedestrian comfort levels (PCL). The development would therefore not accord with Local Plan Policy DM16.1, DM16.2, emerging City Plan Policies AT1 and AT2, London Plan Policies T1 and T2, The Mayor's Transport Strategy and the City of London Transport Strategy.
10. In the absence of a scheme for offsite consolidation it has not been demonstrated that the development would facilitate safe, and efficient deliveries and servicing of the site, including adequate safety and servicing of the Quayside for events. The proposed would therefore not

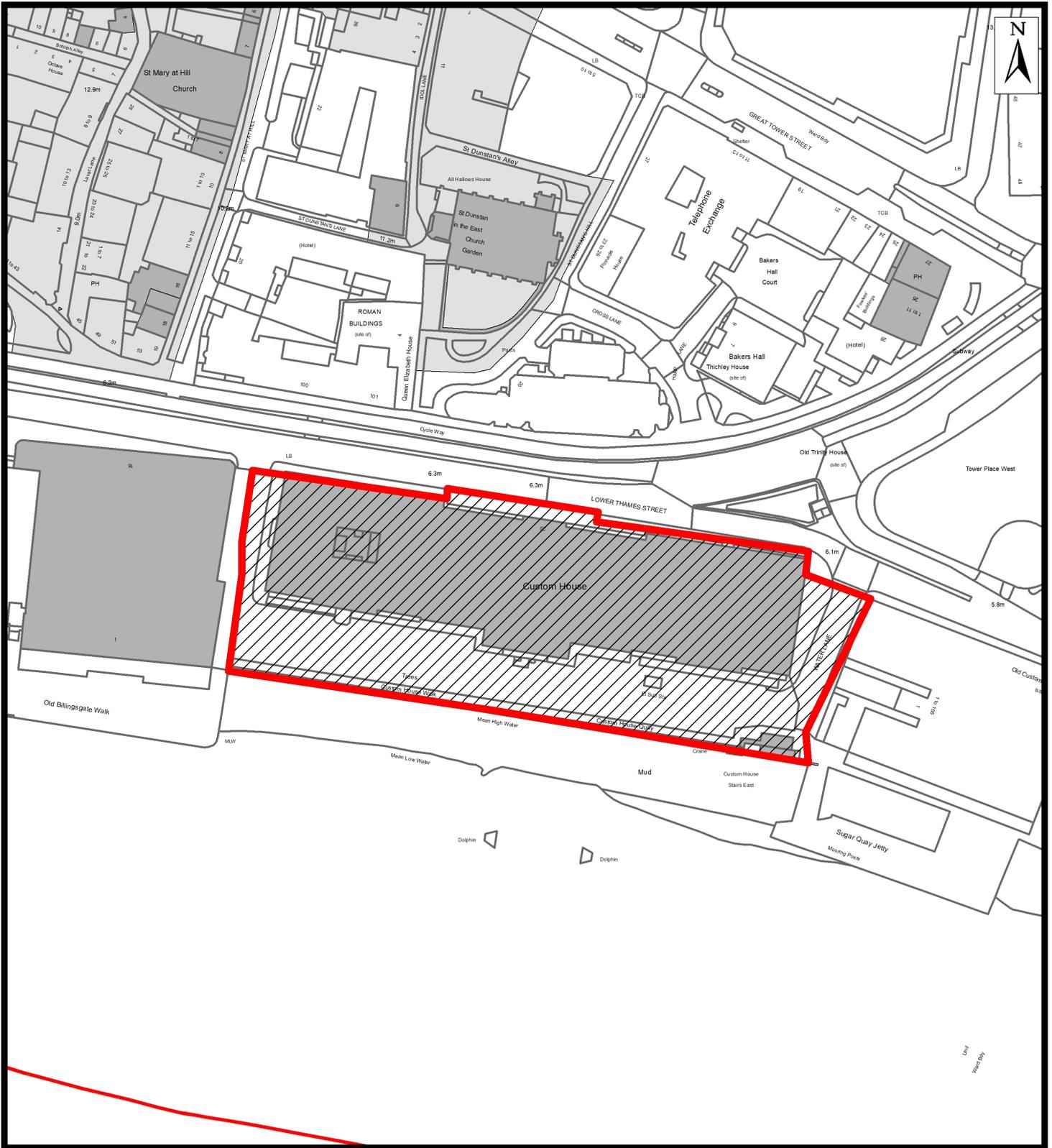
accord with Local Plan Policies DM16.1 and DM16.5, London Plan Policy T7 or emerging City Plan Policy VT2.

11. It has not been demonstrated that the proposed development would not have a detrimental impact on Pedestrian Comfort Levels as a result of the change of use of the site and the potential for increased capacity. The applicant has failed to demonstrate that the closure of the quayside would not create unacceptable Pedestrian Comfort Levels and would therefore not be in accordance with London Plan Policy T4 or TfL Pedestrian Comfort Guidance for London 2019.

106

12. The applicant has failed to enter into an appropriate legal agreement to secure the provision of appropriate site specific mitigation including; Highway Reparation and other Highways Obligations; Local Procurement Strategy; Local Training, Skills and Job Brokerage Strategy (Demolition; Construction and End Use); Delivery and Servicing Management Plan (including Consolidation); Travel Plan (including Cycling Promotion Plan); Section 278 Agreement (CoL); Section 278 Agreement (TfL); Declaration of City Walkway; Visitor Management Plan; Cultural Strategy and associated Cultural Plan (including Cultural officer, Cultural Committee and Heritage Partner); Public Access Management Plan; and Quayside Events Management Plan and Planning Obligations in relation to Affordable Housing; Local Training, Skills and Job Brokerage; Carbon Reduction Shortfall; Section 278 Design and Evaluation; and S106 Monitoring Charge. The development therefore conflicts with Policy CS4 and the City's Planning Obligations SPD.

Site Location Plan



© Crown copyright and database rights 2021 OS 100023243

ADDRESS:
Custom House

CASE No.
20/00631/FULMAJ

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





Image 1



Image 2



Image 3



Image 4



Image 5



Image 6



Image 7



Image 8



Image 9



Image 10



Image 11



Image 12



Image 13



Image 14



Image 15



Image 16

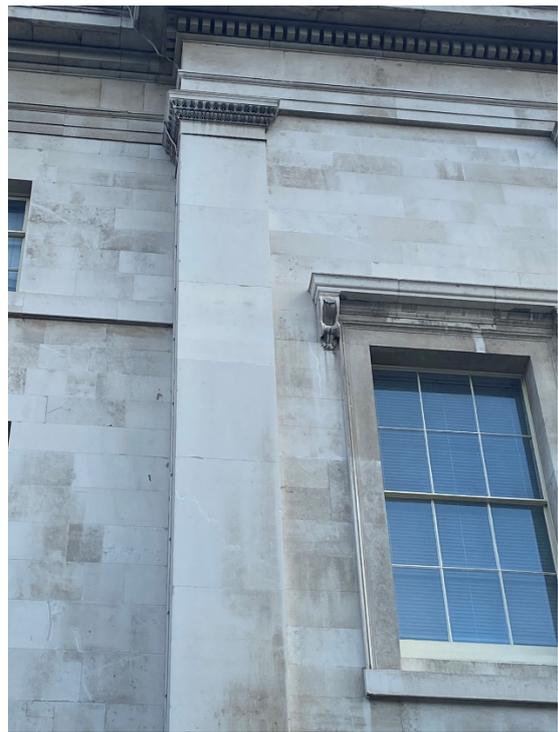


Image 17



Image 18



Image 19



Image 20

1. View from London Bridge
2. Internal office corridor
3. Flood wall and existing plant
4. Main entrance lobby off Lower Thames Street
5. Looking west from existing car park
6. Looking south towards Custom House from Lower Thames Street
7. View west from existing roof top with view of the Monument
8. Existing servicing ramp and basement entrance
9. View from the Thames Path looking west
10. View from the Thames Path looking towards the eastern block and Old Billingsgate Walk
11. View of the railings along the Thames Path
12. View south along Old Billingsgate Walk
13. View south along existing carriageway within Custom House site boundary adjacent to Old Billingsgate
14. View from Lower Thames Street looking south
15. View of the Thames Path, Grade II* listed River Wall, Stairs and cranes
16. Central Block view from within the car park
17. Façade detail
18. Existing entrance into the car park from the West Block
19. Entrances off of land adjacent to Old Billingsgate
20. The Long Room

Main Report

The site

1. The site of the London Custom House is located on the north bank of the River Thames, bound by Lower Thames Street to the north, Water Lane to the east, Old Billingsgate and Old Billingsgate Walk to the west and the River Thames to the south.
2. The site covers approximately 0.947 hectares in area and contains the Grade I listed Custom House (including the Quay) and the Grade II* listed River Wall, Stairs and Cranes.
3. Custom House comprises 19,698sq.m (gia) of offices previously occupied by Her Majesty's Revenue and Customs (HMRC) or iterations thereof since the early 19th century. It is arranged over basement, ground and first to third floors. The building is internally divided into three distinctive blocks, (i) the central block (ii) the eastern wing, and (iii) the western wing.
4. The quayside area between the building and the Riverside Walkway was most recently privately occupied as a car parking area for the use of HMRC. While historically the Quayside was publicly accessible, it has in more recent years been closed off due to the operational and security requirements of HMRC. HMRC vacated the building in June 2021 and it is now vacant.
5. The Riverside Walkway runs along the southern edge of the site, immediately adjacent to the River Wall and provides a continuous connection between the walkway at Sugar Quay to the east and Old Billingsgate Market to the west. Public access to the Riverside Walkway is provided by the section of public highway running adjacent to Water Lane from Lower Thames Street.
6. Lower Thames Street forms part of the Transport for London Road Network for which Transport for London (TFL) is the highway authority.
7. The site is well connected to public transport. It has a PTAL rating of 6b (excellent) and is located approximately 350m south east of Monument, 400m south west of Tower Hill Underground Stations and 500m north east of London Bridge Underground and Overground Stations. There are several bus routes with stops within walking distance.
8. Cycle Superhighway 3 runs along Lower Thames Street as a two-way segregated track, outside the site on the opposite side of the TLRN. The nearest Cycle Hire docking station is located approximately 200 metres west on Lower Thames Street.
9. The site is within the Central Activities Zone (CAZ) as identified by the London Plan, the Thames Policy area and the Pool of London Key area of Change (strategic Policy S19 draft City Plan).

The surrounding area

10. The Eastcheap Conservation Area lies to the north of the site, on the opposite side of Lower Thames Street. The Tower of London

Conservation Area and Trinity Square Conservation Areas are within proximity of the site. On the south side of the river are the Tower Bridge and Tooley Street Conservation Areas in the LB of Southwark.

11. The site is relevant to the following Strategic Views of the London Views Management Framework (LVMF):
 - LVMF View 5A.2 (London Panorama, Greenwich Park), Landmark Viewing Corridor and Wider Setting Consultation Area;
 - LVMF View 4A.1 (London Panorama, Primrose Hill), Wider Setting Consultation Area (background);
 - LVMF View 11B 1-2 River Prospect, London Bridge (Downstream);
 - LVMF View 25A. 1-3 Townscape View, Queens Walk from outside City Hall
 - LVMF View 10A.1, River Prospect, Tower Bridge (Upstream, North bastion)
12. The site also falls within the Monument Views (of and from) as identified in the Protected Views SPD.
13. The site falls within the Thames Policy Area and Thames and the Riverside Key City Place identified in the adopted Local Plan, and the Thames Policy Area and Pool of London Key Area of Change identified within the draft City Plan 2036.
14. The site is in the wider setting of the Tower of London World Heritage Site.
15. The site is within the setting of the following Grade I listed buildings:
 - All Hallows by the Tower Church, Byward Street,
 - St Dunstan in the East and associated railings (railing Grade II),
 - The Monument
 - Tower Bridge
16. The following Grade II* listed buildings:
 - Watermen's Hall, 17-18 St Mary at Hill and Scheduled Ancient Monument
17. The following Grade II listed buildings:
 - Old Billingsgate Market immediately to the west and Scheduled Ancient Monument
 - Adelaide House
 - 16 St Mary at Hill
 - 8 St Mary at Hill
 - 7 St Mary at Hill
 - 9 Idol Lane
 - Walls, Gates and Railings to Churchyard of Church of St Dunstan in the East
 - 26-27 Great Tower Street

18. The following Scheduled Ancient Monuments:
- The Tower of London
 - The site of the Roman Bath House
 - Waterman's Hall
 - Waterfronts below Billingsgate Market
 - The Monument
19. There are several residential properties in the vicinity of the site, these include:
- Sugar Quay, immediately adjoining to the east
 - Three Quays
 - 23 Great Tower Street, 24 Great Tower Street, 26-27 Great Tower Street
 - Beadles Flat, Bakers Hall
 - 31 Monument Street, 49 Monument Street
 - 8-10 St Mary at Hill, 16 St Mary at Hill, 19 St Mary at Hill
 - 11-12 Lovat Lane, 14 Lovat Lane, 21 Lovat Lane, 22 Lovat Lane, 27 Lovat Lane
 - 16 Byward Street
 - 12 Trinity Square, 15 Trinity Square

Planning History

20. The building underwent a comprehensive and largely sensitive refurbishment in the early 1990s, carried out by HMRC, which included removal and rationalisation of mechanical services in the building, installation of a new staircase in the west wing lightwell and a part mezzanine level in the Queens Warehouse, both of which were regarded as reversible installations, reinstatement and re-use of original features, and repairs and redecoration based on historical research of original finishes. The works did not significantly alter the plan form of the West Wing and Centre Block.
21. There have been numerous minor applications since then for works largely associated with the day-to-day functioning of the building.
22. In 1999 planning permission and Listed Building Consent were granted for works associated with the creation of a public pedestrian walkway along the riverside edge of the Quay, which included the erection of railings between the Walkway and the remaining Quayside which formed part of the security requirements of HMRC.
23. On 15 December 2020, HMRC obtained listed building consent for the removal of 4 War memorials from the ground floor entrance hall (20/00672/LBC).

Proposals

The following applications have been made:

20/00631/FULMAJ under which planning permission is sought for:

24. Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E), a ground floor museum (Use Class F1 (c)) and ancillary riverfront public realm.
25. Associated works of demolition, alteration, extension and refurbishment including:
 - i. demolition and re-building behind the retained facade of the East Block
 - ii. demolition of East Block roof and part demolition and alteration of existing West Block to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar pavilions and associated roof terraces at 5th floor;
 - iii. demolition of Centre Block external stairs and replacement with new raised river terraces, stairs and ramped access across Centre, and parts of West and East Block; (south elevation);
 - iv. alterations to and raising of the flood defence wall;
 - v. facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation);
 - vi. creation of a new Museum entrance and provision of a ramp to provide an alternative Museum entrance on the west elevation;
 - vii. removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate level access;
 - viii. removal of railings to riverside quay
 - ix. replacement railings to the river wall
 - x. and other external alterations including elevational alterations; regrading and resurfacing of Quayside; hard and soft landscaping; alterations to vehicle service ramp; provision of on-site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

20/00632/LBC where Listed Building Consent is sought for:

26. External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E), ground floor museum (Use Class F1 (c)) and ancillary riverfront public realm including:

27. External works:

- i. demolition and re-building behind the retained facade of the East Block
- ii. demolition of East Block roof and part demolition and alteration of existing West Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor;
- iii. demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation);
- iv. part demolition and replacement, alterations to and raising of the flood defence wall;
- v. facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation);
- vi. creation of a new Museum entrance and provision of a ramp to provide an alternative Museum entrance on the west elevation;
- vii. removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street;
- viii. removal of railings to riverside quay
- ix. replacement of railings to the Grade II* river wall
- x. and other external alterations including elevational alterations; alterations to service ramp; regrading and resurfacing of the Quayside: hard and soft landscaping.

28. Internal works:

- i. roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works;
- ii. demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.
- iii. installation of new M&E services
- iv. alterations to provide acoustic and fire protection

29. This report deals with both of the above applications.

- The proposed scheme comprises 24,539sq.m gea of floorspace as follows: Hotel providing 200 bedrooms, function rooms and meeting rooms (Class C1) (including back of house) 14,276 sq.m gea)
- Ground level and roof level café/restaurant /bar use (Class E and sui generis) (1587 sq.m gea)
- A Museum on part of the ground floor of the West Wing (Class F1 (c) (457 sq.m gea)
- Basement level spa and leisure facilities (Class E (d)) (504 sq.m gea)
- New external public realm (2800 sq.m.)

- Building circulation and plant areas (7754 sq.m gea)
30. The proposals are set out briefly here but are described in more detail and assessed in the relevant sections later in this report.
 31. The works involve the demolition of the East Wing behind retained facades and rebuilding around a central atrium and lift core with the addition of a new 4th and 5th floor to provide hotel bedrooms from ground to 4th floors and a publicly accessible rooftop café/restaurant /bar and terrace at 5th floor. The basement, retaining existing foundations, would be lowered by to accommodate plant and the servicing bay, cycle parking and associated facilities and two disabled car parking spaces. The vehicle and cycle area would be accessed via the existing (although altered) vehicle ramp from Water Lane.
 32. In the existing building the Centre Block comprises the Queens Warehouse and the original main entrance and lobby from Lower Thames Street at ground level, and the Long Room, an impressive triple height space occupying the whole of the width of the Centre Block at first floor level . The second and third floors include small office rooms along the northern edge facing Lower Thames Street.
 33. The main entrance lobby housed 8 war memorials associated with Customs and Excise, some of which had been relocated in the past from other Government buildings. A separate Listed Building Application was made by HMRC for the removal of four of the memorials and granted Listed Building Consent on 15.12.2020 (app.no. 20/00672/LBC). The remaining four are not considered to be fixtures and fittings in the building and do not require consent for their removal, although they will be retained and relocated by HMRC. These memorials have now been removed, with the vacation of the building by HMRC.
 34. The proposals include at basement level the removal of modern wall additions to reinstate the larger original volumes and the space would house a meeting room, back of house hotel areas and plant.
 35. At ground floor in the Queens Warehouse it is proposed to remove existing timber and glazed partitioning (although some would be retained for re-use) together with a modern mezzanine (1990s) and associated exposed ductwork. The scheme would re-open the main entrance and entrance lobby from Lower Thames Street and proposes a new publicly accessible route through the Queens Warehouse to a new terrace and riverside quay. This would be open to the public between 11:00 and 18:00 hours on any day that the hotel is open for trading purposes. Food and Beverage facilities would flank either side of the route.
 36. On the south elevation a new terrace is proposed with a large central stone staircase and symmetrical ramps on either side, giving access to the public quayside.
 37. The Long Room at first floor level would serve as a functions and

- events space for the hotel. It would be accessed by the two original staircases leading from the main entrance, together with two new lifts to. It is proposed to alter three of the existing windows on the south elevation to provide access from the Long Room to a first floor (presently inaccessible) terrace. This would require a new floor structure on the terrace and a new balustrade would be installed to the perimeter of the terrace.
38. While the Long Room would be available for bookable events and functions, it would otherwise not be publicly accessible. It is proposed that public tours would be arranged (at least one per calendar month) and the Heritage Partners would have 24 bookable timed slots a year y (a timed slot being 9am to 1pm, 1pm to 4.30pm and 4.30pm to 9pm) subject to the Rooms' availability and at the discretion of the hotel operator. The detail of this is discussed and assessed later in this report.
 39. The Robing Room would be retained as a further hotel function space.
 40. At second and third floor levels the office accommodation would be converted to hotel rooms along the Lower Thames Street side of the building.
 41. In the West Wing the building is arranged around a central atrium which is open to the sky. The basement comprises a series of brick arched vaulted spaces; the historic Tide Waiters room is located at ground floor and the Robing Room is located at first floor level adjacent to the Long Room. The rest of the ground to third floors are arranged as offices.
 42. A new Museum (use class F1(c)) is proposed in the north west corner of the West Wing at ground level, fronting Lower Thames Street and Old Billingsgate Walk. The Museum space would comprise 5 existing rooms including the Tide Waiters' Room and would be directly accessible from three entrances: the existing West Wing entrance from Lower Thames Street, a reinstated historic entrance in the West elevation, and a new step free ramped entrance alongside. The Museum would be 457 sq.m gea which comprises 1.86% of the total gea of the building.
 43. The Museum would be free to access and would be open for 6 days a week (Tuesday to Sunday) from 10.00 to 17.00 hrs. It is unclear what the museum space would be used for outside of the opening hours.
 44. The scheme proposes an additional 4th floor accommodating hotel bedrooms and a publicly accessible 5th floor rooftop café/restaurant/bar and associated roof terrace; this results in the roofing over of the central atrium which would be retained at ground to third floor level and internally lit from above by an artificial skylight at the base of the new fourth floor. The base of the atrium would be lowered by half a level to existing basement level and a new floor inserted at ground floor level accommodating a public bar/café alongside the adjoining Tide Waiters room and ancillary to the

Museum. A new lift in the courtyard would provide direct access to the 5th floor retail facility and external terrace.

45. A gym and spa are proposed at basement level which is proposed as a Class E leisure use and would be available to non-hotel guests. Across the rest of the west wing the existing compartmentalised office spaces would be converted to hotel bedrooms including works of subdivision, installation of bathrooms, m&e services etc. The existing ceiling would be removed at third floor level to reveal the original timber king post trusses above.

External space:

46. Externally, it is proposed that the redundant security infrastructure (railings, security hut and vehicle barrier) which was a specific requirement uniquely associated with the operations of HMRC, would be removed and the existing quayside would be resurfaced and laid out as public realm, with seating, planting and lighting.
47. The existing security railings presently prevent public access to the quay, once removed they would result in a significant area of new public realm being created along the river, known as the Quayside for the purposes of this report.
48. The scheme includes proposals for the Quayside to be closed to the public (either partially or completely) for private events up to the current area of the security railings along the Thames Path and to include further areas along Water Lane and land adjacent to Old Billingsgate.
49. The thirteen mature London Planes along the southern edge of the space would be retained and a further tree planted on Water Lane. The existing Grade II* listed cranes would be retained in situ and the existing (non-original) railings on the Grade II* listed river wall would be replaced. The existing riverside walkway along the riverside edge of the Quay would be retained and resurfaced and the ramp at the western edge of the walkway replaced.
50. On Lower Thames Street, for which Transport for London is the highway authority, it is proposed to create a vehicle layby for drop-offs and pick-ups and the pavement would be re-graded to achieve level access to the main entrance doors which are presently stepped.
51. The proposed plant would be located within basement areas of the building and within sections of the roof, predominantly within the eastern wing of the building.
52. The servicing of the building would be at basement level accessed by an external ramp located within the Quayside off Water Lane. The development would provide long stay and short stay cycle parking in the basement or on the Quayside. Two blue badge parking spaces are provided within the basement.
53. Highways works include the reinstatement of public realm on the Quayside after the removal of the existing car park, introduction of a taxi layby to the north of the site off Lower Thames Street, works to existing public footpaths to create level access.

Consultation Process

Statement of Community Involvement

54. The applicants have submitted a Statement of Community Engagement outlining their engagement with political and community stakeholders. A consultation website was launched in July 2019 and a Public Exhibition was held on 11 July 2019 at St Mary at Hill Church, for which an invitation flyer was issued to approximately 2100 addresses. Further communications were carried out in 2020, with local residents, Members and local businesses, following developments in the scheme's design.
55. 47 local workers and residents attended the Public Exhibition in July 2019 and 19 attendees completed a questionnaire. Recorded responses were generally supportive, including that the site would benefit from redevelopment and refurbishment (100%), in support of the proposed hotel uses (95%) and benefits such as opening up the quayside, opening up the previously hidden spaces of the building including new bars and restaurants and the creation of new jobs for local people.
56. Further communications were held with local residents from Sugar Quay, in particular in relation to concerns expressed about potential impact on residential amenity of servicing and deliveries, vehicle movements and potential noise and light disturbance from the rooftop terraces.

Planning application / Listed Building Consent Consultation Responses

57. Following receipt of the applications they were advertised on site and in the press and have been consulted upon, both with statutory and non-statutory stakeholders. Site notices were placed at the site on 17/09/2020, 08/07/2021 and 26/08/2021 and press notices were published on 22/09/2020, 13/07/2021 and 31/08/2021.
58. Copies of all received letters and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.
59. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters would remain to be dealt with under conditions and the Section 106 agreement if permission were to be granted.
60. Revisions to the scheme were formally submitted in June 2021 and a full reconsultation has been carried out including to all those originally consulted and any other body or persons who had made representations. A summary of the representations received in respect of the revised scheme is included in the tables below.
61. Further information, including proposed public access hours to the Quayside and the building, and public access plans were submitted in August 2021 and a full reconsultation was carried out. A summary of

the representation received is included in the tables below.

Statutory Consultees

62. The below table includes the responses received in regard to all three consultation periods for both the planning application 20/00631/FULMAJ and Listed Building Consent 20/00632/LBC.

Consultee	Comments and responses
Greater London Authority – Stage 1 letter and report	<p>The GLA summarises the strategic issues as follows:</p> <ul style="list-style-type: none"> • Principle of development: The principle of refurbishing Custom House to provide a hotel with publicly accessible internal and external spaces could be supported, subject to the submission of a final curation and public access management plan that fully aligns with the principles and objectives set out in the Mayor’s The Case for a River Thames Cultural Vision and his draft Public London Charter (GLA report paragraphs 17-30). • Employment and training: A recruitment and training strategy, or an alternative approach, that demonstrates how the development would provide training and employment opportunities during the lifetime of the development should be robustly secured through planning conditions or legal agreement. • Heritage and urban design: The sensitive approach to the repair and repurposing of the listed building would result in less than substantial harm that would be outweighed by the public benefits; the significance of nearby heritages assets would be preserved. Similarly, the composition of the various LVMF and locally protected views would be preserved. Further work is required on the proposed riverfront public space to ensure activation (GLA report paragraphs 38-56). • Transport: The proposed development is broadly supported; however, there are concerns about some detailed elements of the proposal and further discussion with TfL is required on appropriate planning obligations, especially on the detailed design and delivery of highway improvements required on routes around the site (GLA report paragraphs 57-76). • Sustainable development: The energy strategy

is generally supported; however, further information on various aspects of the strategy is required before the on-site CO2 reduction can be confirmed (GLA report paragraphs 77-81).

Recommendation: - that the application does not currently comply with the London Plan for the reasons outlined above (and as set out in para 85 of the GLA report). Where these concerns are addressed the application may comply with the London Plan and the Publication London Plan.

Principle of development

Policy SD5 of the London Plan states that residential or mixed-use development proposals should not lead to a net loss of office floorspace unless there is no reasonable or demonstrable prospect of the site being used for offices. Subject to viability information provided by the applicants in respect of proposed office use, hotel use is a strategic function of the CAZ and the loss of offices to hotel could be acceptable.

The principle of a hotel and restaurants on this site could be supported in strategic planning terms.

Public use and enjoyment of the River Thames

London Plan makes clear that expanding opportunities and meeting the needs of all Londoners is essential to confronting inequality across London. In reinforcing the importance of publicly accessible space engendering strong and inclusive communities in London, Objective GG1 of the London Plan sets out several measures that development proposals should consider. The London Plan emphasises the need for public access and public activity on and along the riverfront, and the protection and enhancement of its historical and cultural role as an iconic feature of London. To this end, paragraph 9.16.5 under Policy SI16 of the London Plan refers to the Mayor's River Thames Cultural Vision, which aims to increase the engagement of Londoners with the river for cultural and leisure uses, including at night-time. The draft Public Charter sets out eight guiding principles necessary for the development of new public spaces.

The proposal seeks to open up the currently publicly inaccessible site by removing the railings that separate the site from the Thames Path and transforming the car park into a 2,8000 sq.m. publicly accessible riverfront space.

In addition to the external public space, public access to parts of the building is proposed. At ground floor level, a

public route through the building connecting Lower Thames Street to the Thames Path is to be introduced and a publicly accessible terrace would face onto the River Thames. Two rooftop pavilions would also be accessible by the public. Public access to these internal spaces would be available during the normal hours of their operation. Access, however, to the riverside external public space should be unrestricted as prescribed in the draft Public London Charter.

GLA requires that a final curation and public access management plan be submitted to the GLA prior to Stage 2 referral.

Employment and training

A recruitment and training strategy, or an alternative approach, should be robustly secured through planning conditions or legal agreement.

Heritage and Urban Design

Heritage

The proposed works to Custom House involve: the conversion of the spaces in the West Wing and Central Block; extensions to provide rooftop pavilions; demolition and re-building behind the retained facade of the East Block; and the demolition and replacement of external stairs on the Central Block with terraces, stairs and step-free access and alterations to the facade of the Centre Block's south elevation to create a terrace at first floor.

A sensitive approach to repairing and repurposing has been adopted; this has resulted in minor external changes, namely the rooftop additions, to the appearance of Custom House. When the minor external alterations are combined with the internal changes, GLA officers conclude that notwithstanding the comprehensive listing of the building as a Grade I asset any harm resulting from these works would be less than substantial and would be outweighed by the public benefits of the scheme.

The Grade II* listed River Wall, Stairs were also built in 1817 as part of the Laing-designed Custom House. The two Grade II* listed Cranes were added in the 1820's and 1830s. The work proposed to these listed assets would cause no harm to their significance, therefore conserving their significance.

The site is in proximity of Eastcheap Conservation Area, Tower of London Conservation Area, Trinity Square Conservation Area, many listed buildings including the adjacent Grade II Old Billingsgate Market and the

UNESCO World Heritage Site Tower of London with its numerous listed structures. GLA officers conclude that there would be no harm caused to these heritage assets. The significance of these heritage assets would therefore be conserved in line with London Plan Policy HC1.

London View Management Framework (LVMF) – the proposal would preserve the composition of the relevant affected views

Urban Design

The provision of a generous zone of south-facing public space along river edge is a key benefit of the scheme and the rooftop additions are simple and refined. Consideration should still be given to providing community and or commercial uses along Lower Thames Street to better activate and animate this frontage, albeit in appropriate ways given the street's role as part of the London's strategic highway network. Furthermore, the applicant is encouraged to further develop the design of the public spaces inside and outside the building and to provide clarity on how public access would be secured. For example, giving careful thought to the uses provided on ground floor together with introducing more greenery and planting, better lighting, street furniture and informal play spaces around the building will promote activation of the public spaces.

Fire Safety

A fire safety statement prepared by suitably qualified personnel at Norman Disney & Young has been submitted with the application in accordance with Policy D12 of the London Plan. The measures contained within the statement should be robustly secured as part of any planning permission.

Inclusive Access

London Plan Policy D5 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). The application demonstrates how inclusive design principles have been applied to address entry into the building and circulation. However, only 5% of the bedrooms are proposed to be wheelchair accessible from the outset. This does not accord with London Plan Policy 4.5 and Policy E10 of the Intend to Publish London Plan. To comply, 10% of the proposed guestrooms should be wheelchair accessible or 15% accessible in line with the relevant British Standard BS8300-2:2018 Code of practice.

In terms of the proposed public realm, this should also

exemplify principles of inclusive access and should be designed to be accessible, safe and convenient for everyone, particularly the disabled and older people. Special attention should therefore be paid to ensuring that gradients are gentle and surface materials are durable, slip resistant, and conducive to wheelchair users and people with walking aids.

Transport

Healthy Streets

The Thames Path is a strategically important pedestrian link in terms of providing safe access to the river as well as a walking route. Due to the scheme's sensitive and prominent location, the application should demonstrate an exemplar approach to the river frontage.

The development proposes removing the existing riverside car park and using freed up space to create a new river terrace for walking, cycling, and public events. This would improve pedestrian comfort levels by widening the existing walkway currently restricted by this car park.

The new riverside walking and cycling area would expand and enhance London's strategic active travel network, which is strongly supported. It will be essential to ensure convenient and pleasant step-free access to the riverside terrace from all sides of the site, increased urban greening, comfortable and welcoming street furniture for people to stop and rest, and high quality, durable surfacing such as York stone. This may require carriageway raising, kerb realignments and level changes.

An access strategy for the riverfront should also be secured by planning condition or in a Section 106 agreement, and explicitly required to follow the Mayor's 'Public London Charter'. This is important as the riverfront terrace is proposed to remain as private land rather than being adopted as public highway. Permanent public access to the new public realm area adjacent to the river path should also be secured in perpetuity for both pedestrians and cyclists.

Public realm improvements are also required at Old Billingsgate Walk, Water Lane and along the entire site frontage on Lower Thames Street. Old Billingsgate Walk and Water Lane should integrate seamlessly with the new public realm proposed along the River Thames. These routes are vital to the future success of the new riverside terrace as a new walking and cycling route, and necessary in order to enable and encourage walking and cycling to

the new development from Bank, Tower Hill and Monument stations.

Cycle and Car Parking

Cycle parking locations have been provided but the detailed design of all cycle parking eventually delivered on-site must comply with the London Cycling Design Standards (LCDS), which should be secured by condition.

The proposal is car free except for two disabled spaces in the basement servicing area. The applicant should however demonstrate how these spaces will be accessible when the proposed servicing areas are in use, which is unclear.

Deliveries and Servicing

Draft delivery and servicing (DSP) and operational management plans (OMP) have been provided with the application and final, more detailed versions should be secured by condition and discharged in consultation with TfL. The draft DSP should be updated to include a stronger commitment to off-site consolidation to reduce overall deliveries.

Lower Thames Street

The proposal includes a new 15-metre vehicle drop off on Lower Thames Street, which would be able to accommodate a single coach or up to three taxis. Usually, all servicing and access would be expected to be from within the site rather than the TLRN. Given the exceptional need to deliver certain public realm improvements and upgrade the Thames Path, vehicle drop-off on the TLRN may be acceptable.

The applicant, however, needs to demonstrate that the 15-metre vehicle drop-off proposed can be safely delivered without increasing highway safety risk and with sufficient capacity to discourage and prevent over-ranking by taxis and private hire vehicles.

As a result, detailed designs for the Section 278 works proposed on the TLRN should be submitted and approved by TfL prior to determining the application. Initial designs and a Stage 1 Road Safety Audit (RSA) and Designer's Response have already been included in the TA. The Safety Auditor's recommendations must also be considered in the final detailed design.

Sustainable Development

The applicant has submitted an energy assessment,

	<p>which is generally compliant with London Plan. Further information, however, is required before the on-site reduction can be confirmed.</p> <p>The site is in Flood Zone 3 and partially benefits from flood defences. The FRA considers the risk of flooding from a range of sources in line with London Plan Policy SI12 and concludes that the site is at low risk of flooding from all sources. Basement flood gate and flood defences improvements are proposed and safe access in the event of a breach flood scenario has been identified.</p> <p><u>Urban Greening</u></p> <p>In line with London Plan Policy and objectives G1 and G5, urban greening has been included in the design approach to the refurbishment of the building and redevelopment of the site. The proposed records an Urban Greening Factor score of 0.07. This score is substantially lower than the target score of 0.3 for non-residential schemes set out in the Intend to Publish Plan and the emerging local plan. The applicant should therefore explore additional greening measures in order to improve the UGF score.</p>
<p>Transport for London 17/09/2021</p>	<p>Following the recent applicant proposal to limit public access at the riverside, and the City Corporation's request in response for Pedestrian Comfort Levels (PCLs) to be calculated for all proposed layout and access scenarios. TFL would point out some key parts of the Mayor's Stage 1 report are relevant to those matters, Paragraphs 57 – 61 and 72.</p> <p>As was made clear in the Mayor's Stage 1 report, should the development proposal fail to genuinely safeguard and enhance the Thames Path, and fail to provide genuinely permanent, high quality and exemplar public access not only to the existing river path south of the site, but also to the new public realm area proposed adjacent to Custom House itself, the exceptional need to deliver public realm enhancements that significantly upgrade the Thames Path at this location may then no longer be fulfilled.</p> <p>In my view, in such circumstances, the proposed development would then no longer justify Mayoral and TfL support for any vehicular access from the TLRN rather than only within the site, including pick-up and drop-off facilities for taxis and coaches on Lower Thames Street.</p> <p>Furthermore, TFL would draw attention to key information on Pedestrian Comfort Levels (PCLs) which feature in</p>

	<p>some emerging and adopted City of London local policy and guidance. It should be noted that there are specific PCLs in relation to tourist attractions, which include hotels.</p>
<p>Historic England</p>	<p>Historic England raise no objection to the applications on heritage grounds and provides the following Summary:</p> <p>“The Grade I listed Custom House is highly significant for its monumental classical architecture and for its historic role in London’s history as a trading port. The proposal to convert the building for hotel use would cause a low level of harm. It will be for the decision-maker to determine whether this would be outweighed by public benefits, which include providing public access to the building and its riverfront. We urge you to ensure that fully inclusive public access is guaranteed by the proposals should you be minded to grant consent.”</p> <p>Historic England outlines the building’s significance as follows:</p> <ul style="list-style-type: none"> • One of London’s most important monumental neo-classical buildings • It is the fourth or fifth Custom House on or near the current site since the 14th century and has been at the heart of City trade for centuries. It follows that the building is highly significant for its historic role in the development of London as a trading port. • The building also has very high architectural significance, which is characterised by Laing’s and Smirke’s late Georgian neo-classical design in Portland stone. • The late Georgian interior survives mostly intact in the historic centre block and west wing. The centrepiece is Smirke’s ‘Long Room’, the public place where customs duties were historically paid and business conducted. • Other highly significant interior rooms include the entrance hall from Lower Thames Street with its stone staircases, the Queen’s Warehouse fronting the river and Smirke’s Robing Room in the west wing. The Robing Room is notable for its double height interior and panelled finishes. The other original interior spaces are former cellular offices, which are generally functional and plain. <p>Historic England outlines the proposals and their impact as follows:</p>

	<ul style="list-style-type: none">• They note that the rooftop proposals have been amended to avoid partial demolition of the west wing roof structure and have been reduced in scale.• The current proposals are to convert the building from its current use as an office for HM Revenue & Customs to a hotel. The cellular former offices are proposed as hotel rooms, with the Long Room and Queen’s Warehouse proposed as restaurant/bar and function room spaces. We welcome the provision of public access to these spaces, which we consider would be a heritage benefit. The weight of these heritage benefits depends on how inclusive the public access is.• Identify removal of current harmful modern accretions in these large and significant spaces as a further heritage benefit.• Refer to other interventions including roofing over the west internal courtyard, contemporary rooftop pavilions on the east and west wings, a limited number of new openings and a new stone staircase in the classical manner from the south (Thames) side.• The principal impact on the significance of the listed building would result from the proposed rooftop pavilions. These are intended as an integral part of the hotel offer, but also as publicly accessible café/bar spaces offering fine riverside views.• The proposed pavilions are designed to be simple, lightweight and unobtrusive, but would nevertheless have a visual impact on the roof profile of the building from certain views (mostly from the opposite side of the river), and so on the architectural composition of the Custom House’s principal elevation. The impact relates to the introduction of contemporary architectural elements to the mostly original roof profiles of the east and west wings, causing some visual harm. However, they would be set back from and form discreet additions to the two wings without threatening the primacy of the centre block.• Interventions in the historic fabric of the building, including the creation of new openings and alterations to existing window openings, are limited and would have a minor impact on the significance of the historic building.”• In Historic England’s view the level of harm to the significance of the historic building caused
--	--

	<p>by the interventions described above is low.</p> <p>Historic England outline their position as follows:</p> <ul style="list-style-type: none"> • Historic England accepts that the Custom House could be converted for hotel use without causing unjustified harm to its significance. We welcome the restoration and re-use of the most significant interior spaces in their original form. • However, the proposed works would cause some harm to the building’s significance. In our view, this would comprise a low level of less than substantial harm in the language of the NPPF, principally due to the loss of some fabric relating to some of the internal interventions (new openings, dropping window sills etc.), and due to the provision of the proposed pavilion roof extensions that have a visual impact on the overall composition of the building in some views. • It will be important that the City of London is confident that the low level of less than substantial harm identified above is justified clearly in accordance with NPPF paragraph 193. The harm will then need to be weighed against public benefits of the proposals (NPPF paragraph 196). • The public benefits would include a range of heritage benefits that we broadly welcome. These include the provision of a long-term sustainable use for the building, and the restoration and enhancement of its principal interior spaces. The benefits also include making them publicly accessible, and creating a new public space along the Thames that would integrate the building with the Thames Path and enhance its setting. • We believe that public access to the highly significant historic interiors is an important potential heritage benefit, but one that will only be realised if access is socially and economically inclusive. We urge you to give sufficient weight to this issue as part of your decision-making process.
<p>Historic England letters 16.07.2021 and</p>	<p>Historic England do not wish to offer any further comments for the planning application. It is suggested that this application should be determined in accordance with national and local policy guidance and that the views of the</p>

25.08.2021	City's specialist conservation adviser are sought.
<p>Historic England letters</p> <p>16.07.2021 endorsed by Secretary of State</p> <p>08.09.2021 and</p> <p>25.08.2021 endorsed by Secretary of State</p> <p>27.08.2021</p>	<p>The local planning authority are authorised to determine the application for listed building consent as deemed fit.</p>
Historic Royal Palaces	<p>Historic Royal Places do not raise objections to the proposals and have commented as follows:</p> <p>“The applicants and their Design Team consulted with us in September 2019 and presented to us the design proposals and the impacts on the views from the Tower of London World Heritage Site.</p> <p>We note from the application documents that the southern elevation of this grade 1 listed building would be little changed apart from provision of a minor extension at roof level. This would not significantly increase the overall height of the building however and would have an almost imperceptible effect on the setting of the Tower of London World Heritage site in the protected LVMF view 25A.1.</p> <p>We welcome the landscape improvements and the public access to the quayside and terraces, together with the proposals to curate a regular programme of events so that this important riverside location becomes a truly public space.</p> <p>Improving the connectivity and vibrancy of the riverside walk is key to the Mayors’ River Thames Cultural Vision. Whilst the application proposals do contribute to this vision, we would like to register with you formally HRP’s disappointment that the scheme does not address the wider strategic opportunity to improve the overall walking experience between the two bridges in terms of connectivity, wayfinding and pedestrian congestion and the opportunity to master plan the whole area between the river and Lower Thames Street. We wonder therefore whether this might bear further investigation in</p>

	<p>consideration of potential s106 agreements.</p> <p>In summary, we do not raise any objection to the proposals, welcome the landscape improvements and public accessibility within the application site, but would regret any loss of opportunity to contribute to wider strategic improvements along the riverside.”</p>
<p>The Georgian Group</p>	<p>The Georgian Group objects to the application for listed building consent.</p> <p>Their letter outlines the history of the building and notes that:</p> <p>“The Grade I-listed Custom House is a building of considerable importance as the work of David Laing and Robert Smirke, two leading architects of the early-19th century. The building is a fine example of an early Government building, intended to house a number of related functions, and survives in a legible form despite later changes. The external appearance of the building is little altered since the Smirke phase and retains a clear hierarchy between the wings and central block. With the exception of the east wing, the floorplan of the building survives in a largely unaltered state. The Long Room and Robing Room, each with a very specific functional and ceremonial purpose, are unique survivals within Georgian London, as is the whole building as rare surviving purpose built office space. The building also shows an early and innovative use of fireproof construction in the warehouse facilities on the lower floors.</p> <p>The Georgian Group raises the following concerns:</p> <ul style="list-style-type: none"> • Regarding the extensive works that ... are proposed to the historic fabric both within the building and to its elevations. Due to the harm that would be caused by the proposed works described in this application, the Group’s position remains that the conversion of the Customs House into a hotel is not the most viable option • The provision of hotel accommodation within the wings of the Customs House - in particular, the west wing where a considerable amount of historic fabric survives - will cause harm to the significance of the building – in particular the considerable amount of subdivision of cellular office space to create hotel bedrooms • The provision of services into the rooms would require major intervention into the historic fabric

	<ul style="list-style-type: none"> • The harm caused has not been accompanied by a clear and convincing justification as required by para 194 of the NPPF • The addition of two glazed roof pavilions would alter the hierarchy of spaces of the east and west wings with the Centre Block , altering an integral element of the original design • Alteration of existing first floor windows to doors on the southern elevation would harm the composition of the southern elevation by altering the hierarchy of windows • The erection of the roof pavilion would harm the historic fabric of the West Block, by the removal of original construction. Information is required regarding the structural integrity of the building and its capacity to accommodate the proposed extensions • When considering the accumulated harm that the various elements of the scheme would cause, the Group does not believe that the proposed use as a hotel poses the most optimum viable use for the Customs House. Paragraph 192 of the NPPF requires Local Authorities when determining applications to take account of ‘the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation’. • The City of London Local Plan states that ‘proposals for change from offices will normally be refused if the building or site is considered to be suitable for long-term viable office use’ – with this being incorporated within Policy DM 1.1. The Group urges your Local Authority to abide by this policy as the Customs House is suitable for long-term viable office use.
<p>Second letter – Georgian Group 04/11/2020</p>	<p>The Georgian Group reiterates:</p> <ul style="list-style-type: none"> • its belief that a significant level of harm would be caused by the conversion of the West Wing office spaces to hotel rooms. • The harm caused by the addition of the 2 roof pavilions to the architectural interest of Custom House • The west wing roof pavilion would cover the lightwell to the West Wing, an important and original design element which would have provided light into the office spaces below • The Georgian Group supports the aim of opening the building for the public, but greater clarification is

	<p>needed over the access into key spaces</p> <ul style="list-style-type: none"> • Requests that the application is deferred until a public round table discussion is held on the future of this grade I designated heritage asset.
<p>Third letter – Georgian Group 09/06/2021</p>	<p>The Georgian Group reiterates its concerns, focusing on the importance of the surviving office spaces.</p> <ul style="list-style-type: none"> • The Custom House as a purpose-built governmental building is an early example of its type and a rare survival today. The contribution the well-preserved office suites and their fittings make to the importance of this building is substantial. Conversion of the office suite spaces into hotel rooms will require sub-division which would be harmful to the significance of Custom House. • The central section is home to the exceptionally important Long Room designed by Smirke, with the equally impressive Queen’s Warehouse located underneath. Escaping much of the damage when a portion of the southern facade collapsed, the western wing retains large elements of Laing’s original design. The cellular form of the office suites survive, as does the hierarchy of spaces illustrating the relative importance of the officials working within the building. Surviving largely intact, the panelling, cornices, doors and skirtings in the office suites contribute to the significance of the building. This surviving fabric and plan-form in the west wing of the building articulates the former practices of the nearly 2,000 officials employed here during its heyday. • Large-scale office buildings in a well-preserved state are rare outside of Westminster. Located further west along the River Thames, Somerset House by William Chambers set a new scale for Governmental buildings following William Kent’s Treasury early in the 18th century and preceded Soane’s Board of Trade and Privy Council, later remodelled by Charles Barry. Following the conclusion of the Napoleonic wars, the state initiated a large number of building projects in the capital. Custom House was one of these, along with The General Post Office by Smirke which was demolished in the early 20th century. • The survival of Custom House and the well-preserved state of its interior spaces contributes considerably to the architectural and historic interest

	<p>of this grade I listed building. Every effort should be made to conserve this building and the interior fittings to protect this heritage asset for future generations. In line with paragraph 193 of the NPPF, the greatest weight should be afforded for the conservation of this grade I listed building.</p>
<p>Fourth Georgian Group letter 02/09/2021</p>	<p>The Georgian Group advises that the amended plans and further information provided by the applicant have not resolved their previous concerns and therefore the Group maintains its objections to this application for Listed Building Consent.</p> <p>As part of their representations The Georgian Group have submitted a Significance Assessment by the Architectural History Practice which they urge the Local Planning Authority to give particular attention to when determining the application.</p>
<p>London and Middlesex Archaeological Society (LAMAS)</p>	<p>LAMAS have written as follows: “Custom House is a Grade I listed building and is therefore a designated heritage asset of national importance, and the impacts of any proposed development must be assessed with this in mind. A custom house has been known to exist on this site since the 14th century, with the present building constructed in 1812-17 by David Laing, and the centre block rebuilt by Robert Smirke in 1825-8. The east end of the Custom House was rebuilt as office space after World War II bombing. The Custom House is an iconic representation of the history of the City of London, forms an element in the setting of the World Heritage Site of the Tower of London, and Tower Bridge, and sits at the gateway to the City, attracting the attention of the many tourists using the River Thames. As such, the Custom House should be considered as having the highest significance.”</p> <p>LAMAS raises the following concerns:</p> <ul style="list-style-type: none"> • the addition of two glazed pavilions which will be visible from the riverside of the building would seriously despoil the external aspect of the building, resulting in substantial harm to the asset. Paragraph 194 of the NPPF applies. • “the proposed changes will result in the removal of many internal doorways and the creation of hotel rooms and bathrooms, with associated services, also resulting in significant harm to the asset. Further, the proposed change of use (Use Class E) to a hotel (Use Class C1) will restrict the access of the internal spaces to hotel guests only, for example, the Long Room on the first floor and will

	<p>not deliver the public benefits that would outweigh the harm or loss to the building. We would maintain that the harm caused to the building by proposed alterations and its conversion into a hotel will not provide the required substantial public benefits required by Paragraph 195 of the NPPF.”</p> <ul style="list-style-type: none"> • “LAMAS support SAVE Britain’s Heritage view that there are many examples of listed buildings re-imagined as successful public buildings, and that the City of London Corporation should give consideration to finding a more public role for the Custom House in line with the Greater London Authority’s recently published cultural strategy for the Thames.” • “The Committee is of the opinion that the applicant has failed to appreciate the significance of the Custom House building as a nationally listed Grade I building in a world heritage site setting. Therefore, in view of the requirements of NPPF paragraphs 194 & 195, the Committee requests that Listed Building and Full Planning consents be refused on the grounds of the substantial harm it would cause to this designated historic asset.” • “We further recommend that the City of London consider the establishment of a public consultation process to reconsider the proposed conversion of Custom House into a hotel and to consider other alternative uses for such an iconic building.”
<p>Second LAMAS letter 21/09/2021</p>	<p>LAMA requests that Planning permission and LBC be refused on the grounds of harm caused to the designated heritage asset:</p> <ul style="list-style-type: none"> • The Custom House is one of the oldest purpose-built office buildings in the London and as such, should be considered as having the highest significance. Within the West Wing, the proposed changes and creation of hotel rooms and bathrooms will result in the loss of the original layout of the office spaces resulting in significant harm to the building. • The restricted access to the interior e.g. Long Room would not deliver the public benefits to outweigh the harm or loss to the building caused by proposed alterations and conversion to hotel. • The two glazed pavilions would spoil the external aspect of the building resulting in substantial harm to the asset. • The managed access to the Quayside would not meet the objectives of the City of London

	Corporation as outlined in the Riverside Walkway Enhancement Strategy.
Society for the Protection of Ancient Buildings (SPAB)	<p>SPAB object to the listed building application.</p> <p>They raise detailed observations in respect of structural assumptions that have been made in the submission including:</p> <ul style="list-style-type: none"> • The proposed change of use and alterations are dependent on Building Control approval which can often result in far more invasive alterations • Engineering strategy for existing floors needs to be more clearly defined including addressing whether the floors are capable of withstanding the loads associated with the change of use – for e.g. large function area in the Long Room, cantilevered staircases, Smirke’s unique iron floor in the Centre Block so that the potential consequences of the proposed change of use can be understood • Querying the foundation strategy for the East Wing <p>In addition to structural concerns SPAB consider that</p> <ul style="list-style-type: none"> • the considerable intervention and loss of plan form and loss of historic fabric would be contrary to para 193 of the NPPF • that the proposed glazed pavilions would result in loss of intentional primacy of the Centre Block • the creation of a riverfront terrace is welcomed but that riverfront access would be achieved in any event once HMRC move; it is not dependent on this proposal and therefore this is not a robust justification in terms of public benefit. • Agree with SAVE that this is a missed opportunity to discuss a more prominent public role for a building which has, to date, been hidden from the public. • refer to GLA’s The Case for a River Thames Cultural Vision (2019) noting the untapped potential for tourism on the Thames, particularly in relation to the river’s heritage and natural assets. <p>In summary SPAB register their objections and urge that the application is refused.</p>
Ancient Monuments Society	<p>The Ancient Monuments Society (AMS) objects to the LB application and recommends that it is refused.</p> <ul style="list-style-type: none"> • AMS refers to the Significance Assessment prepared by Architectural History Practice • With the exception of Somerset House, the west wing of Custom House is the earliest surviving

	<p>example of purpose-built office space in London</p> <ul style="list-style-type: none"> Given the historic importance of the Custom House's west wing as the forerunner to modern office buildings in the City, we question if a hotel use for this Grade I listed building would be appropriate. The application would involve carving up the intact original Georgian office spaces for hotel rooms and en-suites, and this would cause irreparable damage to the remaining decorative features. It would also cause harm to our understanding of how these spaces were used and how they related to the main Custom Hall. The large light wells were also considered an innovative feature at the time, allowing for useable internal workspaces, and the enclosure of these light wells to create additional floor space and the roof top additions is particularly harmful. It has not been satisfactorily demonstrated that an ongoing office use consistent with the building's conservation - particularly in the west wing - would be viable, and given the high level of significance attributed to this building, the AMS recommends the application is refused.
<p>SAVE Britain's Heritage</p>	<p>SAVE object to the applications for planning permission and listed building consent and request a deferral of the applications for the following reasons:</p> <ul style="list-style-type: none"> " support the comments of the Georgian Group in terms of the harmful impact of the proposals on the 19th Century fabric of the Custom House. Do not consider that the harm to this Grade I listed building can be justified in accordance with para 194 of NPPF. This is particularly relevant to the proposed interventions and alterations within the western wing, which remains largely intact (as originally built to designs by David Laing in 1817), required for the conversion of office space to hotel rooms, and the proposed pavilion roof extensions on the east and west wings." " Considers that the new ownership of the Custom House presents a once in a lifetime opportunity to open up the building to the people of London once again. This is particularly relevant given the large amounts of public money spent on the 1992 refurbishment scheme overseen by SKF Architects. Although in public ownership for over 200 years as the Headquarters of Customs and Excise and built as a partly public building, the Custom House has

	<p>had very limited public access for the last 50 years, and has been effectively cut off since the high security railings were installed in the 1990s. While we are not opposed to the principle of hotel use, we consider in particular that the 180 ft Long Room - one of the most magnificent spaces in London - should be opened up more fully as a public space - as originally designed. Under the submitted plans, the Long Room would be for exclusive use of hotel guests.”</p> <ul style="list-style-type: none"> • “ Wish to emphasise the importance of securing public access to the riverside terrace at all times to ensure that the stated public benefits of this scheme are meaningful public benefits. We consider that any scheme coming forward on this site would be required to open up the river side of Custom House ---- in line with the Greater London Authority’s recently published cultural strategy for the Thames, not just a luxury hotel scheme. We believe that it is incumbent on the City of London, and the British Government who remain the freeholders of the site, to guarantee this provision or secure it in perpetuity.” • “ SAVE wishes to object to the above applications in their current form, and calls on the City Corporation to defer the decision on these proposals until public a round table discussion is held on the future of this most important public building, involving representatives from the City Corporation, the GLA and others. The forum should allow a more wider ranging discussion of uses, some of which may be compatible with the current plans. Let's not squander this once in a generation opportunity. If your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be called in for determination by the Secretary of State.”
<p>Second letter from SAVE 22.01.2021</p>	<p>SAVE reiterates its objections in a second letter, emphasising the importance of public access as integral to any proposals and the need to secure a long term curated cultural programme for Custom House to enable meaningful public access</p>
<p>Third letter from SAVE 04.08.2021</p>	<p>SAVE submits a further letter of objection and offers further comments on the significance of the West Wing and the extent of public access</p> <ul style="list-style-type: none"> • underlining the unique historic importance and rarity of the Custom House as one of the oldest purpose-built office buildings in the country,

	<ul style="list-style-type: none">• The historic significance of the Custom House is in strong part derived from the surviving layout of the virtually unaltered West Wing, with its hierarchically set out floors of naturally lit and ventilated office spaces around the central atrium lightwell. The plan form of the West Wing, combined with the survival of original regency fireplaces, internal trims, interior glazing, and joinery is of high historic, evidential and architectural significance in heritage terms.• This innovatory model of design by architect David Laing has remained largely unaltered and in continual use by its original client (HM Customs) for almost 300 years and is therefore integral to the character and significance of the building. It also attests to the Custom House being one of the earliest ancestors of the modern office building, which remains a hallmark of the City of London to this day.• It is therefore essential that the plans seek as little change to the layout of original office spaces in the west wing as possible, including minimising subdivision and loss of historic detail, so as to retain the significance and rarity value of this wing of the building as highlighted above.• Whilst SAVE acknowledges the amendments made regarding public access to the Custom House Quayside• Terrace, they do not consider the extent of access proposed or the level of detail regarding how access is to be managed to be sufficient to allay their previous concerns.• We remain of the view that permanent public access to the terrace must be secured in perpetuity in order for this project to succeed, and to meet the strategic policy vision for the wider North Bank walkway vision shared by the City of London Corporation (CoLC) and the Greater London Authority (GLA).• historical documents dating from the 1920s and 1960s show that public access to the quay on public land has been hotly debated for at least a century.• SAVE wish to reiterate the importance of securing public access to the riverside terrace at all times to ensure that the stated public benefits of this scheme are meaningful new public benefits.
--	--

	<ul style="list-style-type: none"> • They consider that any scheme coming forward on this site would be required to open up the river side of Custom House in line with the GLA's recently published cultural strategy for the Thames, not just a hotel scheme. Therefore, limited weight should be given to removing the current security railings as a public benefit when weighing up these overall benefits. • It is incumbent on the CoLC, and the British Government who remain the freeholders of the site, to guarantee this provision or secure it in perpetuity - forming a wonderful south facing river terrace for Londoners to enjoy fresh air, and a magnificent prospect of the Thames. • Concerns that the plans do not provide sufficient detail on how events on the quayside terrace will be laid out, managed and controlled without compromising public access to the Thames Path. • The terrace could be available for events but not events which take several days to set up and require the closure of a large part of the terrace, but rather events which could include occasional receptions and parties requiring no more than roping off part of the terrace for say an afternoon or evening event. • , public access must • Public access must be provided and guaranteed, and the open character of the terrace must be protected. • Access to the Long Room SAVE We welcome the applicant's pledge to appoint a Culture and Events Officer to co-ordinate annual events • within the Long Room and other important historic interiors of the Custom House, in line with requests • made by SAVE in our previous correspondence. However, the plans lack sufficient detail on how a range of • events will be managed and curated, including longer form events such as exhibitions and installations • which have the potential to make the Long Room a genuinely publicly accessible space. • Instead, the applicant's 'Cultural and Community Strategy' states that the hotel operator will have unrestricted discretion over all use of the Custom
--	--

	<p>House’s historic interiors at all times, with no further details provided. For instance, no detail is given on how many and what types of publicly accessibly events are proposed to be held in the Long Room, as opposed to private hotel only uses.</p> <ul style="list-style-type: none"> • It is vital in our view that the Long Room remains a flexible space without permanent built-in furnishings such as serveries and sofa table seating so it can serve for a variety of events which could include receptions, lectures, concerts, exhibitions and banquets according to need. Its special quality stems from being a very large indoor space with potential for a continuing mix cultural events and functions that allows a great range of people to experience and enjoy it. • SAVE therefore call for a more robust and detailed Cultural and Community Strategy setting out minimum expectations for publicly accessible events in the Long Room to be put forward as a strict condition for any subsequent planning and listed building consent agreements. <p><u>An alternative cultural vision</u></p> <p>SAVE wish to draw the local planning authority’s attention to the further possibility for enhancing the cultural offer and public access to the Long Room and the Custom House more generally. Further to our previously submitted alternative vision drawn up by architect John Burrell, I attach an updated cross section showing how the Custom House could be transformed into a publicly accessible space worthy of its national historic significance</p>
<p>War Memorials Trust</p>	<p>The War Memorials Trust refers to 8 memorials which will be relocated from Custom House to a new HMRC location, on HMRC’s vacation of the building.</p> <ul style="list-style-type: none"> • “ the Trust has been engaged with HMRC regarding the proposal to relocate the war memorials. The charity is aware of how highly regarded and cared for their memorials are, with Remembrance services being regularly held and attended. Staff at HMRC have gone to great length to ensure that these particular memorials are not forgotten and are appropriately relocated. This is not an attitude shared by all custodians and is one to be

	<p>commended.”</p> <ul style="list-style-type: none"> • “War Memorials Trust generally feels relocation should only take place when a war memorial is at risk. However, as with all war memorial issues this is not black and white. It is important to consider who is commemorated by a war memorial and with whom the remembrance legacy lies. In this case the war memorial commemorates former employees of HMRC. It has meaning to HMRC as an organisation and they continue to use it as part of their commemorative activity. A war memorial is not a fixture and fitting of a building but an active site of remembrance. In such a case it would be appropriate to move the war memorials with the organisation rather than leaving them in situ within a building no longer associated with the organisation of those commemorated and where successor employees cannot easily pay their respects.” <p>City of London response: The Trust raises concern that the removal of the memorials has not been addressed in the planning or listed building applications. Since their letter a separate application for listed building consent has been made on behalf of HMRC and approved on 15.12.2020 (app.no. 20/00672/LBC) for the removal of 4 War Memorials. It was considered that the removal of the remaining 4 memorials did not require listed building consent. The War Memorials Trust was a consultee for this application and responded with advice in line with that above.</p>
<p>Port of London Authority</p>	<p>The PLA welcome the proposals to create a new public open space and riverside promenade – in line with PLA’s Vision for the Tidal Thames (2016) (The Thames Vision) which includes the goal to see more people enjoying the River Thames and its banks.</p> <p>The PLA:</p> <ul style="list-style-type: none"> • Welcomes the removal of the security fencing which presently separate the Riverside Path from the quay • Recommends that appropriate Riparian life Saving equipment are retained and/or provided • notes that the existing river steps to the foreshore located in the south east corner of the proposed development appear unchanged. Access to/from the foreshore via these steps must be retained as part of the development proposals.

	<ul style="list-style-type: none"> welcomes that reference, including timetables is given in the Transport Assessment and Travel Plan to the nearby riverbus services available from Tower Pier, located a couple of minutes away from the proposed development advises that the potential role of the pier in the delivery and servicing arrangements should be considered in accordance with draft City Plan 2036 policy VT4. Notes the details of the external lighting for the scheme and that the PLA should be consulted on quayside events, particularly on any temporary lighting. Notes that a new outfall is proposed to the River Thames which will require separate licence from PLA
Second letter PLA 10.09.2021	<p>No significant additional comments to make.</p> <p>They state that within the submitted cultural and community strategy it is noted that a number of organisations, including the Port of London Authority will be invited to join the culture and community committee. This is welcomed and the PLA would be willing to participate in the committee.</p>
Environment Agency 08/10/2020 20/01/2021 04/08/2021 09/09/2021	<p>The Environment Agency initially raised objections to the proposals on that grounds that there was encroachment into the River Thames flood plain and that details of raising of the flood defences should be clarified.</p> <p>Following receipt of revised and additional information the EA has removed its objection advising that the proposals now provide an overall flood storage net gain of just over 4m³ and that the Flood Risk assessment meets the requirement of the TE2100 Plan.</p> <p>There is no sleeping accommodation proposed in the basement which is for less vulnerable use only and the changes to the ground floor are above the tidal breach level.</p> <p>EA raises no objection.</p>
Natural England	Has no comments to make on the application
Natural England second and third email	Natural England have no further comments to make on this application.

22.07.2021 and 10.09.2021	
Thames Path National Trail	“The Thames Path National Trail runs along Custom House Wharf, should this development take place, we ask that Public Access is legally protected and enhanced along the Thames Path National Trail without let or hinderance with no obstructions to the right of passage by foot at any time. This is in accordance with The Draft London Plan under Policy SI16 Waterways- use and enjoyment.”
Lead Local Flood Authority	Following the submission of revised and additional information the LLFA confirms that its observations in respect of the increased risk of flooding due to encroachment has been resolved in conjunction with the Environment Agency, that a Flood Emergency Plan has been prepared and an issue clarified regarding the continuity of the flood defence. The LLFA recommends the imposition of conditions regarding SuDS measures, measures to prevent flooding during construction and evidence of Port of London Authority and Environment Agency permits for discharging to the River Thames.
London Borough of Tower Hamlets	“The London Borough of Tower Hamlets supports the observations made by Historic Royal Palaces. There are no objections to this particular proposal because its impact on the Tower of London World Heritage Site would be almost imperceptible in protected LVMF view 25A.1”
Tower Hamlets second letter 26.07.2021	The Local Authority raises no objection to this application.
Tower Hamlets third letter 08.09.2021	Tower Hamlets has no observations to make.
London Borough of Southwark	LB Southwark raises no formal objection but comments that: <ul style="list-style-type: none"> • The proposal would not adversely impact on existing vehicular traffic or public transport infrastructure; • The proposed lay-by on Lower Thames Street is unacceptable due to disruption and safety of traffic on Lower Thames Street and the narrowing of the footway for pedestrians; • Concern re planned temporary closure of the footway on Lower Thames Street during the construction period; request that LB Southwark

	<p>be consulted on receipt of a revised CMP;</p> <ul style="list-style-type: none"> • Electric vehicle charging points should be provided
<p>The City of London Access Group (CoLAG) 06/10/2021</p>	<p>CoLAG have provided a set of agreed meeting minutes which form their response to this application.</p> <p>CoLAG Feedback:</p> <ul style="list-style-type: none"> • Applauding concept of using important building in positive way, bringing an alternative source of income. • Noted that the plans were very complicated, and that the management of the building would be a key issue, with lots of competing uses. • Main concern is that Lower Thames Street is one of the main arteries of London and the proposal to use pathway for parking or access would be hazardous and potentially slow the transport time on the roads. • Could the existing access onto Water Lane be used to provide a layby drop off area in this location instead. • Disappointing that blue badge parking is within the basement, not at ground level. This is not a truly accessible or inclusive design. There is a need for these to be visible, would prefer to have disabled parking spots on the ground level; potentially on Water Lane. • The changing places toilets are located in the wrong place. They will need two changing places toilet: one for museum one for main atrium. Changing places is just in relation to one area of the development. A disabled person would have to travel significant distances. These need to be more centrally located. • Planning to host private events and using majority of space for private events in the peak times (Fridays, Saturdays, Sundays and the summer). Key revenue generator seemingly outweighs the key benefits to the public. • Needing to negotiate what times are they referring to and needing to be more constrained in relation to public access • It was concerning to see that access was

	<p>determined by a person's affluence. The City is hoping to improve accessibility and social mobility, but this is not being shown in the presentation.</p> <ul style="list-style-type: none">• Is a hotel use in this location required, could a public exhibition space or other use be more valuable to the City, the current design aims to increase profitability. How can we maximise public benefit?• There is seemingly a lot being crammed into the project, and access seems like a last-minute addition. Not liking the idea of narrow corridors or restricted spaces that require being escorted everywhere.• Strongly feel that if the access facilities are not 100% and do not provide an exemplary scheme, they should be rejected. Not wanting to set a precedent.• Primarily concerned with the exterior. The footways are far too narrow once the space is filled with stalls and tables. The exterior is difficult for someone in a wheelchair or with a pushchair to negotiate. Those ramps from the Quay side have very sharp turning corners, they will be practically impossible for anyone to negotiate around that.• Do the doors off that immediate bank of stairs have sensors? Similarly, to get to the ground floor disabled toilet people will have to go through double doors do these have sensors. Knowing from personal experience that these doors are fire retardant, thus heavy.• Museum is a 'no-go' area for people who are disabled. There is no guarantee that people will be able to get in via access points. In an emergency disabled people will be unable to get out via step-free access doors. Assuming there will be places of safety, however, the only safe place in a burning building is outside.• Could a Sesame Lift be provided for fire evacuation?• Are internal and external doors to be automatic or have sensors, as especially exterior doors can be extremely heavy,• Central atrium is too messy and not easily
--	---

	<p>negotiated by anybody who is in a wheelchair or with a push chair.</p> <ul style="list-style-type: none"> • If Quayside is closed for an event, especially on Water Lane, it would be impossible to access the public cycle parking. • The current layout does not allow for sufficient space. Not sure of the jurisdiction of planning officers over internal furniture. • Do we know how long the ramp is? Exceeding maximum length, and something which should be looked into regardless of the resting points. It is compliant but still very long. • Seconding KK's comments regarding potential exclusiveness of hotel. A London heritage building is being taken from the public. • Level access from the taxi drop off; has this been discussed with transport engineers? Some taxi drivers can't deploy ramps with level access. • Provision of toilets. There is only one accessible WC on the ground floor. There is the potential for people to abuse the accessible facility given the number of people who could be at events. Needing to take into consideration the travel distances for disabled people. • At least one toilet should be ambient disabled for every 4 cubicle (1.2 meters wide, potentially hosting baby change facilities) • Changing places facilities. How does this work between hotel and museum use? If the museum shuts will people be able to access facilities through the hotel? • Fire evacuation: Policy D5 for inclusive design. Needing to have a fire evacuation lift. • Are they going to meet the strategy for wheelchair accessible rooms (policy E10 London Plan). Are there any rooms proposed with a hoist? Inclusive hotels network (further guidance) increasing hotel offering. Spatially they could provide it, but a question to put back to design team. • Could the hotel become part of the Inclusive Hotels Network? • Mayor of London's dementia friendly venues charter (published). Will the museum here be
--	--

	<p>dementia friendly, and meet the toolkit?</p> <ul style="list-style-type: none"> • Signage and navigation is an issue, especially for changing places and accessible toilets, and generally how to get around. • Lots of clutter, needing to design for neurodiversity. Has anything been discussed in terms of acoustics? Needing to consider the British standard for neurodiversity (public consultation, adopted in 2022). • Widths of the corridors in the gardens / terraces - (page 9) garden entrance that is only 1500mm wide (slide 19) café bar 5th floor. Noticed that most of those pathways just edge over the 1800mm-width mark. There ought to be passing places in line with building regs and standards. Ramp would not be compliant without passing places. • If there any cycle parking for adaptive bikes? Not wanting to lock a bike up outside. • Site lines – people in wheelchairs are already having to negotiate a difficult environment, already a narrow space, this becomes really problematic if they cannot see where they are going. • In accordance with the London Plan, members can understand a desire to reduce vehicle access. However, members would not support the notion if they cannot access their destination because they rely on private cars / taxis. • Pavement pinch points – are they intending to do anything about that?
--	--

Public consultations

A total of 462 residential addresses were consulted as part of the full planning application ref. 20/00631/FULMAJ and Listed Building Consent ref. 20/00632/LBC. Notification letters were also sent to 246 properties in Billingsgate.

Following three rounds of public consultation to date 17/10/2021 letters have been received from members of the public and local residents comprising 16 letters of support, 4 of general comment and 61 of objection, 2 of general comment and objection and 1 letter withdrawing a previous objection. Copies of all letters and Representations are attached as background papers to this report.

The letters of support cover the following grounds:

Topic	Comment
<p>Heritage and public facilities</p> <p>Further responses received following the second round of consultations</p>	<ul style="list-style-type: none"> • A sensitive restoration of the building which will bring benefits to Londoners and visitors alike, in particular the rooftop facilities • Look forward to a new hotel with retail, restaurant and entertainment additions to the area. • Quayside and roof terrace will offer unique northside river views • An exciting proposal to open up the building and enhance the North Bank experience • The publicly accessible uses on the ground floor will assist with increasing the vibrancy of the Pool of London and enhance the setting and significance of this Grade I listed building • The scheme retains and enhances the majority of the existing building fabric • The scheme shows what can be achieved with imagination, effective collaboration with heritage bodies and good oversight, to reinvigorate dowdy and inaccessible government buildings in a way which respects and restores the heritage and opens up access so that the public can access that heritage, history and architecture <ul style="list-style-type: none"> • Opening up of the interiors of the Listed Building to the public who would be able to walk through the lobby, visit other floors and rooftop bar. • Sensitively bring back parts of Custom House to their former glory. • Keep the building occupied, in use and viable. • Find the plans a fitting and appropriate legacy. • The proposal allows for previous atmospheres to be recreated through the careful restoration proposed.
<p>Public space</p> <p>Further responses received following second round of consultations</p>	<ul style="list-style-type: none"> • Existing use of the building is sub optimal, particularly the blocked off quayside. • Pleased to note the public space created on the north bank to take my family • Scheme proposes widening and enhancing of the riverside walk which is a major and necessary improvement • The river terrace could be a lovely new public space with great views over the Thames <ul style="list-style-type: none"> • Improvements to the North Bank of the river through landscaping, enhancing the view of Custom House and enhanced public realm.

	<ul style="list-style-type: none"> • Create new publicly accessible views of London from the roof top bar and opened up previously private outdoor parts of Custom House. • The proposals would bring more people to this area.
Traffic Management	<ul style="list-style-type: none"> • Satisfied that traffic will be managed to avoid traffic nuisance to adjacent residents
Employment opportunities Further responses received following second round of consultations	<ul style="list-style-type: none"> • The hotel would offer a cross section of employment skills which is greatly needed in London • The development would create new jobs.
Future investment	<ul style="list-style-type: none"> • Investment in the long-term future of the City of London
Further responses received following further rounds of consultations in relation to:	
Museum second round of consultation Third round of consultation	<ul style="list-style-type: none"> • The plans for a museum that honours the public service that took place on site resonate with former officers. • Pleased with the evolved proposals to add a new museum.
Cultural and Community Strategy Third round of consultation	<ul style="list-style-type: none"> • Pleased with the evolved proposals to include a Cultural and Community Strategy.

The letters of general comment cover the following:

Topic	Comment
Ecology and greening	<ul style="list-style-type: none"> • Note that trees are being retained but concerned about limited greening and low UGF.
Public accessibility	<ul style="list-style-type: none"> • Concerns expressed to ensure that the development is accessible to the public and local residents • Will the public riverside footpath remain open during the hotel's operation and what will the public restrictions be throughout construction • Welcome the improvement to the public walkway but opposed to the space being occupied by food

	<p>stalls as on the South Bank.</p> <ul style="list-style-type: none"> • Concern that public access to Quayside is properly secured under the planning permission and S106 agreement
Traffic	<ul style="list-style-type: none"> • What will the long term on local traffic be when the coach and taxi drop-off is created
Historical artefacts	<ul style="list-style-type: none"> • The building contains significant historical artefacts which need to be preserved and safeguarded prior to works commencing
Further responses received following further rounds of consultations in relation to:	
Noise (Second round of consultation)	<ul style="list-style-type: none"> • Paragraph 182 of the NPPF should be adhered to, in that the hotel use does not unreasonably restrict the use and servicing of Old Billingsgate Market. • In order to comply with this the hotel rooms (in particular in the west wing of Custom House, closest to Old Billingsgate Market) should have appropriately strong double glazing so that no noise or noise from servicing disturbs hotel guests in their rooms. It may be sensible for bedroom windows in the east elevation of Custom House to be non-openable to avoid risk of guests being disturbed. • There should be acknowledgement of this in the decision notice to ensure the operation of the hotel does not place an undue restriction on the running of the existing events business in Old Billingsgate Market.

The letters of objection cover the following:

Topic	Comment
Public access	<ul style="list-style-type: none"> • “This is the ideal moment to improve public access to what is a grand national public building, designed as offices, but once much more open than it has been latterly. The Long Room, in particular, also the former Robing Room and King's Warehouse at least, ought to be seen by more people more frequently. Even more basic is the desirability of general public access to the riverside terrace, which could be facilitated through the centre of the building, much as has happened at Somerset House. The present proposals are deeply disappointing and a huge missed opportunity in failing to provide such access to the public as a whole”. • Proposal is a privatisation of London’s civic heritage – does not represent proper access for the wider public – for example for children • More effort should be made to create a more inclusive

<p>Further responses received following second round of consultations</p> <p>Further responses received following Third round of consultations</p>	<p>alternative</p> <ul style="list-style-type: none"> • Another Thames-side gem should be sought such as the Southbank Centre or Somerset House, which we do not have on the City side of the river. The proposal would be a loss to London and a missed once in a generation opportunity • This is public land which should be opened to the public • The proposal would conflict with draft City Plan 2036 aim to open heritage spaces to attract a wider cultural demographic • A wasted opportunity to revitalise an imposing historic and iconic riverside building • The fabric of buildings such as Custom House constitutes a heritage asset which is 'owned' by - and should be accessible to all • Support for SAVE Britain's Heritage suggested plans for an alternative ensuring the building stays in public use and regenerating this stretch of the river • The proposed public access offer is very restricted and controlled, in terms of hours, accessibility to areas of building • There is less and less evidence along the riverfront of the heyday of London as a great international port. Custom House is a cultural and historic beacon on the north bank which should not be compromised by the external proposals • Custom House used to contain a Smuggling Museum and the public could visit the principal rooms; this building should be preserved as part of our cultural heritage with rights of public access • Provision must be made for the former Long Room, long hidden from view, to be open to the public as much of the original internal layout be retained. • The river walkway should not be blocked from public use
<p>Use</p>	<ul style="list-style-type: none"> • Conflicts with adopted and emerging Local Plan and London Plan policies to protect office use and the primary business function of the City; there has been no attempt to market the site as an office led alternative • Conflicts with draft City Plan 2036 policy for office-led cultural use • Custom House in its various iterations on this site

	<p>has been at the heart of London trading for centuries. Use parts of its office space for start-ups or small companies to encourage growth and protect its history</p> <ul style="list-style-type: none"> • This little known and under-appreciated building has potential to become a major public building, a flagship and long term asset for the City • The development should be used in a way that acknowledges and explores the role of the building in London’s history and respects the architecture of Custom House. • The change of use to an expensive hotel would be at the expense of the building’s working history and its built heritage and would be a loss to Londoners. • The exclusivity of a luxury hotel development contradicts with draft City Plan 2036 for office led cultural use as part of the City’s ambition to open up heritage spaces to attract a wider cultural demographic • A Customs Museum would be a better use of the building • The interior could be put to a variety of uses including small offices, exhibition halls and galleries • The Tate Modern and Somerset House are examples of successful re-uses of historic buildings • The building is a unique symbol of London’s history, both maritime and commercial and if safeguarded would be a magnet to draw tourists back to London • Questioning the need for another hotel in the City post-Covid and whether a better proposal can be made for the site.
<p>Harm to Grade I listed building</p>	<ul style="list-style-type: none"> • “Proposed works, which would if carried forward cause significant and unjustifiable harm to a Grade I listed building. The west wing of the Custom House is the least altered part, the only place where David Laing's building of 1817 remains legible. Significant alterations should not be permitted there. That is the part of the building, the major rooms of the central block apart, that should be most carefully handled in conservation terms. Further, the proposed additions of glazed pavilions on both the west and east wings would be an architecturally unfortunate intervention from an external standpoint.” • A truly civic building of London and nation-wide importance – change to it should be taken very seriously – hotels involve lots of alteration • The Georgian offices which are a unique survival

<p>Further responses received following second round of consultations</p> <p>Further responses received following Third round of consultations</p>	<p>would be needlessly destroyed</p> <ul style="list-style-type: none"> • The light box pavilions on the roof would detract from the integrity of the principal façade, harm the symmetry of this classical building and destroy its external roofline. • The rooftop additions would result in substantial harm or at least a high level of less than substantial harm • The rooftop additions would harm the setting of nearby listed buildings, in particular the reflective illuminated box and roof terrace paraphernalia • The harm to the building is not outweighed by public benefits • The current scheme is far too intrusive and a more sensitive solution should be sought • No justification of the rooftop additions has been offered from an architectural or historic point of view • The removal of war memorials is a sad idea which runs counter to common sense and decency • The current proposals fail to fully take on board the compromising yet elegant classical language of Custom House and seek to adapt the building some what arbitrarily to modern hotel requirements. • The additional rooftop newbuild seems excessive given the large size of Custom House and will disrupt views across the Thames from shipping and the South Bank. • There appears to be an attempt to prettify the riverside terrace with ‘soft’ landscaping, whereas its character as a unique, formally working yard with associated features might be retained with interesting reminders of past usages. • The proposed terrace at first floor level suggests an aggressive amount of intervention and over-conversion to suit what are thought to be modern expectations. • Too many of London’s old buildings are being destroyed, is it really necessary to have yet another luxury hotel in London.
<p>Urban Greening Factor</p>	<ul style="list-style-type: none"> • The development achieves a very low UGF which could be improved upon
<p>Employment and training opportunities</p>	<ul style="list-style-type: none"> • A recruitment and training strategy should be sought to demonstrate how the development would provide training and employment opportunities during the lifetime of the development.
<p>Further responses received following further rounds of consultations in relation to:</p>	
<p>Access</p>	<ul style="list-style-type: none"> • The equal access requirements should be addressing

(Third round of consultation)	in a less intrusive manner, retaining historic stairs and other features.
-------------------------------	---

Policy Context

63. 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.
64. The City of London has prepared a draft plan which is a material consideration to be taken into account.
65. Government Guidance is contained in the National Planning Policy Framework (NPPF) July 2021 and the Planning Practice Guidance (PPG) which is amended from time to time.
66. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure (GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.
67. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, July 2014). Open Space Strategy (COL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Culture Mile Strategy (2018); Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.

Material Considerations:

City Plan 2036:

68. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020, with amendments to reflect the updated Use Classes Order and adoption of the City Corporation's Climate Action Strategy, in January 2021. The draft City Plan 2036 was published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

between 19 March 2021 and 10 May 2021. As such, it is a material consideration in the determination of applications.

69. The National Planning Policy Framework, July 2021, paragraph 48, indicates that:

“Local planning authorities may give weight to relevant policies in emerging plans

according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

70. The draft City Plan 2036 has progressed through three rounds of public consultation – on Issues and Options between 19 September 2016 until 2 December 2016; on a full draft plan between 12 November 2018 and 28 February 2019, and on the Regulation 19, pre-submission draft, between 19 March and 10 May 2021.

71. The Regulation 19, pre-submission consultation, generated responses from 171 individuals or organisations, making approximately 1,100 individual comments on various policies in the Plan.

72. The largest number of comments and objections to the draft City Plan were in relation to the impact of tall building development upon heritage assets, in particular the Bevis Marks Synagogue and the need for more specific planning policy on tall building locations and tall building heights. The Mayor of London has indicated that, as currently drafted, the City Plan 2036 is not in conformity with the London Plan in relation to planning policy for tall buildings. Elsewhere, the Mayor indicates that the City Plan vision and approach aligns well with the London Plan Good Growth objectives. The Mayor did not comment specifically on policies for hotels and the night time economy, other than in relation to the City’s Culture Mile, or comment on policies for the Pool of London.

73. Whilst the Mayor has raised an issue of non-conformity with London Plan policies in relation to tall buildings, he has confirmed that the Plan aligns with London Plan Good Growth principles and has not commented on policies which directly impact on Custom House, indicating that planning weight can be applied to those policies, subject to other comments or objections raised during the Plan consultation.

74. In terms of assessing the impact of the proposals for Custom House, a number of policies in the draft Plan are considered to be significant. The following paragraphs summarise the consultation responses to these policies, highlighting where there has either been support or objection which might impact on the weight to be attached to these policies in the determination of the proposals for Custom House.
75. Strategic Policy S6: Culture, Visitors and the Night-Time Economy sets out the City Corporation's strategic approach to maintaining and enhancing the City's cultural offer, requiring the submission of Cultural Plans for major development. Six comments were received on this policy, including comments in support of the approach which sees culture as complementary to office development. Where negative comments or objections were received, these dealt with the need for smaller scale development to provide culture plans and the potential impact of cultural activity on the amenity of residents in the north west of the City. No specific comments relating to the application of this policy in the Pool of London were received.
76. Policy CV3: Hotels provides a criteria based approach to the location of new hotel development, including that proposals "ensure continuing beneficial use for historic buildings, including enhanced public access to and interpretation of that heritage, where appropriate". Two comments were received on this policy, one emphasising the need to promote cycling and walking and public transport access to hotels and one highlighting the need for flexibility to allow hotels to come forward on appropriate sites, welcoming the impact of the new policy on the Culture Mile area.
77. Policy S8: Design, provides the strategic framework to deliver a high quality of design and layout in buildings and the public realm, including requirements for publicly accessible spaces within buildings, free access to roof terraces and spaces, including in tall buildings, along the river and around City landmarks, delivering buildings which are inclusive and which provide an active street frontage. This policy attracted 11 comments which raised a number of detailed issues and objections as well as support. There was objection to the requirement for internal pedestrian routes and free to enter roof terraces for all office buildings, but an acceptance that this could be appropriate in individual developments. Other objections related to the detail of delivery of zero carbon buildings and the need to apply circular economy principles. There were also several expressions of support for active frontages, provision of active travel and for access to roof terraces. No specific comments were raised at the applicability of this policy to development in the Pool of London.
78. Policy S11: Historic Environment, principally sets out policies for the conservation and enhancement of heritage assets in the City of London, in line with national planning policy and legislation. The policy also sets out the City Corporation's intention to improve public access to heritage assets to enhance the experience and interpretation of these assets. This policy generated one of the largest responses to the

Plan, with approximately 150 objections. These objections related in the most part to the need to conserve and enhance the setting and the heritage importance of Bevis Marks Synagogue, with other objections relating to the protection of the Tower of London, St Paul's Cathedral and the listed structure of the Barbican. Where comments were made on the issue of public access, they were largely supportive. No objections related to the application of policy on the City's riverside.

79. Policy OS1: Protection and provision of open spaces, is concerned with the protection of existing open spaces and the provision of additional space. The policy also seeks additional publicly accessible spaces and pedestrian routes in major commercial and residential development, and to secure public access to existing private spaces. Only 2 comments were received on this policy, one being a detailed comment on litter in open spaces. The other was an objection to the expectation of public access through all buildings, and a request that this be amended to access where feasible and practical.
80. Policy S17:Thames Policy Area, provides strategic guidance for development within the designated Thames Policy Area. A key plank of policy is to ensure delivery of the City's Riverside Walk Enhancement Strategy, including through protecting and enhancing public access along the riverside walk, improving access to the River, improving vibrancy of the riverside and providing publicly accessible roof terraces.
81. Policy S19: Pool of London, then provides more detailed and specific guidance for development and the public realm for that stretch of the riverside from London Bridge eastwards to the City boundary. Policy S19 seeks the provision of retail, cultural and leisure uses, increased vibrancy and active uses and publicly accessible uses, the provision of cultural events, arts and play spaces. Specifically, the policy promotes a continuous publicly accessible riverside walk which is accessible to all.
82. Six representations were received on Policy S17. Three of these were comments or requests to change detailed terminology with no impact on the policy. One comment related to the impact of lighting on wildlife. Of the remaining comments, one was strongly in support of enhanced public access to the riverside, the other raised concerns about public access to roof terraces, suggesting that this should only be where 'practical or viable'.
83. There were 2 representations made on Policy S19. One sought additional wording to preserve and enhance heritage assets and ensure public access in a socially and economically inclusive way, building on the policy wording in the draft Plan. The other representor made comments on behalf of Canon Capital Developments, the long lessee of Custom House. These comments were generally supportive of the proposed policy direction for the Pool of London, but suggested amendments to reflect the lessee's position as an important stakeholder in the redevelopment of Custom House.
84. The above summary of responses to key policies in the Plan has

demonstrated that the level of comment and objection to key elements of the City Plan which deal with public access to buildings and spaces, including rooftop spaces, seek improved interpretation of heritage assets and improvement of the Riverside Walkway, has been minimal. There have been objections to public access through buildings, but not to the principal, only the interpretation and application on all buildings. The principal objections to policies which have been relied upon by the City Corporation in determining the proposals for Custom House have been made by the lessee of Custom House.

85. In accordance with paragraph 48 (b) of the NPPF, the City Corporation does not consider that there have been substantive and unresolved objections to draft City Plan policies as they impact upon the proposals for Custom House and therefore considers that these policies can be afforded weight in the determination of the planning application.

Considerations

Relevant Statutory Duties

86. 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).
87. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);
88. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
89. In considering the planning and listed building applications before you, account has to be taken of the documents accompanying the application, the further information, any other information, and consultation responses, the development, plan, and other material considerations including SPGs, SPDs, emerging policy.
90. 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.

National Planning Policy Framework (NPPF 2021)

91. 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”.
92. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
93. 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:
94. Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development”. That presumption is set out at paragraph 11. For decision-taking this means:
 - a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
95. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

Chapter 8 of the NPPF seeks to promote healthy and safe communities.

96. Paragraph 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.
97. 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”.
98. 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.
99. 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”.
100. 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.”
101. 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.
102. Chapter 14 of the NPPF relates to meeting the challenge of climate change, flooding and coastal change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change.

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.

103. 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.
104. Paragraph 159 states that Where development is necessary, in areas at risk of flooding, the development should be made safe for its lifetime without increasing flood risk elsewhere.
105. Paragraph 167 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment demonstrating that the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment, it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate, any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
106. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. 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.
107. 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."
108. 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.

109. 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”
110. 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.
111. 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.”
112. Relevant Supplementary Planning Guidance is contained at Appendix B.

Good Growth Objectives and Social and Economic Inclusivity

113. ‘Good Growth’ is defined in the London Plan as growth which is socially and economically inclusive and environmentally sustainable – underpinning all London Plan policies – it is the way in which sustainable development is achieved in the Capital (paragraph 1.01). It is the ‘golden thread’ running through the principle and detail of decision making, encapsulated in Good Growth core objectives, GG1-GG6 of the London Plan. Of particular relevance here are GG1 and GG5.
114. GG1 states Good Growth is inclusive growth. To build on London’s tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in development and planning must achieve an overall positive contribution to London, allow for social integration and for all to benefit in the opportunities of growth. Decisions must support a London for all Londoners across all the demographics regardless of background, or social and economic circumstances to engage independently with choice and dignity, breaking down barriers, challenges and inequalities they face, creating a fairer, more inclusive and equal City. Everyone should have a share

in London's prosperity, culture and community.

115. CG2, making the best use of land, includes understanding what is valued about existing places; London's heritage holds local and strategic significance for the City and the special features that Londoners value about a place such as cultural, historic or natural elements should be used to guide and stimulate growth. The Mayor's Good Growth by Design programme will ensure developments are of high quality.
116. GG3, creating a healthy city, requires developments use the Healthy Streets Approach to prioritise health in all planning decisions and make decisions which would improve air quality, create more green infrastructure and space for play, and promote more active and healthy lives. Plans should mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.
117. GG5, Growing a good economy, seeks to ensure the benefits of economic success be shared more equitably, providing physical and social infrastructure, whilst promoting London's rich heritage and cultural assets.
118. CG6, increasing efficiency and resilience, seeks to improve energy efficiency and support a move towards low carbon circular economy and ensure buildings are designed to adapt to changing climates. Developments should create safe and secure environments.
119. This Good Growth agenda is amplified by strategic policy developments at a national, London and local level, in particular to build back better post-Covid. The first report of the Covid Recovery Commission, 'Levelling Up Communities' (2020), identifies London as having the highest poverty rates in the UK, despite being the most economically successful city. It concludes on themes seeking to close the equality gap which focus on i.) people-focused decision-making ii.) building community resilience iii.) improving mental and physical health and iv.) providing educational opportunities with a focus on wellbeing. A key focus was to renew an emphasis on people and places, rather than more abstract regional wealth gaps, focusing more on the wellbeing of individuals, families and communities which are left behind at a local level.
120. The Good Growth objectives and the 'Levelling Up' agenda are amplified by recent City Corporation published policy which seeks to harness the opportunities of a post-Covid shift and re-position, transforming the City as a world class and inclusive centre for business and culture open to all. These visions, which are material considerations, are contained in 'City Recharged: Our Vision for London in 2025 (2020), 'The Square Mile: Future City: creating the world's most inclusive, innovative and sustainable business ecosystem' (2021) and 'Culture and Commerce: Fuelling Creative Renewal' (2021).
121. The Corporation report, 'City Recharged: Our Vision for London in 2025' (2020) seeks to retain the City's competitiveness, including

becoming a world-leader in inclusion, setting the inclusivity bar for other UK cities. Within the vision there is a stated aspiration of creating a public policy 'diversity lens', reflecting that of the Good Growth objectives, through which to assess impacts, while delivering innovative ecosystems, a vibrant offer and outstanding environments which appeal to a diverse demographic and audiences. There is a focus on blending commerce and culture which reaches out to non-traditional City audiences to create a diverse place by day and night. There is a prioritisation on addressing diversity, from ethnic and gender to socio-economic, in order that everyone feels they belong in the City.

122. The Culture and Commerce report seeks to deliver i.) creative activation ii.) culture and commercial exchange and iii.) Creative Enterprise Hubs, in an inclusive manner which enriches the City's ecosystem. It also seeks a public realm which extends beyond traditional boundaries and welcomes a wider demographic and underrepresented groups in the use of space.
123. This has been furthered in the report, 'The Square Mile: Future City' (2021), which seeks to make the City the most inclusive, innovative and sustainable in the world, through delivery of a vibrant use offer and outstanding environments in which all belong. A further Corporation strategic document, 'Culture and Commerce: Fuelling Creative Renewal' (February 2021), a report of the Culture and Commerce Taskforce, seeks to harness the economic and inclusion potential of the creative sector in driving a post-Covid recovery.

The Mayor's Public London Charter

124. The draft Public London Charter (2020) has been produced to fulfil a commitment made by the Mayor in the London Plan to set out the rights and responsibilities for the users, owners and managers of public spaces. The Charter aims to provide a basis for the delivery and management of public spaces in new developments. It sets out 8 principles to meet the objectives of the London Plan which seek to ensure that public realm is safe, accessible, inclusive attractive, well-connected and easy to understand, service and maintain. It advocates for public realm that is open and offers the highest level of public access irrespective of land ownership, with landowners promoting and encouraging public use of public space for all communities.
125. The 8 objectives are: Public Welcome; Openness; Unrestricted Use; Community Focus; Free of Charge; Privacy; Transparency; and Good Stewardship.
126. Planning and managing should welcome the public and foster an open and accessible network of well-designed and amenable streets and spaces, this must be at the heart of planning for a healthy, inclusive and prosperous city.
127. Research shows that the most regulated public spaces in London are

those owned and managed by commercial landowners. Where this type of 'corporatisation' of the outdoors occurs, Londoners are concerned that people can feel, or are, excluded from parts of their own city. The central premise of the Public London Charter is to ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space.

128. The value of our public realm for individuals and communities is extensive. It enables a sense of togetherness and provides opportunities for meeting people; this is especially true when community or cultural events are taking place. Easily accessible outdoor spaces contribute to an increased sense of well-being, for young families, those without gardens, and older people who might be lonely and less likely to leave their local area on a regular basis.
129. Londoners say they value the fact that public space provides easily accessible, and free, outdoor space, to be used how they want. Landowners and managers should seek to minimise the impact on the general use of the public space when planning temporary commercial events that may come with a cost. These should be announced in advance and should not unreasonably compromise the accessibility and enjoyment of the space for other users either through their frequency or the extent of the space that is used.
130. Public space should be managed to respect the privacy and private property of all users. Where CCTV or other surveillance or data harvesting technologies are used, they should protect people and property in a way that is both legal and compliant with regulators' codes of practice; they should not be solely used to obtain biometric information.
131. Compliance with the Public London Charter should be clearly signposted. Users should have easy access online and on site to the principles of the Charter together with details of the owner and management company of the space, and any regulations that apply. Any regulations should be developed transparently and through public consultation with interested parties and relevant stakeholders.
132. Public space should be managed on behalf of all Londoners. Day-to-day supervision should be informal, with both supervision and maintenance carried out in a manner which is considerate of all users.
133. The Charter provides a benchmark and supports a consistency of experience for all Londoners and visitors, to ensure that the public realm is accessible and inclusive.

Considerations in this case

134. In considering the planning and listed building applications before you, account has to be taken of the documents accompanying the application, the further information, any other information, and consultation responses, the development, plan, and other material

considerations including SPGs, SPDs, emerging policy.

135. 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.

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

- The extent to which the proposals comply with the Development Plan.
- The extent to which the proposals comply with the NPPF
- Contribution to the economic success of the City
- The loss of existing office floor space and the change of use to hotel-lead scheme with accompanying flexible uses
- The direct heritage impact arising from the change of use, alteration and extension of the Grade I listed London Custom House, and the associated Grade II* River Wall, Stairs and Cranes
- The in-direct heritage impact, the result of change in settings contribution to the heritage significance of numerous designated heritage assets, and an appreciation of it.
- The achieving of high-quality architecture and good design to deliver Good Growth by Design and a beautiful place.
- The impact on strategic London and City designated views in the London View Management Framework (LVMF); of and from the Monument as identified in the Protected Views SPD and of City Landmarks and Skyline Features as identified in the Protected Views SPD.
- The impact of the proposal on The Tower of London World Heritage Site
- The impact of the proposal on any archaeology beneath the site
- The accessibility and inclusivity of the development
- Transport, servicing, cycle parking provision and impact on highways
- The proposed public realm benefits and cultural/community offer
- The impact of the proposal in terms of energy and sustainability
- The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight and light pollution
- The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability
- The requirement for financial contributions

Principle of Development

137. The Local Plan Core Strategic Policy states that when considering development proposals, the City Corporation will take a positive approach that reflects the presumption in favour of sustainable

development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

138. The loss of the current office floor space, and the change of use of the site to provide a hotel with ancillary uses, provision of retail uses, and the provision of a museum is to be considered.

Loss of existing office floor space

139. Custom House currently provides 19,698 sqm GIA of office and ancillary floorspace arranged over basement, ground, mezzanine and 3 upper floors. A surface car park is located to the south of the site and can accommodate approximately 80 cars. The building has been occupied by HMRC or other iterations of government customs since the early 19th Century but has been vacated. The area immediately surrounding Custom House is predominantly office use, with event space adjacent at Old Billingsgate and residential opposite to the East at Sugar Quay.
140. The proposals seek the change of use from office (Use Class E) to primarily hotel use (Use Class C1) with additional uses including Museum (Use Class F(1)(c)), food and beverage facilities (Use Class E or Sui Generis). The proposal does not include any independent office, therefore resulting in the loss of 19,698 sqm GIA of office and ancillary floorspace.
141. The City of London Local Plan 2015 and the proposed Submission Draft City Plan 2036 promote the delivery of a world class business city and the protection and provision of office floorspace. Local Plan policies CS1 and DM1.1 and proposed Submission Draft City Plan 2036 policies S4 and OF2 seek to protect existing office accommodation.
142. Policy DM 1.1, protection of office accommodation, requires applications be refused that would result in the loss of office accommodation where the site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate.
143. To meet the requirements of Core Strategic Policy CS1 and Policy DM 1.1, applicants proposing the loss of office accommodation will need to provide robust evidence relating to the current and long term unsuitability of the site for office use and that the proposed change would not adversely affect the existing beneficial mix of commercial uses in the area or prejudice the primary business function of the City. Applicants will need to provide robust evidence to demonstrate that the building has depreciated such that office use is not viable or suitable in the long-term. Evidence will need to address the physical state of the building and its functional and locational obsolescence. Marketing evidence will be required to show that there is no recent or likely future demand for continued office use on a site.

144. Emerging Policies S4 and OF2 of the draft City Plan require the protection of existing office stock from being lost to other uses where the existing floor space would be viable in the longer term or where the loss would cause harm to the primary business function of the City.
145. Evidence provided in support of planning applications should take into account the potential for the building to meet a variety of office needs including, where appropriate, the potential for sub-division to provide smaller office suites, the potential to provide accommodation suitable for start-ups or 'move-on' accommodation and the potential for comprehensive redevelopment to re-provide office floorspace.
146. The Office Use Supplementary Planning Document sets out detailed criteria for evaluating the long-term viability of office accommodation and requires the submission of a viability appraisal and evidence of marketing in support of an application for change of use.
147. The applicant has not undertaken formal marketing of Custom House for alternative office use but has submitted an 'Office Market Review and Assessment of Letting Potential' report. This report categorises Custom House as a Grade B office space. It suggests that the size of Custom House, its internal configuration and Grade I Listed status and the availability of more suitable Grade A office space in the EC3 and EC4 areas would mean that it would be unlikely to let to a single occupier. Similarly, the size of the building and the restrictions imposed by its Grade I listing indicate that it would not be attractive to SMEs or a serviced office provider.
148. In support of the Market Review and Assessment Report conclusions, the applicant has submitted an economic viability assessment. The City Corporation appointed independent consultants to review the Assessment and provide advice to the City Corporation on whether the assessment meets the terms of Policies CS1 and DM1.1 and emerging policies S4 and OF2. The Applicant's viability assessment has been undertaken using a residual method, which calculates the value of land by subtracting all expected costs of the development (including an allowance for profit) from the anticipated value of the property once the development is completed (gross development value). The residual value of the land can then be compared with a benchmark land valuation. If the residual valuation falls below the benchmark land value, the scheme would not be viable for a rational investor looking for a market level of return on investment and would not come forward. This approach is the 'industry standard approach' to viability assessment and is supported by national Planning Practice Guidance and RICS guidance. It does not take account of how development would be viewed by an investor willing to accept a sub-optimal level of return.
149. Given the national significance of Custom House, the City Corporation requested that a full survey of the existing condition of the building be provided to better understand what interventions would be needed to maintain the building and deliver the proposed development. Summary information was provided, but not a full and comprehensive condition

survey.

150. A number of options/scenarios have been tested by the Applicant through their Viability Assessment. Six of these options consider the viability of continued office use, five consider hotel development and variations in the size and mix of uses within a hotel scheme. A further hotel viability assessment has also been provided to consider the viability of a hotel scheme alongside a museum use, as set out in the most recent planning application.
151. The office viability options assessed consider whether continued office use would be viable in the longer term, in line with adopted and emerging Local/City Plan policy. The options considered are:
 - Option 1: minimum office upgrade
 - Option 2: comprehensive office refurbishment
 - Option 3: Grade “A” office refurbishment and rebuild of east wing behind existing façade
 - Option 4: As Option 3, but with a 4th and 5th floor extension
 - Option 5a: As Option 4, but with restaurant/event space on basement, ground, first and part 5th floor
 - Option 5b: As Option 5a, but excluding the 5th floor extension.
152. The residual valuation method adopted by the Applicant provides a point in time view of viability of the continuation of office use. This approach concludes that all 6 office options considered would not be viable, with all options delivering a residual land value below the benchmark land value.
153. In considering whether the Applicant’s conclusions can be supported, the City Corporation’s independent assessor has considered in detail the individual inputs to the Applicant’s viability, including assessments of the benchmark land value, the overall development cost of each option and the development value of each option. The City Corporation’s independent consultant has agreed that the benchmark land value adopted by the applicant is appropriate. Potential rental levels for office floorspace have been assessed on the basis of comparable schemes elsewhere in the City and the City Corporation’s consultant considers that the proposed rental values are appropriate.
154. In terms of development costs, the Applicant has provided a cost plan, outlining the expected construction cost for each option. The City Corporation’s consultant has sought specialist advice on the appropriateness of the cost plan given the specific costs likely to be incurred in relation to a Grade I listed building. This advice highlighted a number of anomalies in some of the cost plans, specifically relating to shortfalls in the costs for Options 4, 5A and 5B and covering demolitions, substructure, frame and upper floors, roofing and external works. At the same time, the cost plans make allowances for roofing works and works in the Long Room which are considered by the City’s consult to be excess costs. The scale of the anomalies is around £4.5m

before preliminaries and other costs and is approximately the same level as the total allowances for roofing and the Long Room. For the purpose of the Viability Appraisal, the Applicant's estimated construction costs have therefore been accepted and no changes were considered necessary by the City's consultant to the submitted cost plans. Whilst this approach is suitable for viability appraisal purposes, it does not take into account the very specific circumstances and specific development costs in developing an important Grade I listed building.

155. The City Corporation's consultant has reviewed the Applicant's Viability Assessment for each of the office options considered. The City Corporation's consultant agrees with the Applicant that the viability assessments, as submitted, indicate that continued office use would not be viable at the point the assessments were undertaken. The City Corporation's consultant has also built a bespoke financial model to assess whether continued office use of Custom House would be economically sustainable and viable in the longer term. This approach models projected returns on an annual basis over a 15-year period. Using this model, the consultants have considered the viability of the 6 office options considered by the Applicant, as well as a base model in which the building is retained in its current state without substantial refurbishment. They conclude that retention of the building in its current state would not be viable in the longer term.
156. In relation to the 6 options, the model targets a rate of return of between 8% and 10%, being the level that a rational investor would seek given the associated risk and investment. All of the options tested produced a level of return below this level. Whilst the level of return does improve towards the end of the 15-year period following refurbishment, this is still below the rate of return considered appropriate.
157. In accordance with guidance set out in RICS guidance on viability, the City Corporation's consultant has run a series of sensitivity analyses, considering the impact that a change in rents and/or construction costs of +/- 10% would have on the projected return after a 15-year period. This analysis shows a moderate sensitivity to changes in construction costs but a greater sensitivity to changes in rents. However, even allowing for improvements in rents and reduction in costs, none of the six office options would deliver a level of return which would be acceptable to a rational investor seeking a market return.
158. Overall, the City Corporation's consultant concludes that the retention of Custom House in its existing office use is not financially viable and that it would not be viable in the longer term for future office use under these models. The principle of a change of use from office to an alternative use is satisfied in accordance with Local Plan policies CS1 and DM1.1, proposed Submission Draft City Plan 2036 policies S4 and OF2, and the Office Use SPD.

Change of Use to Hotel

Policy Context:

159. The proposed development site falls within the Central Activities Zone (CAZ). The London Plan 2021 states (paragraph 2.4.4 (j)) that one of the strategic functions of the CAZ includes, but is not limited to, the provision of tourism facilities including hotels and conference centres.
160. Policy E10 of the London Plan relates to visitor infrastructure and states that a sufficient supply and range of serviced accommodation should be maintained.
161. Paragraph 6.10.2 of the London Plan states that it is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum over the plan area to meet the accommodation demands of tourists.
162. Policy E10 (and supporting text at paragraph 6.10.3) state that within the CAZ, strategically important serviced accommodation (defined as more than 20,000 sq.m.) should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ, except wholly residential streets or predominantly residential neighbourhoods and subject to the impact on office space and other strategic functions.
163. Policy E10 (and supporting text at Paragraph 6.10.4) of the London Plan seeks to improve the availability of accessible serviced accommodation, stating that it is vital in ensuring as many visitors as possible can stay in London and experience its visitor attractions and business offer. To help achieve this, serviced accommodation developments should achieve the highest standards of accessible and inclusive design.
164. The application site does not fall within an Opportunity Area as outlined within the London Plan 2021.
165. The London Plan Good Growth objectives GG1, GG2, GG5 and GG6 are considered applicable to the change of use of Custom House to a hotel-led development.
166. The Local Plan Policy CS11 states that hotel development will be allowed where it supports the primary business or cultural role of the City and hotels should be refused where these would compromise the business function or potential for future business growth, and that hotels should not be located where these would create amenity problems for existing residential areas.
167. The Local Plan (paragraph 3.11.5) states that the number of hotels in the City has increased significantly in recent years. The Mayor of London's 2006 Hotel Study encouraged an increase in London's hotel provision and set targets for each borough which the City has exceeded.
168. The draft City Plan (paragraph 5.3.16) gives more up-to-date detail on this point stating that whilst the majority of visitors are day-trippers, the

City has seen strong demand for hotel accommodation in the last ten years, and in 2020 had 44 hotels, aparthotels and hostels, providing over 6,700 bedrooms. The GLA has forecast the need for an additional 58,146 bedrooms in London between 2015 and 2041. The City's projected share of this increase is 4,341 rooms. Based on past trends and hotel sites currently permitted or under construction, there is a strong likelihood that the City will meet the London Plan requirement, irrespective of the proposal. It should be noted that these GLA forecasts predate the Covid-19 pandemic. Whilst there have been short term impacts on the tourism industry, the attractions of the City and of London as a visitor destination remain strong.

169. The Local Plan (paragraph 3.11.10) states that the City's central location makes it attractive for hotel development. New hotel development will be required to secure a balance of uses, protect residential amenity and address local traffic and servicing impacts. Large hotels with substantial facilities may be inappropriate in some locations due to the adverse impact on amenity and traffic.
170. Further to this the Local Plan (paragraph 3.11.11) requires that hotel development be assessed to ensure that the amenities of surrounding residents and businesses are not adversely affected, for example by noise nuisance and traffic congestion.
171. Local Plan Policy DM11.3 states that new hotels will only be permitted where they:
 - do not prejudice the primary business function of the City;
 - are not contrary to adopted Policy DM 1.1 ('Protection of office accommodation');
 - contribute to the balance and mix of uses in the immediate locality;
 - do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
 - provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;
 - are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
 - ensure continuing beneficial use for historic buildings, where appropriate.
172. Strategic Policy S6 of the draft City Plan seeks to maintain and enhance the City of London's contribution to London's world-class cultural offer, whilst allowing the City's communities to access a range of arts, heritage and cultural experiences. It allows for hotel development where it supports the primary business or cultural role of the City.
173. Draft Policy CV3, which indicates the circumstances in which hotels will be permitted, reflects broadly the criteria set out in adopted Local Plan Policy DM11.3 but adds additional criteria:

- include a range of complementary facilities accessible to the public;
 - ensure continuing beneficial use for historic buildings, including enhanced public access to and interpretation of that heritage, where appropriate;
 - address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials).
174. Paragraph 5.3.20 of the draft City Plan states that hotel development may be suited to listed buildings, providing an alternative use which could enable significant heritage features to be conserved and enhanced. Where such change of use is proposed, the City Corporation will seek improved public access to and interpretation of the building's heritage.
175. The draft City Plan (paragraph 5.3.21) recognises that hotels can cause amenity issues for surrounding occupiers, for example through noise nuisance or traffic and servicing impacts. New hotel proposals will be expected to prioritise access by walking, cycling and public transport. The location of entrances and exits, drop-off points and servicing and delivery arrangements will be considered in the context of surrounding occupiers.

Assessment:

176. The provision of a hotel use in this CAZ location is considered acceptable in principle in relation to overarching London Plan Policies, however, it is noted that this site does not fall within an Opportunity Area and the provision of a hotel is not required to fulfil a shortage of serviced accommodation in the City of London.
177. It is considered Policy DM11.3 and emerging Policy CV3 of the Draft City Plan set out the primary criteria for consideration of the change of use to hotel, each part is taken in turn below.
178. Officers consider that the principle of a loss of office floor space has been established as acceptable in this instance, and the change of use to a hotel (C1) would not prejudice the primary business function of the City. Furthermore, the proposal would not result in the net loss of an existing visitor, arts or cultural facility.
179. It is considered that the change of use to a hotel would not likely result in the over provision of hotels or cause an imbalance of land uses in this location, albeit there is a large and growing concentration of visitor accommodation in this part of the City, near to the Tower of London.
180. The proposed development would need to protect the amenity of nearby neighbouring properties and residents. The closest neighbouring residents are located at Sugar Quay immediately opposite to the East, accessed off Water Lane, which it shares with the Custom House.
181. The application documents do not include specific information regarding the spatial extent and nature of events on the Quayside and in the building, most notably the section of the Quayside on and

accessed off Water Lane or the Long Room (and associated external terrace), which has a capacity of up to just under 1000 people. These could have a significant impact on the amenity of the surrounding area and to the residents at Sugar Quay to the east.

182. The Applicant has provided insufficient details of the Quayside closures, how Quayside and Managed Events, or their operations/servicing quantum, times, or natures. An accompanying plan sets out the proposed area for closure of the Quayside, including Water Lane up to the Public Highway, for events. This would allow events to be held in any area, in any denomination of space over the identified Quayside Area. This could result in regular events being held on Water Lane and the parts of the Quayside adjacent to the residential properties in Sugar Quay.
183. Furthermore, the proposed control of the Quayside would be through daylight hours, therefore leaving night-time hours unrestricted. This could result in more night-time events taking place so that the hotel occupier can maximise the use of the Quayside for events over the course of each year. This could result in adverse impacts to the neighbouring residents, especially if these were located on Water Lane.
184. It is also not set out in the application documents how the servicing of events on the Quayside would be undertaken and if these would fall within the consolidated/outside peak hours plans put forward for the hotel building. If there are further servicing arrangements for events along Water Lane this is likely to result in increased noise and disturbance to the neighbouring properties at Sugar Quays.
185. Officers therefore consider that based on the information set out within the application documents there is insufficient information to demonstrate that the proposal would not result in adverse impacts to neighbouring amenity and would be contrary to Policy DM11.3 and emerging Policy CV3 of the Draft City Plan.
186. Amenity issues relating to the site are covered in more detail within a later section of this report, which have informed and provide further detailed analysis into the impacts of the proposed development to the amenity of neighbouring occupiers.
187. For the above reasons it is considered that the application does not demonstrate that the proposal would conserve the amenity of neighbouring properties and would therefore be contrary to part of Policy DM11.3 and emerging Policy CV3 of the Draft City Plan in relation to amenity of neighbouring occupiers, along with other amenity policies within the development plan and set out in further detail in later sections of this report.
188. The proposal would need to provide satisfactory arrangement for service delivery vehicles to serve the hotel and the Quayside/Managed Events
189. The Applicant has not agreed to the use of an off-site consolidation centre in order to reduce the number of deliveries to the development per day. Notwithstanding, the Applicant has agreed to a cap of 28

deliveries to the development per day. This is for all vehicles associated with the building, including any events within the building. The Applicant has asserted that this is a realistic cap for the building, despite not confirming what events may occur in the building and in particular the Long Room. Given the incomplete information we have received, relating to the events in the Long Room, and the potential servicing requirements associated with this, it is considered that a cap of 28 vehicles would only be achievable if an off-site consolidation centre is used.

190. The Applicant has failed to provide detailed information on the proposed private events associated with the riverside event space, therefore Officers have had to assess the case using the information submitted which includes unresolved issues and incomplete information. Officers consider that in a worst-case scenario there could be an event on the Quayside, either private and/or public, every day of the year, which together with the event servicing could potentially close 100% of the area as shown on the submitted plan (G200_P_00_004 Rev A). Officers consider that the Applicant has failed to demonstrate that the servicing of the Quayside would not cause an unacceptable impact in relation to safe management and servicing of and on the Quayside, Water Lane and Lower Thames Street. Therefore, the proposals would not be compliant with part of Policy DM11.3, in relation to satisfactory arrangements for service delivery vehicles.
191. The potential closure of the rest of Water Lane, which is private albeit open land, would have an unacceptable impact on Sugar Quay residents, and people who use Water Lane to access the riverside. Water Lane is regularly used for pick up and drop off, and closing Water Lane would force any pick up and drop off onto the strategic traffic artery, Lower Thames Street.
192. Transport, Servicing, Parking and Impact on Public Highways issues relating to the site are covered in more detail within a later section of this report, which have informed and provide further detailed analysis into the impacts of the proposed development to the amenity of neighbouring occupiers.
193. Officers consider that based on the information set out within the application documents there is insufficient information to demonstrate that the proposal would provide satisfactory arrangements for service and delivery vehicles associated with the hotel use and the Quayside events which would be contrary to Policy DM11.3 and emerging Policy CV3 of the Draft City Plan.
194. The proposed development would need to ensure the continuing beneficial use for the historic building, in this case the Grade I listed Custom House.
195. The proposed hotel use, for reasons established in detail in the Heritage section of the report, would intrinsically work against the grain of the listed building, undermining its essential character, resulting in alterations and introducing servicing arrangements which detract from

special interest, contrary to DM 12.3.

196. Our independent viability consultant found the proposed hotel scheme viable, but deemed it marginal, with downside risk. Their specialist Hotels Team considered that the Applicant had overestimated potential revenue on day one. That scheme, the one proposed, includes not just the hotel bedrooms, but the alterations and extensions at roof level, which would leave the designated heritage asset of the highest order significantly diminished.
197. Officers consider the proposal would be a non-inclusive form of development, the result of its use(s), their disposition and layout, management and curation, non-inclusive inactive frontages and wider look and feel. It is not considered that the proposal would allow for the spectacular heritage significance of the building to be brought to a diverse demographic and audience in an inclusive manner. This is covered in more detail in later sections of this report.
198. Overall, the proposed change of use severs the current historic connection with the lawful use as an office, which Officers consider could be the longest in continued office use in the City, and its oldest surviving purpose-built, and would not secure the continuing beneficial use of the grade I listed building or its setting, the result of leaving an asset significantly diminished and a non-inclusive form of development meaning its heritage significance is not brought to a wider audience.
199. A minimum of 10% (20 hotel rooms) would be designed and fitted so that they are fully accessible, thus meeting the requirements of Local Plan Policy DM11.3 and emerging Policy CV3 of the Draft City Plan. It should be noted that officers do raise concerns regarding the overall accessibility of the external spaces and public realm associated with the proposal. However, this is not a factor under consideration of Policies DM11.3 or draft Policy CV3, but will be addressed in later sections of this report.
200. The draft City Plan Policy CV3 sets out broadly similar criteria as Local Plan Policy DM11.3 but requires that further considerations be considered as set out below.
201. Proposed development should include a range of complementary facilities accessible to the public as part of the development. The scheme would incorporate a number of Class E uses (bars/restaurants) and class F (museum) within the hotel building. Officers are concerned that these may not be truly publicly accessible spaces or independently occupied in a manner which would deliver a diverse variety need to create inclusive vibrancy. However, if suitable conditions of any approval and accompanying legal agreement were secured to ensure the independent occupation of each unit, alongside suitable management plan conditions, then this could be considered to satisfy the relevant criterion in draft Policy CV3.
202. Any proposed development should ensure a continuing beneficial use for historic buildings, including enhanced public access to and interpretation of that heritage, where appropriate. The proposed

development relates to a Grade I Listed building, which forms part of London's long and rich history. Whilst being a publicly owned building, the building has not been open to the public for a long time. This proposal represents a significant opportunity to enhance public access to this heritage asset.

203. When seen through the 'lens' of the London Plan Good Growth objectives, then development proposals should promote London's rich heritage and cultural assets in its role as a 24 hour city, in a way which is strengthens communities, increases active participation, social integration, fosters a sense of belonging, and support the needs of a wider demographic, young and old, families and disabled people, making an overall fairer, more inclusive city through building on access to heritage in creative and inclusive manner.
204. The development proposals would allow for public access through the Queen's Wearhouse from the principal hotel entrance on Lower Thames Street to the riverside terrace area, with access onto the Quayside. The public access would be through the designated hotel lobby and reception areas. There would be an offer of display boards within the hotel lobby for the public to view. This public access route would be accessible between 9am and 10pm, on days when the hotel is operating and when an event is not being held on the Quayside.
205. A museum is proposed as part of the development. It would occupy a less prominent annex, landlocked in the north west corner of the ground floor, which is divorced from the remainder of the building, including the principal heritage/civic arrival and gravitas spaces. It would also not have an entrance fronting onto the Quayside new area of public realm. A public roof terrace is accessible during museum opening hours, however, this is accessed through and shared with a hotel bar/restaurant on a first come first served basis.
206. The removal of the security fencing and the opening up of the Quayside would result in an area for people to dwell and appreciate the external appearance and interpretation of Custom House. However, closure of the Quayside for private events would restrict public access for a large portion of the year.
207. Public tours would be available once per month for members of the public to visit the Long Room, considered to be the gem of Custom House. The Long Room would be a function room so the only time to visit it outside of the once monthly tour would be to book it out for a function. Therefore, it is considered that there would be extremely limited times, 12 per year, for the public to see this space.
208. Whilst it is considered that the proposal would result in enhanced public access to, and interpretation of, a significant heritage asset it is considered that the public access would be curtailed significantly in favour of private hotel guests, events and functions. Therefore, the scheme would not deliver an inclusively viable, vibrant or creative interpretation and appreciation of the outstanding heritage of the site in an inclusive manner, publicly accessible to a wide audience and

diverse communities.

209. Any proposal should address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials). The scheme was pre-assessed against the BREEAM UK Refurbishment and Fit-out (RFO) 2014 scheme. The maximum score that can be achieved by the proposed building at this state is 76.21%, which corresponds to a BREEAM 'Excellent' rating, considered to be an acceptable outcome for a Grade I listed building.
210. The development's scores in the City's three of the four priority categories (Energy, Materials, Water and Pollution) are acceptable. A post construction BREEAM assessment would be required by condition of any approval. It is therefore considered to satisfy draft Policy CV3 in this respect.
211. Whilst some parts of Policy DM11.3 and draft Policy CV3 are satisfied other parts are not. All parts are required to be satisfied for the proposal to be considered acceptable. Officers consider that the proposal would not ensure the continued beneficial use for a historic building. Furthermore, officers consider that it has not been demonstrated that the proposal would conserve the amenity of existing neighbouring occupiers or provide satisfactory or safe arrangements for servicing vehicles. Therefore, the proposed development would not accord with Local Plan Policy DM11.3 or draft City Plan Policy CV3.

Commercial /Retail floor space

Policy Context:

212. London Plan Policy SD4 sets out the strategic priorities of the CAZ. Policy SD6 (Town Centres and High Streets) of the London Plan states that the vitality and viability of London's varied town centres should be enhanced by encouraging strong, resilient, accessible, and inclusive hubs for a diverse range of uses that meet the needs of Londoners.
213. The London Plan Good Growth objectives GG1 and GG5 are considered applicable to the provision of commercial/retail floor space within development proposals.
214. Strategic Policy CS20 of the Local Plan seeks 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.
215. The Draft City Plan encourages increased vibrancy and active frontages at ground floor level, through the provision of publicly accessible retail, leisure and cultural uses. Strategic Policy S1 of the Draft Local Plan 2036 (Healthy and Inclusive City) promotes the provision of publicly accessible recreation facilities. Policy S5 of the Draft Local Plan 2036 (Retailing) seeks to improve the quality and quantity of the retail environment promoting the development of the City's Principal Shopping Centres and the linkages between them, but also supporting schemes which would contribute to meeting the future retail demand of the City.

Assessment:

216. The Site is located within the Central Activities Zone (CAZ), but not within one of the Principal Shopping Centres as set out within the Local Plan.
217. This scheme would incorporate 1,474 sq.m. (GIA) of flexible retail (Use Classes E) and Sui Generis (Drinking Establishment) which comprises two internal restaurant/ bar units (Use Class E(b) / Sui Generis) and two rooftop restaurants / bars with terraces (also Class E(b) / Sui Generis) and a basement Gym/Spa.
218. In principle officers would support proposals for incorporating retail uses within the scheme as they would contribute to creating a mix of uses on the site and would provide ancillary uses to the guests of the hotel.
219. The proposed development for retail floor space would primarily fall under Class E(b) for the sale of food and drink for consumption (mostly) on the premises.
220. The ground floor central block is to be restored and would accommodate a bar, restaurant and function room. The applicant states that this will comprise two separate provisions within this central block, however, there is no information submitted that demonstrates how these would be subdivided and independently occupied. Furthermore, it is not clear from the plans or information submitted how the independent uses would interact with either the hotel lobby/front of house area or the public route passing through the building. The submitted ground floor plan shows that the central space of the central block will be used for 'Hotel Use C1, Hotel Reception and Front of House'. This is shown on the plans in the area which is set out in the public access plans as being the designated public route through the building. No additional information has been provided that would demonstrate how this space would be divided up or managed, with the submitted ground floor plan showing one open plan space for the independent Class E uses, hotel floor space and public access route. Based on the plans submitted it is difficult to assess the proposal in respect of individual uses within this space, therefore the uses appear as ancillary uses to the hotel rather than independent uses.
221. The lower ground floor of the building, within the western end, will comprise areas for spa and gym facilities. There would also be the provision of three meeting rooms, however, it is not clear if these would be publicly accessible. From reading the plans officers consider that the spa and gym facilities would likely be accessed from the western end lift core of the building, an area only accessible by hotel guests as set out within the public access plan. No details have been submitted on the type of offering the spa and gym would be, if it would be independently run by a gym operator or if it would be part of the boutique hotel offer. Without further information it is difficult to determine if the gym would be truly publicly accessible or if it would be an ancillary function associated to the hotel use.

222. Two roof terrace bars are proposed, one to the eastern end and one to the western end of the building. The roof terrace within the western end of the building would be served (during museum opening hours) by a publicly accessible lift. The eastern roof terrace would be served by a lift within a restricted part of the building for hotel guests only. It is not detailed on the plans how this public roof bar would be accessed from street level.
223. Whilst officers are not convinced on the independent nature of the Class E uses at basement and ground floor levels, or the publicly accessible nature of each use within the building, it is considered that the lack of information provided on the submitted ground and basement floor plans (G200_P_00_001 Rev F & G200_P_B1_001) that these retail units (Class E) can be run independently. If planning permission were to be granted details would be required by condition to show how these would be suitably serviced and run as independent uses and not ancillary to the hotel.. Further to this, it is considered necessary to incorporate within an accompanying legal agreement the stipulation that each use identified within the application submission should be independently occupied if permission is granted. On this basis, it is considered that the proposal would comply with Policy CS20 of the Local Plan.
224. Policy DM20.4 of the Local Plan requires retail proposals to provide a variety of unit sizes compatible with the character of the area in which they are stipulated. It is considered this primarily relates to principal shopping centres or larger scale developments where individual retail units would site together in a shopping area, rather than individual smaller buildings such as the application site where the uses are more ancillary in nature to the hotel rather than creating a destination retail area or shopping frontage. As such, the proposal would not be contrary to Policy DM20.4.
225. The proposed ground floor retail/commercial uses would have private terraced areas to the south overlooking the Quayside and river Thames. The application documents do not show how these terrace areas would be occupied; however, it is likely they will be used as seating areas or similar. This is considered to bring some activation to this elevation creating two pockets of active frontage. Whilst this is a small benefit, officers consider that given the extent of this elevation fronting onto the Quayside there is a missed opportunity to create a truly active frontage and provide vibrancy to the newly created area of public realm. Instead hotel rooms are provided along both the western and eastern wings and no public access is proposed through any other existing access points on the Quayside elevation into the building.
226. Given that the ground floor uses within the Central Block are sealed within the building from Lower Thames Street it is considered that, beyond the activation generated from the hotel use, there would be negligible activation or vibrancy of this part of the ground floor as a result of the retail/commercial uses. It is also considered that due to the location of the taxi drop off layby this area would become an extension

of the hotel lobby for receiving guests, further deterring the public from using this area.

227. The leisure and spa facilities in the basement would not contribute to the activation of the elevation fronting onto the Quayside as they would be contained within the building with no external apertures or entrances, other than those screened by the large flood wall.
228. The roof top bars are unlikely to contribute to any activation or vibrancy at street level due to their location.
229. Furthermore, it is considered that due to the private closures of the Quayside for private events and the extent of these closures the small amount of activation provided could be diminished by the fencing in of the building and Quayside, creating extremely inward looking environments over the area of public realm, corralling pedestrians along the narrow public walkway along the river edge.
230. Officers have taken into account the existing building and its current relationship with the immediate locality. Whilst the change of use to a hotel would result in a higher level of activation it is considered that this would mainly be due to the use by guests and patrons of the hotel. The provision of ancillary uses would not likely result in the genuine activation of frontages or enhancement at street level when considering the general public use of the spaces or access to the building. It would be likely to be perceived as a hotel for use by hotel guests, this would be further enforced when large areas of the Quayside are closed for private events.
231. Officers also have concerns regarding the proposed tenants for these commercial and retail uses. The proposed hotel scheme is one of a luxury nature, as such, the commercial bars, restaurants and leisure facilities could match this luxury nature. This could have two consequences, one would be the potential exclusion of particular groups for social-economic reasons, for instance accessibility to the gym/spa facilities would be through paying customers, potentially not creating an inclusive space for the local communities which may wish to use these facilities. It may also result in the internal spaces of the hotel having the perception of exclusion, if the uses were of a luxury nature, and by virtue of their location, for instance occupying the river terraces or flanking the public access route, this would likely result in an exclusive and exclusionary environment. This would not align with the Good Growth objectives of the London plan, in particular GG1 and GG5.

Museum use

Policy Context

232. The Site falls within the CAZ and London Plan Policy SD4 outlines that within this area the unique concentration and diversity of cultural, arts and tourism functions should be promoted and enhanced.
233. The London Plan Good Growth objectives GG1 and GG5 are

considered applicable to the provision of community and cultural use (museum) within development proposals.

234. Policy HC5 of the London Plan recognises that the continued growth and evolution of London's diverse cultural facilities and creative industries should be supported.
235. Emerging Strategic Policy S6 of the draft City Plan 2036 outlines that the City of London will support and encourage access to and development of a wide range of creative and cultural spaces and facilities across the City.
236. Emerging Policy CV2 (Provision of Visitor Facilities) of the Draft City Plan 2036 encourages the provision of facilities that meet the need of visitors in new cultural developments.

Assessment

237. The proposals include a ground floor museum situated in the north-west corner covering an area of 422 sq.m. (gia) comprising five individual rooms and an atrium with a lift up to the roof terrace area. The museum would be run by a Heritage Partner albeit would not be independent but owned and managed by the hotel occupier. Under
238. Within the atrium of the west block there is a café area proposed. It is unclear from the plans how this space would be serviced or used as a café at present, if this would be by the heritage partner or by the hotel operator, however, it is considered a museum room as per the submitted plans.
239. The Museum would be accessible to the public free of charge. It would be open to the public between 10.00 and 17.00 hours, for 6 days a week, Tuesday to Sunday. (excluding bank holidays).
240. The proposed floor plans and supporting documents set out that the museum would fall within use class F1(c) (museum). This falls within the broader Use class F (Local Community and Learning).
241. The museum would be accessed from an entrance off Lower Thames Street at the front of the building and from land adjacent to Old Billingsgate Walk, the access road to the west of the development site. There is also an accessible access ramp on land adjacent to Old Billingsgate Walk to a separate side door entrance. The museum would not be accessible from within the building/hotel, nor would it be accessible from the entrance on the Quayside within the western block.
242. The City has recently published The Square Mile: Future City report which sets out key Corporation priorities over the coming years. The aspirations include the delivery of vibrant environments that engage workers, visitors, learners and residents. There is a specific desire within City of London to enable the City's cultural and creative industries and to explore opportunities to enable and animate the City's weekend and night-time offer. The provision of a Museum would provide a cultural and heritage offer to display the history of the listed building as well as build on the City's diversity and attract new audiences which are also aspirations set out in the London Recharged

report.

243. In principle the provision of a museum (use class F1) is acceptable and would be welcomed. The provision of a cultural community use celebrating the important history of this building would be an asset to this part of London, providing local and wider communities free access to heritage and culture.
244. It is welcomed that the museum would be open 6 days a week and over the weekends which would allow a range of visitors. It is regrettable that the museum would not be open on public and bank holidays, or after main school/working hours, which would allow for a greater outreach, and potentially income generation to make it a viable independent venture.
245. Officers are concerned that the hotel operator could use the museum spaces (outside of museum opening times) as function spaces or ancillary to the use of the hotel. At present there is no information available which sets out how the museum is used outside of operational museum hours. It is considered that an appropriate s106 agreement could be entered into to control the use of this part of the building and its independent use as a museum.
246. It is noted that internal unrestricted access points from within the hotel into the museum exist, it is unclear if these would be shut off when the museum is not in operation or how the internal museum spaces would interact with these access points when it is open.
247. Due to the location of the museum in the north west corner of the building, divorced from the river and Quayside, and from other historical areas of the building, it is not considered to be located within the optimal area of the site for a new cultural and community use. Other areas of the site, for instance the central block or the Long Room would be more suited either by being within the public realm principal elevation, drawing people in and activating the Quayside or within the exceptional heritage area of the Long Room giving public access to this incredibly important part of the building. As it is, the museum is tucked around the corner of the building, and kept away from those wider public internal areas.
248. It is unfortunate that the museum would not be accessed from the western block Quayside as this would create a secondary route through Custom House for the public to appreciate the spectacular original internal areas of the west block. Furthermore, the use of the secondary western quayside entrance would provide some animation and activation of this part of the Quayside and promote to passers-by on the river paths that a museum exists in this location, at the moment the museum is tucked away from proposed areas of public realm improvements. Officers also consider that the access to the museum from the Quayside to the entrance on land adjacent to Old Billingsgate walk would likely be restricted if events were located in the western part of the Quayside, meaning that if anyone wanted to access the museum from the Thames Path they would have to walk around the perimeter of

the site to the entrance off Lower Thames Street. It's tucked away location would also likely reduce the number of incidental visits from members of the public using the Thames Path.

249. Research of historic records has shown that a Smuggling Museum previously existed on the site and that historically members of the public had access to this and to other areas of Custom House, including the Long Room.
250. The floor area proposed for the Museum would constitute just 1.86% of the total floor area of the development. An assessment of the overall proposed public access to the interior spaces of the building that the scheme offers is set out in the later section of the report titled 'Inclusive Public Access into Custom House'. However, it is noted at this stage the unrestricted free publicly accessible parts of the building rely heavily on the incorporation of the museum and the associated Heritage Partner.
251. The application documents state that the museum would be curated and run by an appointed Heritage Partner. Details of the appointment of a Heritage Partner are contained within the draft Heads of Terms. The appointment of a heritage partner would ultimately be at the discretion of the hotel operator. There would be some consultation with the City on the potential Heritage Partner, however, the agreement would only require the developer to have regard to any comments provided by the City. Officers are concerned that if a satisfactory and suitably independent (from the hotel operations) Heritage Partner, with the freedom to develop a wider education and inclusive remit, is not provided the overall success of the museum could be compromised and instead of becoming a genuine public asset celebrating Custom House, it would result in an ineffective space and a missed opportunity to bring a range of communities (some of which would unlikely be able to pay to visit the hotel) into the building and appreciate the unique heritage and culture of the site.
252. There is also no indication of funding for the museum space in perpetuity. The museum would be free to visit and therefore not an income generator for the Heritage Partner. It is therefore likely to be an unsustainable endeavour in its current form. The financial viability of the proposed hotel scheme is balanced on a fine line, diminished further by the incorporation of the museum use. If permission were to be granted it is important that robust agreements are put in place to ensure the initial provision and future safeguarding of this use on the site.
253. For all intents and purposes it is considered that the museum would remain a part of the hotel, which may be used by the hotel in an ancillary way, outside of museum opening hours. This could result in the curation of the museum being tailored to the theme and commercial content of the hotel, rather than a functional and educational museum inclusive to all that wish to visit and learn from it. Therefore, officers consider that the appointment of an independent and appropriate Heritage Partner is imperative to the overall success and viability of the

museum space in the long term.

254. Furthermore, the draft Heads of Terms states that if a Heritage Partner is not appointed within one month of the opening of the hotel the provision of a museum would fall away and a different use be implemented, albeit requiring an alternative use application for this space. This is concerning as the appointment of the Heritage Partner is ultimately at the discretion of the developer. Without proper LPA oversight, the Heritage Partner could be a separate company seeking to operate in the interests of the hotel, rather than a genuine independent creative use. For this reason, it is unclear if the museum is a genuine benefit of the scheme given that it is both, at the ultimate control of the developer, and could be withdrawn from the final delivery of the scheme.
255. Whilst the provision of a Museum is welcomed and accords with the policies of the Development Plan, officers consider that it falls short of providing a significant public benefit. It is considered that the current proposal and associated draft heads of terms do not give certainty that the museum space would be a genuine and sustainable public offering independent of the function of the hotel. The location in the north west corner of the building, divorced from the river and Quayside, and from other historical areas of the building along with the potential for the curation and management to be at the ultimate discretion of the hotel would likely result in an extension of the hotel functionality, rather than a genuine public asset.
256. So, whilst the use of this part of the hotel for a publicly accessible museum is, in land use terms, acceptable, officers can only attribute some public benefit to its provision.
257. If an appeal were to be allowed, details of the operation of the Museum (including open hours, access, heritage partner, funding, interaction with hotel use and other matters) would need to be resolved and secured via Section 106 obligations and relevant planning conditions.

Conclusion on Land Use Principles:

258. In conclusion the proposed development would not accord with Local Plan Policies CS11 and DM11.3, or Policies CV3 of the Draft City Plan and the change of use to the proposed hotel is not considered acceptable.

River Thames and Pool of London

259. Core strategic policy CS9 of the Local Plan (Thames and the Riverside) seeks to ensure that economic growth is sustained and further the aims of the Riverside Walk Enhancement strategy, particularly through:
- protecting public access and river views
 - improving access to the river and riverside walk

- improving vibrancy of the riverside by encouraging a mix of appropriate commercial uses, whilst protecting amenity
 - improving opportunities for biodiversity
260. Strategic Policy S17 (Thames Policy Area) of the draft City Plan builds upon adopted Local Plan Policy CS9, seeking to capitalise on the City's unique riverside location, including for recreation. Seeking to protect (and enhance) public access and river views. It seeks to improve vibrancy by encouraging a mix of appropriate commercial uses, expanding this to recognise the benefit of providing cultural uses.
261. The application site falls within the Pool of London, an area identified within the emerging City Plan as a key area of change. This is set out within draft Policy S19 (Pool of London) which seeks renewal and regeneration of the area through the refurbishment and redevelopment of existing building and the delivery of significant public realm improvements.
262. Emerging Policy S19 seeks to:
- enable office-led mixed commercial use redevelopment including the provision of retail, cultural and leisure uses.
 - Require increased vibrancy and active frontages at ground floor level through the provision of retail and publicly accessible, leisure and cultural uses on the river frontage.
 - Encourage the provision of cultural events, arts and play in public spaces along the riverside, and ensuring their delivery through Cultural Plans.
 - Preserve and enhancing significant heritage assets and historic significance including protected views, as well as encouraging more diverse communities to appreciate and understand the area through creative interpretation.
263. The CoL Thames Strategy (2015) SPD sets out the Thames strategy Area, which the application site falls within. The London Bridge to Water Lane section of the strategy encompasses the site and sets out that Custom House and its associated river wall, stairs and cranes are important heritage assets in the area. Planning Policy aims for this area include the provision of office led commercial development which could include retail, conference or event space, so long as it is compatible with residential development. It is also states that better use of the riverward spaces adjacent to buildings would be welcomed. Car parking and vehicular access for servicing dominates several of the private spaces on this stretch of the riverside. Greater public access and more inclusive use of these spaces would be expected to complement any redevelopment.
264. The Riverside Walk Enhancement Strategy (2015) SPD seeks to address challenges specific to the riverside walk. It states that where re-development occurs, the unique riverside location offers opportunities for creating new public spaces, together with widened and direct sections of Riverside Walk. Custom House (at part 8.3.2.9)

is identified as an area for significant public realm improvements and widening of the current path.

265. In 2019 the Mayor of London published a River Thames Cultural Vision which seeks to elevate London's international profile and deliver on the Mayor's Good Growth priorities. The Vision aims to drive and enhance significant economic, environmental and social change identifying the River Thames as a growing destination for major cultural organisations, offering a multitude of reasons to visit the City, increasing and widening its cultural tourism offer and central to driving London's evening and night-time cultural life. The Vision offers opportunities to deliver on many of the Mayor's priorities for London by, amongst others:
- Broadening access to culture for all Londoners
 - Promoting cultural infrastructure as important to the success of large-scale developments
 - Increasing Londoner's awareness of the heritage and importance of the River Thames to London
 - Promoting access to nature
 - Encouraging journeys along the Thames
266. The Vision identifies ten key opportunities to deliver its long term objective of increasing engagement with underused areas and to inspire Londoners about the heritage and importance of the River Thames to London, connecting its diverse communities with each other and the River and putting the Thames back at the heart of London's cultural life.
267. It is considered that this site presents a once in a generation opportunity to significantly enhance the riverside within this part of the City and provide a genuinely vibrant and accessible offering that would complement that of the South Bank. A successful scheme would set a precedent and scene for further regeneration in this area by creating a diverse and culturally attractive riverside destination attracting communities, visitors and workers from both inside and outside of the City. An appropriate proposal would invigorate and stimulate this area of the river walkway and provide a suitable alternative route for pedestrians to the Lower Thames Street which has been identified as having poor air quality.
268. The proposal would result in harm to strategic and protected views along and incorporating the River Thames (LVMF Views 10A.1 / 25A.1-3 / 11.B.1-2, and views of the Monument from Tower Bridge in the Protected Views SPD). This is considered in detail within section Strategic Views of this report. Officers consider that river views would not be protected as a result of this development proposal, contrary to Policy CS9 and emerging Policy S17 of the draft City Plan.
269. The scheme seeks to provide an area of new public realm to the front of Custom House, referred to as the Quayside. This would be provided in a portion of the existing car park, with a proportion used to facilitate an extension and entrance ramps to the existing building. The

remaining area would be treated as external level space which would be open as public realm.

270. Unfortunately, the proposals do not provide unfettered public access to this proposed area of public realm, as for a large proportion of the year it would be proposed to host a variety of private or managed events in this space. These private closures of the Quayside are detailed further within the public realm section of this report. Whilst public access would be maintained between Lower Thames Street and the River Path (due only to the designation of public highway footpaths, preventing the landowner from shutting them off) it is considered that due to the potential for significant closures of the Quayside, including Water Lane and land adjacent to Old Billingsgate Walk, public access could be restricted during these times to only the river path way currently provided. Furthermore, the proposal seeks to implement a layby area to the front of the hotel along Lower Thames Street, this would restrict the public footway capacity at this part of the public highway. As such, it is considered that the proposal would not wholly improve the access to the river or riverside walk and given the scant details of closures of the Quayside this could result in many different scenarios of access routes being open or closed, contrary to Policy S9 and emerging Policy S19 of the draft City Plan.
271. The proposal would result in a substantial amount of inactive ground floor frontage, including along the riverfront Quay. Where a degree of active frontage is proposed along the main river terrace, the use, form and management of it would be as an exclusive hotel restaurant/bar terrace.
272. Currently it is considered that there is limited retail or ground floor vibrancy given that the majority of the riverside façade is given over to hotel bedrooms. There would be one central entrance with stairs/access ramps leading to two small terrace areas associated with the hotels food and beverage uses. Officers consider this a real missed opportunity to provide activation and vibrancy to this large building and area fronting onto the river. As such, the proposal would provide some activation, especially if measured in relation to the existing situation, but in strategic and aspirational terms it is considered to fall short of what could be provided in this location. Furthermore, given that the Quayside area of public realm could be shut off for private use of the hotel for large amounts of the year under the proposals, this could essentially fall back to the existing situation where the site is inward looking and hostile to public passers-by. Therefore, not resulting in any net benefit in terms of vibrancy or activation. As such, it is considered the proposal would be contrary to Policy S9 and emerging Policy and S19 of the draft City Plan.
273. It is deemed essential to ensure that the connection between the hotel uses, and the shared management and curation of the publicly accessible uses is in a manner which is socially and economically inclusive, accommodating a wider demographic and audience, to encourage more diverse communities to have use of and access to this

building and area.

274. Whilst some of the spaces within the hotel are open to a wider public these are limited. The museum is only accessible from land adjacent to Old Billingsgate Walk or Lower Thames Street, and not off the Quayside for the public. The museum would also not front onto the riverside. The terrace areas fronting onto the riverside would be accessible but only if a patron of the establishments. There is a limited public viewing area within the western roof terrace, which would be accessible for free during museum opening hours. It is not detailed if the food and beverage establishment would be open during these hours and how numbers would be managed, for instance if there would be priority given to free public access or hotel guest/user. The terrace at the eastern end would be accessible to patrons of the food and beverage establishment or hotel. The spa and leisure use in the basement would be accessible but would not be free, it would only be accessible through private parts of the hotel and would not have a street presence.
275. Details have not been provided in relation to the curation of spaces that would be publicly accessible. It is likely that the hotel would be high-end, therefore it is ambiguous as to how inclusive these spaces, which are to be publicly accessible, will be. Further details relating to public access and inclusive public access are contained within later sections of this report. Based on the information provided officers are concerned that the scheme would not provide a genuinely publicly accessible and inclusive scheme, contrary to Policy CS9 and emerging Policy S19 of the draft City Plan.
276. The cultural plan submitted seeks to provide public cultural events and offerings in associated with the development scheme. These include the provision of a museum, tours of the Long Room and Robing Room, some public events on the Quayside such as food stalls or a Christmas market, two plinths either side of the raised terraces for display of art installations and information boards around the hotel relating to the historic significance of the building. The history and tradition of Custom House, which is of local, national and international importance and the significant value of the potential public open space on the Quayside gives an unprecedented opportunity to deliver a vibrant, varied and inclusive Cultural offer for workers, residents and visitors to the City. Officers consider that there is a missed opportunity to provide genuine vibrancy, variety or inclusive cultural events along this part of the riverside. It is also considered that the delivery of the cultural plan is not fit for purpose currently as the draft heads of Terms do not robustly secure the delivery of the strategy. If permission were to be granted this would need to be addressed to ensure the City could secure delivery of the plan for the lifetime of the development.
277. The proposal would not conserve or enhance a significant Grade I listed heritage asset, as set out within section Heritage of this report in detail. The proposal is not considered to be a credible cultural/heritage use that would engage with a diverse audience to assist in the

appreciation and understanding of the area through creative interpretation, contrary to Policy S9 and emerging Policies S17 and S19 of the draft City Plan.

278. In conclusion, officers consider that the proposal would not accord with Policy S9 and emerging Policies S17 and S19 of the draft City Plan.

HERITAGE:

The London Custom House (grade I):

279. The proposals would have a direct impact the result of demolition, alteration and extension of the designated heritage asset and non-direct via change in its setting. Direct impacts are subject to a separate application for listed building consent also for determination (ref: 20/00933/LBC).

It is concluded that the proposal would cause significant harm to the London Custom House, the result of external and internal alteration, diminishing its strategic heritage significance to the City, London and the Nation.

Statement of 'Outstanding' Significance:

Heritage Significance.

280. It is considered that the London Custom House is of outstanding architectural, artistic, historical and archaeological heritage significance.

281. In summary, that heritage significance derives from:

1.) A historic site at the heart of the Upper Pool of London on and around which there has been a Custom House since at least the Middle Ages. It was perhaps the first site of a Custom House in Britain, and the current building is of seminal London, National and even international significance, at the heart of the Port of London, once the busiest in the world, and at the center of a global trading commercial empire. It a remarkably intact survivor of Georgian London and the CoL, it was also the largest British and the 'mother ship' of Commonwealth Custom Houses, giving form and function to the lineage of this distinct building type.

- Values: Architectural and Historical
- Impact of proposal: moderate adverse

2.) A seminal work of renowned British architect, Sir Robert Smirke, and to a lesser extent the seminal work of the lesser known but influential David Laing, both of the Sir John Soane school of architecture influential in establishing the adoption of Neo-

Classism as a national style at an important time in the Nation's history.

- Values: Architectural, Artistic and Historical
 - Impact of proposal: moderate adverse
- 3.) A prominent survival of the 'Greek Revival' movement in British architecture, and of Neo-Classism in general, in late Georgian Britain. Early structural innovation comprising an early example of the extensive use of concrete foundations and cast/wrought iron fire-proofed structure.
- Values: Architectural and Historical
 - Impact of proposal: moderate adverse
- 4.) In their architecture and form, the Long Room, Robing Room and Queen's Warehouse are unique survivals from Georgian London, representative of the heart of the commercial Empire.
- Values: Architectural, Artistic, Historical and Archeological
 - Impact of proposal: moderate adverse
- 5.) The unique, rare, and remarkably intact surviving purpose-built office ensemble, perhaps the longest in continuing office use in the CoL, is considered the earliest purpose-built office suite to survive in the CoL, and one of the earliest in London and the Nation, and is the ancestor of the modern City office, with an important place in the development of the office as a distinct building type which came to define the strategic character and identity of the CoL.
- Values: Architectural and Historical
 - Impact of proposal: moderate adverse
- 6.) A building with an interesting socio-economic history, with connections back to the Transatlantic Slave Trade, the growth in world trade and the origins of a 'Global Britain' and London as a diverse 'World City', in addition to public access to the River and people's relationship with the River Thames.
- Values: Historical
 - Impact of proposal: moderate adverse

Contribution of Setting to Significance, including Summary of Impact:

282. The substantial contribution of setting to the outstanding significance of the London Custom House derives from the essential visual and historic geographical and functional relationship between the principal river-facing facades, the associated Quay they enclose and their wider riparian topographical setting at the head and heart of the historic Port of London, the Upper Pool of London, the historic gateway to Central London from the sea.
283. This comprises views from the Thames itself, its bridges, piers, wharfs

and embankments between the iconic London and Tower Bridges and beyond. Elements of setting, which are principally expressed as views but also relate to historical proximity and association, of particular importance are listed below:

- 1.) Views from London Bridge looking downstream, including LVMF View 11 B.1-2 where the Custom House is best seen as an integral part of the North Bank along with the Tower of London and Tower Bridge, designed to control entry to and oversee the Pool of London, and those from the northern end where a historic layering is visible in conjunction with complementary historical monuments: Old Billingsgate, the former Port of London Authority (PLA) HQ tower and the spire of All Hallows by the Tower, of which the latter operated as the resident Church of the Customs.
 - Contribution: substantial contribution to architectural and historical significance and an appreciation of it.
 - Impact of proposal: moderate adverse
- 2.) Views from the South Bank Queen's Walk between London and Tower Bridges, in particular from the western end, and which include views from Tooley Street and Tower Bridge Conservation Areas (LB Southwark), and in particular the view fortuitously on near axis from Hay's Galleria, the sole surviving exemplar Victorian wharf and warehouse complex to survive on the South Bank here, through which much produce entering the Port of London in the 19th Century passed, forming a historical/functional visual relationship with the Custom House at the heart of what was once the world's busiest port. From here the Custom House is also best appreciated in the context of Old Billingsgate and City skyline churches, in particular St Dunstan in the East with which it shares an architectural and historic association.
 - Contribution: substantial contribution to architectural and historical significance and an appreciation of it.
 - Impact of proposal: moderate adverse
- 3.) From the South Bank, the striking juxtaposition between the Custom House and the emerging modern City, including the City Cluster of tall buildings, as part of a striking, rich and layered townscape of contrast between distinct architectural landmarks, allowing an appreciation like no other of the variety of urban interventions over a long historical period and those buildings which have shaped the character of the City as a world leading centre for trade and business, with the Custom House pre-eminent in the foreground.
 - Contribution: moderate contribution to architectural and historical significance and an appreciation of it.

- Impact of proposal: moderate adverse
- 4.) LVMF View 25A1-3 from outside City Hall and Potters Field, with its important pan-London views from its centre of governance, an iconic London prospect and the best place to view the array of strategic London heritage assets on the North Bank which share defining relationships with the River Thames, and the Pool of London including the London Custom House.
- Contribution: substantial contribution to architectural and historical significance and an appreciation of it.
 - Impact of proposal: moderate adverse
- 5.) Views looking upstream from Tower Bridge where the London Custom House shares an axial relationship with the Monument to the Great Fire, and a wider setting relationship with other strategic landmarks, including St Paul's, Old Billingsgate, the former PLA HQ and the Tower of London, culminating in LVMF River Prospect 10A.1 (Tower Bridge, North Bastion). This viewing experience is the best appreciation of the Custom House alongside those wider strategic City landmarks from the original 'gateway' to London from the sea.
- Contribution: substantial contribution to architectural and historical significance and an appreciation of it.
 - Impact of proposal: moderate adverse
- 6.) In views from the operational River itself, which it was designed and built to have a relationship with.
- Contribution: substantial contribution to architectural and historical significance and an appreciation of it.
 - Impact of proposal: moderate adverse
- These remaining elements of setting, namely views, of the Custom House are deemed more secondary to significance but are still significant given its visual and historical spatial relationship with its sensitive surrounding built hinterland. These elements are:
- 7.) Those more modern and immediate oblique views from the North Bank Thames Path, from Old Billingsgate and Sugar Quay jetties, where you receive a fuller sense of the breadth in composition and scale.
- Contribution: significant contribution to architectural and historical significance and an appreciation of it.
 - Impact of proposal: slight adverse

- 8.) Those northern approaches to the Lower Thames Street elevations, in particular from Lower Thames Street itself, Byward Street, Monument Street, Lovatt Lane and St Mary at Hill, much of which comprise part of or are in the setting of the Eastcheap Conservation Area which, alongside Old Billingsgate, shares a strong visual and historical relationship with the Custom House, forming a historic grouping and hinterland to which the asset relates.
- Contribution: significant contribution to architectural and historical significance and an appreciation of it.
 - Impact of proposal: modest to moderate adverse
- 9.) The spatial and picturesque visual relationship between the evocative historic ruins and garden of St Dunstan in the East (and associated railings and garden) and the Custom House, which share an architectural and historical connection of date, association and design, as a rare, unique and attractive historic grouping.
- Contribution: moderate contribution to architectural, artistic and historical significance and an appreciation of it.
 - Impact: modest adverse
- 10.) Historic and modern high-level views allowing public appreciations of the innovative and distinctive roof and the place of the Custom House in the context of London's wider cultural topography, in particular from the Monument and the Sky Garden at 20 Fenchurch Street.
- Contribution: modest contribution to architectural, artistic and historical significance and an appreciation of it.
 - Impact: moderate adverse

Key Elements of Significance and Summary Conclusion:

284. Significance is broken down into 'key elements' for the purpose of assessing impact, as per the approach in the NPG. It is considered the London Custom House can be split into three contributing parts:
- i.) Architecture and Quay;
 - ii.) Principal civic spaces: Queen's Warehouse, Long Room, Robing Room and the associated arrival experience and;
 - iii.) The office ensemble, including basement
285. The interior of the East Block, rebuilt 1962-66, the current servicing access and the modern flood wall are the only elements not of special interest/significance (with the exception of the retained foundations of the East Block). Some additional analysis of significance is interwoven into the forthcoming sections.

286. In relation to, i.) the architecture and quay, it is considered that less than substantial harm would be caused, in the middle of the spectrum.
287. In relation to, ii.) those principal civic spaces, it is considered that less than substantial harm would be caused, approaching the middle of the spectrum.
288. In relation to, iii.) the office ensemble, it is considered that less than substantial harm would be caused, above the middle of the spectrum, working towards but not at the upper end of the spectrum.
289. There are some heritage enhancements which are established, which are set out within the Heritage Benefits section of this report, which do not come near to outweighing that harm.
290. Overall, the proposals fail to preserve the special interest and setting of the London Custom House, contrary to section 16 and 66 of the Act. It would run counter to the NPPF requiring great weight be given to the conservation of the heritage asset, the greatest weight given the importance of the asset as a grade I listed building.
291. It is considered that the proposals would conflict with Local Plan Policies CS 12, DM 12.1, DM 12.3, London Plan Policy HC1 and City Plan 2036 Policies S11 and HE1. Under the NPPF, that harm is considered less than substantial in that language, just above the middle of the spectrum. This is weighed against the wider public benefit to the public at large under paragraph 202 at the end of this report, and it is not considered that the harm would be outweighed by a wider public benefit.

Impact on Heritage Significance, including Setting - The Key Elements:

Key Element 1: Architecture and Quay

Principal Architectural Composition and Roof

292. Laing and later Smirke would have been conscious of a need for an architectural statement. It had to project both might and confidence and the enlightened humanitarianism of the new age, of a seafaring trading Nation coming out of the Napoleonic Wars, at the birth of a new 'Augustan Age' where London competed with Paris to be the most elegant European Capital.
293. Smirke retained the essence of Laing's design, which built on the basic classical premise laid down by Wren. It comprised a symmetrical whole, in elevation and plan, of tripartite hierarchical form divided into a pre-eminent Centre Block and subservient wings, the East and West Blocks. The whole orderly and harmonious composition was anchored on a definitive central axis through the Centre Block, which contained the principal operational and civic spaces, the Queen's Warehouse on a rusticated basement/ground floor supporting the exceptional scale of the Long Room at piano nobile. This was distinguished by a large hexastyle Greek Ionic portico surmounted by what is said to have been the largest public clock in London when built. This delivered the

architectural representation of the special relationship between the operational River and the august business of the Long Room, the central axis clock and weathervane altering captains and clerks to the pressures of the maritime working day.

294. The wings contained the subservient administration of business and are expressed with subtle, almost severe, appropriate subservience, with engaged Ionic porticos and crowning bottle attic blocking course above principal cornice level. The stepping down and diminishment from the central axis is essential to the whole composition.
295. The whole completed classical composition was tied together by formal alignment, diminishing classical proportions and a clear hierarchy of detail and spaces. Whilst there are some non-original, on the whole incidental, beaches of that completed classical composition, and despite bomb damage and post-war rebuild, this essential character survives with a remarkable integrity and authenticity, relative to the City's wider historic roofscape.
296. It is considered that the proposed double-height roof extensions would, if approved, have the ominous reputation of being the first extensions to undermine the completed composition of one of the Capital's or the Nation's premier Neo-Classical edifices. Officers consider that the proposed response to a strict and scholarly classical monument is without known successful precedent in the ancient, renaissance or modern world. Being intrinsically inappropriate, the roof extensions are not discreet or incidental to an appreciation of the principal composition. First and foremost, in unprecedented fashion, the principal height datum of the extensions would read the same as the definitive main ridge of the Centre Block, whilst their lift overruns would cause a not insignificant breach of c.1m (800/900mm). This impact would be exacerbated by necessary visual clutter essential for maintenance and building servicing, while the proposed finished would bleed and blur the strict and essential pre-eminence of the Centre Block.
297. The roof extensions, at a third of the original area of the wings, well over half their breath (c.26m) and comprising a substantial breaching of the definitive original roof ridges, would not be small or incidental features, like the current clutter. The design intent of these ridges was to act as a definitive datum, essential to the subservience of the wings to the Centre Block. The extensions would breach in height the crowning parapet cornice of the Centre block by between 2.6/3.5m. Being of greater proportion than the crowning attic storey's below, the proposals would overwhelm the simple, subservient original shallow pitched roof forms and chimneyscape, jarring with it, whilst stretching those strict classical proportions.
298. The proposed fenestration, a mixture of transparent and dull opaque back-painted butt-jointed modern double-glazed units at regular 750mm centres would not only reduce any appropriate 'lightweightness', but, alongside a non-aligned vertical bay arrangement and irresponsive solid-to-void bay ratio in the fenestration, the proposal

would detract from the strict and scholarly host. Being inappropriately taller than the attic, broader than the main porticos, it would fail to follow the strict axial arrangements and diminishing proportions of the host, the impact exacerbated by their strident modern appearance, in particular after dark, reading as alien and incongruous.

299. The proposed rebuilt East Block perimeter main ridge would appear in wider view to upset that subtle symmetry and main datum of the composition, with a different treatment of the ridge and the varied near edge treatment comprising a mixture of necessary balustrading/man-safe system which would breach and detract from that definitive datum set by the simple parapet cornice of the Centre Block in facing and oblique views. This would be exacerbated by the East Block terrace pushing a not insignificant c4.3m forward of the line of the West Block terrace, a depth which would be apparent to the eye in reinforcing that asymmetry and assertiveness of the proposals over the pre-eminent attic of the Centre Block.
300. The attic blocking course and windows on the East Block would become a screen wall, with hotel bedrooms set back off a terrace, which could result in a subtle change in character of this fenestration as compared to the arrangement on the West Block, in particular in the evening, and especially in relation to those attic windows of the portico. It is unclear whether the truncating of the eastern perimeter screen would manifest in wider riparian view, in particular from the raised level of the Bridges, London and Tower. From here a new setback eaves treatment, including associated gutter detail, could blur the primacy of the simply expressed parapet gutter termination of the East Block composition, including the raised bays of the central portico attic, whilst, of course, further upsetting that overarching composition symmetry of the whole principal river composition.
301. New fenestration on the north and eastern elevations of the East Block, a discordant mix of louver grill and glazed skylight, to the north without even basic vertical alignment with the ordered fenestration of the host, would further diminish that overriding strict symmetry, and could add further distracting high level clutter, in particular if outward opening, and if an upstand is required.
302. Whilst the overall form of the pavilions would match, these would have large non-symmetrically disposed lift overruns, projecting approx. 1m higher than the main eaves of the proposed roof, and which would upset and appear as incongruous high level bulk, of uncertain appearance, diminishing the attempt at a streamline rectilinear appearance in wider view.
303. Once the aforementioned necessary health and safety and other utilitarian necessary infrastructure to facilitate access and maintenance of the roof, alongside a varied cocktail of associated terrace paraphernalia, decking, tables, chairs, planters, lighting and, of course, the distracting dynamic effect people weighing awkwardly on atop of the main ridges, the strict, restrained and severe harmonious and powerful character of the edifice would be significantly undermined.

304. This would be exacerbated at night, when the glazed facades would appear as 'light boxes' atop the completed composition, with a ceiling-based servicing strategy in particular meaning low level lighting is difficult to achieve, whilst a bulkhead detail is likely to further a 'thickening' of the roof structure which (between 230mm/500mm) already feels heavy compared to the sleek and subtle string courses even the principal cornice detail.
305. The refinement of the whole could be undermined further depending on the solution to drainage and how those integral louvers referred to in the submission, but not shown on the drawings, are accommodated, which could draw further attention to a lack of refined contextualism.
306. Overall, in terms of the roof extensions, the proposals would undermine the strict classical symmetry, proportions, hierarchy and harmonious formal order of the principal architectural composition, undermining that clear architectural and historic relationship with the Upper Pool inherent within it.
307. Making way for the over-scaled roof extensions would be a substantial amount of authentic historic fabric comprising a whole section of shallow king post roof, historic skylights and original roof joists connecting the inner leaf walls and those of the courtyard lightwell comprising approx. c.475sq.m, or over a third, of the original historic roof. What remains of the original City atrium, and perhaps its most generous for over 100 years to survive, would be further truncated, cropped and lidded over, its original function to light and ventilate the interior lost (see Key Element 3 section). What remains of the original West Block perimeter roofs would have their eaves trimmed, whilst the northern range would be incurred for proposed ducting. The Robing Room lightwell would be cleared of modern plant, although its least maligned surviving northern elevation lost, its generous proportions undermined by an extension to create an additional bedroom. The authentic historic character of Smirke's northern Centre Block Long Room lightwell would also be radically altered, lidded over in slate and glass. Finally, the Applicant does not show the weathervane atop the central stack which is connected to the repeater in the Long Room, and which anecdotal evidence suggests could be the only survivor of Wren's Custom House. It is hoped this is a drafting error, rather than an intention to skip, which would of course further the harm.
308. This harm would manifest itself across the Custom House's wider riparian setting in the Pool of London and to the north. Those elements of setting which make a significant contribution to significance, which relate to visual and historical association and proximity. For the reasons set out above, namely that the proposals would comprise an alien and incongruous form of development, the proposals would to various degrees harm all those elements of setting which contribute to significance to the degrees stated, ranging from slight to moderate. This comprises a wide range of kinetic viewing experience from the River, its bridges, embankments from public vantage from above, all of which comprising sensitive strategic London-defining views.

309. The insertion of a terrace at first from level would undermine the proportions of the original façade, result in a loss of fabric, and require built-up for a terrace to deal with a significant change in level which would result in an incongruous fascia board forming an awkward relationship with the attic bases of the pre-eminent Ionic columns. Additional lighting and other clutter would cause further distraction.
310. In conclusion on the roof level proposals impact on setting, it is common ground amongst all statutory heritage stakeholders that these are harmful – including Historic England, the Georgian Group, the Society for the Protection of Ancient Buildings, the London and Middlesex Archaeological Society and the Victorian Society, alongside numerous wider public representations to this effect, including from SAVE Britain's Heritage and Peter Guillery, Senior Editor of the Survey of London and principal author of the architectural history of the Custom House for the Royal Commission for Historical Monuments for England. The harm accused ranges from substantial to lower end of less than substantial in NPPF terms. Your Officer's concur that harm would be caused, which is considered significant, moderate overall, given the extent of harm and importance of this key element.

The Quay, including wider Public Realm

311. The removal of the redundant security infrastructure would not require listed building consent or planning permission and would have little to no fabric implications. Of course, it would open up the Quay enhancing views of the and the relationship with the River. However the proposal would result in a significant annexation of the Quay, engulfing approx. 20% of current open space to accommodate a river terrace containing a plantroom for the hotel SPA facilities and other back-of-house, resulting in a significant loss of original openness and volume, pushing built development a further 7m into the heart of the Quay. This would result in the loss of Smirke's fine and unaltered Queen's Warehouse granite ashlar stairs and the worn, characterful historic granite setts in front of it. It is understood that historic surfacing otherwise doesn't survive under the remainder of the asphalt. Despite Officer request, there is no intent to salvage historic surface treatment for reuse, where it is found.
312. The later steel crane above the main entrance, whilst modern, replaced the redundant original iron crane which is relocated to the east – its loss would remove the last vestige of the historic function, as an operational cargo entrance to a warehouse dedicated to the storage of impounded contraband. The terrace would engulf, obscure and make redundant x10 original Queen's Warehouse half basement windows/openings, including x3 historic accesses between the two, reflective of the integral and secure relationship between the Quay and the Queen's Warehouse, resulting in further diminishment of that relationship. The insertion of x4 additional openings (although the proposed plans and elevations disagree on this) between the Queen's Warehouse and the Quay, whilst resulting in the loss of original fabric, would further diminish an understanding of the original plan form and

secure functional relationship between the Quay and the Queen's Warehouse, which was one of dedicated, secure access, one way in, one way out. The use of the main river terrace for hotel tables and chairs, and the associated paraphernalia they bring, would fail to speak of the more utilitarian nature of the original warehouse which would be turned over to a very different sort of consumption with Al Fresco dining.

313. The whole extent of Smirke's well detailed granite plinth to the principal composition would be either be obscured or engulfed by the proposed river terrace, all 60m of it. The remaining 90m of the principal composition across the West and East Blocks would be screened behind a 2.1m high monotonous blockwork wall with metal planter atop. There is concern, subject to detail, at the at present nebulous "museum wall" proposed for this wall which should be architectural, given its affronting presence, but mute, taking an appropriately discreet place as part for the spartan composition as a whole. It is also noted these would not be symmetrically disposed, as would be decorum on such a strict Neo-classical edifice.
314. This would further block out historic openings in the original West Block, which include two direct access to the basement. In total it is indicated that all half basement windows in the south and west elevations of the West Block would be either lost or altered for ventilating the basement SPA rooms, with unclear implications for the lightwell on Lower Thames Street. These also show an uncertain future for Smirke's plinth on the eastern side of the Centre Block and with insertion of ventilation in numerous openings in the East Block. It is assumed the main river terrace would also need to vent, although this is unclear on the proposed drawings.
315. Otherwise the main river terrace would comprise rusticated Portland Stone with bottle balustrading to match that found in the blocking course. It has been difficult to 'square' the need here for inclusive access dimensions, while responding the architectural symmetry, formal alignments and the general want to enter a simple, restrained character commensurate with the host. It is considered it will appear somewhat overwrought, but broadly satisfactory, and it is disappointing that there is then a lack of some formal alignments with the fenestration of the host. The approach to the whole, including the flood defence walls, would retain a situation which would not allow for symmetry, whilst recognising the constraints of the servicing bay and flood plain.
316. The 2.1m high blockwork flood walls would, whilst obscuring the façade behind, form awkward junctions with the proposed terraces on either side, without following the natural axial arrangements and jarring with the detail of attached detail. It would appear it is proposed to raise the original granite balustrade flanking the main portico door in the West Block, albeit this would now have an awkward relationship with the raised floor walls, diminishing its pre-eminence.
317. Officers sought a continuous integral river terrace, where possible, with the reopening of historic accesses to the Quay to enhance that

appreciation of a more porous relationship between the two, but to no avail. The original central axis doors to the wings and routes through the building would be locked shut, on the West Block becoming a fire escape and on the East Block left an awkward redundant feature hanging incongruously over the retained servicing bay. Together these would visually and symbolically sever an essential and intrinsic indivisible historic relationship between Quay and Custom House, upending the sense of historic circulation. In all, the new tall unarticulated walls, servicing bay and terrace would give a building a more 'fortified' appearance which, in particular on the wings, betrays the integral historical relationship and ebb-and-flow between the two.

318. Universal secondary glazing in the oblique, if not face on, would visually manifest, blur and undermine the integrity of the historic windows, while the intrusion of curtains intrinsic to a domesticated use would make them more 'bind', with less apparent direct visual interface with the Quay with which they have an essential historical relationship.
319. The Quay would require sufficient lighting over a large area, including more focused task lighting, for example around thresholds and tables and chairs, which will be subject to condition. At present, the uncontrolled nature of the proposed use of the Quay for events could have lighting and character implications which would need to be made clear.
320. On the land adjacent to Old Billingsgate the proposal would reinstate the original entrance to the Tide Waiters Room, a minor benefit, whilst installing a ramp to provide inclusive access to an F1 Use, a purported museum, causing some obscuration and cluttering of the façade.
321. On Lower Thames Street the proposal would result in the significant loss of faithful Georgian replica railings enclosing the Centre Block with a consequent loss of historic character. The incursion of a large parking bay would impede a general openness around the pre-eminent Centre Block entrance, pinching it whilst exposing it to further traffic, slightly diminishing an appreciation of it. Substantial re-grading to achieve level access, whilst justified, would still further obscure an authentic historic character, accentuating that wider impact.
322. Otherwise the landscaping of the front and restoring of the historic lanterns would be an enhancement.

Conclusion – Key Element 1

323. The proposal would cause significant harm to the major contribution the architecture and quay make to the architectural, aesthetic, artistic and historic significance of the Custom House. It would also result in some lesser enhancement which is discussed under heritage benefits. In NPPF terms, this harm is moderate less than substantial, in the middle the spectrum.

Key Element 2: Queen's Warehouse, Long Room, the Robing Room and their arrival experience

The Queen's Warehouse

324. The Queen's Warehouse, as rebuilt by Smirke, is of exceptional architectural, historic and evidential heritage significance as a unique survival of Georgian London. This is intrinsic to the plan form and historic fabric representative of the original and later development of the Queen's Warehouse. The historic Queen's Warehouse (formerly King's Warehouse) comprises the main part of the ground and basement level Central Block.
325. The main effect of the proposal would be the fundamental change from a closed and utilitarian operational warehouse for the secure storage of contraband, to a somewhat more luxury 'high culture' hotel lobby and ancillary front of house. This would utterly alter its quintessential character, diminishing an understanding and appreciation of its integral and authentic character. Once compartmentalised and ordered warehousing for the storage of contraband, it would have separated goods such as tea and alcohol stacked high, whilst leaving room for circulation. To a degree this can still be appreciated in the substantive legacy of lightweight glazed timber partitioning, appearing to date from the later 19th and perhaps early 20th Centuries. This includes screens, doors and an iron spiral stair. This historic fabric and plan form legacy, representative of the evolving nature of the Queen's Warehouse, would be wholesale swept away and lost. The result would be an openness which, whilst allowing further view of Smirke innovative raft ceiling, would lose that intimacy and intricacy the original space must have provided.
326. Radical reorientation and opening would further diminish an appreciation of its fundamental purpose and intended plan form. X6 of Smirke's original windows and cills would be lost to transom level fronting the Quay, make quite a porous boundary between it and the original secure warehouse, whilst diminishing somewhat the primacy of the central access, the sole defensible entrance to the secure facility. That original plan form would be further diluted with the insertion of x3 large doors to the main lobby, re-orientating it away from the Quay towards Lower Thames Street with a new principal entrance. This would upend and upset the original circulation and arrival experience to the Long Room also, detracting from an understanding that it was from the wings that the main access to the Quay was concentrated.
327. The retained historic shell a mere 'stage set' to a fundamentally different form of consumption, whose character might better be suited to a different format of a similar retail use. It is thought the floor is mass concrete with timber board on top, and it is thought that the Applicant seek to raise the floor and set down a new probably luxury finish befitting the arrival experience at a luxury hotel, but nevertheless one which could betray that unassuming utilitarian character of an authentic warehouse. Once this is accompanied by a wider pamphlet of hotel reception furnishings and finishes, a number of which are visible on the Applicant's CGIs – French polished joinery and or tropical wood finishes, signature designer seating and lush upholstery, planters and glittering chandeliers, amongst other design-led abundance, the essence of the place drains away.

328. Contributing to an accentuation of the harm would be the following:
- The loss of the steel crane mechanism, whilst modern in fabric, would further diminish an appreciation of that original function and the primacy of the principal central axis entrance.
 - A key original feature of the space are the tall simple tongue-and-groove perimeter wainscoting which provided a simple, functional finish. A limited amount would be lost to form new openings, whilst the whole northern elevation would be screened with a new partition and the historic treatment lost in lined out risers, including for much of the southern elevation to a similar but lesser extent. A potentially stark backdrop to new lush upholstery of the bar 'snugs'.
 - It is inevitable that ceiling mounted large luminaires will require significant amount of trunking between the walls and the location on the beams, detracting from the original fabric.
 - Services drawing G-SK-027(Rev 02) would appear to somewhat differ from JC20_P_00_011 (Rev G) with regard to floor penetrations, some of which could harbour implications for the original primary structural beams, with uncertain consequences.
 - New sprinklers and smoke detection would also be required to the ceiling, although it is not made clear how many would be required. Whilst these are small, given the unusual contours of the roof it is unclear whether these would need to drop and run pipework along the beams, further undermining these and potentially resulting in a significant amount of visual clutter
 - The proposal for riser would incur the Smirke's innovative ceiling at a sensitive junction with the wall. Questions, raised in discussion with the District Surveyor, related to if these were 150x150mm or more than further structural intervention is a strong potential. The applicant didn't respond to this.
 - Some high-level ducting would be replaced with new and neutral overall consequence.
329. As for the basement Queen's Warehouse, the substantive area would be given over to M&E plant and hotel meeting rooms, including kitchens. The proposal would sweep away the gym etc which is of no interest. Of course, replacing the end of life plant could provide some opportunities for better finishes, although much remains unclear at this stage. X5 south-facing Quay windows/doors would be made redundant and blind by the annexation of the private hotel terrace outside, expunging natural light, whilst severing that historic connection with the Quay by blocking out x3 accesses. The use of the basement has evolved over time as the nature of Custom's evolved and the space is home to strong room brick partitions and secure steel flush panelled doors and other ironmongery reflecting that evolution which would again be swept away, with some loss of inherent character. It is a shame that on re-design some of the stout Greek Doric columns would be incurred and scribed around.

330. Otherwise, there is the potential need for dropped ceilings in the meeting rooms and kitchen areas, where high level services would then penetrate the ceiling/walls to serve the ground floor Queen's Warehouse, and final details would be reserved for condition. The servicing trench would avoid sensitive below ground fabric, in particular the foundations, whilst a limited amount of fabric would be lost to new penetrations in the north, east and west walls.
331. Overall, the *modus operandi* and *genius loci* of the Queen's Warehouse would be moderately diminished by change in part an intrinsic consequence of the use, aided and abetted by some loss, obscuration and cluttering of fabric.

The Main Lobby, Stairs and Long Room Lobby

332. The principal public entrance, at least since Smirke's supposed reorientation of the general circulation laid down by Laing and those before him, was from the central axis of the Centre Block, but from Lower Thames (then Thames) Street. The main lobby imparts a grandeur via its spatial volume, whilst the spartan detail imparts a sense of solemn business, general pragmatism and convenience for what was a busy front-of-house, open to the elements, as Laing said: in this building, designed to accommodate the public, a great number of persons may be expected to assemble at the same time, and with the same intent.
333. Some of the wear and tear is plainly visible on the robust stone cantilevered stairs and their worn treads and pot-marked half landings which bear evidence to intensive use, while an sense of Smirke's economy given by the re-use of Laing's Great Stairs iron balusters. It provided the main orientation space for those attending the Long Room, or Clerks accessing the wings, with access to some of the other important departments. This is treated with solid segmental piers screening the open string stairs with deep coffered soffits and groin-vaulted ceilings off the halls with exceptionally large glazed screens assisting in the generous capturing of natural light. It is of outstanding architectural, historic and evidential significance and has a strong integrity and authenticity.
334. Much detail remains to be seen here which would affect its character and significance. The war memorials, it has been deemed appropriate, will leave with HMRC, and the relocation of relevant fixtures is subject to a separate consent with the support of the War Memorials Trust.
335. The main impact would be the fundamental reorientation of the space off the central axis and the dilution of the original plan form and circulation. The insertion of a new prominent entrance to the Queen's Warehouse would distort an understanding of the original functioning and sequence of spaces, including the arrival experience at the Long Room. Much impact on character and significance will be in the detail, for example whether the original stone floor would be revealed and the final disposition of features and treatment of walls surfaces to serve a

hotel and corporate hire orientation space, alongside a potential incidental, and at present nebulous, proposal for a 'Public Display Areas'. As with so much of the Custom House, the more sleek, opulent and soft that final fitout of a luxury hotel, the more it would alter the character of the place.

336. Otherwise in terms of alteration and harm:

- The loss of x2 bays of significant groin vaulted ceiling, arch and associated impressive glazed screen and doors, some historic partitions and the incursion of some risers in those significantly altered chambers beneath the western stair.
- The general dilution of overarching symmetry in plan.
- The minor incursion of risers in the main part of the hall.
- The alteration and loss of historic joinery and significant alteration of proportions and plan form of the chambers under the eastern stair.

337. Final detail for the treatment of the stairs would be reserved for condition.

338. Beyond the stairs would be the reinstatement of the original Long Room lobby, an ante-chamber preceding arrival at the Long Room, a notable enhancement. It provided a generous volume atop the arrival from the main stair as part of a grand sequential arrival experience culminating in the Long Room seeking to impress the power of the State and the importance of the business to the observer, foreign or domestic. A plain, spartan volume of sober business, it was also known as the 'brokers lobby' on account of the gathering merchant crowd haggling to broker a deal with captains and traders, either prior or post duty payment in the Long Room.

339. The benefit is tempered by the retention of later doors in the same coupled segmental arched screens which also mark the stair access from the main hall, while x2 small risers will incur the integrity of the cornice. It is unclear as to the roof makeup here, which could be of fire-proofed solid floor construction, and the riser transfer which is required here could require unsightly bulkheads/trunking and additional penetrations, otherwise upsetting the primal simplicity of the original volume.

340. In the modern WCs in the western chamber, a historic door would be lost, alongside x2 new wall penetration and associated loss of historic stone/slate floor to accommodate the lifts.

The Long Room

341. The Long Room is also a unique and exceptional survival of Georgian London, said to be the largest single un-columned room in Europe when built, it has few parallels even now in London. At 58m by 19m by 16m, the striking volume comprises much of the Centre Block, with a stately battery of river-facing windows and a coffered elliptical roof containing iron laylights admitting more light and screening Smirke's immense long span roof. Symmetrical in plan and elevation, it is the

culmination of the classical composition on the central axis. It's perimeter has tall original joinery which once served the Clerk, with a large open space in the middle. It was for some time a place of fascination for Londoner's and visitors to the Capital alike.

342. It is of outstanding architectural and historic significance. It is common ground that the Long Room is in a good condition, having been comprehensively restored in 1991/92, including a scholarly re-decoration of the Smirke-era paint scheme.
343. The main loss would be that of x3 bays in the southern elevation to provide access to a terrace, x2 bays on the northern elevation and a smaller insertion at the eastern end of the east-west axis. This would result in the loss of wall and associated joinery cupboards which once served the Long Room Clerks along the perimeter of the room and, on the south side, the truncation of x3 stately sash windows. Whilst it is proposed to re-hang the central axis door, a slight benefit, the intended management and arrival experience is unclear.
344. There is a question mark over the proposed use of the Long Room, an ancillary function space to the hotel which, despite Officer request, has remained somewhat opaque. Whilst the rationale behind the terrace doors is clear, Officers are unsure as to the justification of the new northern doors. Whatever the intention, whilst preserving an overarching symmetry, these would truncate the original arrival experience and the primacy of the central axis as integral to the architectural composition as a whole in plan and elevation. This central axis would have funnelled all users via the lobby and central doors allowing the full effect of a balanced, ordered symmetrical composition to be read. The two new doors would appear an awkward retrofit, sitting either side of the protecting aedicules which reflect Smirke's main portico dimensions and complete an overall design intent. Symbolically anchored on this central axis is the external and internal clock and weathervane repeater linked to the roof stack, the fundamental mercantile tools of the trade and which would have informed Clerks in the Long Room of shipping movements and remind them of their statutory timeframes.
345. The fine-beaded flush-faced panelled joinery is consistent with the subtle and neat character of the edifice, surviving with a good degree of integrity and authenticity. The whole surviving interior of these would be lost to service risers, it would appear, and the whole becoming a veneer. Without exception, all would have their beautiful neat joinery despoiled by the punching of supply air louver into the central panel of the bottom range, of uncertain opacity and design, but which will be difficult to detail, whilst resulting in the significant loss of fabric. Return air would also require significant punching through the tops of these much-altered units. An uncertain incursion will be made in x4 of Smirke's original and novel curved lay lights at either end of the ceiling, it is said removing glass and inserting a grill detail for vitiated return air to be drawn into the roof void, where ductwork would run through a void in Smirke's roof, avoiding sensitive junctions and with just minor

incursions in the wall plane on the east and west side. The alteration of the laylight would exacerbate existing harm which has been caused by the smaller number louvers which exist, detracting from their historic character. The roofing over of Smirke's northern Centre Block lightwell would, likely, diminish the natural light to the northern laylights, both accentuating the impact of the grills, while unbalancing the lit effect of the composition as a whole.

346. The tripartite clerestory window would be unblocked, albeit would stare straight into a small well, exposed to a view of a plant room, of uncertain benefit, whilst the opposing view on the west side of sky would be replaced by the prospective clutter of a terrace, the overall effect feeling unbalanced, even hemmed in.
347. Electrical output would be more discreet, fed through floor build up via what could be sensitively detailed flush-mounted floor boxes, all of which would likely involve limited interference with historic fabric. The wider detail as to finishes is unclear and to a degree will depend on the intended use which, it is assumed, could require the need for audio equipment or even acoustic baffling, which would need to be carefully considered.
348. Finally, on entering the Long Room is a long attractive oak counter, added in 1924-5 as staff gained space from the public as customs procedures changed with containerisation moving more proceedings further upriver. They are near contemporary with the 1926 'Special Silence Telephone Cabinets', integral to the original perimeter cupboards. From the counter clerks dealt with public inquires and other duties. After temporary storage in 1989, the counter was restored using as much original fabric as possible in 1992. The proposal new eastern door would result in the loss of one of the fascinating inter-war silent telephone cabinets to much loss. It is also proposed to loss the restored counter and some associated panelled partitioning. The result is the loss of fabric of historic interest, and a diminishment in an understanding of the historic function and evolution of the Long Room.
349. It is difficult to say whether the spirit of the historic space, one of bustle and social-mixing in an intoxicating cocktail, would be enhanced, like it should. As at present, albeit now at the beset of the hotel operator, a select few might take tours which visit the Long Room and, whilst annexed from the purported Museum, it might seldom allow a prospective heritage/cultural partner curate it, at the beset of the hotel operator. It is considered that the proposal would unlikely conjure the spirit of the original place, so essential to that story of the City and London as a global 'World City'.
350. Overall, it is considered that some modest to moderate harm would be caused to the Long Room, as a result of the proposed servicing, the loss of fabric, plan form and the diminishment of the essential composition.

The Robing Room

351. The Robing Room is a unique survivor of Georgian London. It is considered to have been part of Smirke's rebuilding and reorientation of the general circulation laid down by Laing and those before him. Smirke reused Laing's Great Staircase top light to bathe the space in natural light. It comprises a generous double-height volume with a perimeter mezzanine and a top lit galleried corridor leading directly to the Long Room. Supported on the same iron raft structure Smirke used for the Queen's Warehouse, it contains elegant water-grained dressing cupboards and a unique boxed-in spiral newel stair, the detail adopting Laing's judiciously neat neo-classical detailing. It is understood that the space was used by the Long Room Clerks to change into uniform prior to attending state business in the Long Room or other ceremony and is representative of the value placed on this public service. It is of exceptional rarity, integrity and authenticity and is of outstanding architectural/aesthetic, historical and evidential heritage value.
352. It is understood it would be used as a function space. New M&E is proposed, including air handling. It is proposed that the eastern cupboard range would become a large riser. It is assumed that this would involve the substantial loss of the cupboard interior, the detail for which is unclear. It is proposed to punch an uncertain amount of louver into the beautiful joinery, a loss of original fabric and a significant smearing of this elegant joinery and room composition. An alternative hasn't been discussed which is less invasive, for example to the soffit of the mezzanine. It is unclear how fire suppression would be accommodated here in a sensitive manner and is unclear where the extract flue would go on its way to the Long Room roof, which could cause further harm in transferring. It is unclear whether rejected air grills would be required in the ceiling.
353. Overall, it is considered that approaching moderate harm would be caused to the significance of Key Element 2, comprising the Queen's Warehouse, Long Room, Robing Room and associated access spaces. There would be some heritage benefit arising also, addressed under heritage benefits.

Key Element 3: The Office Ensemble, including Basement

354. The office ensemble comprises the surviving central courtyard lightwell, the enclosing galleried circulation halls, ante-chambers and associated office chambers and basement in the West and Centre Block. It is a remarkable historic survival. Considered the earliest surviving purpose-built office ensemble in the CoL, it is incredibly rare even on a London-wide and at a National level, with a seminal place in the development of the office as a distinct building type, then in its infancy. It's essential plan form, of statement light and air-giving central courtyard at the functioning heart of the working environment lays claim to being the earliest (surviving) office atrium in the CoL - a feature which came to define the archetypal City office block of the later 20th Century. As the venerable ancestor of the City office it has a special

place in understanding the canon of this building type which came to define the heritage and identity of the City at a strategic level. Accordingly, the exceptional completeness, integrity and authenticity of this rarest of survivals accentuates an outstanding architectural, historic and evidential heritage value, stemming from its plan form, historic fabric and essential spartan but noble character. It is considered the proposals would result in the significance of this element being much reduced.

355. A dramatic and harmful single intervention is to build over the essential, albeit compromised remains of the last surviving courtyard well. Laing gave considered architectural treatment to the elevations, symmetrically composed as integral to the whole, with fenestration of classical diminishing proportion.
356. The proposed lidding over of the western courtyard would extinguish all forms of natural light and ventilation, destroying the modus operandi of the well. Rather than repairing historic damage caused by later incoherent infilling, the proposal is to substantially worsen the current situation, the original generous volume further infilled to around half the original size, its considered elevations cropped in plan and elevation. The simple stone capping parapet would be cropped for a new roof to sit awkwardly atop, subsuming the lintels of the third-floor garret-style windows, leaving them in in a perimeter shadow trough. Of the original windows, some would be lost, a further x6 either fully or partially obscured to make way of new cores and a riser. Those remaining, rather than capturing light, air and views across the bustling interior, being left hermetically sealed shut, their appearance diluted by necessary secondary glazing, left blind by heavy bedroom curtains and (where clearly necessary) glazing would be obscured - the remains would resemble de-contextualised 'heritage wallpaper', a veneer, symbolically represented in a fake back-lit new eastern elevation serving a large riser cupboard.
357. This would be exacerbated further by the apparent retrofit of the so-called 'scenic lift' between the F1 Use and the roof, sitting uncomfortably in the residual remains of the formal courtyard composition. It is assumed, given the proximity to the most sensitive of hotel bedroom windows, would mean it was less scenic, more opaque. Despite best intentions, it is unclear to what extent those characterfully weathered York Stone flags can be salvaged when lifted. The proposed ground floor demolition plan shows all those original stately sash windows as lost, whilst the need for task lighting and evident other M&E to both light and ventilate the space, the end result would be that the integrity, authenticity and significance of the surviving courtyard lightwell would be very much drained away.
358. The expelling of natural light, sun and sky would pass to the interior, in particular the Tide Waiters Room and galleried office circulation. The Tide Waiters Room is of exceptional significance, comprising a grand waiting room comprising four stout Greek Doric columns and a deep coffered ceiling grid. It is where the ancient office of the 'Tide Waiter',

via their own dedicated entrance, would have completed and discussed duties while awaiting reassignment to ships back upriver to Gravesend. With regard for decorum, admittance of natural light is maximised, befitting an important office of State, and from where the changing skies and passage of the sun would have alerted them to the pressures of the nautical day. The proposal would expel all sky and natural light from the space, plunging it into an artificial darkness, significantly undermining that character and historical context. It would appear the room would be stripped of the original windows and door servicing the courtyard, the coherent composition of the whole undermined by engulfing the blind arcading and pilasters on the south wall in a riser, the principal cornice incurred. It would appear that the sprinkler system proposed could form an awkward relationship with the coffered ceiling, subject to detail.

359. The circulation is in character similar to an ambulatory or cloisters, framing the central well and providing access to the various office chambers of the perimeter. Of lofty stately proportions comprising a galleried processional corridor of tall regular pilasters supporting plane groin vaulting, setting a noble setting for busy clerks. They draw character and significance from their spartan detail, depth, proportions and natural light.
360. The passing of the sun and shadow, a view of the sky and an appreciation of the weather would have told the Quay-facing landing inspectors on the ground floor and the clerks above and around of the passing of the working day, telling of operational conditions essential to the effective an effective service in a time prior to ubiquitous access to accurate timings or whether prediction. Doors would have left open or ajar to allow the proper circulation of air in office filled with the smoke of the fire, whilst optimising the admittance of natural light would have been an essential part of efficient working conditions. Doors and views out to the Quay part of that intrinsic relationship with the River and the City beyond. The lidding over of the courtyard would expel all sky view, prevent a reading of the weather and expunge all natural light and ventilation to the heart of a once living breathing organism. The staid and dull artificial LED light which will be needed to compensate a poor substitute for the intangible qualities of natural light. That ebb-and-flow between the Quay and the interior would be diminished further, the main surviving north and south entrances given over to fire exits, while, it is understood, the Tide Waiters entrance would be closed after 5pm. Symbolically the annexing of the interior from the Quay would be represented in the large perimeter curtain wall to the south, separating the two from the riverside, the indivisibility between the two compromised by the more introvert nature of the hotel bedroom.
361. That integral City ecosystem of clerks and merchants, the hub-hub, the coming and going between the City and the Quay, of hundreds of busy clerks, inspectors and merchants going about daily ritual and routine and the bustle and noise this would have generated, would be expelled. What at present feels like a cloister of colligate character would be lost to a secluded quiet domestic retreat for a few, that rather

hard-nose character replaced by a softer, more luxurious one.

362. At ground floor level, the spatial volume and depth of the grandest of galleried halls would be significantly undermined by the insertion of no less than x7 new full height doors, compartmentalising those grand volumes, upending the depth of those impressive vistas, irrespective of final design. To a lesser extent new doors on the floors above could have a lesser impact, but the meaner proportions of the truncated lightwell, its cropping and lidding over and the awkward relationship with the proposed new West Block roof cafe/bar lift, would rob these spaces of their sky views, making them feel less generous, more hemmed-in. Once demand grows for noise/visual attenuation from the residual remains of the lightwell, what remains of the redundant windows could be further obscured. In association with the loss of light and shadow which impart such an authentic historic ambiance across all floors, replaced by the dull uniform modern artificial light of an escape corridor, the intrinsic character of these space would be much diminished, even prior to any physical alteration.
363. In this sense, the hotel-driven fire requirements would result in the cluttering of those exceptionally simple masonry arches and vaults in the halls, requiring a considerable amount sprinklers sited off-axis, at non-regular spacing and at an awkward angle to the contours of the vault. Albeit minor in scale, once seen alongside emergency lighting, smoke detectors/sounders and alarms, sometime a few per vault, in addition to any other infrastructure require for wireless key card access to the rooms, this significant cluttering would diminish their rather severe detailed character. The potential need for ceiling mounted pendant lighting, in addition to wall mounted, all required to replace the lost day and sunlight, would mean trunking in addition to even more visual clutter to site alongside the swish furnishing which must accompany use a use, leaving their authentic character diminished.
364. Evident visual cluttering effect to one side, fabric implications are less clear, but are likely to require considerable alteration across all floor. It is assumed (although unconfirmed) that the groin vaults are a stuccoed brick masonry arch (as per Laing's basement, more later). Laing's Plates confirm, as one might assume, that the joins connect the inner leaf wall and the courtyard wall, which would appear contrary to the applicants assumptions at 3.7 of the Building Services Strategy, which also assumes a significant void beneath the joists which is considered unlikely. It is likely the pipework would require significant amount of localised splicing through the floor timbers to access all the corridors and rooms off it.
365. The most impressive ante-chamber, originally provided for the Landing Surveyors and comprising a vaulted ceiling with robust Greek Doric iron columns, would succumb to subdivision separating hotel guest from the public, requiring partitions be awkwardly scribed around those columns, depressing the spatial volume, integrity and robustness of the ensemble. An interesting later 19th Century boxed-in direct stair between basement store and ground would be lost.

366. The most major impact is found in the detail, which is accentuated in importance as the inherence is rare, of exceptional evidential value, and the general demeanor is spartan and restrained, so that even small modern detail would feel conspicuous. In this sense the applicant acknowledges that as a minimum of 12 historic doors, associated architraves and fanlights would require alteration or loss to achieve the more onerous hotel fire regulations. If historic doors are retained or replicated with retained historic ironmongery, this would be retrofitted with key card access, numbering and it is assumed a 'peep hole'. Approximately x9 doors would be locked shut, to further reduce the bustle of the original office halls.
367. The inherent hotel need for noise abatement, privacy and the prevention of light spill to all hotel bedrooms would necessitate the wholesale alteration, obscuration and de-contextualisation of an extensive surviving legacy of often impressive glazed joinery, including often grand fanlights, margin lights, glazed screens and floor mounted lights. These sought to capture and optimise borrowed light into the depth of the interior and are an essential part of the original office function and character. Stripped of the potential to capture borrowed light, these would also require secondary/fire retardant glazing which, even if well detailed, would alter simple (and easily overwhelmed) authentic historic fabric and detail, whilst the need to either obscure it or the original glass would strip it of its aesthetic and historical function, leaving them 'blind' de-contextualised redundant pieces of embedded building archaeology. Take for example the huge arched glazed screen lighting the western corridor at second floor level, of exceptional size for its time, which would be boarded up and made redundant. The final result would be that all natural light would be expunged, the outside world expelled from the grand circulation halls. The final result of all this cumulative change would be this that the circulation halls would be much diminished.
368. Accessed off the galleried circulation halls is the substantive remains of the office ensemble, the unique, intact survival of a hierarchical suite of original Georgian office chambers. Their plainness is not to be confused with a lack of exceptional significance, and indeed their detail is intentionally spartan and severe which, alongside their generous proportions, impart a noble and stately charm. Their reserved, dignified and practical character was the intention of Laing who stated: I have abstained from decorations, except in the Board Room ; judging that much ornament was not suited to the character of an edifice intended to accommodate the commercial concerns of the Nation.... each office demanded proper and suitable accommodations for its own purposes and peculiar duties. Indeed, Laing's office appear to have been well-received at the time, Britton and Pugin in their Illustrations of the Public Buildings of London (1825), stating:
369. In the construction and arrangement of the superstructure, the Architect endeavoured to consult utility and convenience in the classification and combination of the numerous offices and departments belonging to the establishment. In the interior, decorations have been spared, except in

the Board Room, as inconsistent with the character and purpose of such an edifice.

370. Smirke changed Laing's general circulation, potentially reducing the amount of direct connectivity between the interior and the Quay (evident in some of Laing's more embellished detail, which survives), whilst otherwise opening up the galleries and keeping his essential office plan. The essential plan and fabric are good Georgian type, comprising a regular arrangement of larger clerks 'chambers' (the so-called 'Clerk Factories' of the day), often attached and/or interconnected to more intimate and detailed private chambers for a managerial overseeing Officer/Inspector. In the typical Georgian manner proportions and detail diminish throughout in accordance with the stature of the department and clerk. Each room comprising timber floor boards (there is now a raised floor), an extremely severe and subtle flush mounted and beaded timber neo-classical dado panelling with stucco on brickwork, lath and plaster ceiling and, it has been said, lime plaster pugging in between the joists as early fireproofing.
371. Every room was fitted out with a central feature fireplace, of which some simple original Regency examples survive amongst some later Victorian/Edwardian examples alongside a number of what appear original built-in cupboard joinery for the storage of account books and ledgers as for Laing put it *nothing can be more important to the officers of these departments, than immediate access to the heads of the establishment, as occasions arise ; with the means of instant reference to books, and other documents connected with their various official duties.* The office chambers often had good timber panelled doors with generous fanlights, some servicing the private chambers of exceptional grandeur. These assist in capturing that essential prerequisite, natural light, with generous window aspects accompanied by borrowed light from the courtyard well preferring, as Laing called it, the superior principles of convenience and utility. This was the 'Grade A' office of Dickensian London and the growing commercial City. As an ensemble these are considered the earliest surviving purpose-built office suites in the CoL, some of the earliest in London, perhaps even the Nation, and are considered to be the longest in continuous office use in the CoL, at just over two centuries.
372. This unique legacy, remarkable for its completeness, integrity and authenticity, would be near wholesale and substantively altered, in some instances beyond recognition, resulting in these being very much reduced. Of all 77 original or historic surviving office chambers, all would be harmed to a different extent, ranging from modest to substantial in each. The proposed F1 Use would spare a few isolated chambers on the ground floor. Given the nature of the draft HoTs, Officer's question to intent to deliver an alternative to hotel bedrooms here, which would mean the entirety of this legacy would be significantly altered.
373. Generous original volumes, for example at R8-9 (ground), R 6-7 (first), R3-4 (first), R7-R8 (second), R18-20 (second) and much of the third

floor, would be substantially subdivided, their generous proportions ruined by compartmentation. All would be left pinched, even claustrophobic in comparison, for example R 4-5 (ground), R 13 (ground), R2 (first, second), R13 (first, second), R10 (first), R1 (second), R12 (second), R 14(second) and for much of the third floor. In several instances, the connection with the managerial private chamber, an essential part of the plan form, would be severed, for example at R1-2, R10-11, R5-6, R12-13.

374. Their quintessential simple character and sparing detail is susceptible to even small-scale intervention, including M&E and cosmetic fit out, where there would be inherent tension between luxury hotel bedroom and sober place of work, the hotel working against the inherited grain and essential genius loci (spirit of the place). We have discussed the need to wholesale alter, obscure and to make 'blind' the original doors and glazing. The proposal would also require the incurring of those defining windows meant for capturing light, and which are integral to that visual interaction with the outside world, being subjected to wholesale secondary glazing which, no matter how well detailed and scribed, will distract from and obscure the retained sashes and panelling, leaving an awkward, often difficult to maintain cavity, while the windows will rarely be opened only finally to be obscured by the heavy curtains demanded by a hotel, becoming lost to the space.
375. The substantive alteration is driven by the hotel use and the need for the bespoke servicing of each room with the insertion of full height WC ensembles. In addition, each chamber would be incurred by at least one, often two, risers, alongside new service runs requiring some alteration of the original floors. Some localised opening up has been undertaken to ascertain floor void dimensions, which are likely to vary. Additional acoustic and fire pugging, in addition those necessary sanitary and electrical services is potentially place significant pressure of void space. It is unclear, then, the implications for the surviving original lime plaster pugging of Laing, said to survive by the RCHME 1993 report, or implications for surviving lath and plaster ceilings without the need to potentially lift floors.
376. Whilst the (for their time) lofty volumes, generous proportions and uniform light of all the original office chambers would be truncated, the installation of essential hotel bedroom features would result in innumerable awkward incurrence, obscuration and diminishment of essential original features: door architraves, chimney breasts, retained cupboards, panelling and cornicing. This is in evidence in almost every original chamber, including instances for example where a bed and new joinery would form a awkward relationship with an exceptional surviving range of cupboards in (R.8, ground), WC obscuring of grand blind arcading (R.11, first) , the engulfing of original doors in risers (for example, R.7, first, or R 14, second) or the de-contextualisation of chimney breast and fire surrounds in WCs (R.13, second, or R.16, third).
377. In all instances would be the cornicing would be incurred, alongside the

slicing and bracing of joists to accommodate serving runs. Given the residual space remaining in some of these original office chambers, questions remain of how sufficient seating, desks, cupboard spaces and other electronics such as kettles, lighting and audio-visual would be successfully accommodated without either requiring trunking along the skirting (or further splicing of the floor) and/or further fixing and obscuration of the remaining timber panelling, their relationship with the chimney breast or awkward junction with an original door or window architrave.

378. Whilst this substantive physical subdivision, alteration and obscuring of authentic original fabric and plan form will have the most significant effect, it will be that final level of detail, fitout and cosmetic, some of which can be reserved for condition, which will cause the terminal diminishment of historic character, to meet the demands of a luxury hotel. This would include lush, high-end and design-led furnishings, the usual trappings of the aspiring hotel: abstract art, bespoke signature lighting and plants, designer flooring including soft feature carpet(s), bespoke ceramic sanitary tiling and marble tops, just to name a few associated finishes. It is difficult to see, once those strident and opulent furnishing of domestic luxury are added to the mix, fundamentally at odds with that essential sober and restrained character of the inheritance, alongside the extensive alteration, subdivision and incurrence/obscuring of those very simple surviving historic features, that the impact on the essence of these spaces would not be terminal. From a workmanlike place of bustling business to the soft, quiet place of domestic retreat. The original character would be much drained away.
379. Third floor level would be left most mutilated, its contribution to the whole ensemble very much drained away. A utilitarian even rather plain character bellies a deeper contribution to significance, whilst imparting an important historic characteristic in of itself. Those 'garret-style' office chambers were reserved for the lowliest of clerk, without business in the principal spaces, at the top of the stairs (prior to lifts), their humble proportions and detail a remainder of the rigid hierarchy of Georgian society at large, surviving as a foil to accentuate an appreciation of the larger office suits below. They survive in a manner which such lesser historic office spaces seldom, if ever, do. Their remarkable degree of integrity and authenticity would be destroyed by the proposals.
380. The proposal would result in an unprecedented loss of authentic historic fabric here, comprising the wholesale loss of prospective original historic fabric comprising ceiling joists, (very) simple cornicing and lath and plaster finish throughout all the corridors, including those skylights in the corners, making redundant those large floor mounted roundel laylights in the corners. Bereft of all natural light, the consequence of lidding the courtyard well, it would involve the additional effective loss of two original windows (x1 removed, x1 blocked up), those remaining windows otherwise left redundant, isolated historic features in a fundamentally modern hotel corridor with

all the trimmings which come with it, upending their exceptionally simple, reserved character. Their current aspect of sky and sun lost, views out of those remaining windows would be awkwardly cropped by a bulkhead ceiling light in the residual remains of the well which could spill much inauthentic modern light into these corridors. Many of the much simpler original doors and architraves here would be lost, their proportions stretched and rehung with doors reinstated from elsewhere, presumably from the lower floors and of an inappropriate detail here, contrary to the evident vertical hierarchy of the once authentic Georgian suites. These doors would sit below new lintels, another significant intrusion into these original wall planes alongside the significant number of padstones required to transfer the loads of the additional stories, which themselves further diminish an appreciation of the original hierarchy. The cumulative result here would be the near total depression of these corridors and a near total loss of authentic historic character.

381. That part in the Centre Block would be similarly very much diminished. It comprises Smirke's Long Room lightwell and an atmospheric original corridor, the proportions and detail of which impart a strong authentic historic character. It is proposed to lose all original partitioning here, their associated doors, architrave, cornicing and simple spine wall arches. In Smirke's lightwell wall, most original windows would be lost, with the potential exception of one, which would be in effect lost to a bathroom and would be necessary be made redundant and blind, the residual remain of a former life. The function of the lightwell would be lost, again lidded over the corridor extended to comprise a larger space, inappropriate to the hierarchy of the original office suites. It is difficult to see how the designer would 'square' the utilitarian remains of the Long Room northern elevation without lining it out or at least adding cosmetics. The result would be the terminal loss of integral and authentic character here.
382. The terminal impact passes to the original chambers here too. These are larger chambers were where the lowliest clerks were packed into more open chambers. As with the floors below, no original proportions would remain, most subdivide in two and the original spaces fundamentally lost. It is proposed to remove all original and historic ceilings here, including some later (albeit historic) laylights, to reveal the king post roof trusses, imparting a voluminous 'Manhattan loft-style' opulence which, whilst no doubt attractive to a prospective hotel guest, is fundamentally at odds with their authentic humble character, upending the clear vertical hierarchy of the office ensemble. Whilst exposed, the boarding between would requiring insulation and 'architectural' lining, leaving this feeling somewhat de-contextualised. It is unclear how proposed partitioning would sit with the skylight lanterns above, where they exist, along the northern range, without incurring these features. Once the secondary glazing is added alongside the cosmic fitout of, what would become, some of the most desirable rooms, the original simple unassuming historic character of these original chambers, and their contribution to the whole remarkable

surviving ensemble, would be fundamentally undermined.

383. Finally, a whole seemingly unaltered northern elevation of the Robing Room lightwell would be lost, including a window, a significant part of the original generous proportions of the well annexed by an additional hotel bedroom, obscuring part of the western elevation of the Centre Block. Another historic window on the western elevation, said to be retained albeit internalise, made redundant and blind (it is assumed).
384. The basement is also a rare survival of Georgian London, certainly in a CoL context. It comprises an extensive network of exposed brick wall and groin vaulted corridor, laid with York Stone flags, which provide access to a significant number of cellar rooms around the perimeter of similar manner, lit during daylight hours by half basement widows and light wells. A room in the north west corner contains steel strengthening works installed during WWII to accommodate a rare surviving bomb shelter and is the only element retained after the major 1993 restoration.
385. Brick columns support the Tide Waiters Room above and with an access to the sunken courtyard lightwell basement floor with its well-worn York Stone flags. All together, there is a dark, utilitarian and authentic 'Dickensian' character, accentuated by the integrity of the survival. As a whole the survival is of exceptional architectural/aesthetic, historic and evidential value, inherent in its authentic and integral historic fabric and tangle/intangible character. It is considered that the integrity, authenticity and significance of the basement could be significantly undermined, resulting from the loss of plan form, fabric and character, and which is to a large degree dependant on final fitout and finishes. Whilst much remains unclear, the spaces are vulnerable to the sort of ancillary hotel luxury SPA and gym experience which could clash with that simple utilitarian character.
386. Much of the basement would be starved of what little essential light permeates those lightwell and half lights windows which impart a characterful 'gloomth' which so accentuates the authentic character of those lit storage cellars. X2 cellars (x3 openings) in the south east corner of the West Block would have their windows/doors further altered and natural light expelled by the annexing of the Quay in front of them private hotel terrace, expunging their historic functional relationship with the operational Quay. Whilst the detail is unclear, it is apparent from the servicing strategy that most, if not all, other window openings in the basement would need to be altered (or further altered), with fabric and natural lighting implications.
387. All original cellars would be turned over from original storage to a mixture of meeting rooms, SPA and Gym and ancillary services such as changing facilities, WCs, treatment rooms, in addition to other hotel back of house such as plant and laundry. Unlike upstairs, there less scope for accommodating essential services in new joinery (at least, this is not made clear) and so it is assumed that floors might require raising, thus obscuring the stone floors, and/or either significant trunking and running of services across the vaulted ceilings or in a

bulkhead/dropped ceiling (assuming servicing these from the hotel bedrooms above is unacceptable). The substantive hotel servicing strategy would mean that all original cellars would be incurred by at least one, often two, risers penetrating the vaulted ceilings more of the than not awkwardly relative to their contours. All of the usual services upstairs would also need to penetrate the original ceilings.

388. The WCs, changing rooms, and to a potential lesser extent the gym and treatment rooms could change, potentially radically, the authentic character of a number of these spaces. The WCs and changing rooms would substantially subdivide those historic cellars, their original volumes lost, the partitions sitting awkwardly with the original vaulted ceilings and the retention of their stone floors probably incompatible with a regular maintenance and cleaning regime (never mind the desirable aesthetic of such a hotel). As above, the fitout and cosmetics would be the difference as to whether these cellar spaces are moderately or significantly diminished. The need to line out the walls, and install designer, more luxurious finishes in a number of these spaces, would fundamentally alter their inherent Dickensian, rustic, utilitarian charm which is so integral to their preservation.
389. In the corridors it is proposed to run the hotels risers underfloor from the cellars into larger central servicing trenches beneath the corridors. It is stated the proposal is to lift the York Stone floors and relay, although it is assumed that convenient access must be provided for on relaying which would require a degree of intervention. Whilst this could allow for the relocation of some above ground servicing, this would involve a significant amount of fabric loss underground of the highest evidential value, comprising Smirke's foundations. These load-bearing foundations comprising brick corbelling wedged up on slates 12 courses of brickwork in Roman cement mortar on York Stone landing with Smirke's underpinnings comprising an early use of cement. The large trenches would include forming of a reinforced concrete trench cutting back these foundations all the way to Smirke's underpinning. This would comprise the whole of the perimeter corridors in the West and Central Block. The significant number of transfer trenches would require cutting through those corbeled foundations. Lateral support would be provided by a reinforced concrete beams at 4m centres. It is not clear if the lift pit for the West Block roof would require further cutting away.
390. These corridors and intimate and authentic and even more susceptible to even minor intervention and clutter than the corridors above. It is assumed that once hotel-driven fire sprinklers, detractors, sounders, lighting (which will require trucking), exist signs, signage and the usual trappings of an exclusive hotel SPA treatment are added to the integral bare brick of the wall then the character of this corridors could fundamentally change.
391. Perhaps the most significant fabric intervention would be in the courtyard. Doubt has already been cast on the potential salvaging (as a whole, or in part) of the characterful York Stone flags, with some

authentic original steps down to the proposed gym would be lost. A significant section of original impressive vaulted ceiling and historic partitioning would be lost for a new core on the eastern side of the western courtyard, including some residual loss of main eastern elevation of the courtyard.

392. In addition to the loss and alteration of some partitioning and doors, the remains of a historic stair in the south corridor (this is unclear) and the loss of a Victorian timber stair connecting the basement with the ground floor office chambers, the sole surviving historic connection with the upper floors would then be lost.
393. In all, it is considered that the strong character of the basement could be significantly diminished, the result of the loss of fabric, diminishment of natural light, the subdivision of original plan form and the likely servicing strategy and final fitout which could result in the obscuration of much fabric and thus character.
394. Overall, to conclude on Key Element 3, it is considered that the outstanding architectural, aesthetic, historic and evidential heritage significance of the office ensemble, its unique integrity and authenticity, would be significantly harmed. This would be the result of the wholesale subdivision, decontextualization, loss, alteration and obscuration of rare and unique surviving plan form, historic fabric and quintessential character, driven often by the intrinsic needs and manner of the proposed hotel use. It is considered that the harm would be significant, less than substantial in the parlance of the NPPF, working towards, but not at, the upper end of the spectrum.

Heritage Benefits:

395. A heritage benefit is one that enhances, to some degree, tangible heritage significance, not an appreciation of it. This significance could be publicly accessible, or not, with no effect on significance. Degrees of public access allowing a greater appreciation or understanding of that significance is a wider public benefit, rather than a 'heritage benefit'. This distinction was established at the Fulham Town Hall appeal (APP/H5390/W/15/3140593). The weight attributed to a wider public benefit gained from access to heritage is a matter of planning policy seen, as it must, through the lens of the Good Growth objectives and other material considerations, which is assessed in detail in later sections of this report and weight attributed accordingly.
396. Overall, there are some 'heritage benefits' arising, and the weight attributed to them is discussed in more detail afterward, which are:
- i. The proposing of a 'viable' use, albeit marginal with downside risk, for the building, including the potential for repair. This is considered a modest heritage benefit.
 - ii. Wider restorative works which would or could be secured. Overall, this has the potential to be a modest heritage benefit.

Putting to Viable Use and Repair

397. A viable use is important to ensuring a long-term future for the building. It has been demonstrated that the proposed use is 'viable', using a standard industry approach to assessing development viability which considers whether development would be viable to a 'rational investor' looking for market-level returns on investment. The Council's independent viability assessor considers the viability to be marginal with downside risks. The viability assessment relies on pre-Covid data and it is considered the risk posed by fluctuating construction costs and potential future hotel returns are significant. Indeed, it is the view of our consultant's specialist hotels team that the Applicant has overestimated potential revenues on a day one basis. This high-level risk factor is a concern, cognisant of paragraph 15 of the NPG:
398. It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.
399. The Council's viability consultant has identified that the viability for this proposal is marginal with risks on the downside at present. This leads the Council to conclude that there is a risk that the proposal may not be delivered as set out in the proposal, including some of the proposed public benefits. As established, cognisant of paragraph 197 of the NPPF, the proposed harmful, high risk and marginal hotel scheme is not a use consistent with the conservation (ie preservation) of the asset. There is risk that a part or fully implemented scheme could fail, leaving that harm behind them and a deteriorated asset.
400. Since the viability assessments and review were undertaken, the City Corporation has implemented its revised Planning Obligations SPD which requires a higher level of s106 contributions from new development. The impact of these higher s106 contributions has not been factored into the viability assessments but, given the marginal nature of both the 204 bed hotel scheme and the hotel/museum scheme, the additional contributions are likely to have a further downwards impact on overall viability, increasing the risk that both schemes would be unviable.
401. Optimum Viable Use (OVU) can be a heritage benefit if it has been assessed, demonstrated and agreed. OVU is defined as the/a viable use which causes the least harm to significance. The viability exercise undertaken as part of this application to date was an office viability equation to establish whether a 'rational investor' would bring the site forward for an office/office-led use, understand the viability of a hotel scheme. The viability exercise did not consider whether there are other alternative uses or investment models which might constitute the OVU and indeed is not a tool designed for this purpose. No formal marketing of the Custom House has been undertaken to establish whether there is a suitable less invasive alternative use, or a willing investor prepared to pursue an alternative use which would not deliver a market level of return. This could, for example, be office-led or a use

of similar characteristics, for example an educational, cultural and/or civic institution. This would likely require less harm to the listed building. The Council concludes that the OVU has not been established.

402. The maintenance and repair of a listed building, in particular where there is an outstanding national special interest, would be an expectation of a responsible owner and is often the subject of a lease arrangement, as here with the Government freeholder. Statutory powers exist in the instance of lack of repair/maintenance, which the NPPF is clear should not be accounted for if this is result of deliberate neglect. There is no accusation here of deliberate neglect, whilst it is generally agreed that the building is in a good condition, an observation of basic visual assessment attested to in the structural assessment submitted as part of the application.
403. Repair and restoration can be afforded weight as a heritage benefit, depending on the circumstance. The building has been maintained over the last 20 years via a Public Finance Initiative (PFI) between Mapeley STEPS and the Government and is understood to be in a good overall condition. There is nothing in the structural report, based on basic visual survey and limited opening up works, to suggest otherwise. The Applicant lease the building from the public (the Government), and is under obligation to maintain and repair.
404. The Applicant was unwilling to provide a comprehensive condition survey to inform assumptions made in the viability assessment and which could justify and quantify a maintenance and repair bill. Neither was the Applicant willing to provide an associated 'Schedule of Works' based on any Condition Survey which could be secured via 106 legal agreement to be implemented, for example prior to occupation.
405. There is limited information or certainty against which benefit could be attributed weight. In doing so it would of course be material to consider whether such works are indeed routine/cyclical, necessary and desirable, before attaching weight. In this context, there is nothing before us which would allow much weight be attached over-and-above the prospect of a (marginally) viable use which could also secure the future of a building which is not under threat or at any risk of being put on the 'At Risk' register.
406. Giving the benefit of doubt, if a condition survey and associated schedule of works can be agreed, and secured via section 106 legal agreement, and the scheme is considered viable without the element of risk, then based on what we know, moderate weight is attributed to a viable use and repair.

Restorative Works

407. Enhancing the significance of a heritage asset and/or the contribution of its setting is given as an example of a heritage benefit in the PPG, paragraph 020. Weight is attributed where there is a material direct enhancement to that tangible heritage significance, were this can be secured via a permission/consent, irrespective of access to it, and

based on contribution to overall significance.

408. The following are considered the heritage benefits

- Removal of redundant modern railings and security hut enclosing much of the Quay, obscuring less of the main façade, in particular in close up views and allowing a greater sense of the volume of the historic Quay, albeit truncated by the proposals.
- Natural replacement of redundant building services with new and more sensitive alternatives where possible, and subject to detail usually reserved for condition. This is in particular in the basement and Queen's Warehouse.
- Long Room: partial reinstatement of the Long Room lobby volume; rehangng of a door and unblocking a window in Long Room.
- The removal of a modern mezzanine occupying one room on the ground floor of the West Block.
- The potential replacing the existing detracting key clamp balustrade running the perimeter of much of the parapet. Whilst the substitute is unknown, it could be an enhancement.
- Some (unspecified) localised repair and enhancement of the original (and modern) office chambers, including the repair of some windows (to remove later trickle vents), the replacement of secondary glazing (mainly in the modern part) with a more sensitive alternative and some restoration of what would remain of the historic office chambers, for example re-plastering, removal of later wall paper finishes etc, so long as this is secured via a schedule of works.
- Reinstatement of Tide Waiter's entrance door.
- Reinsertion of ceiling skylights, albeit modern, to the second-floor level internal Centre Block corridor ceiling.

409. The weight to be afforded to a heritage benefit is dependent (amongst other things) on the degree to which the tangible overall heritage significance is enhanced. The main benefit of substance here is the removal of the redundant security infrastructure, amongst some more limited ones. Overall, assuming details of said enhancements are forthcoming, and that these can be secured via a consent and/or section 106 legal agreement to ensure implementation, then cumulatively these are attributed moderate weight.

Conclusion on Heritage Benefits:

410. It is not considered that these heritage benefits together would not come near to outweighing the cumulative harm identified, which is substantive. Overall, when attributing them considerable importance and weight, they can be given moderate weight as heritage benefits, to be included as wider public benefits as part of the paragraph 202 exercise and the final planning balance in conclusion.

Conclusion: Impact on the London Custom House

411. The harm extends to various degrees from slight and minor to

significant, internal and external, in all spaces, across all floors. Harm would be intrinsic, often inherent in the proposed hotel use, overall affecting all those 'key elements' of outstanding national special architectural and historic interest established in the preceding Statement of Significance, and all of those elements of setting which contribute to it. It is the consequence of wholesale and comprehensive subdivision, compartmentation, alteration, obscuration and the loss of integral and authentic fabric, plan form and character.

412. It should be noted that Historic England, the Georgian Group, the Society for the Protection of Ancient Buildings, the Ancient Monuments Society, the London and Middlesex Archaeological Society and SAVE Britain's Heritage, who provided an independent verification of its position by the Architectural History Group, have all found harm, ranging from lower end to substantial, to the London Custom House.
413. Of course, assessing the level of harm is a matter of professional judgement for the decision maker.
414. Such a judgement must be based upon a proper understanding of the relevant policy. For harm to be classified as substantial, when applying NPPF policy, one is looking for an impact which would have such a serious impact on significance of the asset that its significance was at least very much reduced (as explained in the Bedford judgment). When seeking to articulate the degree of less than substantial harm it is appropriate to bear in mind that, to be at the top of the scale of less than substantial harm, the harm should be close to being substantial (as that word was interpreted and explained in the Bedford case).
415. More up-to-date Government guidance is contained in the NPG, paragraph 018, which states that when considering works to a listed building and whether they constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural and historic interest. This is a situation whereby much of an asset could remain untouched, but a key element of significance could be very much reduced, still resulting in harm which is by definition serious and substantial.
416. It is worth restating that a claim of any harm at all, including negligible or the often-quoted 'lower end' of an NPPF 'less than substantial harm' 'spectrum', is serious given the outstanding heritage significance of an asset of such importance to the City, London and the Nation. Using the Bedford judgement yardstick, Officers consider the harm to the significance of the listed building to be just above the middle of an NPPF 'spectrum' of less than substantial harm.
417. When considering the paragraph 202 NPPF balancing exercise, such harm is to be afforded considerable importance and weight. Having consideration for the judgment at Wymondham given the grade I listing, this weight should apply with particular force. Further, in accordance with paragraph 199 of the NPPF and the grade I listing, the greatest weight is to be given to the asset's conservation.
418. Following the approach in the NPG, this report has considered those

key elements of overarching significance comprising the i.) architecture and quay ii.) the principal civic spaces and iii.) the office ensemble. Overall, it was found that harm is caused to them all, i.) and ii.) in the middle and approaching the middle of the spectrum and iii.) working towards but not at the upper end of the spectrum.

419. To conclude, the harm to the heritage significance of the London Custom House is just above the middle of the spectrum of less than substantial.

Direct Impact: River Wall, Stairs and Cranes (grade II*)

Heritage Significance

420. The river wall, stairs and cranes were completed in 1819 to designs by John Rennie and the two cranes date to the 1820s and 30s. The structures were constructed between 1817 and 1819 as part of the new Custom House scheme, but with a different design and construction team – John Rennie having designed the works and Jolliffe and Banks built them. The ensemble has survived remarkably well and is virtually intact. It possesses very high architectural significance as a well-executed and now-rare riverside retaining wall structure of the early 19th century in London and for the technological interest of the two iron cranes, which are early, well-preserved and now rare examples of the use of cast iron for free standing wharf cranes. The ensemble possesses very high historical significance for its associations with Sir John Rennie, the great early nineteenth century civil engineer of whose London work this is a rare surviving example.

Contribution of Setting

421. Those elements of setting which contribute to significance, in relative order of contribution:
- The immediate setting of the Custom House in wider riparian views in and around the Upper Pool of the River Thames. This List description stating the: ‘ensemble as a whole constituting an outstanding survival of London’s late-Georgian riverscape’. This makes a substantial contribution to architectural and historic significance.
 - That visual connectivity and openness of the Quay behind the wall, providing an open and spacious immediate setting of the London Custom House, allowing space to flow and allowing an understanding of the historic functional connectivity between the Custom House and the Quay. This makes a significant contribution to architectural and historic significance.
 - The maintaining of an open, unobstructed visual and physical access from Lower Thames (formerly Thames) Street and the River via Water Lane and Old Billingsgate, which are historic access reflecting the original historic functioning of the Custom House. This makes a moderate to significant contribution to historic significance.

Impact

422. The listed stairs and cranes would be retained. There would be alterations to the listed River Wall to make connections between the river and proposed surface water drainage system and to reroute water from the roof to discharge into the river. The new outflow, comprising four bored pipes, would be made through the river wall and be core drilled to reduce the impact on the River Wall. The outflows would be finished flush with the River Wall with black hinged flap valves fitted. They would be at a low level, visible at low tide and the flap valves would minimise the visual impact and cause only slight harm to the historic character and integrity of the river wall.
423. The natural removal of the redundant and obsolete security infrastructure would open up the setting of the front, albeit the openness would be somewhat truncated by the substantial proposed river terrace which would annex a significant part. It would also disrupt the historic levels and understanding of the functioning of the quay walls and cranes in the context of the secure Queen's Warehouse, while the remainder of the principal frontage, with a large monolithic wall built in front of it, would dilute an appreciation of the historical ebb-and-flow it would share with the Quay and the functional relationship to it. The Applicant's unclear proposals for potentially host unfettered events on all the Quay, including land adjacent to Old Billingsgate and much of Water Lane, could/would visually and physically block these otherwise open accesses to the River. This would cause harm to cause harm to that contributing element of setting to significance.
424. Overall, the necessary removal of the security infrastructure would further open up a spatial and visual appreciation of the Quay and wall in those close range and to a lesser extent in those wider views from the Upper Pool of London, a significant enhancement. At the same time, a significant annexing of the original historic spatial volume with a permanent river terrace and the potential for unfettered, unspecified events covering the whole Quay could also significantly impair and dilute that primary visual relationship between Quay and the Custom House, and the integral relationship with the River on its access from the north, which would be opened up by the loss of the railings, whilst also potentially significantly reducing that sense of openness and spaciousness. It is considered that the harm arising from this could be greater than the enhancement resulting from the natural removal of the obsolete security infrastructure.
425. Overall, it is considered that the proposal would result in potential modest harm to the significance of the River Wall, Stairs and Cranes, as a result of a direct impact and to a greater degree via change in the contribution made by setting. This is less than substantial in NPPF terms, at the lower end of the spectrum. This is contrary to Local Plan Policies CS 12, DM 12.1, DM 12.3, London Plan Policy HC 4, Policies S11 and HE 1 in the City Plan 2036 and policies in the NPPF which require great weight be attributed to that harm as a grade II* listed structure.

In-Direct Impact on Designated Heritage Assets via Setting:

426. Setting is defined in the NPPF as the surroundings in which a heritage asset is experienced, and which is non-spatially bound and can change. Elements of setting can either enhance, detract or be neutral to significance, and can affect the ability to appreciate it. The NPG and 'Setting of Heritage Assets' (HE, 2015) is clear that all assets have a setting, that this is often expressed visually and that, whilst important, other environmental factors are material, such as an understanding of the historic relationship between places which can be imbued by, but which isn't dependant on, their inter-visibility. Contextual relationships can exist over distance, and could draw on age/period, functional, aesthetic or associative connections, for example. This framework underpins the assessments in this section.

Old Billingsgate (grade II)

Heritage Significance

427. Former fish market, completed in 1873 to designs of eminent architect Sir Horace Jones, renowned City Architect and Surveyor, and designer of the iconic Tower Bridge. The building was the latest in a series of structures serving Billingsgate Market, of ancient origin in the early medieval period as a landing-place for mixed cargoes, eventually specialising in fish from the early modern period. The present building possesses high historical significance, like Custom House, for its long pedigree on the same site. Additionally, the building possesses high historic significance for its associations with Sir Horace Jones; it came after he had constructed the Central Meat Market at Smithfield (1868) but before his later General Market at Smithfield and Leadenhall Market. More widely, the building has high historical significance for its associations with generations of local, national and international communities involved in the fish trade.
428. The building possesses high architectural significance as a good example of the Franco-Classical style typical of High Victorian public buildings and especially as the kind of architectural style that hallmarked the City's public buildings under Horace Jones' tenure. It exhibits the traits for which Jones was notable – ingenious planning and reconciliation of market functions with a difficult site and dignified architectural dressing of the whole.
429. The building possesses archaeological significance for the remains of earlier waterfront structures known to survive beneath and around the site. The site is scheduled as an ancient monument.
430. Overall, it is of high architectural, historic and to a lesser extent artistic, evidential and communal significance.

Contribution of Setting

431. Significance draws on elements of setting which make a substantial to modest contribution, in the following relative order:

- It's prominent Thames-side location, where it has been strategically sited serving the Capital for hundreds of years, forming a historic relationship with the London Custom House which, along with the Tower of London, have historically been the defining monuments of the Upper Pool. This makes a substantial contribution to significance and an appreciation of it.
- The spatial and visual relationship to a clustering of related historic buildings and grain to the north substantively comprising the Eastcheap Conservation Area, now somewhat truncated by Lower Thames Street. This hinterland was once a bustling hive of cartermen and fish labourers serving the market and once hauled produce up the rising banks to the various warehouses and businesses here to the former fish market on Eastcheap, the congestion from which resulted in the building of Monument Street 1884-7, as a piece of traffic alleviation and an unusually formal architectural townscape piece connecting Billingsgate, the Custom House and the Monument as some of the City's principal monuments. These spatial and visual relationships make a significant contribution to significance, and an appreciation of it.
- High level views of a wider historic roofscape as part and its strategic siting relative to Pool of London as an essential contributor to the setting of the Eastcheap Conservation Area, from high-level public vantage, including from the Viewing Gallery of the Monument, the viewing gallery at the 'Tower Bridge Experience' and the Sky Garden at 20 Fenchurch Street. These make a modest contribution to significance, in particular an appreciation of it.

Impact

432. Old Billingsgate Market and the London Custom House form an important group in that strategic riparian setting from the River, its banks and bridges around the Upper Pool of London.
433. The proposals at roof level are not incidental, but are prominent and incongruous, while attenuating a sense of cluttering and blurring/bleeding with a more modern backdrop, undermining the pre-eminence of these well-preserved historic buildings in a wider modern context. In views from London Bridge, in particular the north side, and the western end of the Queen's walk, the proposal would detract from a direct interface between the two, whilst as a whole the integrity and authenticity of the ensemble is diminished, a situation which would be accentuated after dark.
434. From the north and in a number of views and approaches the little-diluted and authentic architectural and historic relationship between Old Billingsgate and the Custom House would be eroded and diminished by the prominent, incongruous and alien presence of the West Block roof extension and terrace. It is considered that the proposal would erode otherwise pristine sky silhouette of both, including the more flamboyant skyline of Old Billingsgate, comprising pediment crowned by a

representation of the seated Britannia and distinctive sturgeon fish finials, in addition to breaching the recessive and definitive ridgeline and integral chimney-scape of the Custom House. In certain view it would be a distracting modern influence, the presence and bulk of which would 'loom' and unsettle the scale relationship between Custom House and the more diminutive Old Billingsgate.

435. This would diminish the strong integrity and authenticity of the relationships here, imbued by a strong visual association with those historical streets and buildings to the north which relate in historic function.
436. This impact would manifest over a wider spatial area including in views from Lower Thames Street, the raised City Walkway (pedway) on Peninsula and St Magnus House, the raised section of King William Street (over Lower Thames Street), Monument Street and Byward Street.
437. From those high-level views, the integrity and authenticity of the group value between Old Billingsgate and Custom House would also be diluted, despite a preservation of the essential relationship. From the top of the Monument only a part of Old Billingsgate and its roof is visible, albeit forming a strong group value along the Monument Street axis, both sharing that defining relationship with the Upper Pool. The loss, alteration and overwhelming of the remaining historic roofscape of the Custom House would dilute the integrity and authenticity of the surviving relationship between the two.
438. From the main south terrace of the Sky Garden at 20 Fenchurch Street the two comprise prominent foreground features defining the edge of the Upper Pool, the remarkable integrity, legibility and authenticity of their roofscapes make them stand out as foreground historic features as part of a related historic hinterland. From here the substantive loss, alteration and obscuring of historic architectural plan form and fabric, which would be overwhelmed by the prominent and alien double-height roof extensions and terraces, would scar and dilute the integrity and authenticity of the relationship with Old Billingsgate, detracting from that group value. This element of settings modest contribution to significance would be harmed.
439. Overall, the proposals would fail to preserve the special interest and setting of Old Billingsgate, contrary to the statutory test at section 66 of the Act. It would harm those elements of setting that make a strong contribution to the significance of Old Billingsgate, and that harm is considered less than substantial, at the lower end of the spectrum.

Tower Bridge (Grade I):

Significance:

440. Tower Bridge is an iconic image of London and Britain. It was the defining (posthumous) work of renowned, idiosyncratic City Architect, Sir Horace Jones, alongside famous engineer Sir John Wolfe Barry, for client, the City Corporation. Completed 1886-94, it defined the

'gateway' to central London from the sea, to the world's busiest port, separating the Upper from the Lower Pool of London. It is archetypal High Victorian, sheathed in Cornish granite and in a fantastical Gothic style, dictated by Parliament given the proximity of the ToL, but less indigenous and more of Jones' Francophile manner, it disguised a considerable raw engineering feat inside. Jones described it as the towers as 'steel skeletons clothed with stone'. It represents a triumph of Victorian engineering as a low hybrid suspension and bascule bridge with a steel frame.

441. It represents an iconic symbol of the end of the Victorian age, of high romanticism, and the dramatic silhouette is often used as a symbol of national character, with its stoic compositional symmetry matched by whimsy pomp. It is crowned by those scots baronial-style turret pinnacles topped by fleur-de-lys and gilt crocketed cresting which command a skyline townscape presence well known to Londoners and visitors alike as a 'portal' to London and Britain.
442. It is of outstanding national architectural, aesthetic, artistic, historical, evidential and to a lesser extent communal heritage significance, much of which is inherent in its fabric, but also drawn from setting.

Contribution of Setting:

443. Elements of setting make a substantial/significant contribution to that significance and an appreciation of it, in this relative order of contribution:
- Those broad riparian views from the River Thames, its embankments and Bridges, including from London Bridge, Southwark Bridge, the Queen's Walk, the North Bank and Butler's Wharf. From here its commanding, strategic siting, architecture and silhouette stands sentinel, guarding the entrance to central London from the sea and as a City (and London) Landmark. That strategic siting and historic intrinsic connection with the operational River Thames is accentuated when appreciated in a 360 degree panoramic context with those other defining landmarks and features of the historic Pool, including City Hall, the Tower of London, the Monument, St Paul's Cathedral, Old Billingsgate and the London Custom House, of course in addition to those remains of the quays, wharfs and warehouses of the historic Pool in a wider familial shared setting. These collectively make a substantial contribution to significance and an appreciation of it.
 - Those local and wider townscape views/approaches, many of which are coincidental and fortuitous, perhaps the most important from in and around the Liberties of the ToL, from main vista at 'More London' on the South Bank and others which are more fortuitous, even incidental, townscape moments/glimpses where its inspiring architectural form makes an unexpected announcement. This includes broad panoramas such as from Greenwich Park (where it is seen alongside St Paul's), where the strategic role of the Pool of London is announced by its towering and dramatic architectural

form and silhouette. These make a significant contribution to significance and an appreciation of it.

Impact:

444. Those strategic riparian views of Tower Bridge from the immediate riparian setting of the Pool of London would be largely unaffected. The Custom House does not share a strong direct architectural relationship, nor one of age or for that matter direct function. Their sole connection is of two defining historic London landmarks which share an intrinsic historical and functional relationship with the River Thames and the Pool of London as the head and heart of commercial empire and the world's busiest port. In a wider historical setting which is much changed, it so follows, we consider, that a direct diminishment to the integrity and authenticity of one as part of a combined viewing experience would diminish those intrinsic shared values and part of an exceptional setting, albeit clearly to a lower, even much lower degree.
445. The proposal would undermine architectural and historic relationship between Tower Bridge and the Custom House, when seen as part of a rich and exceptional array of monuments to the River Thames, as part of the sensitive riparian setting of the Pool of London. This would result from the undermining of the principal river façade of the Custom House in shared viewing experiences, in particular from Tower Bridge itself, around Portland Wharf and Butler's Wharf (around the junction with Marie Blake's Cause), where the setting relationship between the two is more intimate and unfettered historic. Overall, however, given the scale and intervening distance and the lesser direct architectural and historic relationship between the Custom House and Tower Bridge, that impact would be very low.
446. In terms of those more localised townscape appreciations of Tower Bridge, almost all would be left unaffected. There is a brief localised townscape 'moment', or glimpse, of the crowning sky-silhouette of the French pavilion roof of the north tower, its pinnacles, finials and gilt cresting, evident to the south of the Monument's plinth, forming a fortuitous distant backdrop along the Monument Street axis, carved out by the Victorians prior to Tower Bridge. It is confined to the northern side of Monument Street, for a moment on the western side of King William Street, forming part of an open sky backdrop to the Monument, and its gilt cresting forms part of the Custom House chimneyscape up until west side of the Monument's plinth. The proposed West Block roof extension would upset that relationship, further blocking out the top of Tower Bridge from the King William Street junction and in its entirety from further east, impairing this transitory moment. It is non-prominent and momentary in this instance but would make what remains of the top of Tower Bridge incidental. This would result in the smallest diminishment of that wider townscape setting of Tower Bridge.
447. Overall, the harm to Tower Bridge as a result of setting change would cause slight harm which would be for certain less than substantial, at the very lowest end of the spectrum.

St Dunstan-in-the-East (grade I), Walls, Gates and Railings to Churchyard of St Dunstan-in-the-East (grade II)

Heritage Significance

448. Church with a tower of 1695-1701 by Sir Christopher Wren (with assistance from Nickolas Hawksmoor) and a body (now a shell) of 1817-21 by David Laing, in a sympathetic Gothic style, completed at the time he was finishing on the London Custom House it is opposite.
449. An ancient City church being first established in 1108, and churchyard recorded by 1194. The church possesses immense historical significance as a place of worship and burial of past City communities, including many with links to the waterfront activities embodied in Custom House and Old Billingsgate. It was the place of baptism of David Laing, architect of the Custom House, born a parishioner. It holds great historical significance for its associations with the renowned British architect Sir Christopher Wren and its associations with David Laing are significant and particularly resonant in this instance, given Laing's baptism in the church and the rare/unusual visual relationship that exists between Laing's surviving ruined church walls and his seminal career-defining secular piece, the Custom House, in particular his surviving West Block, on which he was completing construction at the same time. The body of the church was destroyed by bombing in WWII and made into a ruin garden, completed in 1971 it is a much-loved, filmed and photographed space since - an established City 'hidden gem'.
450. It has a soaring needle spire carried on four steep flying buttresses rising out of elegant corner pinnacles, comprising a so-called 'crown spire', a rare example in the south of England, and more dramatic than those 15th Century versions in Newcastle and Edinburgh. Of Laing's church the north, south and lower east walls and the shell of the north east porch survive. Laing was potentially assisted by his pupil, William Tite, who went on to design the Royal Exchange.
451. The building holds very high architectural/aesthetic, artistic, historic and communal significance as an example of Wren's masterful ecclesiastical design and as a unique example of a Gothic 'crown spire' in the south of England; it holds high architectural significance as the only example of Laing's ecclesiastical work, opposite his most influential secular piece. The separately listed grade II walls, gates and railings are various in date, from the seventeenth century wall to the modern railings contribute to this setting. They themselves possess moderate architectural and historic significance for their part in the church ensemble and as well-preserved examples of their kind.

Contribution of Setting

452. The following elements of setting make a significant contribution to significance in the following relative order:

- The strategic siting on rising land from the Thames foreshore in the historic parish of St Dunstan's, it provided a landmark for ships arriving in the Upper Pool of London for hundreds of years and its dramatic (and rare) Wren Gothic crown spire is a landmark in views from around the Upper Pool. This makes a significant contribution to significance and an appreciation of it.
- The immediate lush and arcadian setting of the ruins which conspire with the visceral historic ruins to create a 'otherworldly' sense of transitioning from the bustle of city life to a rewilded urban world. This makes a significant contribution to significance and an appreciation of it.
- The immediate historic setting and the architectural and historic (associative) relationship it shares with the London Custom House, both in strategic views from the Upper Pool, and from Mincing Lane/Eastcheap, St Dunstan's Hill, Idol Lane and the romantic evocative ruin gardens of St Dunstan in the East. Here is a rare example of the two seminal works of one influential architect, who also happened to be both a parishioner by birth, having been baptised here, in immediate proximity and picturesque composition, completed at around the same time. It is also the Church which once served the Custom House and those mercantile communities which built the historic hinterland around here including the Custom House and Old Billingsgate. This makes a moderate to significant contribution to significance and an appreciation of it.

Impact

453. In terms of the impact on sensitive riparian views from the Upper Pool the current detracting later plant room and lift overruns on the West Block roof stand between the observer and the church tower from the Queen's Walk. This would be replaced with the much more substantive and strident incongruous and alien presence of the proposed extension and associated terrace. It is uncertain to what extent the proposed extension could obscure an appreciation of the tower from here, albeit it would be minor. The main impact results from the jarring juxtaposition between the alien roof extension(s) and how these would undermine the strong foreground authentic relationship between the two, detracting from that architectural and historic (associative) value. The main impact here would be from the river itself where, from boats, depending on their size, the proposal would further 'crowd' a fuller appreciation of the tower and spire composition, sited as a prominent and alien foreground intervening feature, potentially shutting out the elegant springing point of the needle spire from Wren's crocketed pinnacles. From here the diminishment in the integrity and authenticity of that relationship would be greater. This would result in some harm to this element of setting and its significant contribution to significance.
454. From that contributing setting to the north, including from within the lush confines of the church gardens, the proposed extensions above the surviving West Block would be visible from as far back as Mincing

Lane and Great Tower Street on approach. Here the bulk and alien presence of the extensions and the clutter of the associated terrace would intervene that strong historic foreground, ruining an authentic moment and picturesque juxtaposition, whilst eroding the skyline presence of the two in composition. There would also be an impact from the south garden terrace and Idol Lane.

455. Overall, the harm would be modest and less than substantial in NPPF language, at the lower end of the spectrum. The result is that the proposal would fail to protect and enhance important views of an identified 'City Church with a Skyline Presence', as identified in the Protected Views SPD.

Church of All Hallows by the Tower (Grade I):

Heritage Significance

456. Considered the oldest church in the CoL, founded in AD 675, predating the Tower of London beside it, with which it has a historical relationship, putting to temporary rest bodies from nearby the execution site at Tower Hill. Only standing London church is fabric of Anglo-Saxon vintage. Surviving the Fire, diarist and parishioner Samuel Pepys reputedly watched it from the tower. It has a brick tower of 1658-9 and was substantially restored by noted post-war ecclesiastical architects Seeley and Paget. It has an elaborate copper-covered steeple with needle spire rising from a circular base with flaming urn finials, crowning a striking and picturesque composition with a skyline presence.
457. It has association with notable historical figures and the interior is a relative treasure trove of historical artifact, including an altarpiece Richard II took on crusade, a front by Grilling Gibbons and tessellated Roman pavement in the crypt, amongst others. Since the loss of St Dunstan's in the East it is understood to have become the associated Church of the Board of Customs for staff at Custom House, used for special services and events.
458. Grade I listed, it is of 'outstanding' special architectural, artistic, historical and archaeological heritage significance. This is most evident in the tangible historic fabric, archaeology, form and plan of the Church, and to a significant but lesser extent drawn from setting.

Contribution of Setting

459. Elements of setting make a significant contribution to significance, principally an appreciation of it. This is drawn from, in descending order:
- Views where there is an evident architectural and historic proxy relationship with the Tower of London, in particular from the immediate environs, including from the Inner Ward, and in particular in that axial vista from Great Tower Street where the sky-etched silhouettes of its tower and the White Tower conjure

a pleasing union imbued by historical connection. This makes a significant contribution to significance and an appreciation of it.

- Wider civic riparian views where its striking steeple is seen as part of strategic pan-London river prospects across the Pool of London and alongside its strategic landmarks, including the Custom House, Old Billingsgate and the Tower of London, as part of the historic skyline setting of the River Thames. This makes a moderate contribution to significance and an appreciation of it.

460. It is identified in the Protected Views SPD as a 'City Church with a Skyline Presence'.

Impact

461. There would be little impact on those identified immediate environ views, none from the Inner Ward or Great Tower Street. The proposed roof extensions, for the reasons set out in later sections of this report, would detract from the integrity of the Custom House as part of a wider townscape backdrop skyline in views from Byward Street, around the junction with Seething Lane. From here the most exceptional accretive, layered composition of the main body and steeple of the Church is best appreciated and is seen as part of a wider panorama which includes the north elevation of the Custom House, another architectural landmark of more modern affiliation, which imbues and gives accentuating historical context somewhat truncated by the presence of the busy road. Given the distance and separation, the undermining of the Custom House would undermine the relationship between the two, but only to a very slight extent.

462. There is also an impact on those significant views from London Bridge (north of centre) of the steeple in its wider townscape setting, considered the best from the River. From just north of the centre of London Bridge the sky-etched silhouette of the finials and spire are seen in pleasing architectural juxtaposition as a historic group alongside the London Custom House and Old Billingsgate, prominent in the middle ground, a group value that best evokes the pre-20th Century London skyline from here, susceptible to even minor modern intervention to that historic fabric. It is considered the proposal would obscure and detract from this relationship.

463. Overall, slight harm, the result of change in the immediate and wider townscape setting, which would dilute the contribution of those views from Byward Street and London Bridge to the significance and setting of All Hallows by the Tower. That harm would be very much less than substantial in NPPF language, and it would fail to protect and enhance important views of an identified 'City Church with a Skyline Presence'.

The Monument (Grade I and Scheduled Ancient Monument)

Heritage Significance

464. The Monument to the Great Fire ('the Monument'), by seminal architect Sir Christopher Wren and Robert Hooke, built 1671-77,

symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted Roman Doric column of Portland Stone crowned by a gilded flaming urn sat atop a large pedestal containing inscriptions and base relief representative of the socio-political context in which it was built. It is of exceptional architectural, aesthetic, artistic, historic, evidential and archaeological significance as a City/London-wide strategic landmark.

Contribution of Setting

465. It was symbolically sited near the site on Pudding Lane where the Fire began and on near axial alignment with the Old London Bridge, the site of the original Roman bridge from which London originated. It once, alongside the re-built City church towers/spires, was pre-eminent in the much artistically represented London skyline as part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge, representing the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.
466. The setting of the Monument makes a substantial contribution to its significance and an appreciation of it, in particular its architectural/aesthetic, artistic and historic significance. In order of relative contribution, these derive from:
- The symbolic siting near the attributed origin of the Fire on Pudding Lane which makes a significant contribution;
 - Those views on near axis with the original alignment of the Old London Bridge, London's original bridge, when viewed from the Queen's Walk and the original southern approach from Fish Street Hill, making a significant contribution to significance, in particular an appreciation of it.
 - Those views from Tower Bridge at ground level (including LVMF View 10A.1) and from the high level bridge viewing platform where the Monument is now best seen along the Monument Street axis in its wider City context alongside other strategic landmark monuments, including St Paul's Cathedral, the Custom House and Old Billingsgate, which together make a significant contribution to significance, in particular an appreciation of it.
 - Those historic approaches to the Monument where it commands a local townscape presence as a landmark, in particular from ancient Bishopsgate/Gracechurch Street, but also from those spirited 19th Century townscape improvements from King William Street and Monument Street, which are considered to also make a significant contribution to significance, in particular an appreciation of it.
 - Those spectacular mid-level views and appreciations from London's oldest public viewing gallery of the historic heart of

London, overlooking the Pool of London and much of its seminal monuments, old and new, making a moderate contribution to significance.

Impact

467. It is considered, but not been entirely demonstrated, that the proposal would result in a slight obscuring and thus diminishment of the shaft of the Monument in important wider riparian pan-London strategic views from Tower Bridge (upstream), in a kinetic experience at ground level between the south and north bastions.
468. Similarly, whilst not demonstrated in the application, it is considered that the plinth/shaft would be slightly obscured in views from the high-level bridge viewing platform comprising part of the 'Tower Bridge Experience' attraction. It has been the CoL's longstanding strategic townscape approach to prevent development between the observer and the Monument which would further obscure, crowd and/or distract from it in those few remaining wider skyline views of the Monument, subject to separate strategic view protection addressed elsewhere in this report.
469. The roof level proposals would comprise incongruous additions undermining the Custom House, which at present shares a relatively intact and authentic group value from the Monument in the middle ground of these views enclosing the River. This would dilute that architectural and historic relationship, drawing attention away from the Monument.
470. From the high-level vantage, it can even be seen, alongside the Custom House, as part of a wider skyline of Wren monuments, seen against sky and backdrop hills. Given the importance of the viewing location to an appreciation of the Monument as an integral part of the cultural topography of London, any obscuration, however slight, would result in a degree of harm, here exacerbated by the incongruous nature of the proposals.
471. The proposal would not affect that other strategic wider city skyline view from the Queen's Walk on the axis of the Old London Bridge. It would have no effect on those more immediate townscape views from Bishopsgate or Gracechurch Street. It would have a visual effect at the interface of King William Street and Monument Street, where the commanding presence of the Monument suddenly reveals itself demanding the attention of the viewer in a striking townscape moment. This is the best moment to appreciate the Monument in its identified 'Immediate Setting' (Protected Views SPD, Figure 8).
472. The proposal would be in incongruous distant backdrop element undermining the authenticity of the relationship with the Custom House, and the proposal would very slightly encroach on the sky silhouette of the Monument, drawing slight further undue attention. Given the spatial extent and confinement of the impact, the level of harm is considered very slight.

473. From the Monument Viewing Gallery the proposal would not impinge on the openness of the viewing experience here, still allowing the viewer views of London's wider topographical landmarks, even if diminishing the Custom House in the view, this would not directly harm the significance of the Monument.
474. Overall, the proposal would fail to preserve the outstanding special interest, heritage significance and setting of the Monument, resulting in slight harm, less than substantial in NPPF terms, at the lowest end of the spectrum.

Eastcheap Conservation Area

Heritage Significance:

475. The Eastcheap Conservation Area is of diverse character, being of an unusual (in the City context) mixture of commercial and residential, acting as a historic 'buffer zone' between the River and the City Cluster, providing a complementary wider historic context to the London Custom House and Old Billingsgate, from which it draws historical association and character.

To summarise, its significance derives from:

- The survival of an irregular medieval street pattern and finer urban grain comprising a rich mixture of courts, alleys and streets contrasting with the principal artery of Eastcheap, and with a pronounced topographical descent towards the banks of the River.
- An area characterised by commercial and warehouse buildings and a rare mixing with residential in the pre 20th Century City tradition, including buildings with strong historical associations with the London Custom House, Old Billingsgate and the River Thames Legal Quays.
- A notable collection of fine historic buildings, including significant post-Fire survivals of varied character, including three Wren Church's with a unique and rare historical and aesthetic relationship with the Custom House as part of the historic skyline setting of the River Thames Upper Pool.

Contribution of Setting:

476. There are elements of setting making a significant to moderate contribution to significance and an appreciation of it. These are visual and historical relationships of kinetic visual spatial proximity in sequential views from, within and through the Conservation Area between Custom House, Old Billingsgate and the River Thames and the historic commercial/warehousing hinterland of the Conservation Area which grew directly from that relationship. In summary, those elements of setting comprise in relative order of contribution:

- The strong sense of history and layering of historical commercial development which in important north-south linear townscape

experiences between the City Cluster and the River, impart of strong coherent and often authentic historic environment, where the development of the City as the centre for world trade can be appreciated in a sequential fashion. It is considered this makes a moderate contribution to significance and an appreciation of it.

- An appreciation of the proximity and visual relationship between the Custom House, Old Billingsgate and the River and the architectural/aesthetic and historical relationships between them. It is considered this makes a significant contribution to significance and an appreciation of it.
- The geographical, historical (associative) and architectural/aesthetic relationship between the ruins of St Dunstan in the East and the Custom House. It is considered this makes a modest contribution to significance and an appreciation of it.
- View's into the Conservation Area, in particular from the banks of the Thames and the Upper Pool, as part of a rich townscape of important foreground buildings comprising Old Billingsgate and the Custom House alongside the Wren spires, and as part of an emerging collection of CoL Conservation Areas which can be appreciated from above, not least from the Monument Viewing Gallery (View 11 in the SPD), but also from the Sky Garden at 20 Fenchurch Street. It is considered this makes a modest contribution, in particular to an appreciation of significance.

Impact:

- The proposals would be visible in connection with the Conservation Area, from within, outside and through it, as part of a kinetic, dynamic unfolding townscape experience, with particular interfaces around Lower Thames Street and the junctions with Botolph Lane, Lovat Lane and St Mary at Hill. There is a strong direct visual relationship between Great Tower Street and St Dunstan's Hill and the public gardens set in the ruins of St Dunstan's in the East.
- In high level views, in particular from the Sky Garden, but also from the Monument Viewing Gallery, a good overview of the Conservation Area can be made, including the layout, grain, landmarks and roofscape, where the integral and authentic roofs of Old Billingsgate and the Custom House stand out as central riverside landmarks from which the Conservation Area extends north, imbuing the aesthetic and historical significance of the Conservation Area and an appreciation of it. The proposals is considered to undermine and overwhelm of the surviving historic roofscape of the Custom House, significantly undermining its integrity, authenticity and legibility from the Monument Viewing

Gallery, and to a greater degree from the Sky Garden at 20 Fenchurch Street. The consequent effect is a modest dilution of the historical character and integrity of the whole and an appreciation of it.

- It is considered that from interface views from Lower Thames Street and Monument Street, the proposal would comprise a conspicuous, discordant and incongruous feature, drawing attention to itself, in particular after dark, diluting the historic authenticity and integrity of the relationship between Old Billingsgate and the Custom House, and thus to a lesser degree to the historical/aesthetic core relationship with the those historic north north-south thoroughfares, and the value which is draw from this authenticity to that experience.
- It is considered that the proposal would undermine that relationship between St Dunstan in the East and the Custom House in views from and through the Conservation Area from the immediate environs.
- The proposals are considered to diminish the relationship between the Custom House and the spire of St Dunstan in the East from those strategic riparian views from the Upper Pool, with a slight knock on effect for an appreciation of those wider Wren spires from here.
- The proposals would undermine the integrity, authenticity and character of the London Custom House and its aesthetic and historical relationships with those landmarks of the Conservation Area which, when considered as a whole, would result in slight harm to its significance as a result of setting change, at the lower end of a less than substantial harm spectrum.

Trinity Square Conservation Area:

Heritage Significance

477. The Trinity Square Conservation Area is a small, tightly drawn conservation area clustering around the former Port of London Authority (PLA) HQ (10 Trinity Square) and Trinity House overlooking the openness of Trinity Gardens and the Liberties of the Tower of London to the south and east (LB Tower Hamlets). The Trinity Square Conservation Area Character Summary and Management Strategy SPD (2014) is a material consideration. On the whole, significance derives from:

- The pre-eminence of the former PLA HQ, Trinity House and the Church of St Olave as important historical landmarks.
- An intact group of mostly early 20th Century buildings with a more formal grid of streets characterised by consistently classical, Portland Stone-faced architecture of an imperial character, with an open aspect south towards the River and Tower of London.

Contribution of Setting

478. Elements of setting make a substantial contribution to heritage significance, in particular the topographical relationship with a wider riparian landscape and other notable historical landmarks clustering near to the Pool of London. In particular this is reflected in views. In order of relative contribution, the following elements of setting are considered to contribute to architectural and historical significance:

- The picturesque immediate setting of the former PLA HQ and Trinity House comprising the 18th Century Trinity Gardens and the mercantile landscape of remembrance including the Merchant Navy Memorials (grade I and II*). This makes a substantial contribution to significance.
- The wider geographical and visual relationship to the River Thames and a wider setting of important maritime landmarks, including the Tower of London, Tower Bridge and the Custom House. It is considered this makes a significant contribution to significance.
- The fortuitous visual alignment of Seething Lane with the tower and steeple of All Hallows by the Tower as part of a wider historic townscape setting. This makes a moderate contribution to significance.

Impact

479. It is obvious to establish that no building or space would be physically altered a result of a the proposal at a distance to the south and west and with which the only intervisibility would be from the south west corner of the CA, at the junction between Byward Street and Seething Lane. From here the proposal, whilst appearing as a detracting feature on the London Custom House, it would exert limited visual influence over the CA, especially when taken as a whole. The Custom House would still be understood as part of a wider riparian townscape which shares a visual and historic functional relationship with it, and this overall would still be appreciated. There would be no direct interface with or backdropping of the Conservation Area. There would be no impact on most views out of, into or through the CA, including those identified out over Trinity Gardens, the Liberties or of All Hallows.

480. Overall and on balance, whilst the proposal would harm the appreciation of the Custom House in views from a limited spatial area of the Conservation Area, when considered as a whole, in particular the lesser architectural and historic relationship between this CA and the Custom House, the significance of the CA would be preserved.

Tower Bridge Conservation Area (London Borough of Southwark):

Heritage Significance

481. This a large and varied Conservation Area substantially comprising former industrial/warehousing areas clustered around Tower Bridge with a strong relationship with the River Thames and an open aspect over the Lower Pool and through the Bridge to the Upper Pool of

London. The zones of relevant visual influence here are from Tower Bridge, the Queen's Walk, Portland Wharf and the Riverwalk at the Butler's Wharf West at the top of Maggie Blake's Cause.

482. It is a longstanding industrial area, and riverside warehouses and wharfs had stretched here in earnest by the 16th Century as the heart of a burgeoning trade port clustered around the Upper Pool Legal Quays and the Custom House. During the 17th Century these wharves extended eastwards and industry flourished inland given proximity to resources and demand in the City of London opposite. These downstream wharfs flourished from the 18th and 19th Centuries once the stranglehold of the Elizabethan Legal Quays was relaxed and their monopoly on imported goods relinquished. The dominant force here was Butler's Wharf Ltd with a massive range of warehouses rebuilt on the 1870s, creating a dense warehouse district. The Tower Bridge Conservation Area Appraisal SPD (2003) is a material consideration. It recognises the importance of Tower Bridge as the iconic arrival at the Pool of London and central London, and views from the River are important, including reference to superb views of Tower Bridge and the City skyline (3.3.7).

Contribution of Setting

483. Elements of setting make a significant contribution to significance and an appreciation of it. It is considered these comprise, in order of relative contribution:
- Those views from the riverside walk at Shad Thames around Butler's Wharf which allow an appreciation of the historic relationship between the Conservation Area and the City of London, with its embankments and skyline, including the Custom House, visible through the screen of Tower Bridge. These make a significant contribution to significance.
 - Kinetic views from Tower Bridge and Queen's Walk allowing fuller 360 degree experience of the historic Pool of London, including the dense wharf and warehouse complexes which clustered round those architectural landmarks including the Tower of London, Old Billingsgate and the London Custom House. These make a significant contribution to significance.

Impact

484. The proposal would be visible from the whole extent of those upstream views from Tower Bridge and from the short section of the Queen's Walk which is in the Conservation Area. Here the Custom House is appreciated as a prominent river frontage in 360 degree views of the Upper Pool, the 'gateway' to London from the sea, and is of strategic significance to the development of the Upper Pool as the head and heart of the world's busiest port. As part of a wider context of related River landmarks which accentuates an appreciation of wider civic context and clustering around the City of London. From Portland Wharf and the western end of Butler's Wharf (around the junction with Maggie Blake's Cause), the Custom House can be seen framed by the

imposing silhouette of Tower Bridge, creating an especially well-contained wider historic setting on the foreshore of the Thames with a strong sense of coherence and historic character.

485. There is of course a strong historical and functional relationship between the London Custom House and the development of the wharfs and warehouses which comprise the bulk of the Conservation Area, which clustered around it at the heart of the Legal Quays and near to the City of London. In those views from and through the Tower Bridge there is a visual and historical relationship centred around the River Thames, to which these are all related. The Custom House was designed to impress upon the River the importance of all this connected commerce and is plain to see. The integrity and authenticity of the principal river composition contains an intrinsic architectural and historical relationship with the river, as an integral part of this wider riparian setting. The diluting of that principle river composition would dilute the contribution to London Custom House makes to that wider historic setting around the River, undermining those important wider setting views from the Queen's Walk, Tower Bridge, Portland Wharf and Butler's Wharf.
486. This is an exceptional situation whereby a building outside the Conservation Area is important to an understanding of its significance as a result of a shared architectural and historic setting of outstanding significance. It is obvious to state that the buildings, structures and the vast majority of views would remain undiluted whilst the essential relationship between the two would remain and, commensurate to the Conservation Area taken as a whole, the impact could only be slight and very much less than substantial in NPPF terms.

Tooley Street Conservation Area (London Borough of Southwark):

Heritage Significance

487. A long narrow Conservation Area incorporating buildings north and south of Tooley Street stretching west-east between London and Tower Bridges, with a large section, Sub-Area 1, around Hay's Wharf, which incorporates the Queen's Walk, its historic warehouses and open riverside. Wharves developed around the City's legal quays and the Custom House on this side of the river from the 16th Century, at head of the navigable river, collectively forming the 'gateway' to London from the sea which stopped at London Bridge. Hay's vast warehouse complex was built 1851-57 primarily storing tea around a wet dock, now infilled as Hay's Galleria.
488. The Conservation Area Appraisal SPD identifies the dominant topographical features to be the River Thames and Tooley Street as a historic route connecting followed some of the earlier fireproofing techniques development at the Custom House, opposite. There are some fine remaining wharfs at Cotton's Wharf and 27 Tooley Street (now the London Bridge Hospital). From the 1900s bonded warehousing turned over to related shipping company headquarters, continuing that maritime theme, such as the Bennett Steamship

Company at 15 Tooley Street or St Olaf House (1931) for the management of Hay's Wharf.

489. It is of high architectural and historic heritage significance.

Contribution of Setting

490. Elements of setting make a significant contribution to significance and an appreciation of it. In particular, in descending order:

- Broad riparian prospects into and out of the Queen's Walk around Hayes Walk, the best-preserved group of historic warehouse buildings before Shad Thames the other side of Tower Bridge. The ability see, understand and appreciate these in their wider riparian setting of the Upper Pool of London is essential to understanding their historic origin, original function and architectural value, in particular that relationship with Old Billingsgate and the London Custom House which are all that remain of those original legal quays around which these clustered. Para 3.1.1 of the SPD identifies the essential relationship with the open space of the River Thames, the wharfs forming a urban edge, identifying this part of the river walkway and the Hay's Wharf area as "enormously important to London" (para 3.2.3). It identifies the riverside views over the skyline of the CoL, the most significant identified as a 180-degree ark from London Bridge City Pier, taking in the north embankment, including Old Billingsgate and the London Custom House (3.2.6). This makes a substantial contribution to significance and an appreciation of it.
- The strong urban boundary and historic and architectural relationship with London Bridge Station and its viaduct to the north which encloses this district and the nearby relation with the wider wharfs and docks at Shad Thames just the other side of Tower Bridge. This makes a moderate to significant contribution to significance.

Impact

491. It is obvious to establish that no building or space would be physically altered as a result of, in relative terms to the Conservation Area as a whole, a small proposal on the opposite side of the River. Whilst of course the open aspect and relationship between the Hay's Wharf Sub-Area and the related features of the Upper Pool on the City side would remain intact. However, the proposals at the Custom House are prominent when viewed from the Queen's Walk, including London Bridge City Pier and the former Hay's Wharf (Hay's Galleria). There is a strong architectural and historic relationship between here and the Custom House, around which these structures clustered and took inspiration, with a fortuitous near axial relationship from Hay's Wharf, which gives the observer the best appreciation of the historic Upper Pool between London and Tower Bridge's from when it was the head and heart of the world's busiest port.

492. The proposed dilution of the principal river composition of the London

Custom House, its integrity and authenticity, and the inherent hierarchy of that composition and its intrinsic architectural and historic relationship with the Upper Pool, would diminish its contribution to that shared wider riparian setting.

493. This is an exceptional situation whereby a building outside the Conservation Area is integral to an understanding of its significance as a result of a shared architectural and historic riparian setting of outstanding significance. Of course, the essential relationship between the two would remain and, commensurate to the Conservation Area taken as a whole, the impact could only be slight, less than substantial harm in NPPF terms, very much at the lower end of the spectrum.

Other Designated Heritage Assets

494. The impact of the proposals on the settings of the other designated heritage assets and their significance, identified in the THVIA, have been fully assessed and taken into consideration. These include the Tower of London Conservation Area, the Former Port of London HQ at 10 Trinity Square (II*), Watermans Hall, 18 St Mary at Hill (Grade I and Scheduled Ancient Monument), 16 St Mary at Hill (Grade II), Tower Bridge (Grade I), Tower of London (Grade I), 27 Great Tower Street (Grade II), 9 Idol Lane (Grade II), Church of St Magnus the Martyr (Grade I) and Adelaide House (Grade II). The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to relative distances and the nature of significance and the contribution of setting.
495. The settings and significance of the Scheduled Ancient Monuments at Waterman's Hall, Roman Hypocaust and building on site of Coal Exchange and Structures of archaeological interest below Billingsgate, would not be harmed by the proposals.

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

496. The Tower of London (ToL) was inscribed as a World Heritage Site (WHS) in 1988. Its Outstanding Universal Value (OUV) was agreed in 2011 as comprising: landmark siting; a demonstration and symbol of Norman power; an outstanding example of late 11th century innovative Norman military architecture; a model example of a medieval fortress palace, which evolved from the 11th to the 16th centuries; strong associations with State Institutions and the setting for key historical events in European history.
497. The London Custom House lies approximately 200m west of the ToL WHS. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. Custom House is not in the designated local setting but is in the wider setting. The two do not have a visual relationship within the local City townscape but can be seen together in broader river prospects. There are three views within the London View Management Framework (LVMF) which are critical in assessing the impact of the scheme on the WHS: LVMF River Prospects 10A.1 (Tower Bridge: upstream – the

North Bastion), 11B.1 (London Bridge, downstream), and Townscape View 25A 1-3 (Queen's Walk at City Hall). These are assessed in detail in this report and it is found that the OUV of the WHS would be preserved. More broadly, the proposal has been assessed with regard to the Tower of London Management Plan, the Local Setting Study and the viewpoints and approaches identified in that study. It has been found that in all instances the proposal would preserve OUV.

Summary of Setting Impact:

498. The impact of the proposals belies their relative scale given the outstanding significance of the London Custom House and the sensitive wider spatial scope of influence. The proposal would fail to preserve and would cause harm to the following designated heritage assets:
- The Monument, Grade I, considered slight harm;
 - Tower Bridge, Grade I, considered negligible harm;
 - St Dunstan in the East, Grade I, considered modest harm;
 - Church of All Hallows by the Tower, Grade I, considered slight harm;
 - Old Billingsgate Fish Market, Grade II, considered modest harm;
 - Eastcheap Conservation Area, considered modest harm;
 - Tower Bridge Conservation Area, considered slight harm and;
 - Tooley Street Conservation Area, considered slight harm.
499. Otherwise, all setting significance would be preserved, including the OUV of the ToL WHS.
500. All harms are considered less than substantial in NPPF language, albeit harbouring a diminishment in setting and significance to City Landmarks and Skyline Features and designated heritage assets of the highest order. This draws wider Development Plan conflict in the case of Tower Bridge, St Dunstan in the East and All Hallows by the Tower with strategic Local Plan Policy CS 13(2) and associated guidance in the Protected Views SPD, the result of diminished views of a City Landmark and City Churches with a Skyline Presence. Having regard for the relative low levels of harm, whilst still cognisant of the failure to preserve and thus accord with s.66 of the Act, and the great weight triggered by the NPPF, these harms combined attract only modest additional weight overall to be added to the final balance and are residual and ancillary to the main impact on the London Custom House.

Archaeology

501. The site is in an area of high and significant archaeological potential where remains from all periods are expected to survive. In the early Roman period, the Thames was wider and its north bank was on the north side of modern Lower Thames Street. The land was gradually reclaimed from the river by the construction of a sequence of waterfronts and jetties built from the Roman period, which continued through the medieval period to the 19th century. Archaeological

assessments and evaluation reports have been submitted with the application which set out the survival of remains across the site and the impacts of the building and its foundations.

502. Archaeological evaluation and geotechnical site investigation has been carried out, and has provided information on the existing building foundations, the depth of the current quay surface and survival of the early to mid 19th century quay. This quay was built on an earlier foundation and is to the north of the existing Grade II* listed river wall, which was constructed at the same time as Custom House.
503. The construction of Custom House, its early collapse and rebuilding with the installation of additional foundations, introduced a deep concrete raft foundation to underpin the building. The depth and extent of this foundation is considered to have removed Roman and early medieval waterfronts, the Roman riverside wall, timber and masonry structures and building foundations within the building footprint. There may be some survival of early structures and river-bed deposits, surviving at low levels below the foundation.
504. The proposed alterations to the interior of Custom House include new lift pits, a service trench and lowering the basement floor of the east wing. It is considered that these works would not have an impact on archaeological remains as they would be within the existing raft foundation. If the work extends below the existing foundation it may affect remains of features surviving at this level.
505. The quay and roadways to the west and east of the building have high archaeological potential including survival of earlier waterfront quays and structures, as there are no modern basements in this area. There is potential for up to five metres of remains to survive below the quay, and this depth will increase as the ground slopes up to Lower Thames Street. The proposed extension to the terrace, alterations to the vehicle entrance, enhancement of the flood defences, new drainage, street furniture and landscaping would have an impact on archaeological remains.
506. The proposed terrace to the south of the building would have a shallow concrete slab with a piled raft foundation. There is flexibility in the proposed pile locations for the terrace to allow the preservation of remains of earlier riverside structures which may be present, and this has been designed to avoid the underlying late 18th/early 19th century river wall. This work would affect remains and deposits associated with the construction of quays from the late 17th century. The pedestrian ramp would have a shallow raft foundation which would affect modern material only. The existing flood wall would be removed and replaced with a new concrete wall along the edge of the new terrace.
507. The existing vehicle entrance would be altered to be deeper and narrower and would be constructed within the existing structure. A new retaining wall to the ramp, with a piled foundation and a new concrete wall in front of the ramp, to act as the new flood wall, would be built. There is likely to be an archaeological impact where this work extends

outside and beyond the existing ramp structure and building foundations.

508. The proposed drainage system would require new manholes, trenches and four outflows to the river using bored pipes through the river wall and has been designed to minimise the depth and extent of excavation. The work would have an impact on the late 18th/early 19th century river wall in two places and deposits dating from the mid 18th century. The central manhole would be 4.9m deep and would reveal the river foreshore. The outflow pipes have been located at a height to limit the effect of scour and erosion of the river foreshore and impact on archaeological deposits and structures on the foreshore.
509. There would be new landscaping and street furniture on the quay and roadways to the west and east of Custom House. This includes new cycle racks, bollards, paving, lighting, benches and signage and accessible ramp and stair. The new work and installations would require limited ground works which is considered would affect modern ground only and be above archaeological levels. The proposed accessible ramp and stair at the south west edge of the quay is a lightweight structure which would have a raft foundation which would affect modern material only.
510. The proposed works would have an impact on archaeological remains depending on the depth of the work and where they would extend beyond the existing building and foundations. This is acceptable subject to conditions being imposed, if planning permission and listed building consent were granted, to cover further archaeological evaluation and site investigation, a programme of archaeological work and foundation design.

Conclusion on Heritage:

511. Less than substantial harm, just above the middle of the spectrum, has been found to the London Custom House (Grade I). Less than substantial harm, at the lower end of the spectrum, has been found to the River Wall, Stairs and Cranes (Grade II*). Residual less than substantial harms, at the lower and very much lower end of the spectrum, have been found to a number of designated heritage assets also of the highest order, the result of change in their setting, comprising: the Monument (Grade I and Scheduled Monument), Old Billingsgate (Grade II), St Dunstan in the East (Grade I), All Hallows by the Tower (Grade I), Tower Bridge (Grade I), Tower of London Conservation Area, Tower Bridge Conservation Area and the Tooley Street Conservation Area. Those additional setting harms do not add much to the considerable weight attributed to the more serious harm to the London Custom House. In all, very considerable weight is attributed to heritage harm. This is weighted against public benefit in the final conclusion and planning balance.

ARCHITECTURE AND URBAN DESIGN

512. Good design, according to the NPPF, is indivisible from good planning and sustainable development, and sustainable development in the Capital is deemed 'Good Growth' by the London Plan. Good Growth is design which is socially and economically inclusive. Whilst important, good design transcends skin-deep appearance. It considers how uses, layout, form, access, curation/programming, public realm and the wider 'look and feel' combine to create places for all and that are beautiful. It is considered the proposed design would comprise a non-inclusive form of development and does not constitute 'Good Growth'.
513. The recently published National Design Guide addresses the question of how we recognise well- designed places, by outlining and illustrating the Government's priorities for well-designed places in the form of ten characteristics. According to the guide, well-designed places consider site features and their surrounding context as a starting point. They integrate into their surroundings and are responsive to local history, culture and heritage. Well design places have a sense of identity, relate well to their surrounding and create places for movement, nature and a mixture of inclusive uses. They will create well designed, high quality and attractive public spaces that are inclusive and accessible to all, provide active frontages and promote social interaction accessible to all local communities and visitors.

Roof Extensions

514. Two roof extensions are proposed at rooftop level over the East and West Blocks of the Custom House. These would be of two storeys and would be centrally placed truncating the lightwells of the wings. They would house bars(/cafes) and terraces overlooking the Thames with views of the Upper Pool, Tower Bridge, the Square Mile and HMS Belfast. They would be open to hotel guests, paying visitors and would offer a degree of free public access.
515. Considered in isolation, the roof extensions seek to follow some appropriate design principles – that is to be distinct, seeking a more streamlined, pared-back rectilinear architectural approach, on the main of transparent glazing, to appear more visually 'lightweight'.
516. The detailed success of this approach is assessed below, on the basis of the material provided, in accordance with detailed architectural design policies at DM 10.1, 10.3, London Plan Policy DE3 and City Plan Policy DE2, DE5 which are considered good design principles generally, irrespective of context, but which apply even more so here, given the sensitive context. Of course, no site can be considered in isolation from context. On this site context is everything and even the small details will have a disproportionate effect overall.
517. Officers have engaged with the Applicants throughout the application process to try and seek an appropriate design of the roof extensions and terraces that would respect the essential symmetry, proportions

and subtle character of the building both in elevation and plan, ensuring a rigorous approach to three-dimensional symmetry in vertical and horizontal surface, whilst ensuring the extensions were as 'visually lightweight' and restrained as possible, but to one side the principal of such extensions on a Neo-Classical edifice and completed composition.

518. For the reasons set out in detail under 'Heritage', the proposed roof alterations and extensions are deemed intrinsically inappropriate, harming the core character and identity of the Custom House as a seminal London and National Neo-Classical monument and strategic riparian building.
519. The roof boxes would be contemporary additions over each wing, rectilinear in form with glazing to the river and the roofs would comprise metal cladding. The terraces would comprise metal decking with glazed balustrading. Through the application process refinements to the roof level proposals have been made, including the reluctant omittance of green roofs in an attempt to reduce the height and bulk and slimming down the profiles of the overhanging canopies.
520. Officers have concerns that the extensions would not appear as intended lightweight structures. For example, the glass curtain walls proposed comprise close-centred modules every c1.5m, comprising both clear and opaque glazing units. Officers consider that 1.5m modules create a subtle vertical emphasis, running against the horizontal grain of the host, the frequent interruption resulting in a piece which is less streamline, resulting in a perception of more bulk. The roof extension fenestration does not respond to the regular rhythm, formal vertical alignments or bay proportions of the host elevation, and indeed do not match one another as a symmetrical whole either, which could draw further undue attention. Furthermore, an incoherent mixture of transparent and opaque glazed modules, in particular in the oblique, could further diminish a sense of deferential 'lightweight-ness', making them appear disjointed, even potentially bulkier in certain views.
521. The prominent proposed lift overruns, of apparent non-symmetrical disposition, would in wider views comprise alien utilitarian bulk, in most wider views significantly subduing the intended simple rectilinear approach to the main roof, whilst rising a not insignificant c.1m higher than the definitive datum set by the main ridge of the Long Room roof. The roof fascia would borrow the distinctive patinated copper hue of the post-war re-clad Long Room roof, blurring its distinctive profile so as, rather than attempting to be subservient to, further diminishing its primacy and pre-eminence.
522. The removal of the matching parapet gutter detail and truncating of the southern elevation of the 4th floor perimeter screen on the East Block, would undermine a rigorous '5th elevation' approach. It could also undermine an appreciation of the strict symmetry of the principal elevation in wider strategic views. Further to this it is considered that the setback perimeter roof and non-aligned projection of the proposed

terraces would be apparent to the observer, even in facing views, further upending the symmetry of the principal architectural composition. The terraces, again non-symmetrically disposed in plan and elevation, would sit on significantly different axial lines, whilst the differing line of built up terrace, green roof upstand and necessary man-safe system would appear in southern views to further undermine integral symmetry. The East Block would appear to inappropriately match and breach the integral datum of the Centre Block parapet. The balustrading would also inappropriately breach this datum.

523. The proposal seeks to punch new fenestration through the deliberately 'blind' perimeter roof screens of the north and eastern elevations of the East Block perimeter roof screen. These would undermine the symmetry of the whole composition, whilst often off vertical fenestrational alignment with the host, their final detail could draw further undue attention (for example if requiring upstands and/or outward opening), detracting from the strict and severe Neo-Classical elevations. In summary, the proposed extensions and terraces would be detrimental to Custom House in both long and short-range views of the building. This is because their prominent and incongruous siting over the wings of the building would undermine its overall architectural composition and challenge the primacy of the Central Block, while their contemporary forms and materials would not seamlessly integrate into the overall historic roofscape and would read as assertive, incompatible additions, further damaging the integrity and authenticity of the London Custom House.
524. In addition, the proposal would result in the significant truncation and loss of authentic original fabric and plan form at roof level, as discussed under 'Heritage'.
525. Given the inappropriateness in heritage terms, the proposal does not constitute good design or Good Growth, an essential principle of which is to respect heritage and identity.
526. Therefore, the proposed extensions, terraces and fenestration would result in the significant loss of historic/locally distinctive roof forms, features and covering, and cause adverse impacts to the existing rooflines, roof profiles and protected views, contrary to Local Plan Policy DM 10.3 (1; bullets 3; 4) and City Plan 2036 Policy S17(3;Bullet 4). In detailed design terms the proposal would run contrary to DM 10.1 (bullet 6) and City Plan Policy DE 5(1, Bullet 1) and DE2(2, Bullet 11), , which seeks development which enhances the appearance of the roofscape and is visually integrated into the overall design from street and high-level view.
527. The proposed first floor level private Long Room terrace would add another crude retrofit to the host. To accommodate a significant change in level, it would require terrace build up and an unspecified fascia, scribing around, but nevertheless siting awkwardly with the fine moulded attic bases of the Ionic columns of the principal portico. The proposed balustrading would add visual clutter potentially alongside unspecified terrace paraphernalia, detracting from and undermining the

distinguished primacy of these columns.

528. It is considered that the proposal would be unsatisfactory in terms of M&E servicing, resulting in incongruous modern flues, lift overruns and it is understood necessary health and safety infrastructure and artificial lighting, that would not be successfully integrated into the building design. The flues would further undermine the symmetry and decorum of the host. Whilst unclear from the drawings, the Building Services report confirms the need for louvers in the roof extension facades, potentially further undermining the clean, lightweight and symmetrical appearance of the extensions. Given the inappropriate height of the extensions, even a low-level electrical servicing lighting strategy would result in the potential for a 'light box affect' and would likely draw the eye to a distracting modern light source and the inherent inappropriateness of the roof extensions.
529. Not all roof top plant would be screened and would remain visible in higher level 5th elevation views, for example from the Sky Garden.
530. The proposed building services would not be screened from view or successfully integrated into the design, with adverse effects for character and appearance, contrary to Policy DM 10.1 (Bullet 7).
531. Effort has been made to integrate and mitigate the building vehicular servicing, to which there is not an easy or perfect answer, and the current location, on balance, is deemed the most appropriate, despite bringing vehicles to the pedestrianised riverside. The current arrangement would be narrowed, reclaiming a small amount of Quay, though it would still exert a significant visual influence. The plane blockwork raised flood wall, at 2.1m high, would feel stark, whilst obscuring more of the host building in facing view. The potential for unrestricted year-round events on the Quay could result in regular servicing movements drawing potentially a substantial number of larger vehicles onto the Quay, detracting from its appearance and character.
532. As such, it is considered that it has not been demonstrated that the proposed servicing entrances would appear fully integrated and would not minimise the impact of servicing, especially of the Quayside, on the appearance of the building or streetscene, contrary to Policy DM 10.1 (Bullet 8).
533. The proposal would not deliver satisfactory inclusive access for those with disabilities, which is covered in more detail in the relevant section. It does not deliver the highest standard of accessible and inclusive design, contrary to CS 10 (4) and DM 10.1 (Bullet 12), London Plan Policy, D3(D;4;5) and City Plan Policies S8 (8) and DE2 (2, Bullet 9).
534. DM 10.1 (Bullet 10) seeks external illumination of buildings which is carefully designed to ensure visual sensitivity, with the discreet integration of light fittings into the building design. City Plan Policy S8(11), DE3(Bullet 8) and DE9 seek lighting which is sensitively integrated into the overall design, whilst the external lighting should be positive to the unique character of the City at night.
535. The after dark lit effect of a regular solid-to-void traditional masonry

building is quite subtle, and the Applicant proposes, subject to detail reserved for condition, a subtle light wash of the façade which will reinforce that composition, its proportions and hierarchy. By their very nature, the (on the whole) transparent glass boxes proposed for the roof will inherently 'glow' after dark which it is considered to jar with the host when lit after dark. Whilst the Applicant indicates a low-level lighting approach, it is unclear to what extent this is achievable, and it is considered that the terraces, in particular on the East Block, but also on the West and connecting emergency egress terrace, will require supplementary lighting, ambient and potentially task (for example for tables). Even if achievable, given the intrusion of the proposed fifth floors and terraces above the main ridge of the wings and principal parapet of the Centre Block, a low level strategy, alongside the use of glass balustrading, will likely draw the eye to potential naked modern light source, causing glare and undue distraction. This would accentuate the inherent harmful effect of the extensions, their prominence, lack of coherence and essential symmetry, further undermining the proportions and hierarchy of the main facades.

536. From the north, in particular from the more intrinsically dark spaces around the ruin garden of St Dunstan in the East, exposure the glare and the after dark lit effect would be greater and would draw further undue attention to the incongruous nature of the roof extensions and terraces.
537. To a lesser extent, similar observations relate to the proposed first floor main portico terrace. Uplighters here can cause inclusive access issues (for example, for the partially sighted, causing distress), whilst they are unlikely to generate sufficient ambient or task light. Given the prominence in near distant and close-up views, new lighting would draw further after-dark attention to the terrace as an inappropriate retrofit.
538. On the Quay, the restoration of the original listed lamp standards, subject to detail, is appropriate. It is unclear how sufficient or appropriate event lighting would be achieved, albeit this is a matter appropriately reserved for condition. Overall, much compliance can be reserved for a detailed lighting strategy condition to ensure a carefully designed and visually sensitive lighting strategy can be discreetly incorporated into the building design.
539. The proposal is to raise the current non-original and utilitarian flood defence wall enveloping the front of the principal façade in matching blockwork. The proposed wall would result in a non-architectural and monotonous wall, 2m tall and extending along the prominent Thames frontage. Whilst recognising this is prior to an application of 'features', Officers have a long-standing concern as to the potential visual appropriateness of the applicant's 'Museum Wall', not only on day one, but with wear-and-tear over time as a non-essential operational facet of a hotel on a flood wall. Our view is that the scale of the intervention demands it make an architectural response, which is not apparent, the blockwork wall surmounted with an undistinguished, flush-mounted

metal planter trim (further blocking views of Smirke's fine granite ashlar plinth), is not considered to make a significant architectural response. In pure appearance terms, it is unclear how the flood defence wall would not look much more than an stark and inorganic extension to the restrained elegance of the host it would block out.

540. The proposed River terrace would annex a large amount of the original Quay for a M&E plant room and raised exclusive river terrace for the hotel. The stair and empire-style ramps, whilst unable to make a strict response to the principal composition to accommodate Part M access, would make an otherwise appropriate response to the integral symmetry of the composition, and would be of appropriate material (Portland Stone) and detail, comprising ashlar with a matching bottle balustrade. Despite the loss of historic fabric, new fenestration would be appropriate, subject to details to be secured by condition.

Public Realm, Inclusive Access to Heritage and Riverside

Policy Context:

541. Rights of access over the urban public realm are, on paper, an essential prerequisite to a successful City. Inclusive access for all is dependent not only on a welcoming design or 'look and feel', allowing it to feel like unrestricted access to these spaces which could otherwise just exist on paper. This is the essence of the 'Good Growth' objectives in the London Plan, which seek to deliver sustainable development which is socially and economically inclusive.
542. In the wake of the Covid-19 pandemic there is a sharp focus on the need for good public realm, especially in our towns and cities. There is a realisation that so-called 'Third Spaces', those between home and work, are essential to human health and wellbeing, providing space to breath fresh clean air, access nature, play, interact and integrate. There is a recognition that these are essential to the wider 'Levelling Up' agenda. This was the conclusion of the Government's Covid Recovery Taskforce, who sought to move the debate past broad macro-level regional economic disparity to more localised interventions affecting individuals and local communities – seeking to improve the day-to-day living experience. Our current situation amplifies the importance of national and local urban design and public realm policies relating to access, public realm and wellbeing.
543. The CoL has been leading by example in developing a vision for the post-Covid world, encapsulated in 'City Recharged: London in 2025' (2020), 'Future City: Creating the world's most inclusive, innovative and sustainable business ecosystem' (2021) and 'Culture and Commerce: Fuelling Creative Renewal' (2021). These seek to strategically realign the City with the vision of becoming the most inclusive world leading business and cultural centre. At their heart they seek to deliver outstanding places and diverse business ecosystems which are inclusive of all. In essence 'Good Growth'.
544. This section contextualises adopted design policies through the 'lens' and framework of the Good Growth objectives, GG1-GG6, including

associated 'Good Growth by Design' detailed guidance. This includes the draft 'Public London Charter' (2019), 'Making London Child-Friendly' (2020) and 'Expanding London's Public Realm: Design Guide' (2020). Emerging City Plan Policies S6 (Culture etc), S8 (Design), S17 (Thames Policy Area) and S19 (Pool of London) in particular, are laser-focused on delivering those amenities and public realm which will be essential to delivering on the Levelling Up and Good Growth agenda.

545. The London Plan, for the first time, has expanded the traditional concept of public realm in the Capital. It is all that publicly-accessible space between buildings, irrespective of ownership, and includes natural assets such as the Thames, but it also recognises important alternative forms, of particular relevance to higher density areas such as in the City, including internal and elevated spaces such as markets, sky gardens, viewing terraces, museums and retail courts, to name just a few (paragraph 3.8.1, London Plan). In recent years the CoL has led the way in delivering new and innovative public realm, inside and out, which has inverted traditional hierarchies, expanded people's perceptions of their own city and made it a more vibrant, mixed and viable place for all.
546. The City is quite unique in that it has a larger daytime working population than resident population, comprising a mix of office and associated commercial workers across a wide spectrum, from bankers to those in the 'gig economy'. However, it is home to a growing residential community and is a 'gateway' to East London, and some of greatest population densities in the Nation. It is also surrounded by some of the poorest communities.
547. The design of a place, which includes use(s), their disposition/layout, management/curation and 'look and feel', are essential to providing for this mixed demographic context and their particular needs. This is to ensure the scheme constitutes 'Good Growth' by design - that is growth which is socially and economically inclusive in accordance with the London Plan.

Public Access, Management:

548. In January 1999 planning permission (5023 AH) and listed building consent (5023 AJ) were granted for the erection of the existing riverside railings which run parallel with the river along the length of the Quayside. These works were associated with the creation of a pedestrian walkway along the edge of the quay, including the provision of a pedestrian access ramp at the western end. The remainder of the quayside was inaccessible to the public and was used at that time and still as a private car park for the bespoke Government occupiers.
549. A report from the Director of Technical Services entitled 'Riverside Walkway - Proposed New Walkway at Custom House between Old Billingsgate and Sugar Quay' was presented to Planning and Transportation Committee on 1 December 1998. The report stated that the proposed heads of terms (which were at that time still to be agreed with the Government as landowner) should include a requirement that

“the security fencing and screen to be permitted to remain as long as the site is occupied by a Government Department requiring a high level of visual and physical security as determined by the Secretary of State.” It was clearly envisaged by the City Corporation at that time that the security fencing would be removed following the cessation of high security operations which has now taken place.

550. It is understood that the national security public interest which once justified the security infrastructure around the Quay is now expunged with the relocation of HMRC to Stratford. This has confirmed their economic obsolescence and their removal is required to deliver return and a viable scheme. The bespoke situation which restricted access over the land should not be used as a low baseline for which to assess current proposals for public access.
551. The Applicant is required to remove the security infrastructure and the removal of the car parking which is policy compliance.
552. The present scheme proposes the removal of the Quayside riverside railings, the security barrier and security gatehouse from the end of Water Lane and the gates to the west of Custom House, on the land adjacent to Old Billingsgate Walk, to provide the potential for physically unfettered access to the Quayside, Water Lane and land adjacent to Old Billingsgate Walk. This provides 2800sq.m of new publicly accessible open space in a key south-facing riverside location and has the potential to become a valuable and highly successful reinstated civic space.
553. The Quayside should be car free, with security rated bollards to meet security requirements, would provide an enhanced riverside pedestrian link between Sugar Quay to the east and the former Billingsgate Market to the west.
554. Following negotiation, different forms of public access and public realm, interior and exterior, would be provided throughout the site, which include:
 - External areas referred to as the “Quayside Area” in the draft Heads of Terms (“HoTs”) (s.10). This comprises the area edged in blue on drawing G200_P_004. It would comprise access land adjacent to Old Billingsgate (west), the Quayside and part of the proposed hotel river terrace access ramp (south) and the substantive part of Water Lane (east) abutting the Public Highway.
 -
 - Internal areas referred to as “Public Access Areas” which aren’t linked to a particular drawing(s) in the draft HoTs. It is understood this would relate to that area edged in green on drawing G200_P_00_004. This area would comprise the main hotel/corporate events lobby off Lower Thames Street and a ‘route through’ the centre of the Queen’s Warehouse hotel lobby to the vestibule. This would contain what are referred to under the draft HoTs as the “Historic Display Areas” (s.5, without

reference back to drawings) which it is understood would be under/adjacent to the main stairs in the main lobby and in the Queen's Warehouse vestibule. The draft HoTs (s.8) proposes 'free access' to these areas between 9am and 10pm while the hotel is in operation for trade.

- - Internal areas referred to as "Public Tour Areas" (draft HoTs, s.9). Areas over which pre-arranged tours *could* be provided on the basis that the owner has absolute discretion for no more than 1 per month. The draft HoTs note this comprises the area edged in green on drawing G200_P_00_004, comprising the main stairs, Long Room, Long Room Lobby, Robing Room and associated access spaces.
 - The F1 Use, referred to as the "Museum Area" (with ancillary uses), meaning that area in the West Block ground floor edged in red on drawing G200_P_00_004. The museum hours are proposed to be 10am to 5pm Tuesday to Sundays (excluding public/bank holidays). The same hours of free (no compulsion to buy) public access would apply to the Western Roof Terrace (edged in red on G200_P_05_004), where access would be provided on a 'first come first served' basis from the Museum Area.
555. London Plan Policy D8(H) seeks to ensure appropriate management and maintenance arrangements are in place for public realm, maximising public access and minimising rules governing the space to only those deemed necessary to ensure public safety, in accordance with the Mayor's Public London Charter. The Charter contains 8 principles for the successful management of public space, irrespective of ownership, seeking landowners to promote and encourage public use of space for all communities. It recognises that the management of public space has a significant effect on how it is perceived by the wider public.
556. Despite frequent request Officers have not received a draft public realm management plan relating back to these various identified public realms, so at this time there is no further information on any potential restrictions or understanding of how these spaces would be actively managed or secured when different uses and events are happening within specific areas of the hotel and Quayside.
557. To make this aspect of the scheme acceptable a detailed Public Realm Management Plan would need to be agreed and secured by an appropriate legal agreement, and maintained throughout the lifetime of the development. The success and use of the public realm will be strongly dependant on the terms of the s106 obligations and the public realm management plan (which should be secured through the s106). It is important that the public realm is inclusive and welcoming to the wider public. To this end, the s106 should ensure that there is no deterrent to the use of the public realm and that access is provided in a

non-discriminatory way, without the need to make purchases from on-site offerings. The s106 and the public realm management plan should set out the exceptional circumstances in which the public realm can be closed, how long it can be closed for and steps to be taken for example in the situation of force majeure. The public realm plan should also address maintenance of the public realm and how any security issues will be managed, particularly in the case of unrestricted/unfettered events, so as to ensure important thresholds to the site (for example from Water Lane or land adjacent to Old Billingsgate Walk) aren't made to feel less public. If an appropriate legal agreement cannot be secured, then the proposed development would not be acceptable in this regard.

558. To ensure any necessary restrictions are not unduly prominent or invasive, any signage would need to be conditioned to ensure they don't hinder public enjoyment of the public realm.
559. At the current time, on the basis of the outline heads of terms that have been provided with the appeal documents Officers cannot be assured that the public realm will be wholly inclusive. No details have been provided that demonstrate the access management regime by which the Applicant seeks to govern the proposed public realm, both internal and external, would deliver on Policy D8(H) or the guidance in the Public London Charter.

Quayside

Events and Public Access

560. The fenced off area of the Quayside, its use as a car park and the confined nature of the riverside walkway here, has long been recognised as an unpleasant, often crowded environment for all users, with only limited glimpsed views of the Grade I listed Custom House. The proposal delivers the opportunity to provide a significant area of open space to which the public can gain access and has the potential to meet the requirements of Local Plan, draft Local Plan and London Plan policies and objectives outlined above. The aspirations of the City are included in the Riverside Walk Enhancement Strategy and adopted policy to improve inclusive access to the River and the vibrancy of the riverside, the creation of additional civic spaces with high quality environment and good quality inclusive community spaces and are reflected in the City's draft Policy S19 which identifies this area as a Key Area of Change in which the delivery of significant public realm improvements and transformational is sought.
561. In order to ensure that this scheme delivers a truly civic open space and public realm which is inclusive and without barrier on this historically significant riverside site, it is considered that the external public realm, including the proposed river terrace, should be open, on the whole, to unrestricted public access for 24 hours a day, 365 days of the year. It is anticipated that as part of a cultural strategy the Quayside could be used for 'pop-up' events accessible to the wider public such as street markets, Christmas Fairs, artwork displays and

live music which would be encouraged in order to increase the vibrancy of the riverside and to contribute to the inclusive cultural offer.. However, these events should not preclude access to the wider public, nor prohibit or interfere with pedestrian access across, or the general enjoyment of, the Quayside, forming that important and informal link between Old Billingsgate Market and Sugar Quay, and wider routes between London Bridge and the Tower of London.

562. The Applicant proposes (as outlined in draft 106 Heads of Terms) that the hotel operator should be permitted to close all or part of the Quayside Area for both i.) “Quayside (‘public’) Events” and private ii.) “Managed Events”.
563. Permission is sought for an unrestricted number of Quayside (public) Events covering a maximum of 100% of the Quayside Area. In theory, therefore, the whole of the Quayside Area (including much of the hotel river terrace (other than the hotel tables and chairs) and disabled access ramps) could be closed every day, 24/7, 365 days of the year, for the events which the draft HoTs states are “open to the general public”. Under the current provisions, this does not have to be a ‘free access’ (ie without an admittance ticket, paid for or otherwise), entry could be dependent upon paying for food or drinks or making some other payment.
564. No further information has been provided outside that of the draft Cultural Strategy to demonstrate that events would be wholly publicly accessible, inclusive and provide cultural benefits to both visitors and local communities of a diverse demographic. In order that the proposed use of the Quayside for these types of public events to be considered acceptable and inclusive, free access to these events should be provided for in the s106 and there should be an agreed cap on the number and consideration of the timing of Quayside Events per year with the ability for the City to approve specific events over and above this number to allow for a degree of flexibility, only if additional events are considered acceptable.
565. The local planning authority have not been provided with plan(s) showing how spaces are to be laid out for Quayside or Managed Events to ensure an acceptable form of inclusive public access would be maintained at all times during such events. It has not been demonstrated that the disabled public access ramp to the Queens Warehouse, public seating, potable water fountains or access to heritage information, would be constantly maintained during events on the Quayside. Furthermore, it has not been demonstrated that free and unrestricted, unfettered access would be maintained over this area of public realm for the public. This is contrary to the aspirations of the Development Plan and associated supplementary documents and guidance applicable to this site.
566. No information has been submitted which details how public events would be made safe or what security measures would be needed to ensure sufficient and inclusive management and security of both event attendees or the general public would be maintained. Securing a

perimeter along the narrow City Walkway could be required for events and also during times which they are being set up or cleared away, to ensure public safety. There is potential for a significant number of larger vehicles and/or temporary structures, such as marquees or stalls, to be located on the Quayside for an unfettered amount of time. It is important events do not unintentionally spill/trespass into the surrounding public realm, preventing or even prohibiting free, safe and convenient passage through and around the site, including on the riverfront. It has not been demonstrated that sufficient management of the Quayside space and public safety would be maintained, especially during times when events are being held.

567. The Applicant seeks permission to use the space for private “Managed Events”, as defined in the draft s.106 HoTs as ticketed or invitation only events to which:

- (a.) the general public is not permitted to attend the event without an invitation to do so; and/or
- (b.) a ticket (whether or not a fee is payable) is required to attend the event; and/or
- (c.) it is reasonably necessary (including for proper management or security reasons) to prevent general access to the relevant part of the Quayside Area in order to hold the event; and/or
- (d.) it is reasonably necessary (including for proper management or *security reasons*) to control the number of persons attending the event.

568. The Applicant proposes that Managed Events comprise three categories:

- Managed Event Type 1: 51% -100% of the Quayside could be closed for 5% (225 hours) of annual daylight hours;
- Managed Event Type 2: 26% to 50% of the Quayside could be closed for 5% (225 hours) of annual daylight hours and;
- Managed Event Type 3: 0% to 25% of the Quayside could be closed for 5% (225 hours) of annual daylight hours.

569. Although undefined, examples of private events to which the Applicant refer are a London Fashion Week event/launch, a film/book launch or a private wedding reception and which could include exclusive corporate events such as luxury car or other consumer product showcases, or a private hire corporate event, for example. Officers are concerned about the extensive ability to close the Quayside for non-inclusive events and do not consider the extent of these closures to be acceptable.

570. Officers have concerns about the practicalities and enforceability of what is proposed. The amount of daylight hours in each day changes day by day and significantly over the course of the year. Whilst the longest day in summer could be sunrise 04:43 and sunset 21:22, the shortest day in winter could be 08:04-15:54. How the LPA could, for the purpose of compliance, monitor this for potential enforcement purposes would be extremely difficult, if not impossible. If, for example, a resident at Sugar Quay was concerned as to compliance, they would

require significant and onerous monitoring evidence gathered potentially over a significant period of time. The Corporation's Enforcement Officer and Environmental Health consider the proposals impracticable.

571. Another caveat proposed by the Applicant is that the daylight hours would only apply while an event is in operation/is 'open'. Most events would require servicing, preparation and clearance time which here is undefined, and could be for as long as the hotel owner so desires, with interpretation to be had for 'within reason'. For example, a private event on the summer solstice (21 June) could take place between peak PM hours 16:00-19:00, whilst the Applicant could undertake a set up period between sunrise and 16:00, closing 100% of the Quayside Area for the majority of the normal day, prospectively with land adjacent to Old Billingsgate, the southern Quay and/or Water Lane used for servicing vehicles.
572. In terms of private Managed Events there are 675 daylight hours that the Quay could be closed for a private event in whole or in part (225 at 100%, 50% and 25%). It is reasonable to consider that private closures are most likely to affect the summer months, when most desirable to the public at large. However, it is noted that the daylight method would of course exclude much peak afternoon/evening hours during the darker months, over which there would be no restriction on private closure.
573. This would allow for closure over the course of the year of 100% of the Quayside for 4.3 hours per week, closure of 50% of the Quayside for a further 4.3 hours per week and closure of up to 25% for an additional 4.3 hours per week (therefore some degree of closure for up to 12.9 hours per week). However, it seems fair to presume that the closures could be skewed towards the warmer months of the year, such that if these hours were spread over the warmer 6 months of the year, this would mean permitted closures 100% of the Quayside for 8.6 hours per week, closure of 50% of the Quayside for a further 8.6 hours per week and closure of up to 25% for an additional 8.6 hours (so closure to some extent for up to 25.8 hours per week).
574. As discussed, these hours do not include time to prepare and clear an unspecified private event(s) which likely result in additional closures for a few hours either side of events. The proposed draft heads of terms do not allow a Managed Event to be held on more than 3 consecutive days, this could mean that an event is left in situ for three days, preventing public access, but only being counted towards the allotted daylight hours when it is 'open'. This could result in a substantive part of the working day being closed for private events.
575. There is also nothing to prohibit Quayside Events taking place at the same time as a Managed Event. So even if 25% of the Quay is closed for a Managed Event, the remainder could effectively be closed for another form of event which, whilst perhaps open to the public, would still be a managed event, potentially requiring additional security given the proximity to a Managed Event.

576. The implications of such proposals for unfettered/unrestricted events of the Quayside affects the whole urban design approach to the wider site. Such restrictions are also contrary to the principles of public realm enhancements secured on other sites and would set a seriously regressive precedent. It would even run contrary to those negotiated major development schemes along the River and around City landmarks whereby planning will deliver new high-level public realm, such as at Millennium Bridge House, Seal House and 81 Newgate Street.
577. Officers considered that wider public access to the Quayside Area should be unrestricted 24 hours a day, 7 days a week, with forms of closure for public interest cultural events very much the exception to the rule and capped at a much lower number. If a significant part of the Quay is provided as a private hotel river terrace, the remainder of the Quay is not large enough to sustain regular large events in a manner which wouldn't dominate the space, fundamentally altering its perception as a public space, it becoming viewed as a very much private one. At its narrowest (to the tree line) it would be only c4m wide, and c.13m at its widest. On land adjacent to Old Billingsgate it could leave a pavement at its narrowest c1m wide, and on Water Lane Public Highway which is only c2/2.5m wide, opposite the proposed servicing bay. Even at 25% closure an event could annex the whole of the central area, including the relevant parts of the hotel river terrace, not only preventing/inhibiting inclusive disabled access, but excluding the public from those raised river views, preventing a more generous east-west access across the Quay and ultimately exerting a significant influence over the look and feel of the wider space, which would not feel public.
578. On the basis of management and curation alone, the proposal would comprise a non-inclusive form of development, before even considering the wider detailed urban design proposals.

The Uses: Management, Layout and Design

579. Paragraph 130(e) of the NPPF states that good design should optimise the potential for a site to accommodate and sustain a mix of development. The National Design Guide, paragraph 113, states that mixed use is appropriate in urban locations and areas of larger scale development, such as here. This is consistent with the Central Activities Zone (CAZ) in which, London Plan Policy SD4, seeks to promote and enhance the distinct heritage of the CAZ (C), and the rich mix of its 'strategic functions', which include visitor infrastructure, cultural, retail and leisure uses, whilst enhancing the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions (E). To deliver this at a local level adopted Policy DM 11.3 (Bullet 3) (Hotels) seeks to secure a balance and mix of uses and ensure that wider planning objectives are met (3.11.10). The emerging City Plan 2036, Spatial Strategy (3) and Strategic Policies S8(4) (Design), S17 and S19 (1;2;3;4), seek mixed use buildings, including wider retail, cultural and leisure uses which

enhance heritage assets, seeking to broaden the City's appeal with a range of complementary uses, especially relevant post Covid-19.

580. The National Design Guide, Policy C3 under 'Uses', recognises the importance of uses to socially inclusive development. It states that development should secure social inclusion by i.) creating mixed places accessible to all ii.) maximising the potential for social integration in layout, form and appearance and iii.) to use local resources such as open space and cultural facilities to promote social interaction and integration. These are supported by the Good Growth lens of GG1-6, which seek successful mixed-use spaces, providing access to community spaces and allowing inclusive communities to thrive where all feel welcome.
581. The Applicant has applied for independent Class E (retail) in the Queen's Warehouse at ground floor level and incorporating the majority of the proposed river terrace where it proposes tables and chairs.
582. Alone, luxury hotel ancillary uses are aimed at providing a controlled, managed and exclusive experience for hotel guests, their visitors and those members of the public who pre-book an 'experience'. This is at the discretion of the hotel and any rules they might wish to impose on that access, as discussed above. The food and beverage offer on the ground floor is accessed from the main entrance lobby and the entrance off the terrace on the Quayside. Independent back-of-house and ancillary areas, for example storage, WCs and preparation areas, are not shown. The proposed fifth floor roof level café/bars would be accessed, rather than independently from a wider public realm, from the hotel lobby, and escorted to via areas containing hotel bedrooms on either the West or East Block. Access to the Public Access Areas are not proposed to be open for the whole time the hotel could be operational. Whilst on the West Block independent (no-charge or compulsion to buy) public access would be provided between 10am and 5pm (Tues-Sun), this café/bar would still have independent access provided from the museum area, segregating the different users.
583. This is also the case with the basement gym and SPA facilities, which do not have a direct means of access from the wider public realm, or even from those areas indicated as Public Access Areas, potential users would need first to respond to the front-desk and be escorted.
584. The National Design Guide makes clear that well-designed places are unlikely to be achieved by a narrow focus on appearance, materials and detailing of buildings (paragraph 21) – it recognises that well-designed new development is integrated into its wider surroundings visually, as well as physically and socially.
585. Officers sought to negotiate a hotel-led enabler of independent public-facing retail/leisure uses of various sizes and dispositions to attract diversity and variety, rather than exclusively occupier-orientated complementary use(s). This is considered essential for creating the preconditions of a welcoming, recognisably public and distinct Queen's Warehouse, with a shared role in defining, curating and programming

the proposed river terrace and wider Quayside Area. This was also deemed essential to giving a proper sense of enclosure to a permeable central space, one which felt inviting to a wider public and to allow an appreciation of the Queen's Warehouse. It was considered that this is essential to physically and perceptually define the space, with a clear differentiation between public dwell/movement corridor and semi-public, public-facing independent retail with a shared, unbranded ownership over that central space.

586. This would be in accordance with the National Design Guide, paragraph 114, which recognises well-designed mixed-use development considers the arrangement of ground floor uses to ensure successful occupation, including maximising the potential for social integration in layout, form and appearance, avoiding features that create actual or perceived barriers, contribute to segregation and which promote interaction and integration which is socially and economically inclusive.
587. is the proposal is for a narrow central 'spine' through the Queen's Warehouse, approx. 3.5m wide, albeit with no visible border, and which is assessable to the public between 9am and 10pm. It would be accessed off Lower Thames Street via the main arrival/orientation point for the hotel guest or a paid visitor to a corporate/private event. It is reasonably assumed that the access to the stairs and two doors accessing the ancillary hotel private functions would need to be actively managed, staffed and secured. Very much ancillary to, and visually incidental to the principal function, are the proposed Public Display Areas comprising some wall mounted boards/material not untypical of your average 'heritage hotel' offer. Such standard media is unlikely to attract anything other than the passive interest of those otherwise crowding this event lobby for other purposes, likely overseen by uniformed staff to ensure the arrival experience of the hotel guest.
588. With a shared end user of the space, for example a Heritage/Cultural Partner, Officers have concerns that this would feel an unwelcoming place to a wider public, in particular for example, families with children, young people or simply those who feel their means, attire or cultural background would make them unwelcome, and that they are entering a private hotel space.
589. The Expanding London's Public Realm' (the Public Realm Document) (6.1-2), and the National Design Guide (L3), recognises the importance of a feeling of 'publicness' to public realm, as a matter of regulation and design, which include visitors and passers-by alike, where well-designed places clearly define shared spaces from private spaces. From this perspective, the main hotel lobby from Lower Thames Street performs an important function as the 'threshold' between the City and the important heritage, which should draw people in from Lower Thames Street. This is especially resonant given the important historic publicness of this space in the historic Custom House. Officers consider that the design and management of the proposal would not create an inclusive or welcoming space to the wider public at large.

590. The proposed public main entrance to the Queen's Warehouse and the Public Access Area narrow route from the hotel lobby, rather than being the pre-eminent centrepiece on the main central axis, would be an entrance of lesser presence, of domestic scale and only a bare minimum c.1.1m wide, dominated by x2 flanking doors to the pre-booking hotel restaurants/bars, which would inevitably need to be managed. This runs contrary to detailed design guidance in the Public Realm Document, which seeks to subordinate commercial uses to a wider public function (4.1), to make the entrance to facilities clearly visible (1.5) and to (where possible) design out security/management systems (1.15-16) in order to ensure a sense of publicness. Where the hotel commercial use would dominate the lobby, there is no shared ownership 'baked-in' to the management/design of that lobby, such as independent retail or an independent cultural offer to make it feel more welcoming to the wider public or to enhance the diversity of use and experiential value (4.3), or any 'unassociated' (non-commercial) public seating (4.5). It is not considered that a wider public, in particular harder to reach demographics, would seek to use the main lobby and would be deterred from accessing the Queen's Warehouse from Lower Thames Street.
591. The apparent 'publicness' of the Queen's Warehouse, and how this relates to the Quay and riverfront external public realm, will be critical to the engagement of a wider demographic including families with children (including mothers with prams), young persons and people regardless of their means, to enable them to feel welcomed to use the Queen's Warehouse. A narrow c.3.5m wide strip of Public Access Area would exist 'on paper', however its invisible boundaries would be flanked by, overlooked and merge into the main hotel reception and the hotel front-of-house offer. This is not considered to deliver a diversity of uses (and users), assisting in a wider sense of publicness, by enriching the experience as a whole (4.3), or to deliver a variety of unit sizes for a potential mix of business operator, deemed of particular importance where there should be a natural shared ownership and stewardship of the Public Access Area (4.2).
592. There is no clear hierarchy of space, with clear boundaries between a permeable public route/movement corridor with a clear sightline, enclosed by semi-public spaces which allow for dwelling and then enclosed by a variety of retail/leisure/cultural use over which a right of access comes with potential evident pre-condition of consumption. However, the invisible proposed 'route through' would feel rather hurried, with no shared curatorial role with, for example, a Heritage/Cultural Partner, without a management strategy for unassociated/un-branded blind seating and where the corporate presence of the hotel would overwhelm, without any plan for a consistent public realm palette to compete with it (6.7). It is clear to Officers that what is proposed is simply a hotel reception lobby orientated around an exclusive hotel guest arrival experience, with ancillary front of house around it.
593. An inclusive active frontage will be crucial in attempting to facilitate

welcoming inclusive access to the Queen's Warehouse from the River. Given the proposed unrestricted/unfettered events, private or otherwise, on the Quay and proposed river terrace, there could be a significant period of the year, likely during peak times, where access to the Queen's Warehouse is restricted entirely by the closing off of the Quayside.

594. The proposed landlocked museum space would be somewhat removed from the Quay, and separated from those other principal heritage spaces which would allow a wider public to understand and appreciate the exceptional heritage, including the main lobby, Queen's Warehouse or Long Room. It would have no curatorial shared responsibility for the main lobby, Queen's Warehouse, or the Quay. It would have very limited access to the Long/Robing Rooms, which would be at the absolute discretion of the hotel operator.
595. The proposal is to deliver x2 roof top café/bars on the West and East Blocks. As discussed, independent access will be provided from the remains of the western courtyard from within the F1 Use, open between 09am and 5pm Tuesday to Sunday (and not Bank Holidays), without admission charge or compulsion to purchase, on a first come first served basis as the space is to open as a café/bar area during these times.
596. The proposed roof terrace at the western end would be c1.8m wide fronting onto the Thames, with a slightly wider section to the west adjacent to the opening doors of the café/bar. When comparing the scheme to other publicly accessible roof top terraces it is considered to be significantly smaller in its usable terrace area.
597. As discussed in 'Expanding London's Public Realm', how accessible these spaces are dependent on how they are perceived by all potential users and how well connected these are to the wider public realm. The museum entrance is tucked away from the principal hotel entrances and approaches on land adjacent to Old Billingsgate Walk. Access to the public roof terrace would be via an independent lift from that of paid hotel guests or pre-booked visitors. Access to the terrace would be via a café/bar which is to be owned and managed by the hotel. Whilst first-come-first-served, rather than pre-book, there is no obligation on the hotel to give preference to a non-paying user, or to any member of the wider public. Given the limited capacity, the roof top bar/café could be easily filled by hotel guests or a pre-booked user of the café/bar, meaning the wider public would be unable to access it.
598. The arrival experience at the roof would be unnatural, arriving at a narrow 'pinch point' threshold arrival at the bar, without immediate opportunity to access the wider terrace. Not only would this deter a wider public, for example if you were looking to consume off-site produce, or if culturally-speaking a bar is also a perceptual barrier to participation, the space would only just be wide enough to allow two wheelchairs to pass, or for example a mother with a pram. The terrace itself is likely to feel and be perceived as ancillary to the café/bar, and there is not management plan in place to ensure the hotel didn't occupy

much or all of the terrace with tables and chairs, effectively rendering the limited spatial area unacceptable to even able-bodied users. Furthermore, it is unclear if a non-consumer would be required to leave at 1700.

Active Frontage and Wider Public Realm

599. The proposal would deliver a substantial amount of non-active frontage, even when accounting for evident constraints. It is considered contrary to Local Plan Policy DM 10.1 (Bullet 5), London Plan Policies D3(6;10) and D8(F-G) and emerging City Plan 2036 Policy S8(6), which seek active, public-facing, useable, permeable, lively/interesting and well-detailed active frontage which achieve indoor and outdoor environments which are comfortable and inviting for people to use, creating a inclusively vibrant public realm. These policies must be 'framed' and underpinned by GG1 to ensure that these are inclusive of all, promote a sense of belonging, social interaction/participation, avoid separation and create a fairer city for all, irrespective of circumstance or background. It is considered that the proposed uses and how these relate to the active frontage would reinforce a non-inclusive form of development.
600. The Government's National Design Guide defines active frontage as the front of buildings with openings onto public space that generate activity and engagement between the building interior and outside, particularly entrances so that people come and go at different times. It recognises that successful public realm for all is in part dependant on the uses around its edges (which) reinforce its appeal and help make it into a destination (para 106-7).
601. The vast majority of street level frontage would comprise hotel bedrooms, considered the least active of all frontage, whose modus operandi is to provide defensible, often inactive, at least actively managed/secured, space in front, avoiding views in and protecting views out, while preventing potential noise/disturbance at the cost of the mixed vitality and vibrancy which makes an inclusive public realm. As an insular, introvert form of frontage, unlike even residential, it seeks to control and manage the space in front in its own interest, especially as here, where the vast majority of frontage encloses private land. Deemed a sensitive receptor, it would ensure the public space be dictated in the interest of the hotel guest, and this on the whole would underpin the management, programming and curation of the public realm.
602. The consequence of an unrestricted/unfettered amount of Quayside Events and/or Managed Events (which could happen at the same time), would be that these would be more likely to take place during those peak times at lunch (12:00-15:00) or evening peak (17:00-20:00), outside of sensitive hours. Given the size and disposition of the proposed Quay, after taking account of the extent of the private hotel river terrace, would mean that any event is more than likely to occupy those spaces in front of the hotel rooms. Given at the current time we do not have further details regarding the management plan and

potential restrictions over the use of the public realm, and there is at present no independent Heritage/Cultural Partner to give a wider social remit to the space, then it would be managed only in the interest of the luxury hotel. This could mean that all events are actively managed towards a particular end user deemed desirable for outlook or noise/disturbance purposes.

603. The result of this is that it is more likely that the public would only have access to the seating here outside of peak times, and that is if the applicant is proposed access 24/7.
604. On Lower Thames Street the principal access to the wings would remain locked fire escapes (and which would not be made step-free). The large on-street vehicle layby near the main entrance would result in a less generous arrangement for viewing the principal façade here, which would be more cluttered and noisier, the result of lingering taxis, private hire vans and/or even imposing coaches. A very limited amount of urban greening is proposed around this elevation, in what would be an even harder urban environment, in particular where there could be potential in front of the Centre Block. The proposals would provide a main lobby that could look and feel exclusive and appears as a private hotel reception and corporate events space lobby, with incidental display boards tucked away in the corners. The whole elevation would otherwise remain an impervious block, with hotel bedroom windows and their heavy curtains set behind railings making the façade particularly 'blind' and introverted at eye level. It is not considered that the proposal would deliver an successful active frontage here.
605. On Water Lane, no successful active frontage is proposed. The original main entrance would be blocked, and all windows would serve hotel bedrooms. There is limited seating to be provided to provide for active edge dwell space or 'eyes on street'
606. The off-street cycle parking, in the event of a Quayside and/or Managed Event here, could have restricted access prohibiting their use.
607. On land adjacent to Old Billingsgate, the reinstatement of the Tide Waiters entrance for the F1 Use, is welcomed, but would only be open to the wider public until 17:00 (Tues-Sun), after which the intended use is uncertain, if any. Whilst this harbours the potential for more inclusive active frontage, it is questioned, in particular in the context of unrestricted/unfettered Quayside Events/Managed Events, whether this could be ensured. The proposal would allow for the closure of Water Lane up to the kerb line with the narrow pavement. This could be closed entirely, up to the kerb, reducing the effective width to a pinch point outside the main entrance of c.1m , and which might prohibit step-free access to the Quay. Short stay cycle parking has been preferred to seating with access to these could be restricted in event of a Quayside Event and/or Managed Event. Even outside of events time, the potential substantial servicing requirements for unrestricted/unfettered Quayside events could result, as is the unsatisfactory legacy of the 1980s events space at Old Billingsgate, in

- the carriageway being blocked by vehicles even outside 'active' events
608. The most important active frontage is to the Quayside, given the intrinsic active relationship between the Custom House and the operational River, one of, if not the earliest, places for the wider public to promenade in central London.
 609. The visual embodiment of the unsuccessful relationship proposed would be the defensive-looking and 'blind' 'curtain wall' - a monolithic raised flood defence wall comprising a huge c.60m of blockwork across the entire principal river elevation. At c.2m tall – your average adult eye level being 1.6m -. this would create a stark 'fortress' style wall, protruding 3-6m into the Quay, reinforcing a strong visual sense of 'us and them' in the passive observer, engendering a feeling that it is a space to pass through, rather than dwell for the wider public.
 610. Despite Officers best efforts, the Applicant was reluctant to turn these walls into a public river terrace, where possible, allowing elevated river views for which there is otherwise limited opportunity. The 'dead zone' created by the flood defence wall between the hotel frontage and the Quay, difficult to maintain, clean and oversee, could give rise to anti-social behaviour with active policing or additional security measures such as CCTV acting to further accentuate the sense of a defensive space, a sense of 'us and them'. Given the potential for heavy curtains, the distance between window and public seating of between 3-6m, with the intervening 2m high wall, and a low level ambiance after dusk to prevent light spill to the hotel bedrooms, it is unclear how desirable the seating will be in particular to more vulnerable demographics, where there is little to no immediate passive natural surveillance, or 'eyes on street', to make it feel safer or welcoming.
 611. As discussed, those areas in front of the seating are most likely to be used for events, either Quayside Events and/or Managed Events and which would be unrestricted/unfettered. The result is that for a potentially significant amount of the time the wider public would either i.) not be able to access and use the seating at all or ii.) the experience would be seriously diminished.
 612. In terms of permeability on the front, the proposal would fall short. What is proposed is a luxury hotel, where the guest experience is heavily managed, curated and security conscious. The scheme does not seek to re-open existing historic openings which Smirke or another closed, to reintroduce that frenetic ebb-and-flow which once characterised waterfront life, therefore, those historic north-south routes through the wings remaining sealed fire escapes and no further opening up of those former doors to the Quay from the busy administrative quarters.
 613. In order to make the seating useable and desirable to the wider public and to deliver a public realm which would attract younger people, including families with children, further confirmation was sought on 'baked-in' cultural / formal/informal play infrastructure, in accordance with policies Local Plan Policies CS 10(6), CS 19(4), DM 19.4, London

Plan Policy S4, D8(M), emerging City Plan Policies S1, HL8, CV2 and S19 guidance contained in the Riverside Walk Enhancement Strategy SPD and the Good Growth by Design document 'Making London Child Friendly' (2021).

614. The proposed scheme does not provide permanent play or other such infrastructure on the Quayside which could have taken a number of forms aimed at a wide demographic. Neither has the Applicant proposed the provision of permanent multi-use infrastructure, which could also include outdoor fitness equipment, further encouraging a wider public to use the River for outdoor sports and recreation in accordance with Local Plan Policy DM 19.3.
615. At c.7m deep and 85m long the main river terrace would utilise a substantial area of the historic Quay which is currently 'open' to accommodate a plant room for the hotel SPA, with a private hotel terrace on top. Comprising a symmetrically composed central grand stair and flanking ramps of Portland Stone and bottle balustrades it would make an appropriate architectural response within the constraints of achieving 'Part M' access. The Centre Block would contain a raised main terrace with flanking 'pocket gardens' to the wings. The main part of the terrace would contain the hotel's food and beverage retail offer. The small 'pocket gardens', would allow for a small area of public access, deemed essential by the Inclusive Access Officer as respite space for the exceptionally long access ramps. When viewed from the remainder of the Quay, they would appear as a potential extension of the private hotel river terrace.

Conclusions

616. In conclusion the scheme proposes a significant new public open space in a highly accessible, south facing, riverside location. The space has long been blighted by the security infrastructure required by the former government occupiers of the building, and it would be an expectation of any planning scheme that this, together with the car park, would be removed and the Quayside integrated into the wider public realm along the riverside.
617. In order to meet the requirements of Development Plan policy, access to the building should be welcoming, convenient, comfortable and inclusive to all. The disposition of the uses and the details of the management of public access is therefore critical, particularly to ensure that members of the public, families etc feel free and unhindered to enter the building and the Queens Warehouse, either from the main entrance on Lower Thames Street or from the new terrace and entrances from the Quayside.
618. There is concern that the proposed access to the building remains highly hotel managed. The disposition of uses in the Queens Warehouse reduces the inclusivity and comfort of the public access areas and route through with most of the area being proposed as hotel front of house, or retail food and beverage resulting in potential uncertainty over whether a non-guest or patron would be welcomed.

The very restricted opportunities for members of the public to access the Long Room and the disconnected location of the Museum from the rest of the building, the river and the Quayside fails to fully achieve the aims of adopted and draft development plan policy which seeks improved public access to heritage assets and enhanced interpretation of the City's heritage and the consideration that should be given, when dealing with historic buildings, to inclusive design enabling as many people as possible to access and enjoy the historic environment.

619. The proposal would result in inactive frontages and would not contribute significantly to increasing vibrancy and vitality along the river frontage.
620. The restrictions placed on the area of public realm created on the Quayside are inappropriate and not supported by officers. The Quayside should be unrestricted and provide unfettered public access 24/7 365 days a year.
621. This proposal to fetter public access to the Quayside and Custom House is contrary to the principles of the Mayor's draft Public London Charter, the planning objectives and policies to achieve social and economic inclusivity in London's developments and open spaces, and the key aims to achieve a welcoming and unfettered environment for visitors to, workers and residents of the City in this area identified as a key area of change.
622. In conclusion, the proposal would result in a non-inclusive form of development, the result of the proposed management, curation, use, layout/disposition, appearance and inactive frontage, which would not deliver a successful public realm for all and so would not constitute Good Growth, contrary to Local Plan Policies CS 10, DM 10.1, DM 10.3, DM 10.8, CS 19, DM 19.1, London Plan Policies D3, D5 and D8, policies of the NPPF and the National Design Guide, emerging City Plan Policies S1, S8, S17, S19, OS1, in particular when seen through the 'lens' of the Good Growth objectives, GG1-GG6, including guidance in the Mayor's Public London Charter, Expanding London's Public Realm and Making London Child-Friendly. Officers consider it would fail to deliver an overall positive contribution to the City or London.

Urban Greening:

623. The proposed development would result in an estimated Urban Greening Factor (UGF) score of 0.03.
624. The proposal would therefore fall well short of the minimum Urban Greening Factor (UGF) set out in London Plan Policy G5 (Urban Greening) of 0.3. G5(A) is clear that major development should contribute to the greening of London, incorporating green infrastructure as a fundamental element of site and building design, including trees, green roofs, green walls and nature-based sustainable drainage. Emerging City Plan Policy OS2 (City Greening) requires all new development to demonstrate the highest feasible levels of greening consistent with good design and context. The NPPF, paragraph 131,

recognises the importance of trees, stating all new streets should be tree-lined and opportunities should be taken to accommodate trees elsewhere in development.

625. The proposal would retain the mature avenue of London Plane trees and conditions would be attached to ensure their future prosperity. Otherwise it is a hard-urban historic site with obvious constraints when incorporating green infrastructure with the fabric of a listed building. However, even accounting for this, it is not clear, that urban greening has been optimised. All that is proposed a single additional tree on Water Lane and a small amount of planters and green roof elsewhere, some of which make it difficult to deliver a successful wider public realm.
626. Overall, accounting for constraints, it is not considered that urban greening has been optimised or delivered as a fundamental and integral element of site and building design, contrary to London Plan Policy G5, whilst having regard for emerging City Plan Policy OS2.

Inclusive Access

Inclusive Access within the Building

627. Planning policy requires that developments are designed and managed to provide for the access needs of all communities, including the particular needs of disabled people: Local Plan policies CS10, DM10.1, DM10.5 and DM10.8, policies S1 and S8 of the draft City Plan and policy D5 London Plan. In addition, Policy E10 of the London Plan requires Visitor Infrastructure to be accessible.
628. London Plan 2021 Policy E10 states that either 10% of new bedrooms should be wheelchair-accessible in accordance with BS8300-2:2018 Figure 52 and Figure 30 or 33, or 15% of the new bedrooms should be accessible in accordance with BS300-2:2018 19.2.1.2;
- 5% wheelchair-accessible en-suite shower room for independent use
 - 1% with a tracked hoist system and a connecting door to an adjoining (standard) bedroom
 - 5% with en-suite shower room to meet the requirements of people with ambulant mobility impairments
 - Further number of bedrooms to make up a total provision of 15% of all bedrooms which should be large enough for easy adaptation to accessible bedroom standards.
629. The City of London Access Group (CoLAG) formed a focus group to provide observation on the submission scheme in relation to inclusive and accessible access parts of the development. They raised a number of concerns, detailed in the consultation section of this report, which can be summarised as follows:
- Welcome the reuse of a historic building The plans are complicated with narrow corridors, and the management of the building would be a key issue, with lots of competing uses

- The proposed layby would restrict use of footpath on Lower Thame St
- Disappointing that disabled parking is in the basement and not visible at ground level
- The changing places toilets are located in the wrong place and would not be conveniently located, especially for guests on the Quayside and there is no clarity on how hotel guests access it
- Concerning to see that access could be determined by someone affluent, does not increase social mobility
- Access seems to have been a 'last minute' addition and this is not an exemplary scheme
- External pathways/footways are far too narrow once the area is filled with stalls and tables
- Do internal and external doors have sensors to assertively open them?
- Could a sesame life be provided for fire escape?
- If Quayside is closed for an event, especially on Water Lane, it would be impossible to access the public cycle parking
- The internal layout of the Queens Warehouse is not acceptable in access terms
- There is only one accessible toilet on the GF
- The ramp of the Quayside is not fit for purpose, it is extremely long and narrow, the sharp corners will be difficult to negotiate and it would also not be compliant without passing places
- Level access for taxi drop off would be required to allow ramps to discharge
- Fire evacuation: Policy D5 for inclusive design. Needing to have a fire evacuation lift
- Signage and navigation will be an issue
- Lots of clutter, need to design for neurodiversity
- Widths of the corridors in the gardens / terraces garden entrance that is only 1500mm wide
- Terrace at 5th floor pathways just edge over the 1800mm-width mark, there ought to be passing places in line with building regs and standards.
- There would be several pavement pinch points created as a result of the development, especially outside the new museum steps where it would be reduced to c1m which is insufficient for a less ambulant user to pass
- How would safe fire evacuation of the museum work?

630. CoLAG have not supported this scheme and the strong comments and objections provided have been taken into consideration.
631. The committee raised a number of concerns in relation to access issues present within the current building design and the external areas of public realm proposed, including level changes and public highway alterations.

632. Officers have negotiated with the developer to provide 10% accessible rooms. The original application submission was not compliant and further negotiation required the developer to offer a selection of rooms 'pepper potted' throughout the hotel, including ones within both the eastern and historic western blocks and ones with river views and parity of access to all areas of the building.
633. The plans do not show 1% of rooms with a tracked hoist system, however, the Design and Access Statement does refer to a hoist being available upon request. The provision of a hoist and appropriate room set up, including neighbouring companion room would be required by condition if permission were to be granted.
634. As such, officers consider that the proposed plans show, that from the first occupation of the development, 10% of the hotel bedrooms would be wheelchair accessible which meets the requirements of Local Plan policy DM11.3 and London Plan policy E10. If permission were to be granted a condition would be required to ensure these are provided.
635. Accessible sanitary facilities including accessible WCs would be provided for use by visitors at basement, ground floor, first floor and fifth floor levels. Accessible shower and changing facilities would be provided in the basement for the gym/ spa and within the staff facilities. There is no accessible WC proposed within the museum and only one accessible WC proposed on the ground floor which is unacceptable given the fact that along with the events that could take place, users would have to wait longer than expected or travel to other floors to use an accessible WC.
636. Vertical circulation within the hotel would be via four passenger lifts in the East and West Wing cores (all floors), two passenger lifts within the central block (basement to first floor) and one passenger lift between the museum and fifth floor roof terrace. Horizontal circulation would be step free on all floors except for stepped access on the third floor between the East and West Wing.
637. The proposed development would include two roof top pavilions and associated terraces. The eastern terrace would have a bar/restaurant that would be open to the paying customers. This terrace is considered to have sufficiently sized external spaces that would allow for people to dwell and suitable passing spaces to be maintained. The western terrace would have a bar/restaurant for paying customers, but also be open to the public between 10am-5pm (Tuesday-Sunday) without the compulsion to buy. This terrace is significantly smaller than the eastern terrace and would comprise a narrow 1.8m terrace overlooking the Thames. There is a direct segregated lift from the museum to this terrace which would open onto a narrow corridor area. It is unclear how the terrace is accessed from the lift by members of the public, but the plans would suggest they would need to make their way to the eastern elevation through an area of the bar/cafe. Officers consider that the narrow terrace in the most prime section for views of the Thames would

be constrained and if there were a number of people with accessibility requirements it is unclear how this would be appropriately accommodated. It is also unclear if members of the public could use the internal spaces, for instance if the weather is bad, to look out from the roof top, or if this internal space would have furniture for patron use that would prevent internal use of the space, given the spaces are so tight. In essence, the West Block roof terrace/bar would be a difficult place to access and move about with comfort for a less ambulant users.

638. It is also shown on the plans that the two roof top terraces would be connected to allow for access between them for emergency egress purposes only. This access route would be over 70m long and have a width of around 1m, therefore not acceptable for users with mobility or access needs. The applicant has advised that this would only be used in the case of an emergency and an accompanying wheelchair management plan would be in place for emergency egress. A condition would therefore be required if permission were granted to ensure this part of the roof terrace was only to be used in emergency situations and a wheelchair management plan be submitted.
639. Two designated off-street wheelchair-accessible parking spaces would be provided in the basement of the building. It is not detailed how these would be advertised to blue badge holders as to their presence, or if they would only be available to hotel guests as part of a stay, rather than for wider public access and use, for instance if a user wanted to visit the Quayside for a river walk or to make use of the area of public realm for a Quayside/Managed Event.
640. London Plan policy S6 requires the provision of a Changing Places facility in large scale developments, and Building Regulations require the provision of at least one changing places toilet in assembly, recreation and entertainment buildings, such as hotels with function facilities, museums etc with a capacity of 350 people or more.
641. The proposed plans show a changing places toilet is provided within the museum. It is unclear from the plans if or how this would be accessible by hotel users, corridors are shown from within the hotel, however, no details have been provided of the operation or management of the competing uses and spaces. Also, it is not known if the changing places toilet in the museum space would be accessible outside of museum hours for either members of the public, patrons of ancillary uses or hotel guests. The Changing Places facility should be readily available to all visitors to Custom House, with convenient and independent access and no opening time restrictions.
642. It is considered that the applicant has not demonstrated that there would be free and unrestricted access to the changing places toilet facility for the use of hotel guests or event guests associated with the hotel.

Inclusive access and Public Realm

643. London Plan 2021 D5 states that developments should “be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and Policy D8 states that public realm proposals should be accessible, with appropriate management arrangements in place that “maximise public access and minimise rules governing the space”.
644. The building would be made accessible by ramp from the Quayside. The ramp would be 1.8m wide and comprise one section at 30m Long with a dogleg to the next section measuring 20m long, therefore the ramp would be a total of 50m long. There are level landings at every 5m. This is an extremely long ramp, and due to its narrowness, there is no scope for implementing benches or seats on any of the landing areas. There are small garden areas at landing number 6. No alternative means of accessible entrance has been proposed to overcome the need to use the long ramp; therefore, this is the only accessible entrance for the public from the Quayside into the publicly accessible route through the building. The ramp is not considered to be practical as it may cause fatigue to those who require its use due to its length and lack of resting places, therefore it is not considered to provide the highest standard of inclusive access.
645. Officers are concerned that current proposals would allow for all or parts of the Quayside to be closed for private events, for substantial periods over the course of a year. If an event was to close off the external terrace at ground floor level, for say a private drinks reception, or the central area of the Quayside for a wedding reception, access to the public areas of the building would be impeded and the ramp would be restricted to access the building. Further to this there may also be obstructions when there are free public events such as food fairs and Christmas markets on the Quayside. It is considered unacceptable that the applicant has not demonstrated designated clear, inclusive access routes are proposed within the blue line area of the quayside to the Custom House staircase and ramps during times when events are to be held.
646. It is proposed to implement a taxi drop off lay-by at the front of the building off of Lower Thames Street. This would create a pinch point along the existing public right of way. Although this would be a minimum of 2m, it is still considered to constrain the existing right of way and pedestrian comfort levels in this area. It is also considered that given the level different between the pavement and the layby it would be problematic for disabled taxis to discharge ramps for passengers to exit onto the highway.
647. Proposed adjustments to the pavement levels on Lower Thames Street and the creation of appropriately designed ramps from the Quayside and from land adjacent to Old Billingsgate Walk ensures that there would be, in principle, step free access to all parts of the building from

outside.

648. To the west of Custom House, the pavement to the museum entrances and cycle stands would have unrestricted access, however there are sections narrower than 1.8m (minimum width required for two wheelchair users to pass each other) and a narrow pinch point by the new museum stairs approximately 1.15m wide. There are Environment Agency constraints which prevent the raising of the adjacent carriageway to improve the width of the pavement, however it was previously believed that the carriageway could be used by some pedestrians which would help reduce the number of pedestrians on the pavement and prioritise access for people who require step-free, level surfaces. As the carriageway would be within the blue line area, this would impact the volume of pedestrians on the pavement and the pedestrian comfort levels. There is a 1.5x1.5m wheelchair manoeuvring space at the southern end of the pavement, but it is located on a slope which is not practical.
649. To the east of Custom House, the blue line area covers the whole of the western pavement of Water Lane and a substantial proportion of the western pavement, with the unrestricted access being extremely narrow to the east and at the north of the lane.
650. Access routes should be a minimum 2m wide, as this allows for two larger electric mobility scooters to pass each other. It is also important to note that an aim of the City of London Transport Strategy (Proposal 2) is for all pavements to have a minimum Pedestrian Comfort Level of B+. The reduction of the access routes, both quantity and width, would negatively impact the Pedestrian Comfort Level and could create uncomfortable and crowded pedestrian experiences.
651. All the benches in the public realm are located within the blue line area, so access to resting points could be restricted if the Quayside was closed for events. The pocket gardens are also within the blue line area so access could be obstructed and prevent the opportunity for people to rest whilst using the ramps. The pocket gardens are also narrow and have constrained entrances, which may make them difficult to use for people with mobility issues.
652. As such, Officers consider that it has not been demonstrated that the development would achieve an environment that meets the highest standard of accessibility and inclusive design and would therefore not satisfy Policies CS10 DM10.8 of the Local Plan, emerging Policy S1 and HL1 of the draft City Plan, or Policy D5 of the London Plan.
653. If planning permission were to be granted detailed design of the external landscaping, including surfaces, seating, ramps and stairs, cycle parking and internal and external doors would be required by condition.

Culture and Cultural Strategy

Policy Background:

654. Policies CS11 and DM11.2 in the Local Plan 2015 and policy S6 in the emerging City Plan, require the protection of existing objects of cultural significance and encourage new cultural experiences and art works. Policy S6 in the emerging City Plan requires the production of Cultural Plans for major developments, outlining how the development would contribute to the enrichment and enhancement of the City's inclusive cultural offer.
655. Seen through the 'lens' of the Good Growth objectives, in particular GG1 and GG5, such uses should demonstrably be for a wider demographic, increase participation, social integration and deliver a fairer, more inclusive and equal London and promote London's rich heritage and cultural assets. To do Officers needed to be clear that the use would be inclusive, with a broader social and education remit, and that this is deliverable and 'baked-in' to a permission/consent, for it to be considered 'Good Growth', that is socially and economically inclusive.
656. Emerging City Plan Policy S19 seeks to enhance development in the Pool of London area by encouraging cultural events in public spaces and by enabling communities to appreciate and interpret heritage assets. Policy HC5 of the London Plan seeks to support the continued growth of London's cultural facilities.
657. In 2019 the Mayor of London published a River Thames Cultural Vision which seeks to elevate London's international profile and deliver on the Mayor's Good Growth priorities set out in the new London Plan. The Vision aims to drive and enhance significant economic, environmental and social change, identifying the River Thames as a growing destination for major cultural organisations, offering a multitude of reasons to visit the City, increasing and widening its cultural tourism offer and central to driving London's evening and night-time cultural life. The Vision offers opportunities to deliver on many of the Mayor's priorities for London by, amongst others:
- Broadening access to culture for all Londoners, including delivering on 'All of Us: The Mayor's Strategy for Social Integration calls for Londoners to come together and recognises cultures role in shared experiences.
 - Promoting cultural infrastructure as important to the success of large-scale developments
 - Increase engagement of underused areas and inspire Londoners about the heritage and importance of the River Thames to London
 - Promoting access to nature
 - Encouraging journeys along the Thames
658. The Vision identifies ten key opportunities to deliver its long term

objective of increasing engagement with underused areas and to inspire Londoners about the heritage and importance of the River Thames to London, connecting its diverse communities with each other and the River and putting the Thames back at the heart of London's cultural life, in particular for East London.

659. The City of London Cultural Strategy 2018-2022 sets out the City's objectives to seize a once in a generation opportunity to reposition the City as a world Capital for commerce and culture, harnessing the power of arts, heritage and learning to make the Square Mile far more open, creative, resilient and entrepreneurial. The vision includes a wide range of strategic objectives from delivering cultural excellence and championing cultural leaning to promote our cultural, heritage and creative strengths and widening and diversifying audiences. The vision also seeks to transform the City's public realm, making it more open, distinct, welcoming and culturally vibrant, and to better promote the City's world class culture and heritage offer, using outdoor spaces to widen its appeal to a more diverse audience, enabling communities in the City and beyond
660. The City of London's Open Spaces Strategy (2015) seeks to create a network of high quality and inspiring open spaces which helps to ensure an attractive, healthy, sustainable and socially cohesive place for all the City's communities and visitors.
661. The proposed scheme is accompanied by a draft Cultural and Community Strategy (May 2021). Any Cultural Plan should set out aims to ensure that the proposed development would successfully deliver cultural benefits locally, nationally and internationally with far-reaching social value embracing the 10 principles set out in the Mayor of London's River Thames Cultural Vision.

The Proposal:

662. The submitted Cultural Strategy for the building sets out the intention to 're-establish Custom House as a gem in the heart of the City of London for everyone, all year round' and includes the following specific offers:
 - The creation of a free to access Museum (456sq.m) , open 6 days a week (Tuesday to Sunday, excluding Bank Holidays) from 10am to 5pm on the ground floor of the north-west corner of the building, linked to the West Block courtyard and including a café area in the Tide Waiters Room. The Museum would be accessible from external entrances on Lower Thames Street and land adjacent to Old Billingsgate Walk. There would be direct lift access to the West Wing roof café/bar and terrace from the Museum courtyard/cafe, providing free public access during Museum opening hours, without compulsion to purchase The Museum would be curated by a Heritage Partner, appointed and managed by the hotel operator. After public opening hours the Museum space and roof terrace café/bar would form part of the hotel's operations and functions, including access to the rooftop for customers or hotel patrons.

- Pre-bookable tours of the Long Room and the Robing Room (one per calendar month) provided by the Heritage Partner.
- Heritage Partner use of the Long Room and Robing Room for 24 timed slots per year (a timed slot being 9am to 1pm, 1pm to 4.30pm and 4.30pm to 9pm) (subject to the Rooms' availability and at the discretion of the hotel operator).
- In key public areas, including the main entrance lobby from Lower Thames Street, which would have unrestricted public access, display boards relating to Custom House's history and heritage would be displayed.
- A Culture and Community Strategy would be submitted to the City Corporation for approval prior to the opening date. This strategy would include proposals for the historic display areas and/or artefacts providing details of the history of the property, a specification for the historic display areas and a programme for the implementation of the strategy.
- The hotel would be occupied in accordance with this strategy for the first 5 years after the Culture and community Committee was established.
- A Culture and Community Committee would be established by the Owner with (amongst others) representatives of the Owner, the City, a Ward member, GLA, the Heritage Partner, Museum of London, local residents.
- A culture and community events officer, part of the wider hotel events team, would be recruited, and will implement the Culture and Community Strategy, organise a program of events and prepare the annual report for the review of the Culture and Community Committee.
- The holding of Quayside Events which are cultural and social events that are open to the general public.
- Use of meeting and event spaces free of charge for a number of days each year, including free Wi-Fi as part of those uses.

663. The proposal scheme is for a luxury hotel, it is considered that most of the ancillary offering, such as bars, restaurants, events and leisure facilities would be of a high end provision, and not necessarily accessible to all as a paid for public use. As such, the free public access offerings, are considered fundamental to enabling varied and diverse communities to experience and engage with this strategic heritage asset on the Thames, one of the last great Thames-side assets to come forward for reuse

664. This is especially true in relation to the Long Room, which has a unique place in the Capital's and Britain's identity as a global trading nation and the origins of London as a 'World City'. It was once famed in the public imagination as a unique place for social and cultural mixing. The Robing Room, an important antechamber of it, is also reflective of that honour in public service and interface between the state and the wider populace. The Applicant intends that these are used as ancillary hotel facilities, hosting corporate functions/events.

665. These would only be accessible for free on a potential maximum of pre-bookable tour once a month or as part of a Heritage Partner event (which may not be free of charge). It is unfortunate and a real missed opportunity to not provide increased public access into this significantly important internal space, unless you were to pay for the hire of the room it would only be accessible for free a handful of times a year to the public. The limited periods over which a Heritage/Cultural Partner would have to curate/programme it, at the discretion of the hotel occupier, for potentially more inclusive public events, is limited. The proposed Heritage Partner, under the current terms, would not be independent, but owned and managed by the hotel, potentially limiting the wider social remit, dependant on the nature of the final Cultural Plan Implementation Strategy.
666. In the ordinary course of business, a public route through the building from the hotel entrance on Lower Thames Street of the hotel river terrace on the southern side of the building would be created through the hotel reception lobby. Submitted plans show this as a narrow strip through the building flanked on either side by hotel reception areas, waiting areas and beyond this, restaurant and bars. The public route would be open between 9am and 10pm each day (as long as the hotel is in operation) to the public. It is not detailed in the strategy how the public would be advised of the public route and this would be something the City would expect further information on, as it could be interpreted from Lower Thames Street that it is just an entrance to an exclusive hotel. The route through the hotel would lead out onto a terraced area, where steps or ramps can be taken down to the Quayside. The terrace areas are outlined as being for the bar/restaurants as external seating areas. There are narrow strips highlighted on the public access plan that show how the terraces can be used to access the ramps. It is considered that there would be little space for the public to freely dwell on the terraces and appreciate the views of the river or appreciate the architecture of the building, they would essentially be narrow access corridors.
667. Again, a real missed opportunity for enabling inclusive use of the building's spaces. It should also be noted that this public route can be shut off by the hotel operator if required, for instance if there is a private event with the building or on the Quayside. There is nothing in the draft Heads of Terms proposed which would 'bake-in' an independent heritage/cultural partner into the curation or programming of the defined 'Public Access Areas' outside of the museum space.
668. An amendment to the scheme was provided to include a publicly accessible museum space that would allow for the potential interpretation of the buildings rich and significant history to a diverse demographic and new audiences. The museum, with Café, would be provided at ground floor level in the western part of the building. The main entrance to the museum will be from land adjacent to Old Billingsgate Walk, tucked around the side of the building, rather than in relation to the main civic arrival experiences This is considered a

missed opportunity to not include an entrance from the Quayside, to which the heritage of the building is intrinsically linked, and to those more prominent areas of higher footfall, and have the ability to draw in passers-by to view an interior part of the building clearly identifiable as a public space.

669. The museum will be curated by a Heritage Partner and owned and managed by the Hotel. The museum and its entrances will be fitted out by the hotel, including internal decorations, and the LPA would not meaning input under the current terms. It is unclear from the submission document how much autonomy the Heritage Provider will have in the curation of the spaces. Officers are concerned that as the hotel will be responsible for the internal decoration of the museum it could become an extension of the luxury hotel branding and not an inclusive space for learning and exploration.
670. The LPA would have no remit in securing a broader social and educational outreach remit for the Heritage Partner, who would not be able to extend their wider public remit outside of school and working hours during the week. It is not unusual for 'heritage hotels' to have spaces with boards on a wall, but which are otherwise part of the wider ancillary functions of a hotel.
671. It is unclear what the museum would be used for outside of opening hours and if the hotel operator would use the space for events or functions. This may lead to a conflict between the curation of the spaces as a functional museum and one that is adaptable to private events. Over time, the wider public could come to understand these spaces as more ancillary to the hotel as a result of their out-of-hour private or corporate use.
672. It is unlikely that the Museum would use the Tide Waiter's entrance or the more prominent entrance on Lower Thames Street, but would use the even less prominent ramped non-historic access to have a single, secured and dedicated inclusive access point.
673. The cultural strategy refers to a Heritage Partner being appointed for the curation and management of the museum; this will be appointed by the hotel operator. It is unclear how the Heritage Partner will be funded, given that there is limited scope to host fundraising events and with such limited access to the Robing/Long Room (at the discretion of the hotelier).
674. They will be responsible for the staffing of the museum, the provision of artefacts, running of events and any other associated costs. The strategy states that the museum will be fitted out by the hotel, but it does not state if the Heritage Partner will have to pay rent, utilities or any other associated running costs such as insurance. The museum is free to visit. It is therefore unclear how the museum would generate revenue to cover its costs. It is not stipulated if the Long Room events could be monetised or if the café would be a source of revenue capable of sustaining the museum. It is also unclear if the Heritage Partner has any discretion in opening hours or the use of the museum spaces

outside of public access times to hold revenue generating events. As such, Officers are concerned that the museum would be unviable as set out within the Cultural Strategy. It is also considered necessary to consider the submitted viability assessment for the scheme, where the inclusion of a museum on the site would likely result in the marginal viability of the hotel scheme. It is not clear whether the final Heritage Partner would be an independent credible creative outfit, rather than just an extension of the hotel.

675. These two concerns combined do highlight a significant area of concern for the longer-term viability and provision of the key public offering in relation to the cultural benefit and historic interpretation of the scheme.
676. As part of the museum, there would be a segregated lift to the roof terrace at level 5 within the West Block. Free public access to this small terrace would be provided within the museum opening hours. The terrace would also be open to hotel patrons or users of the terrace bar/restaurant. The access to the terrace would be on a first come first serve basis. It is not known what the capacity of the terrace would be and if the bar/restaurant use would be able to provide bookable spaces which would curtail the public access provision. The Cultural Strategy does not currently provide any detail on this. In reality, it could be that the public could often not be able to gain access to roof terrace, which could be full with paid guests/visitors.
677. There is limited WC provision for the proposed museum, which would be at roof level. If the roof was 'full', then a museum guest would need to exit the building and attend the toilets off the hotel lobby.
678. The museum area would be an annexed and landlocked part of the ground floor, divorced from those principal civic spaces of the Quayside, Queen's Warehouse, Long Room and main lobby which are so important to the narrative of the building. They would have limited to no stake in their active curation and programming to ensure there is the potential pre-conditions for a more diverse mix of media and content which could attract a wider public.
679. It is considered that this limited public access to the building's internal spaces for Cultural events and cultural and historic interpretation falls short of a meaningful offer commensurate with the significance of this building and site. It has not been demonstrated within the strategy that the hotel would provide an inclusive and well promoted public access offer. There is insufficient detail relating to the curation of spaces, events, public access, heritage partner and X within the cultural strategy.

Quayside

680. The Cultural Strategy outlines the intention for a year-round programme of events for the Quayside including both public and private events. Early ideas include:

- installation of heritage panels and information boards providing information about Custom House, the listed historic cranes and the building's role in the Pool of London.
 - Pop-up kiosks for food and drink, Christmas markets or other publicly access events.
 - Private events and significant closures of the Quayside.
 - Two plinths on either side of the raised terrace for the display of art installations (it is unclear if these are permanent or not)
681. Whilst the submitted Cultural Strategy sets out the possibility for public events, it is relatively silent on private events. There is no information on the balance of the events calendar, if the hotel would be in operation of them all or if guest curators or the Heritage Partner would have ability to host events. Currently the strategy gives all weight in the events on the Quayside to be within the control of the hotel operator.
682. The Cultural Strategy states that public access will be open to and actively encouraged to the Quayside. A calendar of events over the year will be planned and managed by the Hotel operator. The strategy states that 'this acre of space in the heart of the City will be warm, inviting and buzzing with activity. A place that brings people together. Where everyone feels welcome.' Officers welcome this initiative strategy, however, consider that the proposed provision falls short of this aspiration. Given the most up-to-date offer provided by the application (public offer email dated 18/08/2021) which would allow for up to 100% of the Quayside to be shut off for private events for a significant amount of time over the year. The cultural strategy does not give detailed consideration to the types or duration/mix of private events. For instance, over peak days or months the hotel operator could host mainly private events, shutting off the Quayside and public access to the building from the Quayside to the public. It is unclear how the Quayside would be closed off, if there would be fencing or security set up to stop the public accessing the site, therefore creating a wholly unwelcoming space that create physical and social barriers .
683. The Cultural Strategy submitted is aspirational in its objectives and this is welcomed by officers, however, there is significant concerns that the conflict between public and private access and events is likely to result in the aspirations of the strategy to fall short in reality. The marginal viability of the scheme is a material consideration in the ability for the aspirational cultural strategy to be delivered. It is unclear how the provision of the museum would be sustained over the lifetime of the development. If the significant closures of the Quayside are required to ensure the hotel is profitable (unclear as it has not be included within any viability assessment), then the public benefit of the space must be equated to the provision of the Quayside for public use, accessible cultural and community uses, and interpretation of the heritage asset.
684. As outlined in within other sections of this report, the closure of the Quayside for private events is not supported by the City and is not considered to fulfil the policy requirements for unfettered public access to new areas of public realm on the riverside, or for a Cultural offer to

broaden access to culture for all Londoners.

685. The Strategy identifies the opportunity to partner with schools, local groups and City institutions such as the Tower of London, Museum of London, the Livery Companies to curate a seasonal cultural and educational programme for all. This is wholly welcomed and further detail should be provided on how this would be provided, if there is an expectation of the Heritage partner to satisfy this objective, this needs to be factored into the funding of the provider to carry out this additional work.
686. In addition to a Heritage Partner, the Strategy proposes that a Culture and Community Events Officer would be appointed by the hotel to sit within its large events team, in order to implement the Cultural and Community Strategy. A Culture and Community Committee is to be established at the discretion of the hotel operator, comprising amongst other representatives of the Owner, the City, a Ward member, GLA, the Heritage Partner, Museum of London, local residents. This is welcomed and the full details of the responsibilities and governance the committee would have over cultural offerings and balance between the public interests and the private hotel interests.
687. In conclusion the history and tradition of Custom House, which is of local, national and international importance and the significant value of the public open space on the Quayside gives an unprecedented opportunity to deliver a vibrant, varied and inclusive Cultural offer for workers, residents and visitors to the City. Custom House would become a major landmark destination on the North Bank of the Thames and would integrate with the network of other historic institutions in the City and on the river.
688. The draft Cultural and Community Strategy, outlines a number of ideas and commitments to implement an inclusive, diverse and sustainable cultural offer. This is wholly welcomed and should underpin any proposal on this site. However, for the reasons outlined above, officers do not consider that the scheme presented would be deliverable in line with the supporting Cultural Strategy. Therefore, the proposal would not demonstrate that it would contribute to the enrichment and enhancement of the City's inclusive cultural offer. It would not enhance development in the Pool of London by not encouraging cultural events in public spaces and by enabling communities to appreciate and interpret heritage assets. The development would not deliver the Mayor's priorities as outlined in the River Thames Cultural Vision or Good Growth priorities.
689. As such, the proposal would be contrary to Policies CS11 and DM11.2 in the Local Plan 2015, policies S6, S19 in the emerging City Plan and Policies HC5 of the London Plan.
690. If the appeal were to be allowed, to ensure the delivery of a tangible and successful cultural strategy, befitting of this significant historic building and site, a robust Cultural Implementation Strategy would need to be secured in the S106 agreement. This would need to secure a

year round reviewable Cultural Programme which would establish monitorable deliverables in the curation of the internal and external spaces for cultural activities and events, the sharing of knowledge and the celebration of the history of Custom House, which would respond to the needs of the local area and be informed by a continuing dialogue with stakeholders, the local community and building users.

691. The applicant has submitted a draft Heads of Terms. Officers have concerns regarding the proposed draft Heads of Terms in respect of provisions of the Cultural Strategy including:

- The restrictions to public access to the Quayside and the building as discussed elsewhere in this report;
- No inclusion of the terms around the selection criteria, appointment or retention of a Heritage Partner;
- No requirement to obtain Local Planning Authority approval of the Heritage Partner to be appointed by the hotel operator and the provision that, if it is not possible to appoint a Heritage Partner despite best endeavours, then details of an alternative use of the area to be submitted to the City, meaning the proposed Museum could fall away;
- The apparent limited remit and locus of the Culture and Community Committee;
- That the relevant period for the implementation of the approved Culture and Community Strategy and the existence of the Culture and Community Committee lasts only 5 years. What the Operator's intentions are for after this period are not set out.

692. It is considered that the proposed draft heads of terms for Culture and Community Strategy, Museum and Public Access as currently drafted would not robustly secure the delivery of an inclusive, diverse and sustainable cultural offer in accordance with Development Plan policy. As such, officers consider that there is very limited public benefit that could be attributed to the cultural and community strategy, and its deliverables.

Residential Amenity

693. Local Plan Policies CS10, CS11, DM10.3, DM11.3, DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14 seek to protect the amenity of neighbouring uses, including residential, from adverse impacts of uses including hotel and culture from noise, light pollution, daylight and sunlight and other amenity impacts.

694. Draft City Plan policy DE5 requires that there is no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity from roof terraces

Noise

695. Local Plan policies DM15.7, DM 3.5, draft City Plan policies CV4, HL3 and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise, including from evening and night-time uses does not adversely affect the amenity of residents and other noise sensitive uses.
696. The nearest noise sensitive receptors to Custom House are the residential flats at Sugar Quay, immediately opposite to the east, and the Premier Inn hotel to the north-east of the site.
697. The application was initially accompanied by an Acoustic Planning Report (11th June 2020, prepared by Sandy Brown). Following amendments to the scheme an updated Acoustic Planning Report (June 2021, prepared by Sandy Brown) has been submitted in support of this application. The report states that an environmental noise survey was carried out to establish background sound levels around the site and close to nearby noise sensitive premises, and ambient and maximum noise levels at the site (summer 2019).
698. The noise report considers the internal environment of the proposal for hotel guest rooms and the requirement of internal sound insulation of the retained structure. It should be noted that the proposal relates to a Grade I listed building and any noise or acoustic interventions will need to ensure that there is no conflict with the conservation and enhancement of this significant heritage asset. The report assumes that if the brick walls are made good the thickness of brick wall would provide acceptable levels of sound insulation. These predictions assume that horizontal flanking through the timber floors is well controlled. The report states that this is to be assessed in detail as the design progresses. The existing floors would achieve around 5-10 dB lower than the minimum Approved Document E requirements for both airborne and impact sound insulation. Interventions would be required within the existing timber floor structure.
699. In relation to the external facades the report considers façade sound insulation measures to control noise ingress, especially from Lower Thames Street. The elevation fronting onto Lower Thames Street would require R_w+Ctr 38 dB as a minimum glazing sound insulation. This would result in secondary glazing being required in addition to the existing original windows.
700. Officers are conscious that interventions to floors and windows to provide adequate acoustics within the building may cause conflict with the Grade I listed building, where original features such as windows are protected to ensure the historic significance of the asset is conserved. Subject to the proposed glazing specifications being acceptable in Listed Building Terms, it is considered that the application would provide acceptable internal noise levels for hotel guests.
701. The noise report(s) consider the operational noise generated by the two roof top terraces. The report focuses on the eastern terrace due to

its proximity to the residential properties at Sugar Quay. The end of the proposed terrace would be 25.5 metres away from the end of the proposed roof terrace.

702. The report submitted in August 2020 proposes noise from the terrace is limited to 10db above the average noise levels. The noise survey results used to inform this would result in limits on operational noise at 1m from the nearest residential receptor being 52bd (daytime) 50bd (night-time).
703. The August 2020 report considers that the east wing terrace, based on 15 people speaking in raised voices at the same time would result in noise levels of 50db at the nearest window at Sugar Quay. The report sets the following operational noise limits of terrace being 83bd (daytime) 81db (night-time) based on a typical terrace bar break out space with limited background music noise. Internal spaces could reach levels 20-30db higher than this if a suitable facade is used, doors are installed with good seals and not left open when the space is operational. The figures put forward consider that the Sugar Quay development windows are closed as the apartments, due to whole house ventilation and comfort cooling, would not require windows to be opened.
704. The report submitted in June 2021 provides further detailed assessment of the predicted noise levels from the roof top terraces. This report is based on the terrace being occupied to its maximum capacity (1 person per sqm), however, only considers that a third of the people are talking at any one time. The report does not quantify this in numbers, but officers have assumed this would mean approximately 190 people could be accommodated on the terrace and 63 people at any one time.
705. The updated assessment would result in a noise level of between 53-55db at the nearest window of Sugar Quay. This conservative estimate is above the limits set out in the August 2020 report which states that noise limits for residential receptors should be under 52bd. The applicant has justified this by stating that the ambient façade noise levels at Sugar Quays is already above this, therefore resulting in no noticeable noise from the terraces, based on windows being closed.
706. Officers note that based on the two reports submitted the increased capacity on the terrace, from 15 people speaking, to 63 people speaking (of a potential 190 people on the terrace) would result in only a 3-5 db increase in noise at Sugar Quay.
707. The updated assessment also includes a comparison of the predicted transmitted terrace noise levels against the internal noise criteria. The British standard for internal noise levels is 30db. The applicant assumes (taken from the Sugar Quay planning report) that sound insulation performance would be between 43-38db, the applicant has subtracted this away from the terrace noise levels (55-53bd) to give a predicted internal noise level of between 12-15db.
708. This updated assessment has taken both an existing ambient façade

- noise and sound insulation performance for Sugar Quay from the Sugar Quay planning report (reference: 14/01006/FULMAJ). Based on these the applicant expects that noise levels from the terrace would not be audible within the Sugar Quay apartments, with the windows closed.
709. Officers do note that the reference drawings in both the submitted reports, within the operational noise sections, display different measurement locations. The earlier report draws from the end of the balcony and the latter report from the central area of the balcony. As such, it is unclear if this has resulted in slightly different assessments being undertaken in the respective reports. It is concerning that if the latter assessment has been taken from a further distance this could result in different conclusions being drawn.
710. It is noted that the assessment submitted only considers the roof terrace impact in isolation on the residential units at Sugar Quay. It has not taken into account any cumulative impacts that could result from other terraces associated with the development site, for instance in there is a large function in the Long Room, restaurants or bars in the central block spilling out onto other terraces or Quayside. Officers consider that this could lead to increase noise levels above that contained within the noise assessment reports. Without this information officers consider that the development could result in unacceptable noise levels, creating harmful impacts to the residential dwellings at Sugar Quays.
711. Given that Officers only received details regarding closures of the Quayside for private and public events on the 18/08/2021 it is not referred to within the submitted noise report. The accompanying public access plan outlines the entire Quayside, inclusive of Water Lane and land adjacent to Old Billingsgate Walk, for the provision of private and public events. Officers have significant concerns regarding the potential for adverse impacts to be caused to the amenity of neighbouring properties, most concerning would be residential properties at Sugar Quay. The hotel would be permitted, as per the submitted information, to close 100% of the Quayside for a significant proportion of time both for private events, such as London fashion week, cinema evenings or weddings, or for public events like Christmas markets or food shows. There has been no submission of any information to demonstrate the impact these events would have on ambient noise levels or what mitigation measures would be required to safeguard neighbouring occupants. No information has been provided on specific timings of events, audio or music allowances, how events would be managed or controlled or how the developer would control people accessing or leaving such events. As such, Officers have been unable to make an assessment on this and cannot conclude that there would not be adverse impacts caused to the amenity of residential properties or other neighbouring developments.
712. The application does not include specific assessment or information regarding the extent and nature of events across the hotel complex for example on the Quayside and in the building. The Long Room has a

capacity of up to just under 1000 people with an associated external terrace area and the roof top terraces for 190 people. There has been no cumulative assessment of the potential impacts that could result from a number of events happening at the same time across the site and the potentially harmful impacts this may cause to the amenity of neighbouring residential properties. There has also been no assessment made of potential cumulative impacts from surrounding uses, such as events being held at Old Billingsgate.

713. Consideration would also need to be given to the dispersal and management of events both within and outside the building to ensure that there would not be harm caused to the amenity of neighbouring properties when events end and potentially crowds of people exit into the local area. The submitted noise report does not consider this. If permission were to be granted a dispersal and management of events plan would need to be conditioned.
714. Officers are also mindful that the main servicing and delivery access is along Water Lane, adjacent to Sugar Quays, to the basement access on the Quayside. No information is contained within the noise survey report(s) that assess the potential impacts of this on the residents of Sugar Quays. Further to this, due to the proposed Quayside closures and events, there is likely to be unrestricted access for set up, servicing and removal of events within the Quayside areas. Given that these have the potential to occupy the space, for instance a public market, for 100% of the time it is not known how the amenity of the residents would be affected or protected in relation to noise and disturbances generated by delivery and servicing vehicles.
715. The survey results will inform the necessary choices for plant equipment, such that the level of noise emissions from plant would meet the criteria stipulated by planning conditions.
716. The City's Markets and Consumer Protection department have reviewed this application and provided the following, most recent, response:

Based on further information received concerning the proposed use of the quayside terrace area this department has significant concerns regarding the potential direct detrimental impact that the quayside terrace is likely to have on neighbouring residential properties. In addition, there is concern that the cumulative impact of the multiple terraces may also give rise to significant levels of disturbance to neighbouring properties.

Insufficient information has been submitted to allow for the determination of the potential impacts on amenity of noise for the proposed terrace usage.

717. Officers have taken the Environmental Health Officers comments into account in the assessment of the proposed development .

718. For the reasons set out above, and to protect the amenity of residential occupants in particular, officers conclude that there is insufficient information to conclude that the impact would be considered acceptable . It is therefore considered that this would have been recommended as a reason for refusal had the local planning authority had the opportunity to determine the as it cannot be demonstrated that there would not be an unacceptable harmful impact to neighbouring properties, including residential dwellings at Sugar Quays.
719. As it cannot be demonstrated that there would not be harm to residential amenity the proposed development would be contrary to Local Plan Policies CS10, CS11, DM11.3, DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14.
720. If planning permission were to be allowed , it is recommended a number of conditions to be imposed which would impose limits and restrictions relating to the operation of the hotel and associated events to protect the amenities of residents and the surrounding area during the period of works and the operational phases of the development.
721. If planning permission were to be allowed , details of events on the Quayside, including hours, and events in the building, would be need to be detailed and controlled under the provisions of a Visitor Management Plan and an Events and Operations Management Plan secured by S106 agreement, and any licences would need to be separately obtained.

Overlooking

722. Local Plan policy DM10.3 encourages roof terraces where they do not immediately overlook residential premises. Draft City Plan policy DE5 requires that there is no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity
723. The western roof terrace would provide a public viewing space associated with the museum and a bar/restaurant space associated with the hotel. This terrace is considered acceptable in amenity terms as it would not result in the overlooking of any neighbouring residential properties.
724. The larger eastern roof terrace would provide a restaurant/bar space associated with the hotel. The proposed roof terrace would be located primarily to the south and would extend to the east towards the east end of the building adjacent to Water Lane. To the other side of Water Lane is a residential development, Sugar Quay, which has a number of windows fronting onto the development site. Sugar Quay is a modern building with large glazed windows and rises some 11 stories in height. Therefore, resulting in direct overlooking of windows from the development site. The measurement from the end of the terrace to the nearest window is approximately 25m. from the eastern end of the

terrace would provide a space for people to dwell and look out into the Sugar Quay development, including into habitable rooms such as bedrooms and living rooms. The submitted plans show a standard height balustrade (1.1m) around the eastern terrace area. There are no details on the plans stating if this would be solid or glazed, however, due to the height even if this was a solid material it would not be of a height sufficient to prevent views being attained from the end of the terrace into the residential properties. The nature of the views south east towards Tower Bridge and City Hall etc and likely to draw observers to this part of the terrace which would increase sense of infringement. Given the open aspect of the terrace and the ability for people to dwell in these spaces is likely to reduce the privacy of the neighbouring properties to some degree, especially to habitable rooms. The applicant has not included assessment of this aspect of overlooking within their planning statement, nor have they sought to include any mitigation measures in this location.

725. Officers consider that a privacy screen could be implemented in this area which may alleviate the potential for overlooking, however, this is likely to result in some harm to the listed building which would need to be considered as part of this application. As no proposal for a screen has been made, Officers are unable to make an assessment at this time. Based on the information provided Officers consider that there would be a degree of overlooking from the terrace area to neighbouring residents in Sugar Quay. As there are no mitigation measures to assess, in its current form there is insufficient information to ensure that overlooking issues could be acceptably mitigated at this time.
726. The roof top pavilion would also have potential for overlooking issues to occur, due to the eastern elevation of glazing creating the potential for overlooking to the same Sugar Quay residents. The proposed lighting strategy states that this elevation would be obscurely glazed which would alleviate the potential for overlooking to occur. Therefore, officers are satisfied that the internal area of the pavilion would not result in unacceptable levels of overlooking.
727. As it cannot be demonstrated that there would not be harm, as a result of the potential for overlooking from proposed roof terrace, to the residential amenity of neighbouring properties the proposed development would be contrary to Local Plan Policies CS10, CS11, DM10.3, DM11.3, DM15.7, DM21.3 and draft City Plan Policies DE5, HL3, HS3, CV3, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14.

Light spillage

728. Local Plan policy DM15.7 and draft City Plan policy DE9 require that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
729. A draft internal lighting strategy has been submitted which describes

the measures to be implemented to reduce light spill from the rooftop pavilions and terraces at a very high level. The eastern glazed elevation of the rooftop bar facing Sugar Quay, would be of obscured glass, to prevent both overlooking and direct light spillage towards the residential units, which of course exacerbates the inappropriateness of the roof extensions as a contextual heritage response. Lighting on the external terraces would be low level and muted, although it is not clear if the required Lux levels can be met without the potential for glare or light trespass.

730. If permission was allowed a condition would need to be included which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity.
731. As such, subject to conditions, it is considered that the proposal would not result in adverse light spill in accordance with Local Plan policy DM15.7 and draft City Plan policy DE9.

Daylight, Sunlight, Overshadowing

732. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) guidelines and considered having regard to policy D6D of the Publication London Plan, policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan 2036. The BRE guidelines can be used to assess whether a noticeable reduction in natural light is likely to occur.
733. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL) for nearby residential windows. These are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane.
734. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction.)
735. For sunlight a window may be adversely affected if it receives less than 25% of Annual Probable Sunlight Hours (APSH) (including at least 5% in the winter months) and less than 0.8 times its former value, or is reduced by more than 4% APSH over the whole year.
736. Ten residential units over the 3rd to 6th floors at Sugar Quay immediately to the east of Custom House were identified as requiring assessment. (Assessment of flats below these levels is not required as

no part of the additional massing on Custom House would be visible above the existing parapet from these units, and flats above 6th floor level would be above the proposed development and so would not be impacted.) Of the 15 rooms and 40 windows assessed, results show that the reductions in VSC and Daylight Distribution (DD) would be negligible ranging between no change and 3% reduction.

737. Likewise, for sunlight, of the 13 windows tested, most would experience no change, and reductions in sunlight, where occurring, would be negligible with windows retaining annual and winter sunlight values within 0.8 times the former value.
738. An overshadowing assessment to the existing public amenity area at St Dunstan in The East Church Yard shows that there would be no change to the amount of permanent overshadowing as a result of the development.
739. The Quayside has also been assessed for sunlight amenity using the permanent overshadowing test. The results show that the space would have good sunlight availability across the year with the entire area achieving at least 2 hours of sunlight on 21 March, in line with BRE Guidance.
740. In conclusion the impact on daylight and sunlight to nearby residential properties and on overshadowing to public amenity areas is well within the BRE Guidelines and would not be harmful. The proposals would comply with the relevant policies of the Local and London Plan.

Sustainability & Energy

Circular Economy

741. Emerging New 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.
742. The submitted Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. Overall, the majority of the existing building is retained, with the non-original east wing being replaced inside its replica exterior walls and above the existing historic underpin foundations. The new works would include lowering of the basement slab and rebuilding the interior structure. This amount of rebuilding is proposed to re-align the floor levels internally, to relocate building services into the basement and overall to achieve a sympathetic relationship between the original and modern parts of the building.
743. The existing post-war structure has been assessed to be unsuitable for adaptation to achieve a high quality and accessible interior that is appropriately corresponding with the historic architecture, due to the differences in floor levels and limitations in the flexibility of the existing construction for this development and any future adaptations. The

retention of the small sections of the existing structure that could be retained is therefore considered to be impractical.

744. In addition, the statement considers the impact of the two new roof pavilions and of the external works.

745. The applicant's commitments to achieve a low embodied carbon impact new structure for the east wing and the extensions include:

- Optimising the design of the new steel and reinforced concrete frame while avoiding the need for strengthening works to the retained walls and foundations
- Using recycled aggregate and 50% cement replacement products for the new concrete elements
- Aiding future flexibility of use and alterations by designing a simple, regular East Wing structure and providing a BIM model (building information modelling) with structural and materials details
- Using hot rolled steel sections (rather than cold rolled steel) that have increased flexibility and can include recycled steel for the new pavilion structures
- Reducing water demand
- Selecting of building services manufacturers that offer "take back schemes"
- Responsible sourcing of materials, local procurement and material performance, to be reviewed during the detailed design stages of the development
- Undertaking a Reuse Viability Assessment (a more detailed pre-demolition audit) in the next design stage to advise on the reuse and closed loop recycling potential of building elements, fittings and fixtures.

746. 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 would be requested by conditions if planning permission were to be granted. The detailed assessment would be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Energy and CO2 emissions

747. The strategy assesses the refurbished areas and the new extension areas separately.

Refurbished areas:

748. The refurbishment would achieve an overall 50% reduction in regulated carbon emissions compared with a building that is compliant with the building regulations relating to existing buildings other than dwellings.

749. The energy demand reduction measures would amount to a 13.1% reduction of carbon emissions savings compared to the Building Regulations compliant building. However, when compared to the performance of the existing listed building, the energy demand

reduction measures would result in a 34.7% reduction of carbon emissions, achieved by measures such as secondary glazing, thermal fabric upgrade of the east wing and active energy efficiency improvements through new building services (see paragraph below regarding the whole development). Improvements to the insulation of the building envelope of the central wing and west wing of Custom House would not be acceptable in the context of its special architectural and historic interest.

New extension areas:

750. The roof extensions would achieve an overall 48.6% reduction in regulated carbon emissions compared with a building that is compliant with the building regulations relating to new buildings other than dwellings.
751. The energy demand reduction measures would amount to a 15% reduction of carbon emissions savings compared to the Building Regulations compliant building which meets the London Plan target for efficiency measures. These include high thermal efficiency to the facades and roofs of the new built elements as well as energy efficient building services (see paragraph regarding the whole development).

Whole development:

752. The proposed energy efficiency measures through active measures include the use of very high efficiency (95%, standard is 90%) gas boilers for some of the heating load, and Variable Refrigerant Flow (VRF) water source heat pumps to provide the total cooling load of the building. In addition, wastewater heat recovery (WWHR) would be incorporated as this is an efficient, carbon saving technology in hotel use where showers constitute over 80% of the domestic hot water energy consumption. Natural ventilation as part of a mixed mode system for the bedrooms could be enabled through the windows at a later date when noise and air pollution have decreased to acceptable levels. Sensors would be fitted to the windows to turn off the mechanical ventilation system when the windows are open, to save energy use.
753. The proposed design has made provision for a future connection of Custom House to a district heating network when this becomes available to serve the site. A space for a future connection has been identified at basement level in the gas boiler plant room space.
754. 69% of the proposed building's heating load would be provided by renewable technologies in the form of Water Source Heat Pumps (WSHP) and Variable Refrigerant Flow (VRF) water source heat pump systems which would generate heat for the majority of the year from the cooling system throughout the building via a condenser water loop.
755. Variable refrigerant flow (VRF) water source heat pump systems will also be used for heating (and cooling) of individual guest rooms which will make up the majority of the heating load for the building. The operation of VRF units is not associated with NOx emissions hence it has no negative impact on air quality.

756. The whole development would achieve 13% carbon emissions savings from energy demand reduction, 37% carbon emissions savings from renewable and low carbon technologies, resulting in 50% carbon emissions savings overall.
757. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission targets. If planning permission were approved a S106 clause would 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 would 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

758. The scheme was pre-assessed against the BREEAM UK Refurbishment and Fit-out (RFO) 2014 scheme. The maximum score that can be achieved by the proposed building at this state is 76.21%, which corresponds to a BREEAM 'Excellent' rating, considered to be an acceptable outcome for a Grade I listed building.
759. The development's scores in the City's three of the four priority categories (Energy, Materials, Water and Pollution) are acceptable. The score in the Pollution category is relatively low (6 out of 13 credits) due to the use of refrigerants needed to run the building's heat pump systems, the need to use grid energy to run these and the limited opportunities to reduce surface water run-off to avoid watercourse pollution. However, further opportunities for the use of low impact refrigerants and to include rainwater harvesting for the western and central roofs would be assessed in the detailed design stage. A post construction BREEAM assessment would be requested by condition.
760. The final BREEAM pre-assessment result complies with Local Plan Policy CS15.

Whole Life-Cycle carbon emissions

761. Emerging New London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the

reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

762. The submitted Whole Life-Cycle carbon assessment for the whole building includes the demolition of the East Wing, as well as the details of the proposed construction, materials and systems for all new built elements and alterations detailed in the Circular Economy Statement.
763. The whole development would meet, and improve upon, the GLA's aspirational benchmark for maximum carbon emissions over the life-cycle of the building. This demonstrates the benefits of the significant proportion of retention of the existing building.
764. Further opportunities to reduce embodied carbon across the life-cycle of the scheme will be considered in the detailed design stages of the development and include:
- Establish a material procurement strategy, including engaging with the second-hand material market
 - Review the viability of low impact refrigerants to reduce in-use emissions
 - Explore material "take back schemes"
 - Identify use for innovative products such as cement replacements
 - Review the opportunity to use timber stud internal partitions instead of steel stud partitions
 - Develop an end of life/deconstruction plan for all modern structures.
765. A strategy that has optimised the results for the proposal's Whole Life-Cycle carbon emissions through the detailed design development, and a confirmation of the post-construction results would be requested by conditions.

Climate Change Resilience

766. Policies DM 15.5 of the Local Plan and DE1 of the emerging City Plan requires developers to demonstrate through Sustainability Statements that major developments are resilient to the predicted climate conditions during the building's lifetime.

Heat Stress

767. The sustainability statement outlines the alignment of the proposals with the GLA cooling hierarchy. The amount of heat entering the building and generated inside would be minimised through the relatively low window-to-wall ratio of the historic building and its high thermal mass, and highly efficient LED lighting and other installations

are designed to prevent internal heat gains. Passive ventilation is not proposed due to anticipated high noise and air pollution levels in the local area. Therefore, the proposals include the incorporation of mechanical ventilation with heat recovery. However, natural ventilation could be introduced in the future.

Flooding

768. The risk of local flooding would be reduced by the proposals to harvest rainwater for irrigation from the eastern part of the roof and by discharging rainwater directly into the river.

Water Resources

769. The development aims to reduce water consumption by 25% over the BREEAM baseline through the specification of water efficient equipment, and a leak detection system. In addition, rainwater harvesting for landscaping irrigation is suggested. These measures will enable the development to reduce the use of fresh potable water which will be under increasing pressure as we experience longer periods of drought.

Natural Capital and Pest & Diseases

770. Although constrained by its current low ecological value, some improvements to biodiversity and urban greening are proposed. These will be further enhanced by the proximity of the site to the Tidal Thames, designated as Site of Metropolitan Importance for Nature Conservation, and help to support 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.
771. 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 a condition is attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

Ecology

772. A baseline ecological survey has been carried out that identifies the site as being of low ecological value, with no notable or protected species or habitats. The proposed development provides the opportunities for ecological enhancement to improve biodiversity and the ecological value of the site for targeting Land Use and Ecology BREEAM credits.
773. The submitted Preliminary Ecological Appraisal has identified the trees on the south side of Custom House to have a high potential for nesting birds.

774. The existing site supports nesting birds, on the roof and in the 13 London plane trees on the south edge of the Quayside. As nesting birds are legally protected, demolition works should take place outside of the nesting bird season or following a breeding bird survey by a suitably qualified ecologist. Enhancements can be achieved by the incorporation of bird boxes either within the built form or hung in trees and the improvement of foraging opportunities with increased landscaping at ground and roof level. Other enhancements are the provision of wildlife friendly landscaping on the proposed green roof and the introduction of bat boxes on the trees to be positioned facing south.
775. If planning permission were to be granted, a condition is recommended requiring details of the provision to be made to improve the ecological value of the site and for these to be maintained for the life of the building.

Conclusion

776. 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.
777. The proposed development would see the continued use of a building, thereby applying circularity principles. A high level of embodied and operational carbon emission reduction would be achievable through the positive impacts of the retention of a majority of the building and the replacement of building services with efficient and renewable technologies.
778. An appropriate degree of climate change mitigation would be achieved. The sustainability strategy overall meets London Plan policies as well as Local Plan policies, and the development is on track to achieve an “excellent” BREEAM assessment rating. The proposals therefore are considered to positively contribute to the environmental sustainability of the City of London.

Arboriculture

779. Local Plan policy CS19: Open Spaces and Recreation Plan protects the amenity and biodiversity value of trees within the City of London and is supported by the Tree Strategy Supplementary Planning Document (SPD) (2012). Draft City Plan 2036 policies OS3, OS4, DE3 and London Plan policy G7 requires the retention of existing trees and encourages additional tree planting to increase biodiversity and create green spaces.

780. The site includes 15 trees: two located on Water Lane and a row of 13 mature London Planes, along the Quayside adjacent to the river.
781. The scheme proposes that these trees would be retained, and one additional tree is to be planted in Water Lane.
782. An Arboricultural Report accompanies the applications surveying the condition of the trees and assessing the potential impact of development on them. The report states that the proposed works to the building and the proposed public realm works to the Quayside will not have a harmful impact on the existing trees and their root systems and stipulates protective measures to be adhered to during the period of works.
783. If planning permission were to be granted, a planning condition would be applied requiring the details of protective measures to be submitted to and approved by the Local Planning Authority.
784. The proposed scheme would comply with the relevant policies above.

Flood Risk

785. London Plan policy SI 12, Local Plan policies CS18 Flood Risk, DM18.1, DM18.2 and DM18.3 and draft City Plan 2036 policies S15 Climate Resilience and Flood Risk, CR2, CR3 and CR4 are the relevant policies addressing Flood Risk. These require that developments deliver a reduction in flood risk, demonstrate the suitability of use in flood risk terms, reduce the risk of flooding from surface water, reduce rainwater run-off and ensure that flood defences provide the highest category of protection for the City, building in flood resistance and resilience.
786. The site is located within the City Flood Risk Area, Flood Zone 3, and a Flood Risk Assessment has been prepared and submitted in accordance with policy. This covers the sequential and exception tests, flood defences, flood gate and basement flood protection and flood emergency plans.
787. The assessment finds that flood risk from surface water, ground water, sewers and artificial water bodies is deemed to be low for this site. The most significant source of potential flooding is from the River Thames. When a flood event occurs, the water from the Thames overtops the river wall which is adjacent to the foreshore (not the flood defence wall) and advances up the Quayside. The building is protected by flood defences along its southern edge, meaning that the flood risk to the building is a residual one, which would only be realised in the event of a breach in the said flood defences.
788. The statutory flood defence line for the River Thames comprises the flood defence wall which closely follows Custom House's southern façade. The existing service ramp to the basement service area from Water Lane forms a gap in the defence line and is presently protected by a manually operated flood gate. To the east and west of Custom House (Water Lane and land adjacent to Old Billingsgate Walk) the

flood zone is naturally curtailed as the ground levels rise towards Lower Thames Street.

789. The proposed development incorporates flood resilience measures. The existing flood defence wall has an existing top of wall level of 5.85m AOD to 5.97m AOD. In responding to potential climate change levels it is proposed to raise the height of the wall to the year 2100 level of 6.35m AOD (as recommended in the Environment Agency's Thames Estuary 2100 Plan). This involves the demolition and reconstruction of the wall to the East and Central Block and the raising of the height of the existing wall at the West Wing with additional masonry courses, and with additional strengthening to the rear façade of the wall. (The design impact of this and the integration of the wall into the quayside proposals is addressed in earlier sections of this report.)
790. The existing service vehicle ramp to the basement would be narrowed, increasing the area of the quayside and reducing the gap in the defence line; the manual flood gate across the service ramp would be replaced with an automatic hydraulic flip-up barrier providing defence to the 2100 level of 6.35m AOD.
791. The proposed alterations to the southern face of the building which include creating an external terrace from the Queen's Warehouse, and new steps and two wheelchair accessible ramps from the terrace to the Quayside, would result in an encroachment into the River's floodplain. This would result in a loss of floodplain (reduction in storage volume of water) of 187.7m³ and 305m³ for the 2065 and 2100 levels respectively. Following discussions with the Environment Agency, the proposals have been amended to partially compensate for this encroachment by minor alterations to slightly lower the level and to alter the crossfall of the river quayside across the whole of the site. The mitigating effect of this has been reviewed by the Environment Agency who are satisfied with the proposed amendments and this level of compensation; the EA have withdrawn their initial objection.
792. As part of the amendments to the scheme, a revised west elevation drawing has been submitted which shows a museum entrance whereas the original proposed west elevation showed this doorway converted to a window. It is unclear whether or not this change could compromise the flood defence which relies on the rise in level of the lane to the west of Custom House. The Flood Risk Assessment, based on the original scheme, shows this entrance blocked and made water-tight. This entrance lies within Flood Zone 3 and confirmation will be required that the provision of an entrance does not compromise the flood defence. Notwithstanding the withdrawal of an objection by the Environment Agency, additional information on the impact of these changes on flood defence is required.
793. National policy requires a sequential, risk-based approach to the location of development, which aims to steer development towards areas with the lowest probability of flooding. Land uses are categorised according to their vulnerability to flooding with different uses being

deemed acceptable or not in different flood zones. A Sequential Test is used to apply this policy approach, with an Exceptions Test required for 'more vulnerable' development to be considered acceptable in Flood Zone 3. Under national policy an office is classed as a 'less vulnerable' use whereas a hotel increases the vulnerability classification to 'more vulnerable'. The City's Local Plan reflects this national policy approach to flood risk.

794. National Planning Practice Guidance (PPG) indicates that the Sequential Test and the Exceptions Test do not apply to applications for most forms of change of use, although it recognises that a change of use may involve an increase in flood risk if the vulnerability classification is changed. In such cases, PPG states that the applicant will need to show in their flood risk assessment that future users of the development will not be placed in danger from flood hazards throughout its lifetime, adding that, depending on the risk, mitigation measures may be needed.
795. Given that this application is classed as a major development due to the level of new floorspace proposed, it is arguable whether the Sequential Test and Exceptions Test should be applied notwithstanding that it is primarily a change of use proposal. In any event, to address the increase in vulnerability of the proposed hotel use, it is proposed to use the lower ground floor (which is below the breach flood level of 5.905m AOD) for less vulnerable uses, such as servicing, mechanical plant, back of house and a spa/gym. The uses classified as more vulnerable (hotel bedrooms) would be at ground floor and above, which is above the breach flood level, and for which safe access and egress can be provided out to Lower Thames Street, which is above the maximum flood extent.
796. If planning permission were to be approved a planning condition would need to be applied to prohibit future use of any area of the building below the breach flood level for sleeping accommodation or for other "more vulnerable" uses.
797. The Flood Risk Assessment provides evidence that the development would not increase flood risk elsewhere through the sustainable drainage strategy which will divert all surface water direct to the River Thames thus reducing the burden on the combined sewer in this area. The proposed raising of the local flood defence level at this site will reduce flood risk overall.
798. A Flood Emergency Plan has been prepared and submitted in accordance with the Development Plan and the City Corporation's draft Flood Emergency Plans for New Developments Planning Advice Note. The aim of this is to provide background and advice to the eventual hotel operator to enable them to prepare specific emergency planning procedures, undertake staff training, understand flood warnings and procedures, to identify evacuation routes, and to ensure the safe evacuation access and egress of Custom House in the event of a

breach of the flood defence wall. This is a live document which would be maintained, enacted and reviewed by the hotel operator. The submitted document meets the requirements of the NPPF and Development Plan.

799. The proposals together meet the requirements of the Environment Agency, national policy and the relevant Development Plan policies.

SuDS

800. The relevant policies - London Plan policy SI 13, Local Plan policy DM18.2 and draft City Plan 2036 policy CR3 set out a drainage hierarchy, state that development must incorporate SuDS principles and that SuDS features should be integrated into the design of the building and landscaping.
801. The development has been assessed against the drainage hierarchy contained in Policy SI 13 of the London Plan.
802. The existing building discharges both foul and surface water to the combined sewer on Lower Thames Street while surface water from the Quayside drains directly into the River Thames.
803. The proposed development would improve upon this by capturing surface water from the building and draining it to basement level; from here it would be piped below the Quayside to discharge to the River Thames via a new outfall through the listed wall, thus avoiding any surface water discharge to the sewer. Appropriate licences would need to be obtained from the Environment Agency, the Port of London Authority and the Marine Management Organisation for the discharge and any associated works. The impact of the proposed works on the listed wall is considered in the Heritage Impact section of the report above.
804. Other SuDS techniques which are proposed include the collection of rainwater in a rainwater harvesting tank on the East wing for use as irrigation, a small area of green roof and limited areas of green planting for water attenuation.
805. The Lead Local Flood Authority raises no objections to the proposals and has recommended the imposition of conditions should planning permission be granted, requiring the details of the proposed SuDS components and details of its lifetime maintenance.

Air Quality

806. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion

flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.

807. An Air Quality Assessment has been carried out to assess the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.
808. During demolition and construction, dust and PM10 emissions are likely to increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.
809. For the completed development, heat and hot water would be provided by Air Source Heat Pumps in conjunction with low NOx gas boilers. The boilers would be compliant with the GLA emission limits set out in the Sustainable Design and Construction SPG, and would replace the existing low efficiency oil-fired boilers at the site, substantially reducing combustion emissions to air.
810. The proposed use is expected to generate 180 vehicle movements a day, which is a reduction compared with the existing site use and therefore the overall impact on local air quality would be beneficial. The assessment concludes that the development would have no significant impacts on local air quality.
811. The development meets the Air Quality Neutral benchmarks for both building and transport emissions assessment.
812. The City's Air Quality Officer has no objections and recommends that, if planning permission were to be granted, a condition is applied requiring the submission and approval of an Air Quality Report to detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and the submitted Air Quality Assessment.
813. 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, and policy SLI of the d London Plan which seek to improve air quality.

Fire Safety

814. 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.
815. The application is accompanied by a fire strategy which demonstrates how the development would achieve acceptable standards of fire safety, including details of construction methods and materials, means of escape and fire safety features.
816. Regarding the means of access for fire service personnel, the

submitted fire strategy had not been updated to reflect the closures on the Quayside. Requires are for the need to provide fire brigade access to within 18m of the dry riser inlet points. It is also considered that a fire strategy for this scheme should include consideration of the fire access to Sugar Quays and any potential issues that may arise from the proposal scheme, especially in relation to the potential closures of Water Lane. An updated fire strategy would be required to demonstrate that safe access could be achieved both for Custom House and Sugar Quays.

817. The building itself would be served by five stairs and this will include two new firefighting shafts in the East and West wings of the building in separate fire compartments. Both the new firefighting shafts will be provided with protected firefighting lobbies, firefighting lift installations and dry rising fire mains.
818. If planning permission were to be granted, a condition would be recommended requiring the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) with details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority in consultation with the London Fire and Emergency Planning Authority, Building Control Health and Safety Team prior to construction of the building and the strategy shall remain in place thereafter.
819. Subject to compliance with the condition the proposed development would meet the requirements of Policy D12 of the London Plan.

Transport, Servicing, Parking and Impact on Public Highways

Cycling

820. 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 (LCDS) and that developments should cater for larger cycles, including adapted cycles for disabled people.
821. Based on 200 hotel rooms, 1587 GEA of retail, a museum with 2 full time equivalent staff (FTE), and a spa with 4 FTE, we have estimated that the development requires a minimum of 22 long stay cycle parking spaces and 86 short stay cycle parking spaces based on the London Plan. We have estimated the number off FTE for the museum and the spa because this information has not been provided. The Applicant is proposing 40 long stay cycle parking spaces and 96 short stay cycle parking spaces, which is satisfactory.
822. The long stay cycle parking would be accessed via the servicing ramp from Water Lane, and the short stay cycle parking would be on Water

Lane and the land adjacent to Old Billingsgate Walk. A minimum of 5% of the cycle parking spaces would be accessible for adapted cycles and this the arrangement of the cycle parking would be secured by planning condition, in line with London Plan Policy T5 (Cycling), LCDS 8.2.1, and draft City Plan 2036 policy AT3. The Applicant proposes to be able to close off either all or parts of the Quayside, land adjacent to Old Billingsgate and Water Lane for the holding of Quayside Events and/or private Managed Events, which could either wholly or partly remove access to the short stay cycle parking, or at least deter access to them, which in the absence of an appropriate management plan is unacceptable, and contrary to the requirements in London Plan Policy T5 (table 10.2).

823. The proposal includes 4 showers and a minimum of 40 lockers to 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 and the proposals are satisfactory.

824. The Applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required, by legal agreement to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It would be submitted to the City for approval in line with the London Plan Policy T4 (Assessing and mitigating transport impacts).

Vehicular access

825. 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. Specifically, London Plan Policy T6.4 (Hotel and leisure uses parking) allows limited on-site provision of parking to meet the needs for disabled persons, operational needs, and parking for taxis and coaches. Policy DM11.3 of the Local Plan 2015 says hotels should provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches.

826. The existing site currently provides approximately 100 on-site car parking spaces on the Quayside, now redundant following the departure of the bespoke former occupier, which would be removed in accordance with London Plan Policy T6.

827. As part of the proposed development, two Blue Badge spaces are proposed in the basement of the development. The Blue Badge spaces would have electric vehicle charging points in line with the London Plan Policy T6 (Car Parking), and the draft City Plan 2036 Policy VT3. The provision of the Blue Badge spaces is in line with London Plan Policy T6.4.

828. As discussed elsewhere in this report, the Applicant proposes to retain

the ability to close off either all or parts of the Quayside, land adjacent to Old Billingsgate and Water Lane for the holding of Quayside and/or Managed Events, which could either wholly or partly remove access to the Blue Badge spaces in the absence of an appropriate management plan, which is unacceptable and contrary to London Plan Policy T6.4 and VT3.

829. The Applicant has proposed a lay-by on Lower Thames Street, for which TfL is the highway authority. The purpose of the lay-by is to allow taxis and private hire vehicles to drop guests off without causing Lower Thames Street to be disrupted, or Water Lane to be congested. The proposed lay-by would be 15m long with waiting restrictions and would be able to accommodate up to three taxis, or one coach. No management of this bay by the operators of the development would be allowed, as the bay would be a public facility on public highway.
830. During negotiations Transport for London advised that the proposed layby on the Transport for London Road Network (TLRN) would only be given positive consideration in the event of the hotel scheme providing an exceptional new area of pedestrian public realm on the Quayside so that, on the whole, the scheme could be said to deliver on the Healthy Streets approach and Model Hierarchy contained in the Mayor and CoL's Transport Strategies. As discussed elsewhere in this report, the Applicant proposes to retain the ability to close off either all or parts of the Quayside for the holding of Quayside and/or Managed events which would either wholly or partly exclude inclusive public access to the Quayside for all. This conflicts with the aims of the Mayor of London's Public Charter and diminishes the value and amenity of the proposed public realm. On that basis, the public offer on the quayside could not reasonably be described as exceptional, therefore, TfL and Officers do not consider that the creation of servicing on the TLRN is justified in this case. When in use, the lay-by would reduce the effective width of the pavement on Lower Thames Street, contrary to draft City Plan Policy AT1. It would not comply with policies contained within the Mayors Transport Strategy, which sets out a vision with a bold aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041. It would also not be in line with draft City Plan Policy AT2, as the proposals promote unsustainable private travel by vehicle in a pre-eminent position at the front door of the development and does not prioritise active travel, contrary to the modal hierarchy, the Mayors Transport Strategy and the City of London Transport Strategy. Policy DM11.3 of the Local Plan 2015 says hotels should provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches. It is considered that without providing a lay-by for the pick-up/drop-off of passengers, there are still satisfactory opportunities for the pick-up/drop-off of customers, in line with on-street restrictions, on Lower Thames Street and Water Lane.
831. In addition, Policy 2 of the Mayor's Transport Strategy and Proposal 2 of the City of London Transport Strategy, requires us to put the needs of people walking first when designing and managing our streets. The provision of a lay-by for drop-offs and pick-ups would not be in line with

Proposal 2. The City of London Transport Strategy also requires that the Square Mile is accessible to all. Specifying that pavements and crossings should be smooth, level and wide enough to avoid uncomfortable crowding. The provision of a lay-by on Lower Thames Street, would reduce the width of the footway, make the footway uneven, and cause a pinch point on the highway. The lay-by is not considered necessary to make the development acceptable and would be contrary to proposals in the City of London Transport Strategy, as set out above.

Servicing and deliveries

832. 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 only permitted where this is not possible.
833. The servicing of the whole building would take place off-street accessed off Water Lane. Vehicles would be able to enter and exit the servicing area in forward gear. The servicing area would accommodate 2 vehicles up to 8m in size. As discussed elsewhere in this report, the Applicant proposes the potential to close off either all or parts of the Quayside, land adjacent to Old Billingsgate and Water Lane for the holding of Quayside and/or Managed Events, which could either wholly or partly remove access to the servicing bay, which is unacceptable.
834. Draft City Plan 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. Environmental Health Officers have stated that if this application were to be approved restrictions on servicing and delivery would need to be imposed to ensure no overnight servicing would take place to preserve the amenity of neighbouring residential properties.
835. 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.

836. The proposals are considered contrary to London Plan Policy T7 (G) as the development proposals have not demonstrated the ability to facilitate safe, clean, and efficient deliveries and servicing. The proposals are considered contrary to draft City Plan 2036 Policy VT2 due to the lack of information on servicing of the quayside and the objection to off-site consolidation.
837. The applicant has not agreed to the use of an off-site consolidation centre in order to reduce the number of deliveries to the development per day. Instead they have proposed a 'combination of consolidation methods,' however a combination of consolidation is not considered to be as effective as off-site consolidation. Notwithstanding the above, the applicant has agreed to a cap of 28 deliveries to the development per day which would need to be secured through an appropriate a legal agreement. This is for all vehicles associated with the building, including any events within the building (but not vehicles associated with the riverside event space, which would be subject to a separate management plan). The Applicant has confirmed this is a realistic cap for the building, despite not confirming what events may occur in the Long Room. Given the incomplete information we have received, relating to the events in the Long Room, and the potential servicing requirements associated with this it is considered that believe a cap of 28 vehicles would only be achievable if an off-site consolidation centre is used. The development would be required to produce a delivery and servicing plan, and if approved, this would be secured by legal agreement.

Quayside Event Space

838. Under the current proposals the Quayside and much of land adjacent to Old Billingsgate and Water Lane to be closed for an unrestricted/unfettered managed and/or private event for potentially significant periods throughout the year. The Applicant has not provided detailed information on the proposed events, therefore we have assessed the case using unresolved issues and incomplete information. Consequently, we have had to assume a worst-case scenario to assess the impact of servicing the quayside event space.
839. In a worst case scenario there could be an event on the quayside, whether private or public, every day of the year at any time. The Quayside Event scenarios the Applicant has proposed, may include public events. As an example, if there is a market every day and there are 50 stalls (5m wide each) and each has 1 delivery per day, there could be 50 deliveries per day. This is almost double the number of vehicles to the development, on top of what has already been agreed for the servicing of the building and would have a severe impact on the quality of the public realm.
840. The Applicant has failed to demonstrate that the servicing of the quayside would not cause an unacceptable impact on the Quayside, Water Lane and Lower Thames Street. Therefore, the proposals are

unacceptable. Should the application be approved the development would be required to produce an event management plan for the quayside public realm space. The event management plan would include servicing restrictions for the event space on the riverside to ensure vehicles are kept to a minimum, including a requirement for off-site consolidation and delivery caps. Where possible and efficient, events on the quayside would be required to use the servicing yard for appropriately sized deliveries. The applicant would also be required to explore cargo cycle only events, to reduce the number of vehicles servicing the quayside, as part of the benefit of this proposal is to keep the riverside vehicle free.

841. A plan showing the area of the quayside for closure for private events includes the whole of Water Lane including a narrow strip of public highway along its eastern edge (plan ref: G200_p_00_004 Rev A). Closure of public highway would not be permitted. The potential closure of the rest of Water Lane, which is private, would have an unacceptable impact on Sugar Quay residents, and people who use Water Lane to access the riverside. Water Lane is regularly used for pick up and drop off, and closing Water Lane would force any pick up and drop off onto Lower Thames Street.
842. Based on the information that we have been provided with the set up/close down of private closures and events would not be included within the daylight hours as set out by the applicant. The addition of closures for set up and close down, would increase the quayside closures by a significant number of days per year.
843. The applicant hasn't demonstrated that the quayside could be safely managed and serviced in all scenario types. For example, with the information we have been provided the applicant could close part of the quayside, which would prevent vehicles from turning around on the quayside. This may lead to reversing manoeuvres in the public realm, and there are unknown safety concerns associated with this. Therefore, any event on the quayside would potentially detrimentally impact on the safety of the public and management of the development. The draft City Plan deals extensively with issues of pedestrian movement, safety and comfort, both within new development sites and the surrounding general street environment.
844. The section of the riverside walkway along Custom House is currently a two metre wide footpath. As described in the City of London Riverside Walk Enhancement Strategy the walkway here is of confined nature caused by the position of the railings alongside the adjoining car park. This section of the walkway creates an unpleasant, often crowded environment. The walkway is also occasionally flooded and unusable. It is the aspiration of the City that through discussions with current or future owners, the private forecourt could be brought entirely into public use, thus creating a continuous string of spaces for public use from Montague House to Sugar Quay. Point 1.3 of the City of London Riverside Walk Enhancement Strategy recognises development provides opportunities for widening sections of the Riverside Walk.

845. The current proposals are not in line with the City of London Riverside Walk Enhancement Strategy because there remain scenarios where the quayside would be wholly or partially closed, and the river walkway would be flooded, meaning that there would be no improved public access along the river front as part of this application.

Pedestrian Comfort

846. The applicant has failed to demonstrate that the closure of the quayside would not have a detrimental impact on Pedestrian Comfort Levels (PCLs) in baseline, future and cumulative scenarios. A PCL assessment was initially not considered necessary because of the proposed opening up of the quayside and in the absence of information of the quantum and nature of managed events. As there were no proposed reductions to the footpaths, only expansions of public realm areas, it was therefore considered these were sufficient to cope with the increased footfall generated by the hotel and other uses. However, once the Applicant provided information on the number of closures, Officers requested information on PCLs around the site. PCLs are a widely accepted and well-established metric used for measuring or predicting future on-street pedestrian comfort to support planning in London (see TfL Pedestrian Comfort Guidance for London 2019). The Applicant has failed to provide an assessment of PCLs.
847. Transport Assessments submitted in support of planning applications should assess the level of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating." The number of people predicted to attend events on the quayside has also not been given, nor has a cumulative assessment of a range of events happening across the proposed hotel complex. There is concern that in a scenario where some or part of the quayside is closed for private events, additional crowding may occur on the narrow Riverside Walk, further exacerbated due to people dwelling and observing the private events.
848. TfL's pedestrian comfort guidance gives detailed advice on which PCLs should be considered suitable for different area types during peak hours. For 'office and retail' levels the minimum 'acceptable' level is set at C+. The 'at risk' level is set at C- for peak times and an even lower PCL (C- to D) for an average of the maximum activity. This is because of the greater number of single travellers and the shorter durations of most walking trips. For a 'Tourist attraction', as visitors more often tend to be in groups, the 'at risk' level of service is raised to a PCL of B-. Due to unfamiliarity and not being alone, people visiting tourist areas are likely to be more sensitive to crowding. Tourist attractions like the development proposed are therefore treated as particularly sensitive to crowding in relevant TfL guidance. TfL's guidance defines PCLs of C+ and C- as "unacceptable / uncomfortable" for a tourist attraction. Furthermore, walking movement becomes significantly more restricted and difficult as C+ degrades to C-. PCLs at this level also cause issues with future-proofing; they do not have contingency built in to allow room

for further growth. Given the closure of the quayside, we therefore need a thorough PCL assessment to be done for the whole site, including the river walkway.

849. The applicant has predicted (using the TRICS database) that the total number of trips to the development only (excluding the quayside) in the AM and PM peak would reduce considerably due to the likely arrival times of hotel guest visitors compared to office user peak time. Overall the daily (two way) trips would reduce from 4670 as existing, to 1593 as proposed for the hotel use and 440 for the museum. This is a net reduction in the number of trips to the development over the course of a day of around 2636 trips. The reduction in trips in the AM and PM peaks are 489 and 343 respectively. It should be noted the trips to the riverside event space is not included in the trip generation exercise.
850. The submitted transport assessment indicates that the overall increase in trips to the development across all modes would have a positive impact on the surrounding highway and public transport network capacities, particularly at peak times. However, the transport assessment does not consider the impact on the PCLs on the city walkway or surrounding streets when the quayside is closed for private events. It is therefore considered that the proposals are not in line with London Plan Policy T4 (Assessing and mitigating transport impacts), because the applicant has not appropriately assessed the impact of the quayside closures on people walking. The City transport planning team predict that there would be more people in the public realm and city walkway due to the proposed events, so the PCLs would become materially worse. This is made worse as the Quayside is part of the Thames Path National Trail, a strategic London and National active travel route.

Public Transport

851. 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 Tower Hill, and Bank/Monument underground stations, Tower Gateway DLR, and Cannon Street and Fenchurch Street Station. The site is close to several bus routes running close by on Lower Thames Street and Fenchurch Street.

Construction

852. The applicant has committed to maintaining pedestrian access along the riverside throughout the construction phase. The applicant has also been liaising with the adjacent landowners to ensure public routes on adjacent land would be maintained through construction.

City Walkway

853. The City of London Corporation maintain, and cleanse the riverside walkway outside Custom House, however it appears it was never officially dedicated as city walkway. Therefore, as part of this application, the applicant has agreed to regularise the city walkway as it is used today. We recommend the existing width of walkway running

parallel to the Thames is officially declared as city walkway when the public realm works are completed.

854. The existing ramp on the riverside walkway is proposed to be replaced and improved by the applicant, the width of the ramp would be widened and be a minimum of 2705mm (it is currently approximately 2400).

Public Realm and Hostile Vehicle Mitigation

855. 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.
856. 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. HVM would be located on private land, and as much as possible would be incorporated into the public realm design.
857. The applicant has proposed a signage strategy. Any signage that is proposed in the public realm should be in the form of Legible London totems.

Section 278 Agreement

858. If the permission were to be granted, the applicant would need to enter into a S278 agreement with TfL (the highway authority) comprising works to the Lower Thames Street pavements to reprofile the levels and allow level access into the development, crossing improvements on Lower Thames Street, and works to tie the private public realm works into the public highway.
859. There would also be highway works 'in kind' on Water Lane, which is mainly private land. The S278 agreement, highway works 'in kind', and the private public realm works would be secured through the Section 106 agreement to ensure they are of an exceptional standard.

Transportation conclusion

860. Overall the proposals are compliant with London Plan Policy T1 and D11, the Local Plan 2015 policy DM3.2 and DM11.3, and the draft City Plan 2036 policies, S2, and SA3 as outlined above.
861. Whilst the development proposal would be in line with a number of transportation and highway policies within the development plan, officers consider that due to insufficient information being provided as part of this submission, it is not demonstrated that the development would provide adequate and safe servicing, acceptable PCLs, and unfettered access to cycle and blue badge parking and would therefore be contrary to London Plan Policies T4(E), T5, T6, T6.4, and T7, the

Local Plan 2015 Policy 16.3, 16.5, the draft City Plan 2036 Policies AT1, AT2, AT3, VT2 and VT3, the Mayor's draft Public London Charter, and the City of London Transport Strategy Proposal 38.

Security

862. Local Plan Policy DM3.2, draft City Plan 2036 Strategic Policy S2 (Safe and Secure City) and Policy SA3 (Designing in Security) sets out how appropriate security and safety provision must be incorporated into all development. Policy D11 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.
863. 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.
864. The building is grade I listed and it would be difficult to implement 'internal' structural solutions to mitigate the impact of any vehicle borne attack.
865. Retractable Security bollards are proposed and would be located within the site boundary to stop vehicles entering the quayside.
866. If planning permission were to be granted, further details of security mitigation measures would be secured via condition and S106 obligations. This would incorporate the requirements of vehicle mitigation measures, including traffic calming to protect pedestrians when entering and leaving the building/Quayside and all mitigation measures would be required to be within the site boundary.
867. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

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

868. 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.
869. 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.
870. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
871. 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.
872. This application has been assessed against the Equality Act 2010 and any equality impacts identified.
873. 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:
- Aldgate Residents Association
 - Middlesex Street Community Association
 - Residents and local businesses in the surrounding area
 - Old Billingsgate Market
874. As set out in the submitted Statement of Community Involvement (SCI), the consultation process included local residents and the community, which sought to understand the needs of local community groups and identify opportunities to inform the designs of the proposals.
875. Potential impacts of the proposed development on the nearby occupiers and protected characteristics have been assessed, including the impacts on the use and functionality of the spaces.
876. Throughout this report officers have expressed concerns about inclusive access and design and that officers therefore have concerns that the development does not do enough (or in some cases provide enough certainty in the absence of draft management plans) to ensure that the development eliminates discrimination and promotes equality of opportunity for people who share relevant protected characteristics and persons who do not share it, particularly in the case of disability and access for parents with buggies.

Human Rights

877. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights (“ECHR”).
878. In the event that it is concluded that the benefits of the proposal do not outweigh any disbenefits, the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties. It is the view of officers that, if it is considered that the balance should be struck in favour of granting planning permission, such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of

the economic well-being of the country, and proportionate.

CIL and Planning Obligations

879. If the proposed development were to be granted it 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. 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.
880. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
881. 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 Mayor's planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
882. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£345,950	£332,112	£13,838

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£191,400	£181,830	£9,570
<u>City Planning Obligations</u>			

Affordable Housing	£127,600	£126,324	£1,276
Local, Training, Skills and Job Brokerage	£76,560	£75,794	£766
Carbon Reduction Shortfall (as designed)	£2,717,675	£2,717,675	£0
Section 278 Design and Evaluation	£0	£0	£0
S106 Monitoring Charge	£4,000	£0	£4,000
Total liability in accordance with the City of London's policies	£3,117,735	£3,151,623	£16,112

City's Planning Obligations

883. The City would require the obligations set out below in accordance with the City's SPD if permission were to be granted. They would be deemed necessary to make the application acceptable in planning terms. They are considered 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.

- Heads of Terms:
- Highway Reparation and other Highways Obligations
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (Demolition; Construction and End Use)
- Delivery and Servicing Management Plan (including Consolidation)
- Travel Plan (including Cycling Promotion Plan)
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement (TfL)
- City Walkway Works - Custom House Walk and Custom House Quay
- Declaration of City Walkway
- Visitor Management Plan
- Cultural Strategy and associated Cultural Plan to include:
 - Establishment of a Culture and Community Committee,

- Appointment of a Culture and Community Events Officer, and
 - Commitment to specific events (ie. Open House London Festival)?
 - Curation of cultural displays throughout the building
 - Curation of museum
 - Public tour areas
 - Provision of annual reports of cultural activities, tours and events
 - Heritage Partner
 - appointment of independent Heritage Partner
 - selection criteria for HP to be approved by CoL
 - final selection of HP to be agreed with CoL
 - funding arrangements for the HP
 - review and monitoring
 - Museum and Western Pavilion / Roof Terrace
 - Museum (456sqm)
 - Museum Management Plan
 - Lease agreement with heritage partner and independent operation of museum
 - Details of funding/rents/utilities
 - Western Pavilion and Roof Terrace
 - Secure the first come first served (with no bookable spaces) of the roof terrace for public core opening hours of museum
 - Out of core hours events and ability to keep the museum open at discretion of heritage partner
 - Advertisement and publicity of the museum
 - Outreach program to schools, communities etc
 - Long Room and Robing Room
 - Public Access
 - Tours and Capacity
 - Heritage Partner Events/Tours: use for an access to the Long Room and Robing Room for events and tours
 - Min number of school trips per year
 - Specification of Works
 - Public Realm (incl. Water lane, land adjacent to Old Billingsgate, and Quayside)
 - Public Access - 24/7 365 days per year
 - Quayside Events Management Plan
 - Lobby and Riverside Terraces
 - Public Access - 24/7 365 days per year (in line with the operational hours of the hotel)
884. The applicant has provided a draft Heads of Terms as part of their submission documents.
885. Officers are concerned that the draft Heads of Terms are not sufficient to secure the obligations deemed necessary to make the proposed development acceptable. As noted within relevant sections of the report there are significant concerns that key obligations are not fit for purpose. A copy of the draft Heads of Terms can be found appended to this report.

886. If permission were to be granted or appeal proceedings take place officers would seek to negotiate acceptable obligations within the Section 106 to secure relevant aspects of the proposal scheme.

Monitoring and Administrative Costs

887. 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.
888. 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

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

Assessment of Public benefits and the paragraph 202 NPPF balancing exercise

890. Paragraph 202 of the NPPF states where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal.
891. Wider public benefits should flow from development and could be anything that delivers economic, social or environmental outcomes as described in the NPPF. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.
892. 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, the more important the asset, the greater the weight. Paragraph 200 states that, any, harm to significance of a designated heritage asset, should require clear and convincing justification.
893. As the statutory duties imposed by sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 are engaged, considerable importance and weight must be given to the desirability of preserving the special interest and setting of listed buildings, when carrying out the paragraph 202 NPPF balancing exercise. The more important the asset the greater the weight that should be given to the asset's conservation.

894. Less than substantial harm of different degrees has been identified to designated heritage assets and this is summarised below:

- Significant harm to the significance of the Grade I listed London Custom House, the result of cumulative harms to the interior, exterior and quay, overall resulting in harm, which is less than substantial, just above the middle of the spectrum.
- Modest harm to the significance of the Grade II* listed Custom House River Wall, Stairs and Cranes, the result of alteration and undermining of setting, considered to be at the lower end of the less than substantial spectrum.
- Slight harm to the significance of the Grade I listed (and Scheduled Ancient Monument) Monument to the Great Fire ('The Monument'), the result of a diminishment in the contribution of setting, considered to be very much towards the lower end of the spectrum.
- Modest harm to the significance of the Grade I listed St Dunstan in the East, the result of a diminishment in the contribution of setting, considered to be at the lower end of the spectrum.
- Slight harm to the significance of the Grade I listed Church of All Hallows by the Tower, the result of a diminishment in the contribution of setting, considered to be very much towards the lower end of the spectrum.
- Modest harm to the significance of the Grade II listed Old Billingsgate, the result of a diminishment in the contribution of setting, considered to be towards the lower end of the spectrum.
- Modest harm to the significance of the Eastcheap Conservation Area, the result of a diminishment in the contribution of setting, considered to be towards the lower end of the spectrum.
- Slight harm to the significance of Tower Bridge, the result of a diminishment in the contribution of setting, considered to be very much towards the lower end of the spectrum.
- Slight harm to the significance of the Tower Bridge Conservation Area, the result of a diminishment in the contribution of setting, considered to be very much towards the lower end of the spectrum.
- Slight harm to the significance of the Tooley Street Conservation Area, the result of a diminishment in the contribution of setting, considered to be very much towards the lower end of the spectrum.

895. In this case, para 202 requires this harm should be weighed against those wider public benefits of the proposal. The PPG, para 020, recognises that public benefit should flow from the development, and that these need to be of a scale and nature of benefit to the wider public at large, and should not be a private benefit.

896. The following public benefits flow from the proposed development:

- Heritage benefits are the reuse of a listed building and direct enhancements including restorative works, in particular reinstating the Long Room lobby and the removal of modern alterations.
- The removal of the existing redundant security infrastructure and car park and the provision of public access to a significant new area (2800 sq.m.) of public realm on the Quayside and on land adjacent to Old Billingsgate Walk, creating a new riverside area of potential civic importance. The proposal would enable a hotel operator to use the Quayside for private events which could either partially or totally exclude members of the public throughout the year, diminishing the wider public benefit associated with the creation of this new area of public realm.
- Provision of a museum (Use class F1 (c) 422sqm, 1.86% of the total building) and associated café freely accessible to the public Tuesday-Sunday (excluding bank holidays) from 10-5pm and curated by a Heritage Partner, owned and managed by a hotel operator. To include once monthly tours of the hotel and the use of the Long Room for 24 timed slots per year for the Heritage Partner. This is to be secured through an appropriate s106 agreement.
- The curation of a Cultural Strategy and plan that would create a program of cultural events, the scope and implementation of which is to be agreed through a s106 agreement.
- Internal public realm comprising the Public Access Areas, allowing a form of public access to certain small areas of the interior which, alongside so some Public Displays Areas offering interpretive material, would allow the public an understanding and appreciation of heritage significance. The extent and nature of the public access will depend upon the detailed provisions of the s106 Agreement.
- The provision of a small publicly accessible (without compulsion to buy) hotel roof café/bar with ancillary viewing terrace with a dedicated access.
- The provision of publicly accessible bars, restaurants, spa/gym leisure facilities, and conference/event spaces.
- The provision of a hotel which would add to the City's expanding visitor accommodation infrastructure.
- Short stay cycling parking provision proposed Land Adjacent to Old Billingsgate and Water Lane, in excess of policy requirements, albeit tempered by potential access restrictions
- Planning obligation payments in accordance with the City of London's adopted SPD.

897. Officers consider that, giving considerable importance and weight to the desirability of preserving the listed buildings and their settings, the public benefits of the scheme, taken at their highest, are far outweighed by the less than substantial harm that the proposed development would cause to the significance of the designated heritage assets identified.

Compliance with Section 4 of the NPPF, Decision-Making

898. Officers have approached decision making in a positive and creative way, working proactively with the Applicant from day one to secure a development which would optimise economic, social and environmental conditions, in accordance with paragraph 38 of the NPPF. Officer's attended varied meetings since 2018, always offering clear and consistent advice which was solution focused. Our first comprehensive letter of pre-application advice provided in 2018 set out all the principal planning matters which were still being resolved up until a non-determination appeal was made valid on the 25th September 2021.
899. Throughout the planning process progress was made and in that time heritage harm has gone from substantial to less than substantial, there have been urban design and accessibility improvements and sustainability has been properly addressed and improved. However, it is true that there was and remains long-standing disagreement on a range of planning matters, from land use principles to heritage and urban design, amongst other matters of detail. Officers have been clear and consistent in their advice and, even when that disagreement was becoming insurmountable, continued to work proactively with the applicant to mitigate impacts and find common ground.
900. Unfortunately, not long after finalising the process on establishing the basic land use viability baseline, the Applicant submitted to us very material new information on public realm closures and potential management without sufficient information on which Officers could make informed decisions. Regrettably, an appeal against non-determination was received while the Council undertook a further round of public consultation on a scheme which has drawn much public interest. Since that point, despite our best efforts, the Applicant shut down communication with CoL Officers, which has resulted in additional reasons for refusal, which we hoped could have been addressed. Unfortunately, we regrettably recommend the application for refusal.

Conclusion

901. 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, and the emerging Local Plan and considering all other material considerations.

The Development Plan

902. The London Custom House is one of the last great historic Thames-side institutions to come forward for re-use. It is a once in a generation opportunity to build upon the UK's and London's great tradition of providing public destinations along the River Thames which are at the heart of the national cultural debate, such as Somerset House, the Southbank Centre or the Royal Festival Hall. It is a rare occasion for

a seminal and defining London and British building to come forward for a new future and will set the standard for the City's post-Covid ambitions to 'Level Up' and deliver 'Good Growth', in accordance with national and local policy to 'Build Back Better', in particular how these relate to heritage. It will set the standard for the regeneration of the remainder of the Pool of London 'Key Area of Change'. It is a heritage asset of the highest order, of national, even international significance, once at the heart of the world's largest trading port, capturing the imagination of the public and visitors alike, the origin of London as a global 'World City', and a symbol of Britain as a global trading power, 'Global Britain Plc'. It has a resonance today like at no other time and its conservation, enhancement and celebration should capture the spirit of the time.

Change of Use

903. Viability information has been submitted in support for the loss of the current office floor space, which is considered acceptable in this instance and would accord with Local Plan Policy DM1.1.
904. The site is within the CAZ and the principle of a hotel use could be supported in this location.
905. The proposed development will not ensure the continuing beneficial use of a Listed Building and therefore conflicts with Policy DM11.3 and emerging Policy CV3 of the Draft City Plan.
906. Officers therefore consider that based on the information set out within the application material there is insufficient information to demonstrate that the proposal would not result in adverse impacts to neighbouring amenity which would be contrary to part of Policy DM11.3 and emerging Policy CV3 of the Draft City Plan.
907. Officers consider that based on the information set out within the application material there is insufficient information to demonstrate that the proposal would provide satisfactory arrangements for service and delivery vehicles associated with the hotel use and the Quayside events which would be contrary to part of Policy DM11.3 and emerging Policy CV3 of the Draft City Plan.
908. Whilst some parts of Policy DM11.3 and draft Policy CV3 are satisfied other parts are not. All parts of these policies are required to be satisfied in order for a proposal to comply with them. Officers consider that the proposal would not ensure the continued beneficial use for a historic building. That is because the proposals, in large part driven by the hotel proposal, would result in a significantly diminished heritage asset, and one of the highest order. It is also because, Officers consider, that non-inclusive form of development would not attract a wider audience or demographic to appreciate or understand the heritage significance.
909. Officers consider that it has not been demonstrated that the proposal would conserve the amenity of existing neighbouring occupiers or provide satisfactory or safe arrangements for servicing vehicles.

Therefore, the proposed development for a new hotel in this location would not accord with Local Plan Policy DM11.3 or draft City Plan Policy CV3.

Other Land Uses

910. In principle the creation of 1,474m² (GIA) of independent flexible ground floor and roof level retail/restaurant/bar floorspace and public viewing terrace (Classes E & Sui Generis (Drinking Establishment)) and lower ground floor leisure facilities (Class E) is considered to be acceptable. However, it is considered that the retail offer would not be likely to result in effective activation of frontages or enhancement at street level as a consequence of the limited general public use of the spaces or access to the building. The proposed development would be likely to be perceived as a hotel for use by hotel guests, and this would be further enforced when large areas of the Quayside are closed for private events. It is considered that the scheme would not significantly contribute to creating active frontages and vibrancy in this area. It is clear that the public benefit associated with the provision of additional uses as part of the hotel scheme are limited as they would not likely result in genuine, inclusive publicly accessible spaces.
911. The provision of a museum is welcomed and accords with the policies of the Development Plan. To ensure the museum is delivered as a genuine public benefit a robust legal agreement would need to be agreed to ensure the appointment of an independent Heritage Partner to curate and manage the museum as an independent function from the hotel. Officers are concerned that the location of the museum in the northwest corner of the building is divorced from the river and Quayside, and from other historical areas of the building. If a robust legal agreement is not agreed officers are concerned that the potential for the curation and management of the museum could to be at the ultimate discretion of the hotel which would result in an extension of the hotel functionality, rather than a genuine public space and asset.

Pool of London

912. Officers consider that the scheme does not respond to, and build upon, its key riverside location. Falling within a Key Area of Change, the Pool of London, the scheme should seek to capitalise on the City's unique riverside location, including for recreation, development should protect (and enhance) wider public access and river views and improve vibrancy by encouraging a mix of appropriate commercial uses, expanding this to recognise the benefit of providing cultural uses. Officers consider that the scheme would not provide a genuinely publicly accessible and inclusive scheme that would bring vibrancy to the riverside. The proposal would not conserve or enhance a significant Grade I listed building and it has not been demonstrated that it would provide a credible cultural use, with a wider public remit, that would engage with a diverse audience to assist in the appreciation and understanding of the area. It is therefore considered contrary to Policy CS9, emerging Policies S17 and S19 of the draft City Plan, the Riverside Walkway Enhancement Strategy and the Mayor of London's

River Thames Cultural Vision.

Heritage

913. The proposal would cause, in the language of the NPPF 'less than substantial' harm to the significance of important heritage assets, including The Custom House. As the statutory duties imposed by sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 are engaged, considerable importance and weight must be given to the desirability of preserving the special interest and setting of listed buildings, when carrying out the paragraph 202 NPPF balancing exercise. The general duty applies with particular force if harm would be caused, as in this case, to the setting or significance of a Grade I listed building. The more important the asset the greater the weight that should be given to the asset's conservation. The effect of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is to create a statutory presumption against granting planning permission for development which fails to preserve a listed building or its setting. The presumption, which is not irrebuttable, is engaged in this case. On the basis of the analysis set out above, it is not considered that the statutory presumption has been rebutted.
914. The proposal would not safeguard the London Custom House and the River Wall, Stairs and Cranes as Grade I and II* listed buildings, failing to preserve or enhance their significance. As a result of development within their setting, the proposal would fail to safeguard the settings of the Monument (grade I and scheduled ancient monument), Old Billingsgate (grade II), St Dunstan in the East (grade I), All Hallows by the Tower (grade I) and the Eastcheap, Tower Bridge and Tooley Street Conservation Areas. The degree of less than substantial harm caused to the significance of these assets is considered to fall lower on the spectrum than the harm to The Custom House, albeit to heritage assets of high to outstanding national interest.
915. As harm is caused to the significance of designated heritage assets, the proposal fails to conserve or enhance the significance of designated heritage assets and their settings, while failing to safeguard the listed buildings, contrary to Local Plan Strategic Policy CS 12(1) and DM 12.1(1;4). It would conflict with Local Plan Policy DM 12.3 (Listed Buildings), which allows for change of use or alteration, *only*, where this would not detract from special interest/significance, character or setting – the proposal would fail in relation to both the change of use and the alterations proposed. Failing to conserve significance is also contrary to London Plan Policy HC1 (Heritage Conservation and Growth). The proposal would also run contrary to City Plan 2036 Strategic Policy S11(1;2) (Historic Environment) and HE1(1;2) (Managing Change to Heritage Assets).

Strategic Views

916. The proposal would conflict with policies and guidance protecting the contribution of strategic views to the core character and identity of the Square Mile and London. Here the proposals at roof level would fail to

protect and enhance significant local views of and from the Monument, drawing some conflict with Local Plan Strategic Policy CS13(2), emerging City Plan Policy S13(bullet 2) and guidance in the Protected Views SPD. That slight harm caused to Tower Bridge, All Hallows by the Tower and St Dunstan in the East (through development within their setting) would draw some further conflict by failing to protect and enhance these identified City Landmarks and Skyline Features.

917. The harm identified relates to a seminal London heritage asset, which is a prominent contributing key element/feature to the characteristics of LVMF strategic River Prospects from Tower Bridge (10A.1) and London Bridge (11.B1-2) and the Townscape View from Queen's Walk by City Hall (25A.1-3). It would result in development which is intrusive, harming the characteristics of the Views, in conflict with Local Plan Policy CS 13(1), City Plan Policy S13 and London Plan Policy HC 4.
918. Overall, it is considered the proposal would be contrary to Local Plan Policy CS 13 (City Plan Policy S13) and London Plan Policy HC4, and guidance contained in the Protected Views SPD and LVMF SPG, for the harm the proposal would cause to strategic views of the City and London.

Design and Public Realm

919. The architecture by virtue of the proposed height, bulk and detailed design, would not promote a high standard of design and would therefore conflict with Local Plan Policies CS10 and DM 10.1, the NPPF and associated guidance in the National Design Guide.
920. The scheme proposes a significant new public open space in a highly accessible, south facing, riverside location. However, the development proposal would allow the hotel operator to close all or part of the Quayside for managed events for a significant amount of time over the course of each year.
921. Therefore, the proposed development would not result in inclusive access (as a result of closure wholly and partly for events on the Quayside) and would limit the internal public permeability of the whole building, which in turn would limit the interpretation and enjoyment of this seminal heritage asset.
922. The management of the spaces, curtailed pedestrian movement through the building and across the Quayside, along with the detailed curation, design and look-and-feel of the internal and external public realm, including the interface created between these would result in a non-inclusive form of public realm. The vibrancy and animation of the riverside for public use due to the limited active frontages and restricted publicly accessible open space would fail to deliver a fairer, more equitable and inclusive place which is welcoming to all communities and therefore conflicts with the spatial aspirations of Core Strategic Policy CS9 and the Pool of London Key Area of change Policy S19 and guidance in the Riverside Enhancement Strategy, City Public Realm SPD, the Mayor's draft Public London Charter and 'Expanding

London's Public Realm' document.

923. The restricted opportunities for members of the public to access the Long Room and the disconnected location of the Museum from the rest of the building, the river and the Quayside fails to fully achieve the aims of adopted and draft development plan policy which seeks improved public access to heritage assets and enhanced interpretation of the City's heritage and the consideration that should be given, when dealing with historic buildings, to inclusive design enabling as many people as possible, across a broad and diverse spectrum, to access and enjoy the historic environment.
924. In conclusion, the proposal would result in a non-inclusive form of development, the result of the proposed management, curation, use, layout/disposition, appearance and inactive frontage, which would not deliver a successful public realm for all and so would not constitute Good Growth, contrary to Local Plan Policies CS 10, DM 10.1, DM 10.3, DM 10.8, CS 19, DM 19.1, London Plan Policies D3, D5 and D8, policies of the NPPF and the National Design Guide, emerging City Plan Policies S1, S8, S17, S19, OS1, in particular when seen through the 'lens' of the Good Growth objectives, GG1-GG6, including guidance in the Mayor's Public London Charter, Expanding London's Public Realm and Making London Child-Friendly. Officers consider it would fail to deliver an overall positive contribution to the City or London.

Inclusive access

925. The proposed internal layout of the building and management of the wider public realm would not provide suitable and accessible facilities for hotel guests, customers to the ancillary retail uses or to members of the public who are able to access the building. The external areas of public realm would result in reduction of public footpath widths and pinch points, and it has not been demonstrated how this would impact on Pedestrian Comfort Levels (PCLs) and accessibility issues in general.
926. The proposal would not comprise the highest standard of accessible inclusive design, failing to meet the access needs of all of the City's communities, including the particular needs of disabled people. The development proposal would therefore be contrary to Local Plan Policies CS10, DM 10.1, DM10.8 and CS16, draft and City Plan Policies S1 and HL1, London Plan Policy D5 and policies contained in the NPPF.

Sustainability and Urban Greening

927. An appropriate degree of climate change mitigation would be achieved. The sustainability strategy overall meets London Plan policies as well as Local Plan policies, and the development is on track to achieve an "excellent" BREEAM assessment rating.
928. The proposal would fall very short of the minimum Urban Greening Factor and, accounting for the evident site constraints, has not

demonstrated or justified that it has delivered the highest feasible amount of essential green infrastructure as a fundamental element of building and site design. This is contrary to London Plan Policy G5 and emerging City Plan Policy OS2 (City Greening).

Highways and Transport

929. Overall the proposals are compliant with London Plan Policy T1 and D11, the Local Plan 2015 policy DM3.2 and DM11.3, and the draft City Plan 2036 policies, S2, and SA3 as outlined above.
930. Whilst the development proposal would be in line with a number of transportation and highway policies within the Development Plan, Officers consider that due to insufficient information being provided as part of this submission, it is not demonstrated that the development would provide adequate and safe servicing, acceptable PCLs, and unfettered access to cycle and blue badge parking and would therefore be contrary to London Plan Policies T4(E), T5, T6, T6.4, and T7, the Local Plan 2015 Policy 16.3, 16.5, the draft City Plan 2036 Policies AT1, AT2, AT3, VT2 and VT3, the Mayor's draft Public London Charter, and the City of London Transport Strategy Proposal 38.

Residential Amenity

931. It has not been demonstrated that the proposed development would not cause undue harm to the amenity of neighbouring occupants. Insufficient information has been provided in support of the proposal to allow Officers to assess the impact of the development in relation to noise and overlooking. As it cannot be demonstrated that there would not be harm to residential amenity, the proposed development would be contrary to Local Plan Policies CS10, CS11, DM11.3, DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14.
932. When considered as a whole the proposed development does not accord with the Development Plan.

Other Material Considerations

933. It is considered the proposed development would provide a new hotel within the City of London which would contribute to the economic prosperity of London. However, the proposal is not considered to support strong, vibrant or healthy communities by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Furthermore, officers do not consider that the scheme would protect and enhance the built and historic environment.
934. It is considered the scheme would not represent sustainable development that is socially, economically and environmentally in

accordance with the NPPF.

935. The proposal would not conserve an irreplaceable resource in a manner appropriate to its significance, contrary to paragraph 189 of the NPPF. In accordance with paragraph 199 of the NPPF great weight should be given to the conservation of the asset, the greatest of weight, given that it is a Grade I Listed Building, a designated heritage asset of the highest order. In terms of the combined impact on the Custom House (and Quay) and the River Wall, Stairs and Cranes and the failure to preserve the contribution setting makes to the significance of a number of other designated heritage assets, then very considerable weight is attached which far outweighs the wider public benefit. It follows, then, that there is no material consideration to override the indication given by the Development Plan.
936. It is considered that the proposed development would not be in compliance with the NPPF when considered in its entirety.
937. The proposed development is not considered to accord with the emerging Draft City Plan 2036.
938. As set out in the section above it is considered that the public benefits are not sufficient to outweigh the less than substantial harm to the significance of designated heritage assets. Therefore, as the development does not accord with the Development Plan, and other material considerations also indicate that planning permission should be refused, the proposal is unacceptable and refusal of this application is, regrettably, recommended.

Overall Conclusions

939. The proposed scheme would cause harm to the significance of a character-defining Grade I listed heritage asset. It would cause some lesser harm to the significance of other heritage assets of high to outstanding significance. That same impact would harm strategic local City of London and pan-London views. In large part also for this reason, it would not constitute good design. It would not provide the highest level of accessible design for all the City's communities. It can't be demonstrated that the proposal would deliver on the City's and London's strategic sustainable transportation strategies or the 'Healthy Streets' approach, which prioritise pedestrians and active travel in a convenient, comfortable and safe manner. The proposal is not in accordance with the Development Plan when read as a whole, and there are no material considerations to indicate that the decision should be made otherwise than in accordance with the plan.
940. Overall, the proposal would fail to respect the City's past, while undermining its future, and it is not considered the proposal would make an overall positive contribution to London.
941. When taking all matters into consideration it is recommended that planning permission be refused.

Conclusion on Listed Building Consent

942. The proposals have been assessed against Local Plan Policies CS 12, DM 12.1, and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. There has also been special regard to the desirability of preserving Custom House and the River Wall, Stairs and Cranes including their setting and any features of special architectural or historic interest which they possesses, under s.16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
943. The proposed change of use to hotel is not considered appropriate in this instance as it would result in significant conflict with the conservation of the asset.
944. Overall, the proposal would not comply with Local Plan Policies CS12, DM 12.1 and DM 12.3 (1), draft City Plan 2036 policies S11 and HE1 (2, 3, 4 and 5), and London Plan Policy HC1 (A, B, D and E).
945. Therefore it is recommended that Listed Building Consent be refused.

Reasons for Refusal

946. Planning Application Reasons for Refusal
1. The proposed development would not ensure the continued beneficial use for a historic building. It has not been demonstrated that the proposal would conserve the amenity of existing neighbouring occupiers due to noise and overlooking or provide satisfactory or safe arrangements for servicing vehicles. The proposed development for the change of use of the existing building to a hotel (Use Class C1) would therefore not accord with, Local Plan Policy, CS10, CS11, DM3.5, DM11.3, DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3, DE5, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14.

Heritage

2. The proposed development would fail to preserve the special architectural and historic interest and setting of the London Custom House (Grade I) and the River Wall, Stairs and Cranes (Grade II*), causing less than substantial harm to their heritage significance the result of direct and in-direct impacts on setting, resulting from external and internal alterations, extensions, loss and de-contextualisation of historic fabric, plan form and character. The harm would not be outweighed by public benefits. The proposal is not in accordance with policies: London Plan Policy HC1; Local Plan Policies CS 12, DM 12.1, DM 12.3; HE1; Draft City Plan Policies S11 and HE1 and the NPPF.
3. The proposed development would fail to preserve the settings of Old Billingsgate (grade II), St Dunstan in the East Ruin (Grade I) and by association its Walls, Gates and Railings to the Churchyard (Grade II),

the Monument to the Great Fire (Grade I and Scheduled Ancient Monument), All Hallows by the Tower (Grade I), Tower Bridge (Grade I), the Eastcheap Conservation Area, the Tower Bridge Conservation Area and the Tooley Street Conservation Area, causing harm to their heritage significance and an appreciation of it by way of contribution made by elements of setting.

The harm would not be outweighed by public benefits. The development would not be in accordance with Local Plan Policies: CS 12, DM 12.1, DM 12.3; London Plan Policy HC1; City Plan Policies XX; and policies and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (NPG).

Design

4. The proposed development would not comprise a high standard of design as a result of its architecture, in particular the roof extensions, which by virtue of their siting, height, massing, appearance and detailed design, by day and night, would fail to be visually integrated into the overall design of the building when seen from street and higher level view, which would not be sympathetic and contextual to character or history, adversely affecting the character and appearance of the host building, contrary to Local Plan Policies CS 10, DM 10.1, Emerging City Plan Policies and the NPPF and National Design Guide.

Strategic Views (London):

5. The proposed development would comprise an intrusive form of development causing harm to the characteristics of London View Management Framework (LVMF) designated River Prospects from London Bridge (11B.1-2) and Tower Bridge (10A.1) including impact on the setting of the Monument as a landmark element and the Townscape View from the Queen's Walk at City Hall (25A.1-3). The development is not in accordance with Local Plan Policies: Local Plan CS 13(1); London Plan HC4; City Plan S13 and guidance contained in the LVMF SPG.

Strategic Views (Local):

6. By virtue of the height, bulk, massing and appearance of the roof extensions, associated terraces and alterations to roof level, the proposal would fail to protect and enhance significant local views of and from the Monument, and would fail to protect and enhance views of identified historic city landmarks and skyline features, namely Tower Bridge, St Dunstan in the East and All Hallows by the Tower. The development is not in accordance with Local Plan Policies: Local Plan CS 13(2); City Plan Policy S13 and guidance in the Protected Views SPD.

Public Realm

7. The proposed development would not result inclusive access by closure wholly and partly for events on the Quayside and limited internal public permeability which would limit the interpretation and enjoyment of a seminal heritage asset. The management, pedestrian movement, curation, detailed design and look-and-feel of the internal and external public realm, including the interface created between these would result in a non-inclusive form of public realm. The vibrancy or animation of the riverside for public use with limited active frontages and restricted publicly accessible open space would fail to deliver a fairer, more equitable and inclusive place which is welcoming to all communities whilst conflicting with the spatial aspirations of the emerging Pool of London Key Area of change. The proposal would not be in accordance with Local Plan Policies CS9, CS10, CS19, DM10.4 the overarching good growth objectives in the London Plan, London Plan policies D5, D8, S4, S14 and S16, Draft City Plan S17, S19, DE3, S14, OS1, CV2, HL1, the aspirations of the Riverside Walkway Enhancement Strategy SPD 2015, Mayor's Public Charter.

Accessible Design

8. It has not been demonstrated that the proposed development would provide highest standard of accessible design including disabled access provisions or facilities both within the hotel development and externally within the Quayside area or adjacent areas of Public Highway. The development would not meet the highest standard of accessibility and inclusive design and would not be in accordance with Local Plan policies CS10, DM10.1, DM10.5 and DM10.8, policies D5 and E10 of the London Plan or policies S1 and S8 of the draft City Plan.

Highways

9. The lay-by would result in the width of the pavement being reduced on Lower Thames Street therefore not promoting active travel by walking and diminish pedestrian comfort levels (PCL). The development would therefore not accord with Local Plan Policy DM16.1, DM16.2, emerging City Plan Policies AT1 and AT2, London Plan Policies T1 and T2, The Mayor's Transport Strategy and the City of London Transport Strategy.
10. In the absence of a scheme for offsite consolidation it has not been demonstrated that the development would facilitate safe, and efficient deliveries and servicing of the site, including adequate safety and servicing of the Quayside for events. The proposed would therefore not accord with Local Plan Policies DM16.1 and DM16.5, London Plan Policy T7 or emerging City Plan Policy VT2.
11. It has not been demonstrated that the proposed development would not have a detrimental impact on Pedestrian Comfort Levels as a result of

the change of use of the site and the potential for increased capacity. The applicant has failed to demonstrate that the closure of the quayside would not create unacceptable Pedestrian Comfort Levels and would therefore not be in accordance with London Plan Policy T4 or TfL Pedestrian Comfort Guidance for London 2019.

106

12. The applicant has failed to enter into an appropriate legal agreement to secure the provision of appropriate site specific mitigation including; Highway Reparation and other Highways Obligations; Local Procurement Strategy; Local Training, Skills and Job Brokerage Strategy (Demolition; Construction and End Use); Delivery and Servicing Management Plan (including Consolidation); Travel Plan (including Cycling Promotion Plan); Section 278 Agreement (CoL); Section 278 Agreement (TfL); Declaration of City Walkway; Visitor Management Plan; Cultural Strategy and associated Cultural Plan (including Cultural officer, Cultural Committee and Heritage Partner); Public Access Management Plan; and Quayside Events Management Plan and Planning Obligations in relation to Affordable Housing; Local Training, Skills and Job Brokerage; Carbon Reduction Shortfall; Section 278 Design and Evaluation; and S106 Monitoring Charge. The development therefore conflicts with Policy CS4 and the City's Planning Obligations SPD.

947. Listed Building Consent Reasons for Refusal

1. The proposed development would fail to preserve, causing extensive moderate less than substantial harm to the exceptional special architectural and historic interest of the grade I London Custom House, a visually prominent historic building within the Pool of London. This level of less than substantial harm would not be outweighed by the public benefits. This harm would result from external and internal alterations, extensions, adaptation and concealment to areas of very high, high and moderate heritage significance: eroding the Custom House architectural composition; eroding the historic floor plan; irreversibly removing historic fabric. These proposals would be contrary to policies: London Plan Policy HC1; Local Plan Policies CS 12, DM 12.1, DM 12.3; Draft City Plan Policies S11 and HE1 and the NPPF.

Appendix A

Background Papers

21.09.2020 Steven Tabbitt
22.09.2020 Charles Horne
23.09.2020 Spencer Scher
29.09.2020 Karren Mair
29.09.2020 Luis Oganés
29.09.2020 Edward Worthy
09.10.2020 Edward Worthy
12.10.2020 Mr Lee Saywack
12.10.2020 Matthew Thurston
13.10.2020 David & Karen Collins
14.10.2020 Elliott Giles
14.10.2020 Inga Johal
14.10.2020 James Barrett
15.10.2020 Joel Watkins
15.10.2020 Viki Fox - LAMAS
16.10.2020 Bruce Mann
22.10.2020 Natasha Curran
01.11.2020 Peter Guillery
09.01.2021 Sue Smith
13.01.2021 Philip Roy
02.02.2021 Jennifer M. Freeman
04.02.2021 Eric Reynolds
14.02.2021 Graham Taylor
14.02.2021 Don & Lizebeth Burch
14.02.2021 Peter Hilliard
14.02.2021 Pauline Robertson
14.02.2021 David Trillo
14.02.2021 Andrew Shields
14.02.2021 Elizabeth Gaskill
14.02.2021 Elizabeth Gaskill
14.02.2021 Josephine Eglin
14.02.2021 Melissa Delano
14.02.2021 John Kent
14.02.2021 Ruth Fleming
14.02.2021 Alison Homewood
14.02.2021 Caroline Murray
14.02.2021 Colin Eastaugh
14.02.2021 Richard Wiseman
14.02.2021 Glenn Leeder
14.02.2021 Helena Smith
14.02.2021 Dr Jackie Randall
14.02.2021 Jamie Surman

14.02.2021 Lynda Bailey
14.02.2021 Patricia Kelly
14.02.2021 Peter Smith
14.02.2021 Shirley Collier
14.02.2021 Simon Ward
14.02.2021 Steven Clarke
14.02.2021 Vicky Stewart
15.02.2021 Deborah Merrett
15.02.2021 Mary Peskett Smith
15.02.2021 Mary Peskett Smith
15.02.2021 Jill Wilson
15.02.2021 Charles Rumbles
16.02.2021 Ann North
16.02.2021 Jon Petre
16.02.2021 Jennifer Newbold
16.02.2021 Merlin Waterson
16.02.2021 Susan Mayer
17.02.2021 Alun Watkins
17.02.2021 Joan Dawson
17.02.2021 Patricia Wilkey
17.02.2021 James Emerson
18.02.2021 Julian Kirkby
18.02.2021 Michael Hahn
18.02.2021 Richard Kirker
18.02.2021 Ruth Hope
18.02.2021 Stephanie Lawrence
04.03.2021 Catherine Hopkin
22.03.2021 Davitt Jones Bould
06.04.2021 Joanne Greene
26.07.2021 Jason Zeloof
31.07.2021 Martin Dubbey
02.08.2021 Davitt Jones Bould
13.08.2021 Pat Goldrick
12.10.2020 Ros And Pat Goldrick

Development Plan Policies

London Plan Policies

Policy SD4 The Central Activities Zone (CAZ)

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

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 S4 Play and informal education

Policy S6 Public toilets

Policy E2 Providing suitable business space

Policy E10 Visitor infrastructure

Policy E11 Skills and opportunities for all

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 HC6 Supporting the night-time economy

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 SI5 Water Infrastructure

Policy SI7 Reducing waste and supporting the circular economy

Policy SI 8 Waste capacity and net waste self-sufficiency

Policy SI12 Flood risk management

Policy SL13 Sustainable drainage
Policy SI14 Waterways – strategic role
Policy SI16 Waterways – use and enjoyment
Policy SI 17 Protecting and enhancing London’s waterways
Policy T2 Healthy Streets
Policy T4 Assessing and mitigating transport impacts
Policy T5 Cycling
Policy T6 Car Parking
Policy T6.4 Hotel and leisure uses parking
Policy T7 Deliveries, servicing and construction

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.

DM1.1 Protection of office accommodation

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

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

DM1.2 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.

DM1.5 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.

CS2 Facilitate utilities infrastructure

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

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
 - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
 - b) reasonable gas and water supply considering the need to conserve natural resources;
 - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;

e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

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

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

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

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;

b) measures to be integrated with those of adjacent buildings and the public realm;

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

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

CS9 Thames and the Riverside

To ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding, by:

1. Designating the Thames Policy Area and preparing and keeping under review an area appraisal which identifies the attributes of the area and gives guidance on development within this area.
2. Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth and further the aims of the Riverside Walk Enhancement Strategy, particularly through:
 - (i) protecting public access and river views along the riverside walk and securing completion of the riverside walk at Queenhithe;
 - (ii) improving access to the river and riverside walk from the rest of the City and the Thames bridges;

- (iii) improving the vibrancy of the riverside by encouraging a mix of appropriate commercial uses and promoting office-led commercial development, whilst preserving privacy, security and amenity for residents, businesses and other stakeholders;
 - (iv) improving opportunities for biodiversity, in line with the City of London Habitat Action Plan for the Thames foreshore.
2. Supporting and safeguarding sites for the construction of the Thames Tideway Tunnel, including connection of the Fleet combined sewer outflow, resulting in reduced storm water discharges into the River Thames and improved water quality.
4. Promoting the functional uses of the River Thames and its environs for transport, navigation and recreation, particularly through:
- (i) retaining Walbrook Wharf for waterborne freight traffic;
 - (ii) encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
 - (iii) retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;
 - (iv) maintaining London Bridge, Tower Bridge, Blackfriars Bridge, Southwark Bridge and the Millennium Bridge;
 - (v) refusing development on or over the River, except for structures which specifically require a waterside location for river-related uses;
 - (vi) resisting the permanent mooring of vessels; if moored vessels are exceptionally permitted they must be of national importance, have a special connection with the City and the River Thames, be used for a river related purpose and not have a detrimental impact on navigation, river regime or environment;
 - (vii) maintaining access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

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.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to

unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

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

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

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.

Policy DM 11.3 Hotels

Proposals for new hotel and apart-hotel accommodation will only be permitted

where they:

- do not prejudice the primary business function of the City;
- are not contrary to policy DM1.1;

- contribute to the balance and mix of uses in the immediate locality;
- do not result in adverse impacts on the amenity of neighbouring occupiers,
- including cumulative impacts;
- provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles
- and coaches, appropriate to the size and nature of the hotel or apart-hotel;
- are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible
- standards;
- ensure continuing beneficial use for historic buildings, where appropriate.

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

DM12.3 Listed buildings

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

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.

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

DM15.2 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.

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

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

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
 - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

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.

CS17 Minimising and managing waste

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

DM17.1 Provision for waste

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

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
 - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
 - b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

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

DM18.3 Flood protection and climate

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

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.

DM20.1 Principal shopping centres

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown

in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

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.

Draft City Plan 2036 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

HL7 Sport and Recreation

HL8 Play areas and facilities

HL9 Health Impact Assessment (HIA)

S2 Safe and Secure City

SA1 Crowded Places

SA2 Dispersal Routes
SA3 Designing in security
HS3 Residential environment
OF2 Protection of Existing Office Floorspace
S4 Offices
RE3 Ground floor retail provision in the City
RE5 Markets
S6 Culture, Visitors and the Night -time Economy
CV2 Provision of Visitor Facilities
CV3 Hotels
CV4 Evening and Night-Time Economy
CV5 Public Art
S7 Smart Infrastructure and Utilities
S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE4 Pedestrian permeability
DE5 Terraces and viewing galleries
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular transport and servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment

HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HE3 Setting of the Tower of London World Heritage Site
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Spaces
OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR2 Flood Risk
CR3 Sustainable drainage systems (SuDS)
CR4 Flood protection and flood defences
S16 Circular economy and waste
CE1 Zero Waste City
S17 Thames Policy Area
S19 Pool of London
S27 Planning contributions
PC1 Viability Assessments

APPENDIX B

There is relevant GLA supplementary planning guidance and other policy in respect of:

- Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014),
- Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014),
- Sustainable Design and Construction (GLA, September 2014),
- Social Infrastructure GLA May 2015),
- 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);
- Mayor's Transport Strategy (2018):
- The Case for a River Thames Cultural Vision September 2019;
- Draft Public London Charter GLA February 2020.

Relevant City Corporation Guidance and SPDs comprises:

- Air Quality SPD (CoL, July 2017),
- Archaeology and Development Guidance SPD (CoL, July 2017),
- City Lighting Strategy (CoL, October 2018)
- City Transport Strategy (CoL, May 2019),
- City Waste Strategy 2013-2020 (CoL, January 2014),
- Protected Views SPD (CoL, January 2012),
- City of London's Wind Microclimate Guidelines (CoL, 2019),
- Planning Obligations SPD (CoL, adopted May 2021, Implemented 1 October 2021).
- Open Space Strategy (COL 2015),
- Office Use (CoL 2015),
- City Public Realm (CoL 2016),
- Cultural Strategy 2018 – 2022,
- Eastcheap Conservation Area Character Summary March 2013:
- Trinity Square Conservation Area Summary 2014;
- Statement of Community Involvement 5th July 2016;
- Flood Emergency Plans for New Development (Planning Advice Note June 2020).
- Freight and Servicing SPD (CoL Feb 2018).
- Tree Strategy SPD (CoL May 2012);
- Thames Strategy SPD (CoL 2015);
- Riverside Walkway Enhancement Strategy (CoL 2015);
- Open Space Strategy SPD (CoL 2015).

Relevant Local Plan Policies

CS10 Promote high quality environment

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

CS11 Encourage art, heritage and culture

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

CS11 Allow hotels in suitable locations

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 by (inter alia) allowing hotels that support the primary business or cultural role and refusing hotels where they would compromise the City's business function.

CS12 Conserve or enhance heritage assets

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

CS13 Protect/enhance significant views

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

CS17 Minimising and managing waste

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

CS18 Minimise flood risk

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

CS19 Improve open space and biodiversity

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

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.

CS22 Maximise community facilities

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

CS2 Facilitate utilities infrastructure

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

CS3 Ensure security from crime/terrorism

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

CS4 Seek planning contributions

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

CS9 Meet challenges of Thames/Riverside

To ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding.

DM10.1 New development

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

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

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

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

DM10.4 Environmental enhancement

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

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

DM10.7 Daylight and sunlight

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

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.

DM11.3 Hotels

Proposals for new hotel and apart-hotel accommodation will only be permitted where they:

- a) do not prejudice the primary business function of the City;
- b) are not contrary to policy DM1.1;
- c) contribute to the balance and mix of uses in the immediate locality;
- d) do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
- e) provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;
- f) are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
- g) ensure continuing beneficial use for historic buildings, where appropriate.

DM12.1 Change affecting heritage assets

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

information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

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

DM12.3 Listed buildings

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

DM12.4 Archaeology

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

DM15.1 Sustainability requirements

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

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

DM15.2 Energy and CO2 emissions

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

DM15.3 Low and zero carbon technologies

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

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

DM15.4 Offsetting carbon emissions

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

DM15.5 Climate change resilience

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

DM15.6 Air quality

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

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land

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

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

- b) the benefits of the development outweigh the flood risk to future occupants;
- c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

- a) all sites within the City Flood Risk Area as shown on the Policies Map; and
- b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

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

DM19.1 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.

DM19.3 Sport and recreation

1. To resist the loss of public sport and recreational facilities for which there is a continuing demand, unless:
 - a) replacement facilities are provided on-site or within the vicinity that meets the needs of the users of that facility; or

- b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
- c) it has been demonstrated that there is no demand for sport and recreation facilities which could be met on the site.

2. Proposals involving the loss of sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed at reasonable terms for sport and recreational use.

3. The provision of new sport and recreation facilities will be encouraged:

- a) where they provide flexible space to accommodate a range of different uses/users and are accessible to all;
- b) in locations which are convenient to the communities they serve, including open spaces;
- c) near existing residential areas;
- d) as part of major developments subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses;
- e) where they will not cause undue disturbance to neighbouring occupiers.

4. The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment.

DM19.4 Play areas and facilities

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas identified as deficient, by:

- a) protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
- b) where the creation of new play facilities is not feasible, requiring developers to work with the City Corporation to deliver enhanced provision nearby;
- c) requiring external play space and facilities as part of new residential developments which include 20 or more family units (those with 3 or more bedrooms) or 10 or more affordable units of 2 or more bedrooms;
- d) promoting opportunities for informal play and play within open spaces where it is not possible to secure formal play areas.

2. Play areas and facilities should not be located where they would cause undue disturbance to neighbouring occupiers.

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.
3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:
 - a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
 - b) in locations which are convenient to the communities they serve;
 - c) in or near identified residential areas, providing their amenity is safeguarded;
 - d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

DM22.2 Provision of Public Toilets

A widespread distribution of public toilets which meet public demand will be provided by:

- a) requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;

- b) supporting an increase in the membership of the Community Toilet Scheme;
- c) resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- d) taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

DM1.1 Protection of office accommodation

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

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

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;
- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;

e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

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.

DM3.4 Traffic management

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

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

DM3.5 Night-time entertainment

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

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

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

CS21 Protect and provide housing

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

CS9 Meet challenges of Thames/Riverside

To ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding.

CS15 Creation of sustainable development

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

CS16 Improving transport and travel

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

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM10.8 Access and inclusive design

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

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

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: 20/00631/FULMAJ

**Custom House 20 Lower Thames Street & River Wall, Stairs And Crane,
Custom House Quay London**

Change of use from office to hotel with ground floor internal north/south public route (sui generis), ground floor museum (Class F1 (c)), flexible ground floor and roof level retail/restaurant/bar floorspace and public viewing terrace (Classes E & Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Class E) and new riverfront public realm including Water Lane, Old Billingsgate Walk and Lower Thames Street (Sui Generis / C1 Hotel); works of demolition, alteration, extension and refurbishment: i.) removal of railings around riverside car park, (ii) demolition and re-building behind the retained facade of the 1960s East Block iii) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions to provide hotel rooms, plant and roof level retail; iv) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access (south elevation); v) alterations to and raising of the flood defence wall; vi.) facade alterations and associated works to create a first floor terrace at on the Centre Block (south elevation) and reinstated door and new ramped entrance access to West Block (west elevation); vii.) removal of railings on Lower Thames Street and alterations to Centre Block entrance on Lower Thames Street providing step free access; viii.) works to the river wall ix) other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a vehicular drop off on Lower Thames Street. The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

REASONS FOR REFUSAL

- 1 The proposed development would not ensure the continued beneficial use for a historic building. It has not been demonstrated that the proposal would conserve the amenity of existing neighbouring occupiers due to noise and overlooking or provide satisfactory or safe arrangements for servicing vehicles. The proposed development for the change of use of the existing building to a hotel (Use Class C1) would therefore not accord with, Local Plan Policy, CS10, CS11, DM3.5, DM11.3, DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3, DE5, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14.

- 2 The proposed development would fail to preserve the special architectural and historic interest and setting of the London Custom House (Grade I) and the River Wall, Stairs and Cranes (Grade II*), causing less than substantial harm to their heritage significance the result of direct and in-direct impacts on setting, resulting from external and internal alterations, extensions, loss and de-contextualisation of historic fabric, plan form and character. The harm would not be outweighed by public benefits. The proposal is not in accordance with policies: London Plan Policy HC1; Local Plan Policies CS 12, DM 12.1, DM 12.3; HE1; Draft City Plan Policies S11 and HE1 and the NPPF.
- 3 The proposed development would fail to preserve the settings of Old Billingsgate (grade II), St Dunstan in the East Ruin (Grade I) and by association its Walls, Gates and Railings to the Churchyard (Grade II), the Monument to the Great Fire (Grade I and Scheduled Ancient Monument), All Hallows by the Tower (Grade I), Tower Bridge (Grade I), the Eastcheap Conservation Area, the Tower Bridge Conservation Area and the Tooley Street Conservation Area, causing harm to their heritage significance and an appreciation of it by way of contribution made by elements of setting. The harm would not be outweighed by public benefits. The development would not be in accordance with Local Plan Policies: CS 12, DM 12.1, DM 12.3; London Plan Policy HC1; City Plan Policies S11 and HE1; and policies and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance.
- 4 The proposed development would not comprise a high standard of design as a result of its architecture, in particular the roof extensions, which by virtue of their siting, height, massing, appearance and detailed design, by day and night, would fail to be visually integrated into the overall design of the building when seen from street and higher level view, which would not be sympathetic and contextual to character or history, adversely affecting the character and appearance of the host building, contrary to Local Plan Policies CS 10, DM 10.1, Emerging City Plan Policies and the NPPF and National Design Guide.
- 5 The proposed development would comprise an intrusive form of development causing harm to the characteristics of London View Management Framework (LVMF) designated River Prospects from London Bridge (11B.1-2) and Tower Bridge (10A.1) including impact on the setting of the Monument as a landmark element and the Townscape View from the Queen's Walk at City Hall (25A.1-3). The development is not in accordance with Local Plan Policies: Local Plan CS 13(1); London Plan HC4; City Plan S13 and guidance contained in the LVMF SPG.
- 6 By virtue of the height, bulk, massing and appearance of the roof extensions, associated terraces and alterations to roof level, the proposal would fail to protect and enhance significant local views of and from the Monument, and would fail to protect and enhance views

of identified historic city landmarks and skyline features, namely Tower Bridge, St Dunstan in the East and All Hallows by the Tower. The development is not in accordance with Local Plan Policies: Local Plan CS 13(2); City Plan Policy S13 and guidance in the Protected Views SPD.

- 7 The proposed development would not result inclusive access by closure wholly and partly for events on the Quayside and limited internal public permeability which would limit the interpretation and enjoyment of a seminal heritage asset. The management, pedestrian movement, curation, detailed design and look-and-feel of the internal and external public realm, including the interface created between these would result in a non-inclusive form of public realm. The vibrancy or animation of the riverside for public use with limited active frontages and restricted publicly accessible open space would fail to deliver a fairer, more equitable and inclusive place which is welcoming to all communities whilst conflicting with the spatial aspirations of the emerging Pool of London Key Area of change. The proposal would not be in accordance with Local Plan Policies CS9, CS10, CS19, DM10.4 the overarching good growth objectives in the London Plan, London Plan policies D5, D8, S4, SI14 and SI16, Draft City Plan S17, S19, DE3, S14, OS1, CV2, HL1, the aspirations of the Riverside Walkway Enhancement Strategy SPD 2015, Mayor's Public Charter.
- 8 It has not been demonstrated that the proposed development would provide highest standard of accessible design including disabled access provisions or facilities both within the hotel development and externally within the Quayside area or adjacent areas of Public Highway. The development would not meet the highest standard of accessibility and inclusive design and would not be in accordance with Local Plan policies CS10, DM10.1, DM10.5 and DM10.8, policies D5 and E10 of the London Plan or policies S1 and S8 of the draft City Plan.
- 9 The lay-by would result in the width of the pavement being reduced on Lower Thames Street therefore not promoting active travel by walking and diminish pedestrian comfort levels (PCL). The development would therefore not accord with Local Plan Policy DM16.1, DM16.2, emerging City Plan Policies AT1 and AT2, London Plan Policies T1 and T2, The Mayor's Transport Strategy and the City of London Transport Strategy.
- 10 In the absence of a scheme for offsite consolidation it has not been demonstrated that the development would facilitate safe, and efficient deliveries and servicing of the site, including adequate safety and servicing of the Quayside for events. The proposed would therefore not accord with Local Plan Polices DM16.1 and DM16.5, London Plan Policy T7 or emerging City Plan Policy VT2.
- 11 It has not been demonstrated that the proposed development would not have a detrimental impact on Pedestrian Comfort Levels as a result of

the change of use of the site and the potential for increased capacity. The applicant has failed to demonstrate that the closure of the quayside would not create unacceptable Pedestrian Comfort Levels and would therefore not be in accordance with London Plan Policy T4 or TfL Pedestrian Comfort Guidance for London 2019.

- 12 The applicant has failed to enter into an appropriate legal agreement to secure the provision of appropriate site specific mitigation including; Highway Reparation and other Highways Obligations; Local Procurement Strategy; Local Training, Skills and Job Brokerage Strategy (Demolition; Construction and End Use); Delivery and Servicing Management Plan (including Consolidation); Travel Plan (including Cycling Promotion Plan); Section 278 Agreement (CoL); Section 278 Agreement (TfL); Declaration of City Walkway; Visitor Management Plan; Cultural Strategy and associated Cultural Plan (including Cultural officer, Cultural Committee and Heritage Partner); Public Access Management Plan; and Quayside Events Management Plan and Planning Obligations in relation to Affordable Housing; Local Training, Skills and Job Brokerage; Carbon Reduction Shortfall; Section 278 Design and Evaluation; and S106 Monitoring Charge. The development therefore conflicts with Policy CS4 and the City's Planning Obligations SPD.

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr Steven Tabbitt

Address: Thames Path National Trail Speedwell House Oxford

Comment Details

Commenter Type: Other

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

Comment Reasons:

- Traffic or Highways

Comment: Under Public Access Quayside Part 5

It states that access to the Quayside may be restricted....

The Thames Path National Trail runs along Custom House Wharf, should this development take place, we ask that Public Access is legally protected and enhanced along the Thames Path National Trail without let or hinderance with no obstructions to the right of passage by foot at any time. This is in accordance with The Draft London Plan under Policy SI16 Waterways- use and enjoyment.

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr charles horne

Address: Eden House 23-25 Wilson street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I have worked in the city for over 30 years and I am pleased to see this application as a sensitive restoration of the building will bring with it benefits to Londoners and visitors alike in particular the rooftop facilities. I would therefore like to register my support for the project.

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr Spencer Scher

Address: 502 Cedar Court London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I attended the public exhibition for the site and met the architect. I am pleased to see this scheme being submitted and as at the exhibition am pleased to note the public space created on the north bank for me to take my family. I support the application.

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Miss Karren Mair

Address: Flat 17, Waterloo Gardens 2 Milner Square London

Comment Details

Commenter Type: Member of the Public

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

Comment Reasons:

- Other

Comment: There is a Public footpath running along in front of this building will this still be accessible when the hotel is in use and what will be public restrictions throughout construction?

What will be long term effect to local traffic when the coach and taxi drop-off is created?

Begum, Shupi

From: LUIS OGANES [REDACTED]
Sent: 29 September 2020 16:23
To: PLN - Comments
Cc: Williams, Sonia
Subject: Re: Custom House project

This is my address. Thank you.

Apt 143 Sugar Quay
1 Water Lane
London
EC3R 6AP
United Kingdom

Luis Oganés, Ph.D.
[REDACTED]

> On Sep 29, 2020, at 15:53, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

>

> Dear Luis Oganés,

>

> Thank you for your comments on the above Planning Application, please note we require your address.

>

> Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

>

> Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

>

> Please visit our webpage for further information:

>

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.cityoflondon.gov.uk%2Fservices%2Fenvironment-and-planning%2Fplanning%2Fplanning-applications%2Fview-planning-applications%2FPages%2Fdefault.aspx&data=01%7C01%7C%7Ca92211d23af348e234dd08d8648b8d90%7C9fe658cdb3cd405685193222ffa96be8%7C1&data=d7dgAkzYzLTQ%2BoviFAZ2I%2FiIMrmpUtHRgVygaD5ghJU%3D&reserved=0>

>

>

> Regards,

>

> Shupi Begum

> Planning Administrator

> Department of the Built Environment

> City of London Corporation

>

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=01%7C01%7C%7Ca92211d23af348e234dd08d8648b8d90%7C9fe658cdb3cd405685193222ffa96be8%7C1&data=nahNusn%2F8mypyqXE3SxDQtdF1zn8nVW3jdSoxEgF6x%2F0%3D&reserved=0>

>

>

>

>
>
> -----Original Message-----
> From: LUIS OGANES [REDACTED]
> Sent: 25 September 2020 16:55
> To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
> Subject: Custom House project

>
> Hello

>
> I am a homeowner of an apartment at Sugar Quay, 1 Water Lane, London EC3R 6AP, which is next to the Custom House where a conversion to a hotel is expected. I want to express my support for the project. The existing use of this beautiful historic building is clearly suboptimal, particularly since the access to the waterfront is semi-blocked by a fenced parking garage. As a neighbor I look forward to having a hotel next door with new retail, restaurant and entertainment additions to the neighborhood. I hope the project goes through.

>
> Thanks

> Luis

>
> Luis Oganés, PhD

> loganes@aol.com

> THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website:

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=01%7C01%7C%7Ca92211d23af348e234dd08d8648b8d90%7C9fe658cdb3cd405685193222ffa96be8%7C1&data=nahNusn%2F8mypoqXE3SxDQtdF1zn8nVW3jdSoxEgF6x%2F0%3D&reserved=0>

Begum, Shupi

From: Edward Worthy [REDACTED]
Sent: 29 September 2020 13:15
To: PLN - Comments
Subject: Re: FW: Custom House

My address is:

Flat 23, Werna House, 31 Monument Street, EC3R 8BT

Kind regards,

Edward Worthy

On Tue, 29 Sep 2020 at 13:04, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

Dear Edward Worthy,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

Regards,

Shupi Begum

Planning Administrator

Department of the Built Environment

City of London Corporation

www.cityoflondon.gov.uk

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

From: Ed Worthy [REDACTED]

Sent: 24 September 2020 12:19

To: PLN - Comments <PLNComments@cityoflondon.gov.uk>

Subject: Custom House

Reference: 20/00631/FULMAJ;

20/00632/LBC:

I live around the corner from this development and have just seen the planning application for Custom House. It sounds like a good development, but my main concern is accessibility to local residents. Will the venue be accessible to the public or nearby residents? Who is submitting the application? This is at the bottom of my road so I'm concerned about it being done improperly.

Kind regards,

Edward Worthy

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

Begum, Shupi

From: Edward Worthy [REDACTED]
Sent: 29 September 2020 13:15
To: PLN - Comments
Subject: Re: FW: Custom House

My address is:

Flat 23, Werna House, 31 Monument Street, EC3R 8BT

Kind regards,

Edward Worthy

On Tue, 29 Sep 2020 at 13:04, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:
Dear Edward Worthy,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

Regards,

Shupi Begum

Planning Administrator

Department of the Built Environment

City of London Corporation

www.cityoflondon.gov.uk

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

From: Ed Worthy [REDACTED]

Sent: 24 September 2020 12:19

To: PLN - Comments <PLNComments@cityoflondon.gov.uk>

Subject: Custom House

Reference: 20/00631/FULMAJ;

20/00632/LBC:

I live around the corner from this development and have just seen the planning application for Custom House. It sounds like a good development, but my main concern is accessibility to local residents. Will the venue be accessible to the public or nearby residents? Who is submitting the application? This is at the bottom of my road so I'm concerned about it being done improperly.

Kind regards,

Edward Worthy

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr Lee Saywack

Address: Dominvs Group 14A Shouldham Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Dear Ms Williams,

I am writing to you as I understand that you are the Custom House case officer.

Dominvs Group is a City developer with a hotel under construction at Creed Court, 3-5 Ludgate Hill and having obtained resolution to grant for a hotel and workspace scheme at Citicape House, 61-65 Holborn Viaduct.

We are supportive of the creation of new public realm adjacent to the River and two publically accessible rooftop terraces.

Further, we believe that the publicly accessible uses on the ground floor assist with increasing the vibrancy of the Pool of London area and enhance the significance and setting of this Grade I listed building.

We would like to also express our support for the design of the scheme, which ensures that the vast majority of the existing building fabric will be retained and where possible enhanced.

All in all, we believe that this is an excellent scheme for the City and wish to convey our full support.

Yours sincerely,

Lee Saywack

Development Director
Dominvs Group

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr MATTHEW THURSTON

Address: 40 GRACECHURCH ST LONDON LONDON

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: This is an exciting proposal and it's about time something was done to open up this building and improve and enhance the North Bank experience. I would like to register my support for the scheme

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr David & Karen Collins

Address: 36 Sugar Quay Water Lane off Lower Thames St London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: We consider this will offer improvement to the area amenities and to the existing building. For those reasons we support the application.

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr Elliott Giles

Address: 19 Widegate Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I jog past this site on the way to work and support the scheme as the river front is much wider and more accessible than it is now.

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr INGA Johal

Address: 30 Gresham street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Having taken strolls during my lunch breaks I am extremely pleased to see the expansion of the narrow walkway into a public quayside and offering of restaurants and bars. Given the pandemic this would represent a great investment in the long term future of the city of London and i support the scheme.

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr James Barrett

Address: 15 Church Street Kintbury

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I support this development. I have worked in the City for 15 years, and have often been amazed a car park has been allowed on the Thames' edge in this location. Making it a public place and having the option to finally see inside custom house would be fantastic. Please approve the application

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr Joel Watkins

Address: The St Botolph Building 138 Houndsditch London

Comment Details

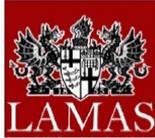
Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I am happy to support the scheme and look forward to using the restaurants in this magnificent building in the future.



**Re: Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE
Listed Building Consent reference: 20/00632/LBC
Full Planning Permission reference: 20/00632/FULL**

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews applications for listed building consent and seeks to ensure a sustainable future for vital aspects of London's built heritage.

We write regarding the application submitted for the partial demolition, alteration, extension and conversion of the Custom House from an office to a hotel with retail floorspace, leisure facilities and ancillary riverfront public realm.

Custom House is a Grade I listed building and is therefore a designated heritage asset of national importance, and the impacts of any proposed development must be assessed with this in mind. A custom house has been known to exist on this site since the 14th century, with the present building constructed in 1812-17 by David Laing, and the centre block rebuilt by Robert Smirke in 1825-8. The east end of the Custom House was rebuilt as office space after World War II bombing.

The Custom House is an iconic representation of the history of the City of London, forms an element in the setting of the World Heritage Site of the Tower of London, and Tower Bridge, and sits at the gateway to the City, attracting the attention of the many tourists using the River Thames. As such, the Custom House should be considered as having the highest significance.

Externally, the proposals include the addition of two glazed pavilions which will be visible from the riverside of the building and seriously despoil the external aspect of the building, resulting in substantial harm to the asset. Paragraph 194 of the NPPF applies.

Within the building, the proposed changes will result in the removal of many internal doorways and the creation of hotel rooms and bathrooms, with associated services, also resulting in significant harm to the asset. Further, the proposed change of use (Use Class E) to a hotel (Use Class C1) will restrict the access of the internal spaces to hotel guests only, for example, the Long Room on the first floor and will not deliver the public benefits that would outweigh the harm or loss to the building. We would maintain that the harm caused to the building by proposed alterations and its conversion into a hotel will not provide the required substantial public benefits required by Paragraph 195 of the NPPF

LAMAS support SAVE Britain's Heritage view that there are many examples of listed buildings re-imagined as successful public buildings, and that the City of London Corporation should give consideration to finding a more public role for the Custom House in line with the Greater London Authority's recently published cultural strategy for the Thames.

The Committee is of the opinion that the applicant has failed to appreciate the significance of the Custom House building as a nationally listed Grade I building in a world heritage site setting. Therefore, in view of the requirements of NPPF paragraphs 194 & 195, the Committee

requests that Listed Building and Full Planning consents be refused on the grounds of the substantial harm it would cause to this designated historic asset.

We further recommend that the City of London consider the establishment of a public consultation process to reconsider the proposed conversion of Custom House into a hotel and to consider other alternative uses for such an iconic building.

Vicki Fox (Hon. Secretary)

LAMAS – Historic Buildings & Conservation Committee

15 October 2020

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr Bruce Mann

Address: Manor Cottage Lower Ashton EXETER

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I warmly support. As a former Director of the Government Property Unit, I have seen what can be done - with imagination, effective collaboration with heritage bodies and good oversight - to reinvigorate dowdy and inaccessible government buildings in a way which not only respects and restores their heritage but also opens up access so that the public too can access that heritage, history and architecture. This scheme appears to follow that path, and is very welcome for that.

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Dr Natasha Curran

Address: Flat 15 London

Comment Details

Commenter Type: Member of the Public

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

Comment Reasons:

- Other

Comment: I welcome the proposed changes to improve the public walkway of this stretch of the river plus access to custom house. However one of the great aspects of the north bank of the river is precisely that it is not like the south bank and littered with food stalls. Is it really necessary to have these? Does the City of London not want to provide different kinds of areas for the public rather than homogenise? Thank you for considering.

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Cc: [Elev, Ben](#)
Subject: FW: 20/00632/LBC and 20/00631/FULMAJ, Custom House, EC3R 6EE
Date: 02 November 2020 09:25:33

From: Peter Guillery <[\[REDACTED\]](#)>
Sent: 01 November 2020 13:54
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: 20/00632/LBC and 20/00631/FULMAJ, Custom House, EC3R 6EE

Dear Ms Williams

Planning applications: 20/00632/LBC and 20/00631/FULMAJ

Site: Custom House, 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay, London EC3R 6EE

I am writing to object to these applications. I will identify my interest in the London Custom House before spelling out my reasons for writing.

I am an architectural historian, a senior editor for the Survey of London at the Bartlett School of Architecture in University College London, though I am writing here in a personal capacity. The Survey of London was formerly a part of the Royal Commission on the Historical Monuments of England. When I was employed by RCHME, I was the principal author of an architectural history of the Custom House, published in booklet form in 1993 as *The London Custom House*. It was a great privilege then to be able to become familiar with this important historic building that in recent times has been otherwise generally inaccessible except to HMRC.

The present opportunity for increased access lies behind the first of my objections. This is the ideal moment to improve public access to what is a grand national public building, designed as offices, but once much more open than it has been latterly. The Long Room, in particular, also the former Robing Room and King's Warehouse at least, ought to be seen by more people more frequently. Even more basic is the desirability of general public access to the riverside terrace, which could be facilitated through the centre of the building, much as has happened at Somerset House. The present proposals are deeply disappointing and a huge missed opportunity in failing to provide such access to the public as a whole.

My second objection relates to the proposed works, which I believe would if carried forward cause significant and unjustifiable harm to a Grade I listed building. The west wing of the Custom House is the least altered part, the only place where David Laing's building of 1817 remains legible. Significant alterations should not be permitted there. That is the part of the building, the major rooms of the central block apart, that should be most carefully handled in conservation terms. Further, the proposed additions of glazed pavilions on both the west and east wings would be an architecturally unfortunate intervention from an external standpoint.

I wholly support the representations made by the Georgian Group and SAVE Britain's Heritage and urge you to refuse permission and consent for these applications.

Yours sincerely

Peter Guillery

Fellow of the Royal Historical Society

13 Swallowfield Road
London SE7 7NS

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Miss Sue Smith

Address: 176b Leighton Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I support the proposal by SAVE Britians Heritage to have a London-wide debate on the future of this important site. I object on the following grounds:

1.) This is a truly civic building of London and Nation-wide importance. It should not be treated like any other old building and change to it should be taken very seriously. Hotels always mean lots of alteration.

2.) London is now littered with these 'anywhere'-type banal hotels, often for international visitors, not locals. The visuals look misleading if you look at the drawings - it is just another crass privatisation of London's civic heritage. There is nothing for the wider public, not even a nod. Shame on HMRC.

3.) Whilst it might say the public can access it, in truth who wants to visit a hotel reception and bar? You would be made to feel very uncomfortable unless buying an expensive drink. Why would children visit the site?

4.) The Corporation and the Mayor should seek another Thames-side 'gem' such as the Southbank Centre or Somerset House. There is nothing like that on the City side of the River. The current proposal would be a loss to London and a missed once in a generation opportunity.

5.) This is a symmetrical classical building with a beautiful river facade. Putting two huge glass boxes and terraces on the top would make it unsymmetrical and would look incongruous.

6.) Surely this is public land anyway and should be opened to the public?

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Mr Philip Roy

Address: Milman's House Milman's Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I have seen the SAVE Britain's Heritage proposal and also object to the proposal on strong terms. This is a scandalous sell off of a public asset to the highest bidder to carve up and turn into yet another "luxury" hotel, the last thing London needs post Covid. The STEPS (Strategic Transfer of Estate to the Private Sector) contract sold off most of HMRC's freehold estate for a poultry £370 million - considered now to be a serious undervaluation. Surely some of this money 'lost could be retrieved through a better proposal for the site? I also object to:

1.) Mapeley are a non-UK Bermuda-based firm to avoid paying tax on the PFI contract at the public's expense. The Times reported that the applicant would avoid £170 million in UK tax - on HMRCs property - this couldn't even be made up if you tried (see also reporting in the Private Eye).

<https://www.thetimes.co.uk/article/tax-haven-firm-owns-hmrc-london-office-36hd39jl9>

2.) Under the PFI HMRC leased back the properties with Mapeley providing facilities/ maintenance services at a taxpayer cost of "merely" 12 million a year. Presumably this public money has been reinvested in restoring the building which they claim now is in need of restoration by this proposal? Well, the 2017 report, Managing the HMRC Estate, found that "Mapeley's performance under the contract has fluctuated", recovering from a low point in 2013/14 and has been below standard since. Indeed it found Mapeley worked on "tight margins", of course against the cut down price for which they bought it...

3.) The same report states HMRC are set to profit from carving up the building as they are to share in the tax free "Development Gain" to the tune of as much as 50% of anything over £5million. Not sure how this affects the "viability" of the scheme?

4.) The Government own the freehold and could still do the right thing. It said in Parliament that they retained the freehold because of the "historic interest" of the Custom House. So where is that TLC now?

Begum, Shupi

From: Adjei, William
Sent: 08 February 2021 13:05
To: Begum, Shupi
Subject: FW: Billingsgate and Custom House

From: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Sent: 29 January 2021 13:48
To: DBE - PLN Support <DBEPLNSupport@int.cityoflondon.gov.uk>
Subject: FW: Billingsgate and Custom House

Please download to 20/00631/FULMAJ and 00632/LBC

Many thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Jennifer Freeman [REDACTED]
Sent: 27 January 2021 11:53
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: Fwd: Billingsgate and Custom House

Dear Ms Williams,

I write with reference to current planning proposals for the grade1 listed Custom House by David Laing,1813. on Lower Thames Street. (The east end was of course destroyed in WW11 and rebuilt with a restored facade).

I am familiar with Sir Horace Jones' former Billingsgate Fish Market which stands on the riverfront directly west of the Custom House. Following a repurposing of this building some years ago the terrace in front of the Market facing the River Thames was successfully opened, giving access to the public to admire the buildings and the view across the River.

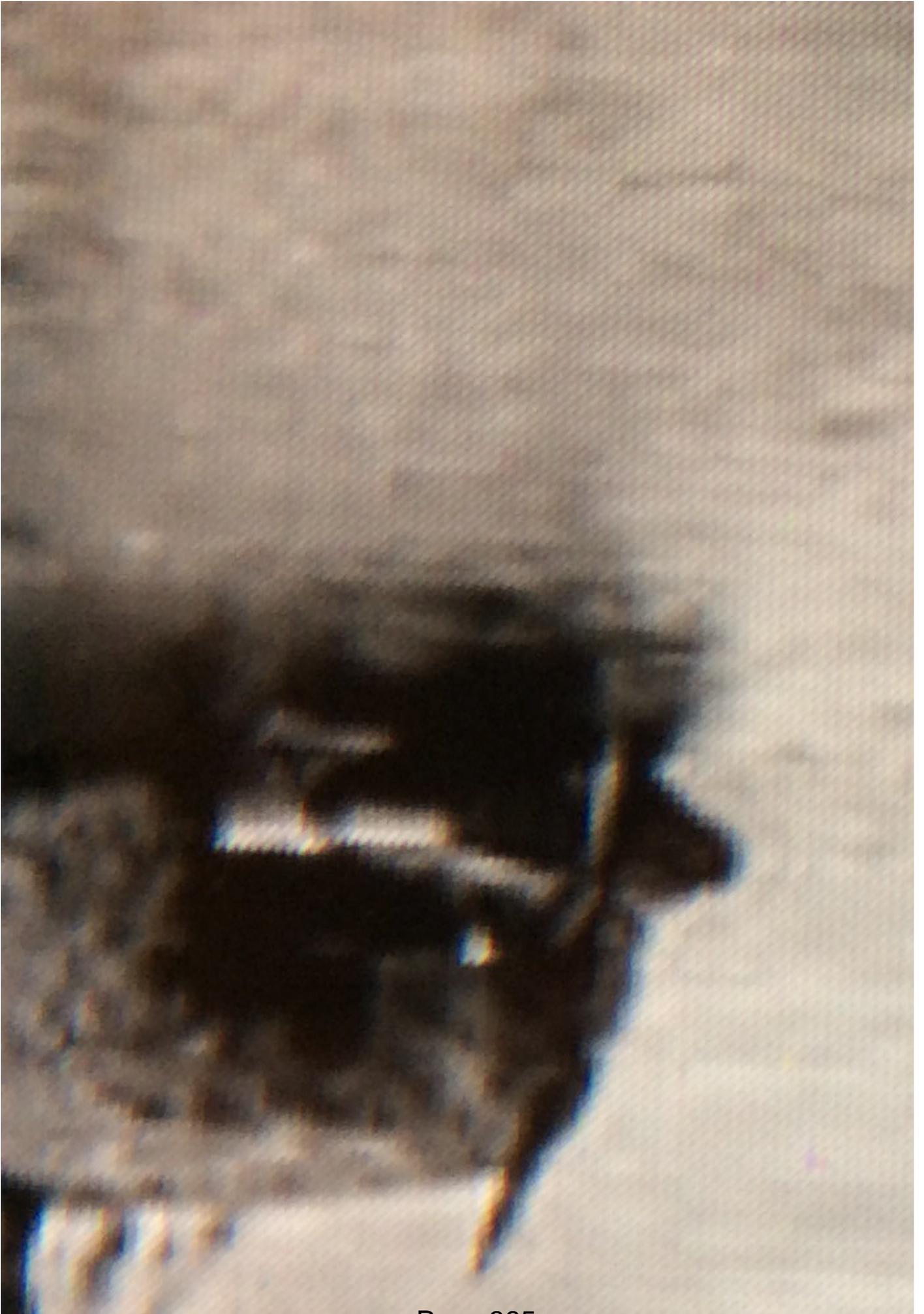
For many years the Custom House has been effectively closed to the public and the proposal to adapt it for hotel use offers a similar positive opportunity. There might also be pre-arranged access to the Long Room on HODS and other occasions.

I would be grateful if you could take these comments into account.

Yours sincerely'

Dr Jennifer M. Freeman OBE

Historic View of Custom House and Billingsgate Market from the South Bank



Begum, Shupi

From: Jennifer Freeman [REDACTED]
Sent: 02 February 2021 14:50
To: PLN - Comments
Subject: Custom House

My address is 8 Kensington Gate London W8 5NA

Jenny Freeman

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Subject: FW: Custom House refs :20/00632/LBC and 20/00631/FULMAJ
Date: 04 February 2021 17:46:31

From: Eric Reynolds
Sent: 04 February 2021 17:44
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: RE: Custom House refs :20/00632/LBC and 20/00631/FULMAJ

Good afternoon Ms Williams

I write to object to aspects of the above application and to comment on the most important question of public access to the riverside terrace and the Long Room.

The principle of conversion of parts of this important public building into an hotel may be acceptable if the building is treated with proper respect and with the provision of public access to the Long Room. However the idea of keeping the terrace behind gates and railings to serve as a private car park flies in the face of the now long established aspiration to open up a riverside walkway throughout London. It is therefore very gratifying to learn that the Corporation has negotiated that the terrace will have full public access. I would encourage the Corporation to use its powers to resist any creeping privatisation when any development is complete. Successive Mayors of London have published studies of the importance of access to the Riverside as have the Port of London Authority, the Environment Agency and of course your own Corporation. Most riparian boroughs now make such provision a mandatory condition of all new planning applications. And of course the EA requires an unobstructed minimum of 6m for maintenance of the sea wall. So although the developer seeks to claim an unusual public benefit in the removal of the railings it would have been a minimum requirement in any case.

The grade 1 listed 1820s Custom House is unquestionably one of London's most prestigious public buildings. I say public as of course it was constructed at public expense to serve government, and as use by government is to be replaced by an hotel (also a form of public building) an opportunity will exist to encourage public appreciation of the very fine Long Room.

You will be aware that SAVE British Heritage working with architect John Burrell has produced a report illustrating the potential and alternative possibilities along the lines of Somerset House.

I am aware that the current owner and possibly the Government via some profit sharing mechanism might be tempted to maximise the commercial income but I am sure that the public will view with dismay the loss of opportunity to enhance their city.

Yours faithfully

Eric Reynolds FRSA HFRIBA



Eric Reynolds
Urban Space Management
Riverside Building
Trinity Buoy Wharf
64 Orchard Place
London, E14 0JW
Registered in England at the above address no. 02340815

“ Supplier of design and construction services (Olympic Broadcast Services Studios) to the London 2012 Games”

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

Begum, Shupi

From: Graham Taylor [REDACTED]
Sent: 14 February 2021 18:45
To: Williams, Sonia
Cc: Moss, Alastair
Subject: PLANNING OBJECTION

Re: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I am writing to urge you to reject the above applications for redevelopment of the Custom House. These proposals would do unnecessary harm to Grade 1 listed building which is of central importance to the City of London's heritage. They would also remove all opportunity for public access, which seems counter to the Corporation's stated policy desire to do the opposite.

Yours sincerely

Graham Taylor

'Jeanie Deans'
Harbourmaster's Office
46 Goodhart Place
E14 8EG

Begum, Shupi

From: Lizebeth Burch [REDACTED]
Sent: 14 February 2021 18:11
To: Williams, Sonia
Cc: alistair.moss@cityoflondon.gov.uk
Subject: Customs House!

Is there no end to the WANTON DESTRUCTION of historic City Buildings? Now you propose to redevelop this magnificent structure to fit in with the financial aims of yet another person who isn't even a resident of London. We emphatically say "NO WAY" should this be allowed to happen.

You must surely recognise the heritage and value of this building. It should be used, at least in part, for the benefit of the public, and not compromised for future generations, as so many structures around London have recently been — or, completely pulled down. What is the point of having a London that looks like every other city in the world? Much of the East End has already been ruined by generic slab buildings which now will most likely stay largely empty after the pandemic, and will last only a few years before they, in turn, will be replaced.

DO NOT CHANGE THE EXTERIOR OR INTERIOR OF THE CUSTOMS HOUSE to suit a developer's whim. Do we need another hotel, at this point in time, anyway? SAVE Britain's Heritage have an alternate scheme which is of significant value in presenting a workable alternative. The Tate Modern and Somerset House already exist as very successful reimaginings of historic buildings. Please, we beg you not to add the Customs House to those which have succumbed to greed and a disregard for history.

Thank you for your attention.

Don and Lizebeth Burch
25, Maiden Lane
London WC2E 7NR

Sent from my iPad
History Belongs To The Public

Begum, Shupi

From: Peter Hilliard [REDACTED]
Sent: 14 February 2021 17:45
To: Williams, Sonia
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

To whom it may concern

I should like to object to the change of use of The Custom House , This building has played such an important part in our heritage that it needs to be kept accessible to the public and not become another pointless Hotel , I am a stonemason involved in conservation and am saddened at how our most important buildings are lost to big business and not celebrated .

Regards Peter Hilliard

9a Blurton Road
London E5 0NL

Begum, Shupi

From: [REDACTED]
Sent: 14 February 2021 16:41
To: Williams, Sonia
Cc: Moss, Alastair
Subject: OBJECTION

20/00632/LBC
20/00631/FULMAJ

CUSTOM HOUSE, LOWER THAMES STREET

For some while I worked as a tutor for HM Customs and Excise based at the Custom House and strongly object to the application to turn it into an hotel. The City does not need yet another "luxury" hotel and this historic building should be kept int the public domain.

I will also take this oppportunity of saying how appalled I am at some of the truly hideous blocks which been allowed within the City with no apparent consideration for either scale or sympathetic design.

Pauline Robertson
Penthouse 2,
Cromwell Court,
Cromwell Road,
Hove,
East Sussex, BN3 3EF

Begum, Shupi

From: David Trillo [REDACTED]
Sent: 14 February 2021 15:57
To: Williams, Sonia
Cc: Moss, Alastair
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJyour The Custom House

Dear Ms Williams

The Custom House is a Grade 1 building. It is scandalous and bizarre that a developer based out of the UK should even think that he can turn it into a hotel. The building and its predecessors are steeped in centuries of English history. To turn it into a hotel will require the destruction of the inside of the building and to put another level on the roof will destroy the very fine external roofline of the building. The Custom House would lose all reason.

The City of London can lean on its own planning committee to agree with plans for buildings and has a record for doing so. It does not have a good record for retaining its heritage buildings. The Western Smithfield buildings are a good example and they were only saved because they were "called in". The City's plans for the future refer to "office led cultural use". If the City does not follow their plan the Custom House will become an ultra-expensive hotel at the expense its working history and its building heritage. It will be another loss to Londoners.

I write to express my deepest objections to the redevelopment being proposed for the Custom House.

Yours sincerely

David Trillo
45 Ellington Street
Islington
London N7 8PN
[REDACTED]

Begum, Shupi

From: Andrew Shields [REDACTED]
Sent: 14 February 2021 15:40
To: Williams, Sonia
Cc: Moss, Alastair
Subject: Custom House development - OBJECTION

I am writing to object to the proposal from the offshore leaseholders of the Custom House to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel. The building should be put back to public use for all Londoners, in line with the attractive alternative scheme developed by SAVE Britain's Heritage.

I object in particular to:

- The exclusivity of the luxury hotel development which contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development destroying suites of Georgian offices that are a unique survival.
- The hotel development adding two light box pavilions as bars on the roof which will compromise the principal frontage.

I wish to be kept informed of further developments relating to this proposal.

Andrew Shields
9 Hartley Road
London E11 3BL
[REDACTED]

Begum, Shupi

From: Elizabeth Gaskill [REDACTED]
Sent: 14 February 2021 14:43
To: Williams, Sonia
Cc: Moss, Alastair
Subject: Objection

Dear Madam Williams,

I am writing to object to the plans to redevelop the Customs House into a luxury hotel. It is a Grade I historic building and should be made available to public use to all Londoners - and perhaps visitors as well.

I love London and have visited it more often than any other city since I moved to Amsterdam (from the United States) in 1986. I am now a Dutch citizen. It would sadden me to see this engaging historical building desecrated.

I heard about the proposed plans by reading the following and I am very much against this "unsympathetic and destructive conversion":

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

Please try to block these plans!

Sincerely yours,
Elizabeth Gaskill
Oeverpad 593
1068PM Amsterdam

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Objection
Date: 05 March 2021 17:44:35



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Elizabeth Gaskill [REDACTED]
Sent: 14 February 2021 14:43
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

Dear Madam Williams,

I am writing to object to the plans to redevelop the Customs House into a luxury hotel. It is a Grade I historic building and should be made available to public use to all Londoners - and perhaps visitors as well.

I love London and have visited it more often than any other city since I moved to Amsterdam (from the United States) in 1986. I am now a Dutch citizen. It would sadden me to see this engaging historical building desecrated.

I heard about the proposed plans by reading the following and I am very much against this "unsympathetic and destructive conversion":

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel.

- **The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.**
- **The hotel development will destroy suites of Georgian offices that are a unique survival.**

- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

Please try to block these plans!

Sincerely yours,
Elizabeth Gaskill
Oeverpad 593
1068PM Amsterdam

Haven Cottage
Church Street
Norton Saint Philip
Bath
Ba2 7LU

14 February 2021

OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Sir/ Madam,

I understand that since HM Revenue and Customs vacated the Custom House it has been leased to an offshore property developer based in the Bermuda tax haven, the irony of which can not be lost on anyone. Further, I see that this developer has submitted a planning application to convert the Custom House into a luxury hotel. The Custom House is a grade 1 listed, publicly owned building with suites of unique Georgian offices which will be destroyed under the proposals. Moreover, the addition of two light box bars to the roof will seriously compromise the river frontage.

As I am sure you are aware, Save Britain's Heritage have prepared an exceptionally fine alternative scheme taking advantage of the location and the potential for turning the magnificent Long Room into a public space for all. This scheme also incorporates enhanced pedestrian access from the City to the Thames, something sadly lacking at present. Under these proposals the interior could be put to a variety of uses including small well ventilated office spaces, the need for which has become increasingly apparent during the Covid pandemic, alongside exhibition halls and galleries. The outstanding success of riverside precedents like Somerset House and the Tate Modern confirm the viability of the latter.

Another crass hotel depriving Londoners and visitors of a potentially splendid public space is highly undesirable, and I should like to object most strongly to the above planning applications. This wanton destruction would be a loss to us all and is both morally questionable and aesthetically repellent. I would urge you to do everything within your power to reject this application.

Yours faithfully,

Josephine Eglin

Begum, Shupi

From: Williams, Sonia
Sent: 15 February 2021 09:06
To: DBE - PLN Support
Subject: FW: 20/00632/LBC and 20/00631FULMAJ

Please download to 20/00631 and /632

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Melissa Delano [REDACTED]
Sent: 14 February 2021 20:37
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: 20/00632/LBC and 20/00631FULMAJ

Dear Ms. Williams, I write to urge that your committee reconsider turning your beautiful, historic Custom House into a "luxury" hotel. I have seen this phenomenon occur here in our beautiful "City Different", Santa Fe New Mexico USA. For example, the old Saint Vincent Sanatorium/Hospital was converted into a Drury Group hotel that we now refer to as the "Dreary". These types of developments do not in any way benefit or include the local community beyond the use of cheap labor. We need more housing for our local population and could really use more affordable work/live type spaces. Lots of cities are facing these same issues and wouldn't our historic properties be put to better use as something that would attract visitors and locals alike? We can't afford to alienate our local population and sometimes it is worth the effort to create more inclusive alternatives. At some point life has to be about more than the almighty buck. Thank you for your consideration. Sincerely, Melissa Delano PO Box 1820 Santa Cruz NM 87567 USA

Begum, Shupi

From: John Kent [REDACTED]
Sent: 14 February 2021 19:40
To: Williams, Sonia; Moss, Alastair
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Sir,

Id like to add my objections to the above.

There are plenty of hotels in London and only one custom house. There is a lot of history attached with this building that contains the first and greatest long room in HM Customs.

There is no customs museum and this would be a far better use for the building

John Kent

58 Elmdale close

#warsash

Southampton so31 9rx

Begum, Shupi

From: Williams, Sonia
Sent: 05 March 2021 17:45
To: PLN - Comments
Subject: FW: OBJECTION TO PROPOSED REDEVELOPMENT OF THE CUSTOM HOUSE

Categories: Red Category

Please download to 20/00631 and 00632 and acknowledge

Thanks

sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: Ruth Fleming [REDACTED]
Sent: 14 February 2021 14:32
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION TO PROPOSED REDEVELOPMENT OF THE CUSTOM HOUSE

I am writing to inform you of my objections to the proposed redevelopment of the Custom House REF 20/00632/LBC and 20/00631/FULMAJ.

I strongly object to this wonderful and historically significant building which is Grade 1 listed being converted into a luxury hotel. The offshore leaseholders have submitted applications to seek permission to convert this historically significant building to a luxury hotel. The plans reveal that the conversion will be destructive and is unsympathetic.

The City of London City Plan 2036 gives preference to 'office-led cultural use' as part of the City's ambition to open historic spaces to attract a wider cultural demographic. The Customs House should be put back into public use for all Londoners.

The hotel development will destroy rare suites of Georgian offices that are a unique survival.

The hotel development will add two light box pavilions as bars on the roof which will compromise the principle frontage.

London does not need another luxury hotel, and should not squander yet another important piece of our historical and cultural heritage.

Please acknowledge receipt of my objections.

Ruth Fleming

Adjei, William

Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

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

From: alison homewood <

Sent: 14 February 2021 06:36

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: alastair.moss@cityoflondon.gov.uk

Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I am writing to object strongly to the proposal by developers to redevelop the Grade-1 listed Customs House into a luxury hotel.

This would be a heritage sacrilege. This handsome, imposing building is a unique symbol of London's history, both maritime and commercial. In uncertain times for Britain as we step out into a post-Brexit world we need to safeguard these unique remnants of our history as they will be the magnet that bring back the tourists. London has an over-supply of elegant and expensive hotels in the city and on the river; it does not need another one.

SAVE Britain's Heritage has demonstrated what successful re-uses historic buildings can be put to, notably with Smithfield's Market and the Museum of London. Please refuse this planning application, don't let any more of my beautiful London be destroyed by overseas developers with no cultural soul and only seeking commercial profit.

ALISON HOMEWOOD

31 Colebrooke Avenue

London W138JZ

Adjei, William

Subject: FW: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Caroline Murray
Sent: 14 February 2021 12:27
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Madam and Sir,

I note with complete dismay the plan to convert the Grade-I listed London Customs House into a 'luxury hotel', with severe internal destruction and the marring of the external appearance as part of this process.

It is disgraceful in the first instance that HMRC have offered the building to a private developer, rather than making it available for cultural public use, as defined in the City of London's policy outlined in the City Plan 2036. It is also completely unclear that London will have the need for yet another 'luxury hotel' (see for example the ludicrous proposal for the Whitechapel Bell Foundry in Tower Hamlets, currently up for appeal) for the foreseeable future.

But my main concern is that this is yet another example of the pursuit of profit by private developers which is being allowed to destroy the irreplaceable historic fabric of the city for their own short-term gain and for no benefit (indeed, rather the reverse) to the inhabitants of London.

I very much hope that the planning committee will reject this proposal, and stand their ground if /when the developer lodges an appeal.

Yours sincerely,

(Dr) Caroline Murray

23 Tenison Avenue
Cambridge
CB1 2DX

Adjei, William

Subject: FW: OBJECTION - proposed redevelopment of the Customs House

From: Colin Eastaugh
Sent: 14 February 2021 08:40
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION - proposed redevelopment of the Customs House

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Sirs

Do we need another luxury hotel along the River Thames? Of course the answer is no. Do we need more heritage space in the Lower Thames Street area? The answer is yes.

City of London's City Plan 2036 is proposing a preference for 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. Another luxury hotel in such a prominent position seems to go against the spirit of the City of London's proposals.

It is also disappointing to note that the property developer will destroy suites of Georgian offices and add two light box pavilions as bars on the roof which will compromise the principal frontage. In summary destroying both the interior and exterior fabric of the building.

It is a miracle that Customs House has survived so long, survived WWII and the planning authorities of the past. Fingers crossed the planning authorities of the 21st century don't end up destroying this wonderful building.

Regards.

Colin Eastaugh
58 Foyle Road
London
SE3 7RH

Adjei, William

Subject: FW: Customs House redevelopment

From: Richard Wiseman
Sent: 14 February 2021 12:22
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Customs House redevelopment

20/00632/LBC and 20/00631/FULMAJ CUSTOMS HOUSE REDEVELOPMENT

I am writing to object in the strongest terms to the proposal. I do so on the following grounds:

This is an historical building of utmost importance. Yet, the developers propose to make changes which will permanently disfigure it. The external changes, particularly the light box pavilions, however well designed, are unnecessary, unhistorical and are intended to pander to hotel guests many of whom will come to London to experience what is left of the City.

The destruction of internal rooms and spaces, particularly offices will be an act of vandalism rarely seen on this scale in such an important building.

How can owners of other listed buildings be persuaded that conservation issues are to be taken seriously when something like these proposals are permitted or even encouraged.

I can think of only one building of its sort that was allowed to be destroyed in a similar way, namely Soane's Bank of England. At least in that case, the new architect had some sense of sympathy with the original exterior. How much better would the architecture of the City be if the building had been allowed to stand.

As is so often the case, the proposals are an act of hubris on the part of all concerned, with self-serving justification which bears not the slightest scrutiny.

Richard Wiseman

18 Reynolds Close, NW11 7EA

Adjei, William

Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Glenn Leeder

Sent: 14 February 2021 09:08

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>; Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I regularly walk along the Thames in front of the Custome House. It is a beautiful building.

It is my belief that the leaseholders of the Custom House want to undertake an ugly and destructive conversion of this listed Grade I historic building into a luxury hotel. I believe it should be put back to public use for all Londoners and visitors, not just the wealthy.

My points of objection are -

- The exclusivity of the proposed luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. The City of London has the opportunity to extend the area in close vicinity to the Tower of London to include cultural and visitor attractions within easy walking distance of the Tower. This is a unique heritage space and should not be lost to the public.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage. Surely these light boxes cannot be allowed to be added to a Grade 1 listed building. You are the guardians of our heritage. Please do not let developers destroy it.

I urge you to reject this proposed development.

Glenn Leeder
25 Folgate Street
LONDON E1 6BX

Adjei, William

Subject: FW: OBJECTION

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

From: Helena Smith

Sent: 14 February 2021 07:49

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

Subject: OBJECTION

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Ms Williams,

I am writing to say that I strongly object to the proposed redevelopment of the Customs House as a hotel. This building is part of London's history, and its development should benefit as many Londoners as possible, not a privileged wealthy few. In addition, the development should be made in such a way that acknowledges and explores the role of the building in London's history, and respects the architecture of the Customs House.

A great example of such a building being used for the public good is Somerset House. A reimagined Customs House would open up a wonderful stretch of the Thames as a promenade for Londoners, as well as an intriguing building. It is a great opportunity for the city, not simply an opportunity for a developer to make money.

Yours sincerely,

Helena Smith

--

10 Tomline House

Union Street

London SE1 0ET

Adjei, William

Subject: FW: Custom House Development proposed Hotel

From: jackie randall <
Sent: 14 February 2021 09:55
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: Custom House Development proposed Hotel

I object to this planning application on the grounds the building contains historical grade II listed architecture which is a part of London's heritage and is better used not for private financial gain but for the Community of London.

Kind Regards

Jackie Randall
65 Cherry Tree Rise
Buckhurst Hill, IG9 6EZ

Sent from my iPhone

Adjei, William

Subject: FW: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Jamie Surman <
Sent: 14 February 2021 08:04
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Jamie Surman
122 Willoughby House
Barbican
London EC2Y 8BL

14 February 2021

Sonia Williams
The Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
London,
EC2P 2EJ

Dear Ms Williams,

REF: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Please accept this letter as an objection to planned proposals to alter the purpose of Custom House's use. Custom House is a Grade I listed building of national importance. Proposed plans seek to alter the fabric of the building irreparably and prevent it from being for public use.

The nature of the building is as a public space. Exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

Additionally, the original layout of Georgian offices would be destroyed by the plans and the addition of two light box pavilions on the roof would compromise the principle frontage.

SAVE Britain's Heritage have put forward excellent plans for an alternative, that would ensure the building is in public use, as has been successfully illustrated at Somerset House further down the river. This would also help regenerate a largely ignored stretch of the river past Tower Hill, and take full advantage of its excellent position for all to enjoy. I implore you and your colleagues to consider this as a serious option.

https://mcusercontent.com/9ea03bb11e3ccc82634488e2b/files/89340061-ef7a-407b-bf18-01a31aabd800/2003_SAVE_CUSTOM_HOUSE_6_.pdf

Yours sincerely,

Jamie Surman

Adjei, William

Subject: FW: OBJECTION

From: Lynda Bailey
Sent: 14 February 2021 10:18
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Good morning

I have just heard of the proposed development of the Custom House to become a luxury, exclusive hotel. Please stop this.

The City Plan is for such places to be adapted to encourage more people and different types of people to enjoy our heritage. A hotel does none of this.

I am also disturbed that Georgian offices, pretty much untouched, will be damaged or removed altogether. These are precious!

Please stop London becoming ever more remote from the people who live in it. A Custom House has been an important part of our history since before Chaucer's time. Millions of Londoners could learn about what happened here – good and bad – and enjoy the marvellous spaces inside.

Regards

Lynda Bailey

Flat9, 2 Carpenters Place, London SW4 7TD

Adjei, William

Subject: FW: Objection

From: tricia kelly <
Sent: 14 February 2021 11:31
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

Re: Planning applications 20/00631/FULMAJ and 20/00632/LBC

Though I am obviously not visiting much at present I have spent several years working at various points along the north bank of the Thames and value the many lesser-known historic elements to be found there.

I was horrified therefore to hear of the proposed changes to the Custom House being put before you in these applications. This little-known and much under-appreciated building has such potential to become a major public building, a flagship and long-term asset for the City. Instead, these proposals rip out its historic heart (the near uniquely intact Georgian offices in one wing of the building) and blemish its face with glass-box bars.

I can understand that there is not much hotel accommodation within the City itself, but there is plenty in the wider area. At best if the venture is successful it is likely to increase the number of coaches manoeuvring around Lower Thames St. However, the current pandemic means tourism is at its lowest ebb for over a generation and is unlikely to recover fully for several years. This proposal is therefore wrecking a Grade 1 listed building to create an hotel with what must now be a dubious business case.

The proposal is also in contradiction to your own policy in the City Plan 2036, which looks to 'office-led cultural use'.

This building gives a magnificent opportunity to encourage the aims of the plan, steering the future of this building towards something that will give wider public access while maintaining its historic features. The Customs House in its various iterations on this site has been at the heart of London trading for centuries. Surely as the country is looking to widen its trading horizons once more there must be a use for it that embodies pride in its past glories while encouraging growth and celebrating its future? Using part of its office space for start-ups or small companies for instance, while opening up the Long Room, even if this means parts are shut at times for events.

I do hope this change of use will be voted down and this vital part of the City's history protected for Londoners.

Yours sincerely
Patricia Kelly
Oak Lodge
Mill Rd
Gt Totham
CM9 8BR

40 Rutherford house, 483 Battersea Park Road London SW11 4BT

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

14 February 2021

Dear Sirs,

**Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Objection**

I am writing to object to this planning application to convert the historic Customs House into a hotel.

Customs House is a listed building that has played an important part on the history of this country and is a star in the City's heritage. I understand that there are other better proposals that take account of the building's importance and would preserve it for the benefit of the City and its residents. Somerset House is an example of what is possible.

It would be wrong for a hotel development to destroy the building's unique suites of Georgian offices.

The future of the building should follow the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

Although I am retired now, my entire career was spent as a City solicitor. During this time I came to appreciate the City's history and magnificent buildings such as Customs House.

I hope the application will be refused.

Yours sincerely

Peter Smith



Flat 1, 90 Bootham
York
YO30 7DG

For the attention of

Sonia Williams, Principal Planning Officer, City of London

Alastair Moss, Chairman Planning and Transportation Committee, City of London

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

14 February 2021

Dear Ms Williams and Mr Moss,

OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I write with regard to Planning Applications 20/00632/LBC and 20/00631/FULMAJ to object to the proposed redevelopment of the Custom House, a grade I listed building, and its conversion to a luxury hotel. The proposals will be destructive to the fabric of the grade I listed building and

- contradict the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic;
- will destroy suites of Georgian offices that are a unique survival;
- will compromise the principal frontage through the addition of two light box pavilions as bars on the roof.

I would ask you to consider this objection carefully and fully, bearing in mind that London is a place that millions call home, as well as being a major commercial centre and international travel destination. The fabric of buildings such as the Custom House constitutes a heritage asset which is "owned" by – and should be accessible to – us all. We have a responsibility of stewardship as citizens, to ensure that the asset is protected and shared widely.

Yours sincerely,



Shirley Collier MBE

Adjei, William

From: PLN - Comments
Subject: FW: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Simon Ward
Sent: 15 February 2021 11:54
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams,
I am writing to object to the above planning applications regarding the redevelopment of the London Customs House building.

My objection centres on the concerns highlighted by the Georgian Group and others about the damage the plans would cause to a priceless and irreplaceable piece of our architectural heritage.

Furthermore if the proposed development proceeds the site would be inaccessible to the majority of the general public. This would be to waste a huge opportunity to revitalise an imposing historic riverside building. That this is achievable is amply demonstrated elsewhere on the river in Somerset House, a similar Georgian office building which has been completely reimagined, while retaining its intrinsic beauty and interest. Why should the Customs House not be treated with the same respect?

I urge the Corporation to reject these unsympathetic proposals and to reconsider how best this great building can be brought back into use, ensuring that it can be enjoyed for hundreds of years to come.

Yours sincerely,
Simon Ward
8 St Thomas's Place,
London
E9 7PW

Adjei, William

Subject: FW: Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Stephen Clarke

Sent: 14 February 2021 12:12

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

Subject: Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I write to object to your plans to replace the London Custom House with another Hotel.

Efforts must be made to preserve our hereditary buildings in some form.

Steve - Sent from my iPad

53, Burwell Road, Leyton E10 7 QG

Adjei, William

Subject: FW: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Vicky Stewart
Sent: 14 February 2021 10:20
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I am appalled at the proposal to convert the Custom House into an exclusive luxury hotel and believe this historically significant Grade 1 building should be restored for public use.

The City of London's 'City Plan 2036' ambition to 'open heritage spaces to attract a wider cultural demographic' would be ignored in favour of private use by the rich elite.

The Georgian offices would needlessly be destroyed.

The light-box pavilions on the roof would detract from the integrity of the principal frontage.

Please do not allow this development to take place.

Yours sincerely
Vicky Stewart
10c Petticoat Tower
Petticoat Square
London
E1 7EE

Begum, Shupi

From: Williams, Sonia
Sent: 15 February 2021 09:04
To: DBE - PLN Support
Subject: FW: OBJECTION

Please upload to 20/00631 and 632

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Deborah Merrett [REDACTED]
Sent: 15 February 2021 07:47
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

To whom it may concern,

Regarding s Planning Applications 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

I wish to object to the above proposals. I set out my reasons below:

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel when it should be put back to public use for all Londoners.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. This proposal is contrary to the City Plan.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

For these reasons I am placing an objection to the above proposal.

Yours,
Deborah Merrett
9 Cookes Wood, Broompark. Durham DH77RL

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Subject: FW: OBJECTION to plans for the Customs House - 20/00632/LBC and 20/00631/FULMAJ
Date: 15 February 2021 17:00:29

From: margrove
Sent: 15 February 2021 16:54
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION to plans for the Customs House - 20/00632/LBC and 20/00631/FULMAJ

Dear Sonia Williams

I wish to object to the planning application to convert the historic Custom House on the Thames into a hotel, which will entail the demolition of parts of the Georgian building and the entirely inappropriate addition of two light-boxes on the roof. This historic building with its Thames frontage should be imaginatively re-developed as an amenity for Londoners and visitors alike; perhaps in the manner of the Somerset House which attracts large numbers of people to its cultural activities.

The development of luxury hotel seems inappropriate for the site and building, particularly as the building's importance is reflected by its Grade 1 listed status.

I would like this objected to be forwarded please.

Mary Peskett Smith

8 The Old School

Princeton Street

London

WC1R 4AY

Adjei, William

From: PLN - Comments
Subject: FW: OBJECTION to plans for the Customs House - 20/00632/LBC and 20/00631/FULMAJ

Dear Sonia Williams

I wish to object to the planning application to convert the historic Custom House on the Thames into a hotel, which will entail the demolition of parts of the Georgian building and the entirely inappropriate addition of two light-boxes on the roof. This historic building with its Thames frontage should be imaginatively re-developed as an amenity for Londoners and visitors alike; perhaps in the manner of the Somerset House which attracts large numbers of people to its cultural activities.

The development of luxury hotel seems inappropriate for the site and building, particularly as the building's importance is reflected by its Grade 1 listed status.

I would like this objected to be forwarded please.

Mary Peskett Smith

8 The Old School

Princeton Street

London

WC1R 4AY

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Subject: FW: Custom House Planning Application
Date: 15 February 2021 12:52:54

From: Jill Wilson
Sent: 15 February 2021 12:36
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>; Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Custom House Planning Application

Custom House Planning Application - 20/00632/LBC & 20/00631/FULMAJ

I am writing to you about the above application and the plans to turn The Customs House into a luxury hotel.

My initial reaction when I heard about it was that there must be something more imaginative which could be done with the building as there are so many other new hotels springing up all over London and hotel saturation point must be reached soon! Surely could be an alternative scheme which would have more benefit for the public? An art gallery? Exhibition space? Cultural/education centre? The possibilities are endless...

However having studied the plans and seen how much of the original building is going to be retained in the proposal, I have warmed to the hotel scheme and think that the Customs House could make a stylish and popular hotel, provided that they do actually adhere to the slightly worrying words that original features will be "reused if possible"... Who decides what is possible?

My hackles also rose when I saw the words "retaining the existing facade" on the eastern block as there has been a plague of ridiculous facadism happening recently when perfectly good buildings have been destroyed with only their facades remaining to hide soulless developments behind. But it sounds like the Eastern wing is already in the facaded category having been rebuilt since the war, so one hopes that the new building would be complementary to the existing Western wing and the original building.

There are several positives in the proposed scheme (provided the developers actually stick to them!!).

The river terrace could be a lovely new public space with great views over the Thames, and one hopes that people would be genuinely welcomed into the internal spaces like the Long Room.

I can also understand why the developers want to put the two cafes onto the roof as again these would provide some brilliant views over the City and the Thames. But why oh why do they have to be such a dull design?? At the moment they are an eyesore, and

completely out of keeping with the existing building, and would look particularly strange when lit up at night. With my designer's hat on I can see that it would make a huge difference if the roof line of the cafes were to continue on the same angle as the existing roof - if the plans are accepted, perhaps that could be a tweak you could stipulate?

Whatever the outcome of the application, I trust that you will do everything you can to protect this historic and interesting building for future generations.

Best wishes

Jill Wilson
Broadside
Kent Hatch Road
Oxted
Surrey RH8 0SZ

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Subject: FW: OBJECTION
Date: 15 February 2021 17:03:13

From: Charles Rumbles
Sent: 15 February 2021 15:28
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Alistair.Moss@cityoflondon.gov.uk
Subject: OBJECTION

Dear Sonia,

PLANNING APPLICATIONS 20/00632/LBC and 20/00631/FULMAJ.

I wish to object to the planning application to convert the former Custom House building in Lower Thames Street, London into a hotel.

I moved from Scotland at age 18 to begin my career with HM Customs & Excise on 29 October 1973. Custom House, Lower Thames Street was my first office of employment. The building has a rich economic history and should be preserved as a Customs museum or similar social space.

Regards

Charles K Rumbles

6 Pitcaple Gardens
Bellsquarry, Livingston
West Lothian, EH54 9HW
Scotland, UK

Begum, Shupi

From: Williams, Sonia
Sent: 17 February 2021 08:58
To: DBE - PLN Support
Subject: FW: OBJECTION TO PLANNING APPLICATION FOR LONDON CUSTOM HOUSE
Attachments: PLANNING APPLICATION CUSTOM HOUSE.docx

Categories: Red Category

Please download e mail and attachment to the 2 applications and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queuing outside your premises? Complete our short form to request temporary vinyl signage

From: ann [REDACTED]
Sent: 16 February 2021 20:31
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION TO PLANNING APPLICATION FOR LONDON CUSTOM HOUSE

Dear Ms Williams

Please find attached my objection to the planning application **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

I worked in Custom House for some years and find the proposals very sad. Particularly the light boxes destroying the outside of such a fine building.

Yours sincerely

Ann North
Mrs Felicity Ann North



Virus-free. www.avast.com

OBJECTION TO THE PROPOSED PLANNING APPLICATION TO CONVERT LONDON CUSTOM HOUSE INTO AN HOTEL

London Custom House is a wonderful historic building which deserves to be preserved as it is and not turned into a hotel for the rich and famous. The beautiful interior is full of character and historic importance particularly the Long Room and the basement. The Georgian rooms and the Main entrance Hall with memorials to Custom Officers who died both fighting for their country and in the course of their duties should be kept intact. Somerset House has not been sold off as a hotel but has become a venue for everyone. The Thames frontage is unique and should not be tampered with. The building is considered one of the pearls of the river and the building was often open to the public for the London Heritage weekend in September. Volunteers in period dress would act as guides and explain the history of the building particularly the wonderful Long Room.

Surely those in charge of the capital of our country should preserve its history and remind visitors of the wealth of beautiful and interesting places within it. Locals and visitors should be encouraged to use these wonderful spaces, for community space, museums, education etc. The City of London should look to its own citizens rather than always finding in favour of the money makers.

Please preserve London Custom House for us not as a hotel.

Begum, Shupi

From: Williams, Sonia
Sent: 11 March 2021 09:17
To: PLN - Comments
Subject: FW: OBJECTION - plans to redevelop Custom House

Categories: Red Category

Please download to 20/00631 and 00632 and acknowledge

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Jon Petre [REDACTED]
Sent: 10 March 2021 17:34
To: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>; Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION - plans to redevelop Custom House

Hello,

I want to lodge my objection to the City's plans to redevelop Custom House as a luxury hotel development, i.e. applications 20/00632/LBC and 20/00631/FULMAJ.

Custom House has been a unique and critically important part of the City of London's history, and it would be a massive loss to the heritage and the prestige of the City if it were to be redeveloped as an identikit chain hotel. Under current plans, the addition of lightboxes to the building will damage the historic frontage of the building and gutting the Georgian offices will erase another part of the city's history.

During the lockdown, I discovered St Dunstan-in-the-East. I think it's my favourite park in London. With all shops closed and very few places to go, public spaces like St Dunstan's have been a refuge: a rare place where you don't need to pay to enjoy yourself and you feel aware of the City's rich texture and accessibility. It's a testament to the City as a place to be lived in - a place where, no matter how times change, the environment is designed for everyone to enjoy. I view Custom House in much the same way: as, like St Dunstan's, an irreplaceable public asset that we can do so much with. I would love to see a restored Custom House once again open to the public, following the lead of Somerset House or the Southbank pavilion: a truly community-focused space that is for everyone in the city, a place to socialise, relax and learn. Please don't throw this opportunity away.

Do let me know if I can do anything else to help the development of Custom House. If there is to be a People's Hearing or similar regarding Custom House please do add me to a mailing list or a discussion group and I would be more than happy to give my opinion.

Best wishes and looking forward to hearing from you.

Jon Petre

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: OBJECTION
Date: 17 February 2021 08:55:59

From: Jennifer Newbold <>
Sent: 16 February 2021 22:01
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

16 February 2021

City of London Corporation
Guildhall, London
OBJECTION

Dear Honourable Members,

I am writing in objection to the scheme proposed by Planning Applications 20/00632/LBC and 20/00631/FULMAJ for the Custom House development.

Yet another financially driven, culturally insensitive proposal. London already has a number of Thames-fronted luxury hotels in which I cannot afford to stay. In the vicinity are the Savoy, Royal Horseguards, Rosewood, L'Oscar and the Four Seasons, amongst others. The Custom House deserves a better fate than to be made yet another exclusive haunt of the elite. This proposal is insulting, and will do irreversible damage to the integrity of this distinguished Grade I historic building.

The developers propose to destroy suites of Georgian offices that could, and should be, preserved. They propose to mar the appearance of the building with jarringly unsympathetic roof bars. Furthermore, the proposal contradicts policy as stated in the City Plan 2036, which aims to open heritage spaces to a wider demographic.

I wholly support the alternative proposal offered by SAVE Britain's Heritage. It would allow this structure to be reopened for public use, as was its original purpose. It offers a multi-use, sensitive conversion that takes into consideration the interior integrity of the building. It provides democratic access and offers multiple options to appeal to a wide range of persons, be they tourists, historians, gallery visitors, shoppers, or restaurant-goers. The business-hub portion of the proposal alone is brilliant, opening access to small- and independent business owners whilst preserving the surviving Georgian office suites. What I wouldn't give for a pop-up office in the Custom House!

I urge you to reject Planning Applications 20/00632/LBC and 20/00631/FULMAJ.

Respectfully yours,

Jennifer Newbold
124 Hillcrest Road
Concord, MA 01742
USA

The Old Rectory,
Saxthorpe,
Norwich,
NR11 7BJ

16th February 2021

Sonia Williamson,
City of London

Planning application 20/00632/LBC
20/00631/FULMAJ

Customs House

Dear Sonia Williamson,

The proposals for Smirke's Custom's House are a matter of deep concern. This is not only a building of outstanding interest and importance, but it occupies an exceptionally prominent site.

My concerns are:

- the proposed bars on the roof will compromise the main elevation, particularly at night
- the interiors, including the Georgian offices, deserve rigorous protection
- the plans for the building should allow for a degree of general public, as opposed to exclusive, access.

It should be possible to improve the plans, to deal with these aspects far more sympathetically.

Yours faithfully,

Merlin Waterson, CBE, FSA

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 16 February 2021 16:09:20

From: Sue Mayer
Sent: 16 February 2021 16:03
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I am writing to object to the plans for this Grade 1 listed Customs House.

I understand the Georgian offices are unique so they should be preserved. I would not like to see the long room carved up.

Adding light pavilions to the roof will not be in keeping with the exterior of the building and will look awful.

This building is part of our heritage and as such should be used in a sympathetic way which we can all enjoy, not just the rich visitors who would stay in an expensive and exclusive hotel.

I am very depressed at the number of historical buildings that have been lost for ever in London. Please don't destroy our history.

I am sure this building could be used as a museum highlighting our importance in trade as after all this was a customs house.. It could also be used by the community. It just needs a bit of creative thought. Turning it into an exclusive hotel shows a lack of thought and is clearly just about making money.

This hotel plan contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to "office-led" cultural use", as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

Susan Mayer
81, Warburton Road, Poole, Dorset, BH17 8SD

Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 08:40
To: PLN - Comments
Subject: FW: OBJECTION to planning app 20/00631/LBC & 20/00632/FULMA

Please download to 20/00631/FULMAJ and 00632/LBC and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: alun_watkins2003 [REDACTED]
Sent: 17 February 2021 16:45
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION to planning app 20/00631/LBC & 20/00632/FULMA

OBJECTION

Dear Ms Williams

I would like to register an objection in the strongest possible way to the planning application to convert the UK's most famous Custom House into a luxury hotel.

Custom House is an iconic building and sits on the same prime Thames side site

That has been occupied for many centuries by a Custom House. It is a Grade 1 listed building of huge cultural significance and the plan to give it to a private company register in a tax haven is an insult to the British population.

This building must be saved from destruction and returned as a space for the British public to utilise and enjoy. Having worked in this building for 30 plus years it is inconceivable that it can be sympathetically converted into a hotel; that this is to be done in the name of profit for an offshore tax haven based company is abhorant.

This magnificent building belongs to the British people and it should be conserved as such. It should never have been leased to an offshore entity many years ago and an equity should also be launched into this potentially corrupt action.

Custom House would provide a prime site for a museum or gallery, and also provide valuable public space much like how Somerset House and Tate Modern have been similarly converted in the past.

Regards
Alun Watkins
326 Richmond Rd
Kingston Upon Thames
KT2 5PP

Begum, Shupi

From: Joan Dawson [REDACTED]
Sent: 17 February 2021 23:30
To: PLN - Comments
Subject: Custom house project - my address

Dear Shupi Begum,

Thank you for your letter regarding my communication about the customs house.. My full address is

Joan Dawson
941 Greenwood Ave,
Halifax, NS B3H 3L1
Canada

Regards,

Joan Dawson

Begum, Shupi

From: Joan Dawson [REDACTED]
Sent: 14 February 2021 13:22
To: Williams, Sonia
Cc: Moss, Alastair
Subject: Custom House

City of London Corporation

To whom it may concern:

As a former Londoner, I wish to express my opposition to the redevelopment of the historic, Grade 1 listed Custom House as a luxury hotel. When buildings are listed, it is in order to ensure their preservation for their historical and architectural significance. The proposed changes in this case are not in keeping with this intention.

Ownership of such a building brings with it certain responsibilities and obligations. A cottage owner in a country village can be expected to maintain it in good order, and can be denied planning permission to make changes to his own home for his convenience. Why should overseas developers be allowed to make significant changes to this building purely for profit, most of which will go out of the country?

The Custom House should be sympathetically repurposed without changes to such significant features as its historic Long Room, either as offices to which the public would have access, or as a living museum that would attract both Londoners and visitors from Britain and abroad. It should not be disfigured in order to accommodate the wealthy and bring profit to a tax-evading consortium.

I hope wiser heads will prevail.

Joan Dawson,
Halifax, Nova Scotia

Begum, Shupi

From: Patricia Wilkey [REDACTED]
Sent: 17 February 2021 16:08
To: PLN - Comments
Subject: RE: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear William,

So sorry, my address is noted below.

21 Winter Folly
Laindon
Basildon
Essex
SS15 5GL

Kindest regards,

Pat Wilkey

[Sent from Yahoo Mail on Android](#)

On Wed, 17 Feb 2021 at 12:18, PLN - Comments
<PLNComments@cityoflondon.gov.uk> wrote:

Dear Patricia,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

regards,

William Adjei

From: Patricia Wilkey [REDACTED]
Sent: 16 February 2021 17:20
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams,

I would like to lodge my objection to the above noted proposed redevelopment of The Custom House.

I was under the impression that the City of London was against exactly this kind of exclusivity, the kind a luxury hotel development of this sort offers.

The City Plan 2036 is being contradicted here in my opinion. The development will destroy the Georgian office suites that are a unique and very rare survival and the pavilion light boxes which will be used as rooftop bars will absolutely compromise the principal frontage.

I do hope that you make note of my objection and I thank you for your time in doing so.

Kindest regards,

Pat Wilkey

[Sent from Yahoo Mail for iPad](#)

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London

falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

Comments for Planning Application 20/00631/FULMAJ

Application Summary

Application Number: 20/00631/FULMAJ

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street.

The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Case Officer: Sonia Williams

Customer Details

Name: Dr James Emerson

Address: 141 Blackheath Park London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The building is a significant (national) historical and cultural asset, which should have been treated more sensitively by this application. In particular the external appearance, the main hall and the Georgian offices are all very worthy of preservation in essentially their current form. Because this application will damage all these it should not be approved.

Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 08:39
To: PLN - Comments
Subject: FW: OBJECTION

Please download to the 2 applications referenced and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: jlk1972 [REDACTED]
Sent: 18 February 2021 08:36
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Madam and Sir,

I am writing to record my objection to the requested unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel when it should be put back to public use for all Londoners.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal

Yours sincerely,

Julian Kirkby
23 Sherwood Avenue
London
E18 1PB

Begum, Shupi

From: Michael Hahn [REDACTED]
Sent: 18 February 2021 23:57
To: PLN - Comments
Subject: Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Planning committee

I've been made aware of the planned redevelopment of the Custom House building without any apparent thought being given to its historic or characteristic existing features. The sole objective by the off shore owners to create another 'new' hotel without respect for the history of London. I feel that either sufficient guarantees are received to incorporate key original features or the planning permission be refused.

Thank you

Michael Hahn

7 Manor Park Gardens
Edgware
HA8 7NB

Tel: [REDACTED]

Begum, Shupi

From: Williams, Sonia
Sent: 19 February 2021 12:40
To: PLN - Comments
Subject: FW: Objection: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Please download to 20/00631/FULMAJ and 00632/LBC and acknowledge

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Richard Kirker [REDACTED]
Sent: 18 February 2021 23:29
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I am not persuaded that this plan merits planning approval.

The exemplary nature of this elegant and imposing Grade 1 building, its history, and iconic location should be put at the disposal of all Londoners and its visitors.

Much as Tate Modern and Somerset House have been converted into major public cultural attractions, to great acclaim, this building deserves a more noble fate than to become another and superfluous luxury hotel.

As a publicly owned building redevelopment costs would not include land or building purchase making the project financially feasible, with significant income generation potential from visitors and events/exhibitions.

The plans are an unsympathetic conversion which would be destructive to the fabric of the grade I listed building, erasing its meaning and significance. In particular, suites of Georgian offices which are a unique survival will be destroyed and two unsightly two light-box bars added to the roof, weakening the aesthetic appeal of the river frontage.

Richard Kirker
10 Coopers Close
LONDON
E1 4BB

Begum, Shupi

From: Hope, Ruth (PUT) Staff [REDACTED]
Sent: 19 February 2021 10:15
To: PLN - Comments
Subject: Objection regarding the Customs House

Dear William

Thank you for flagging up that you need my details. Apologies for not providing my address.

It is
97 Claverdale Road
London
Sw22dh

Please let me know if you need anything further.

Kind regards
Ruth Hope

Sent from my iPad

Important Notice

This message and any files transmitted with it are confidential to the addressee.

If you are not the intended recipient, any disclosure copying or distribution is prohibited and may be unlawful. You should notify the sender immediately and delete this message and any attachments without retaining a copy.

Please note that any views or opinions expressed in this message are solely those of the author and may not represent those of the Company or School.

No liability is accepted by The Girls' Day School Trust for any loss or damage incurred through use of this e-mail.

The Girls' Day School Trust. A limited company Registered in England No. 6400 Registered Charity No. 306983.
Registered Office: 10 Bressenden Place, London SW1E 5DH

Begum, Shupi

From: Adjei, William
Sent: 19 February 2021 09:37
To: Hope, Ruth (PUT) Staff
Cc: Williams, Sonia
Subject: RE: Objection

Dear Ruth ,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

regards,

William Adjei

From: Hope, Ruth (PUT) Staff [REDACTED]
Sent: 14 February 2021 10:03
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

Planning Applications 20/00632/LBC and 20/00631/FULMAJ PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Sonia Williams

I am writing in strong objection to the proposed redevelopment of the Customs House.

This building should be put back to public use for all Londoners, and London really is not short of luxury hotels so this idea should be rejected. This Grade I listed building could be redeveloped in the same way that for example Tate Modern has been. There are other examples of sympathetic redevelopments, and the proposed luxury hotel is not sympathetic or inclusive.

In addition,

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

I strongly object and I know many others will do too.
Sincerely
Ruth Hope

Sent from my iPad

Important Notice

This message and any files transmitted with it are confidential to the addressee. If you are not the intended recipient, any disclosure copying or distribution is prohibited and may be unlawful. You should notify the sender immediately and delete this message and any attachments without retaining a copy.

Please note that any views or opinions expressed in this message are solely those of the author and may not represent those of the Company or School. No liability is accepted by The Girls' Day School Trust for any loss or damage incurred through use of this e-mail.

The Girls' Day School Trust. A limited company Registered in England No. 6400
Registered Charity No. 306983. Registered Office: 10 Bressenden Place, London SW1E 5DH

Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 18:33
To: PLN - Comments
Subject: FW: OBJECTION 20/00632/LBC and 20/00631/FULMAJ

Please download to both apps and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Stephanie Lawrence [REDACTED]
Sent: 18 February 2021 18:29
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams and Mr Moss,

I would like to strongly object to the proposed plan to turn Customs House into a luxury hotel with bars on the roof - planning applications 20/00632/LBC and 20/00631/FULMAJ.

I was lucky enough to visit Customs House on one of the Open London weekends and it is a stunning building with Georgian suites of offices that I understand would be removed in the development. With so few Georgian suites of offices even remaining that simply cannot be allowed. It is a beautiful place that deserves preservation and admiration in its current form.

I work in St George's hospital and, as I'm sure you can imagine, this year has been the most challenging of my career and continues to be so. When there is the opportunity, I will need time to stop and recuperate. Beautiful buildings and history are two things that bring me peace and healing, and I'm sure I cannot be alone in that. My NHS salary is insufficient to afford luxury hotels in London, such as the proposal for Customs House. Thus if it is turned into one, I am excluded from yet another building in London due to financial limitations and I am absolutely certain that I am not alone in that either.

It is my understanding that such a development is not even permitted as it contradicts the City of London's policy outlined in the City Plan 2036, whereby preference is given to office-led cultural use. Opening this building up to the public in the manner stipulated in the City Plan 2036 would enable someone like myself to visit there.

We are fighting the biggest medical fight of our time, I am fighting the biggest personal fight of my time. Please do not permit it to happen that I emerge from this fight to find myself excluded from yet another part of the city that I have worked tirelessly to help.

Please deny the proposal for a hotel in Customs House.

With kindest regards and hope of a positive outcome,
Stephanie Lawrence

44 Chester Close, Pixham, RH4 1PP

Get [Outlook for Android](#)

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Objection to planning application 20/00632/LBC20/00631FULMAJ
Date: 04 March 2021 12:20:26

Dear Ms Williams,

I am writing to object to the proposed conversion of the Customs House into a hotel. This is an unsympathetic and destructive conversion which would dramatically change the Grade 1 listed buildings appearance on the outside as well as destroying a suite of Georgian rooms inside. This is London's historical heritage and we lose it at our peril.

Londoner's and visitors to London should be able to use and enjoy this historical space.

Please reject this application and support applications that put restoration, preservation and Londoners at the heart of their application. Benefiting us all.

Yours sincerely
Catherine Hopkin
31 Camp Road
St Albans
Herts
AL1 5DX

Ms Sonia Williams
Department of the Built Environment
City of London Corporation

Our Ref: 19/00116/FULL

Your Ref: 20/00631/FULMAJ

Date: 22 March 2021

By email only:
sonia.williams@cityoflondon.gov.uk

Dear Ms Williams

**Objection to Planning Application 20/00631/FULMAJ & 20/00632/LBC
Custom House – Proposed Change of Use from Office to Hotel-led Mixed Use Development**

We act for Tony Matharu, Chairman of Integrity International Group and former Managing Director of Grange Hotels. It should be noted that our client has no interest, or connection with the application.

Our client does have a long and distinguished track record of investment in London and, while he is highly supportive in principle of the refurbishment of Custom House, cannot support the current application.

The proposals are in material conflict with the aims of local and national planning policy, and fail to protect and promote both this valuable heritage asset, and the exceptional importance of the office-led area around it. The City is urged to refuse the application for the reasons set out below.

1. Loss of Office Space

1.1. All adopted and emerging local and national planning policies relevant to this site are heavily weighted towards the protection of office-led use, chiefly (our emphases):

1.1.1. Policy DM 1.1 of the City of London Local Plan 2015: *“To refuse the loss of existing (B1) office accommodation to other uses where the building **or its site** is considered to be suitable for **long-term** viable office use”* and paragraph 3.1.10: *“The **riverside** is an attractive location for offices and office-led commercial mixed use development”*

1.1.2. Policy DM 11.3 of the City of London Local Plan 2015: *“Proposals for new hotel and apart-hotel accommodation will only be permitted where they: • do not prejudice the primary business function of the City; • are not contrary to policy DM1.1;*

1.1.3. Strategic Policy S18 of the Draft City Plan 2036: *“The Pool of London Key Area of Change will be regenerated through...1. Enabling **office-led** redevelopment or refurbishment of the existing building stock, including the provision of retail, cultural and leisure uses*

LONDON

MANCHESTER

BIRMINGHAM

TAUNTON

Main switchboard: 0344 880 8000 • Website: www.djblaw.co.uk

All correspondence to be directed to: 12-14 The Crescent, Taunton, TA1 4EB • DX 32129 Taunton

*which are complementary to, and **do not detract from, the primary business function of the City.***"

1.1.4. Policy SD4 of the London Plan 2021: "B. The **nationally and internationally significant office functions** of the CAZ should be **supported and enhanced** by all stakeholders, including the **intensification** and provision of sufficient space to meet demand for a **range of types** and sizes of occupier and rental values."

1.2. Policy SD4 of the London Plan 2021: "Residential or mixed-use development proposals should **not lead to a net loss of office** floorspace in any part of the CAZ unless there is no reasonable and **demonstrable** prospect of the site being used for offices. To achieve this, alternative **provision of equivalent or net additional** office space can be made (including through swaps and credits – see Part H below). This should be within the CAZ and near the development"

1.3. The policy presumption is therefore a difficult one to rebut, but clearly it has not been sufficiently rebutted in this case:

1.3.1. the Viability Assessment submitted with the application purports to have determined that *no* viable options existing for any continued office use, and that the *only* viable use is that of a hotel. This somewhat beggars belief given the site's current use and location;

1.3.2. the City of London's Chair of the Planning and Transport Committee reported on 9 March 2021¹ that "so far this year, it has given planning consent for the equivalent of almost 80% of the total office floorspace it approved for the whole of last year; demonstrating the City office market remains resilient despite new ways of working being adopted throughout the coronavirus pandemic.";

1.3.3. it cannot be said that there is no demonstrable prospect of continued use as office-led development when no attempt has been made to market an office-led alternative;

1.3.4. the proposal contains *no element of office use* and no alternative provision of equivalent or net additional space as required by Policy SD4.

2. Public Benefits

2.1. It is acknowledged that Historic England's view is that harm to the listed building would be likely to be 'less than substantial', engaging the test under paragraph 196 of the NPPF to weigh the harm against the public benefits of the proposal.

2.2. It is with respect to the weighting of those public benefits that the application is misguided and inadequate.

¹ <https://news.cityoflondon.gov.uk/city-office-floorspace-surges-as-developers-back-the-square-miles-future/>

- 2.3. At first glance, the proposals will open up the riverfront, give access to the interior of the building and remove the parking.
- 2.4. However, on closer scrutiny, the terms on which it is proposed to afford public access are heavily constrained and entirely within the discretion of the operator. For example, the draft heads of terms for the section 106 agreement provide that:
 - 2.4.1. Public access to the hotel foyer on the ground floor is only open from 11am to 6pm on normal trading days (subject to frequent closure for events;
 - 2.4.2. Further access is by prior booking only, and then also at the owner's discretion;
 - 2.4.3. Public tours will only be available once per months and by prior booking;
 - 2.4.4. Public access to the quayside will be subject to operating times of the hotel – and the owner has complete discretion to close it at any time and for any purpose;
 - 2.4.5. The owner specifically negates the creation of any public rights of way over the quayside area.
- 2.5. When viewed in the context of the intention to operate a large number of events (public and private), these restrictions on accessibility and enjoyment of the proposed development further diminish any public benefits.
- 2.6. Particularly with respect to the heavily caveated access to the quayside, it is clear that the benefits fall far short of outweighing the 'less than substantial harm'.
- 2.7. Another key concern is that the current commitment to these measures through the draft heads of terms only extends to 5 years and makes no commitment after that.
- 2.8. Compare this for example to The Ned, where there is extensive public access to a large indoor dining area, and to 55 Broadway, where public access is in perpetuity.

3. Thames Riverside – Activation of the River Front

- 3.1. A much-touted benefit of the proposal is the public realm and access to be provided on the river frontage. However as explained above, the result of the restrictions on access to the quayside public realm area effectively mean that it cannot truly be considered a 'public benefit'.
- 3.2. The London Plan 2021 at paragraph 9.16.5 refers to the Mayor's 'Case for a River Thames Cultural Vision' and clearly aims to increase engagement of Londoners with the river.
- 3.3. The London Plan 2021 at paragraph 9.16.4 also refers to the importance of London's waterways for walking routes, health and well-being and linkages to transport.

- 3.4. If the quayside public realm were truly a public benefit of the proposal, public access would connect with and continue the river paths either side of it, and ensure free access and public right of way at all times, such as the nearby route along the frontage of Riverbank House and the Nomura building at Swan Lane.

4. Urban Greening Factor

- 4.1. Adopted Policy G5 of the London Plan confirms that all major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. It confirms that predominately commercial developments, such as Custom House, should target a UGF score of 0.3.
- 4.2. The current proposals for Custom House proposed an UGF score of 0.08, which falls short of this target by 0.22. The project ecological consultant, Olivia Guindon from Greenage, even acknowledges in her January 2021 letter that other solutions to increase the UGF score are available including more planting as well as vertical greening on suitable elevations of the building.
- 4.3. This should be considered and explored further prior to the determination of the planning application given the current low level of UGF proposed. The proposal is not policy-compliant in this respect, particularly given its position next to the River Thames and the proposed riverfront public open space proposed.

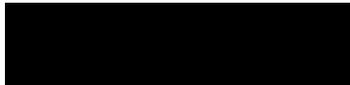
5. Employment and Training

- 5.1. Adopted Policy E11 of the London Plan emphasises the need for strategic development proposals to support local employment, skills development and training opportunities.
- 5.2. Policy GG1 of the London Plan good growth objective clearly states that everyone should benefit from economic opportunities in London to ensure a fairer and more equal city. In these terms, the GLA in their Stage 1 report have sought a recruitment and training strategy, or an alternative approach, that demonstrates how the development would provide training and employment opportunities during the lifetime of the development, which should be secured through planning conditions or legal agreement. I
- 5.3. No such details appear to have been made available, but in light of the total loss of office space this obligation takes on a greater significance, and is necessary in order to partially offset some of the detraction of the proposed use from the primary business function of the City.
- 5.4. It is therefore a highly material and relevant that these details are not left for later submission via section 106 obligations, and that they are fully considered prior to determination of the application.

6. Conclusions

- 6.1. Far from recognising the nationally and internationally significant office function of the City, the proposal detracts from the primary business function of the City and leads to a net loss of office floorspace.
- 6.2. The application contains no element of office use and no alternative provision of equivalent or net additional space as required by Policy SD4 of the London Plan 2021.
- 6.3. The proposals for providing and securing public access fall far short of that required to meet the level of benefit require to outweigh the 'less than substantial harm'.
- 6.4. The loss of office space, together with the severely limited opportunities for public access and enjoyment, would result in a use that effectively isolates this historic building from commercial or cultural integration with the Thames, London and Londoners.
- 6.5. The harm occasioned by the loss of office space, and the lack of full permanent public access to the quayside, cannot be outweighed by the minimal public benefits of this scheme.
- 6.6. The policy non-compliance of this application, coupled with the inadequate supporting information and public access proposals, are fatal to this scheme, and it should be refused.

Yours faithfully

A solid black rectangular box redacting the signature of Davitt Jones Bould.

Davitt Jones Bould

From: [William, Sonia](#)
To: [DL - Comments](#)
Subject: FW: OBJECTION
Date: 06 April 2021, 15:16:02

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

From: [james.greene](#)
Sent: 06 April 2021 17:42
To: 'William, Sonia' <Sonia.Williams@cityoflondon.gov.uk>
Cc: Miss. Alastair <Alastair.Mason@cityoflondon.gov.uk>
Subject: OBJECTION

Dear Ms Williams,

Re: Planning Applications 20/00632/L/BC and 20/00631/FUL/MAJ

I would like to register my objections to the proposed redevelopment of Custom House, Lower Thames Street, EC3R 6EE.

It is a building of national historic significance and should be sympathetically restored and put back to public use for all Londoners.

Having worked in Somerset House and lately Custom House, I have seen first hand what can be done with a national historic building converted for public use.

I urge you to consider an alternative proposal.

Yours sincerely,

James Greene
16, Berkeley Close, Abbots Langley, Hertfordshire, WD5 0XA

From: [REDACTED]
To: [Williams, Sonia](#)
Cc: [PLN - Comments](#)
Subject: 20/00631/FULMAJ - Custom House, Lower Thames Street
Date: 26 July 2021 15:40:40

THIS IS AN EXTERNAL EMAIL

Dear Sonia

I hope you are well.

I write in relation to planning application 20/00631/FULMAJ in respect of Custom House on Lower Thames Street and it's change of use to a hotel with associated ancillary uses together with physical alterations.

I write on behalf of Billingsgate Management Limited, which occupies the next door building, Old Billingsgate Market.

Billingsgate Management Limited runs an events space and venue for hire at Old Billingsgate Market, running both public and private events. Many events run at night, some late at night, and servicing for the events (large scale deliveries and collections, which inevitably generate some noise) is carried out both late at night and very early in the morning from Old Billingsgate Walk which is located between Old Billingsgate Market and Custom House.

We write in **support** of the planning application, provided paragraph 182 of the NPPF is adhered to, in that the hotel use does not unreasonably restrict the use and servicing of Old Billingsgate Market. In order to comply with this the hotel rooms (in particular in the west wing of Custom House, closest to Old Billingsgate Market) should have appropriately strong double glazed windows so that no noise from Old Billingsgate Market (in particular from servicing) disturbs hotel guests in their bedrooms. It may be sensible for the bedroom windows in the east elevation of Custom House to be non-openable to avoid the risk of guests being disturbed. Perhaps there could (if there is a sound planning basis for this) be an acknowledgement in the decision notice that the hotel and its operation should not place any undue restriction on the running of the existing events business in Old Billingsgate Market.

Subject to this point about paragraph 182 of the NPPF, the proposals for Custom House look extremely positive. The proposals would:

- bring more people (hotel guests as well as restaurant and bar visitors) to the area;
- improve the north bank of the river through landscaping, enhancing the view of the listed Custom House building from the Riverside Walk (and also from the south bank of the river), as well as enhancing the public realm;
- open the interiors of the listed building up to members of public who will be able to enter and walk through the lobby, and be able to visit other floors of the building if visiting the rooftop bar;
- create new publicly accessible views of London (looking south) from the rooftop bar and from the opened up private outdoor parts of the Custom House plot of land;
- sensitively bring elements of Custom House building back to their former glory;
- keep the building occupied, in use, and viable; and
- create new jobs.

These benefits would have a positive impact on the area.

I hope these comments are helpful. I am happy to discuss if you have any questions.

Kind regards

Jason Zeloof
Billingsgate Management Limited



31st July 2021

City of London Planning
To whom it may concern.

By email to

PLNComments@cityoflondon.gov.uk

Sonia.Williams@cityoflondon.gov.uk

PLANNING PROPOSAL: CUSTOM HOUSE , 20 Lower Thames Street **20/00631/FULMAJ**

My company is based in Lower Thames Street, but I write as a former Customs Officer who first entered the Custom House in 1979 and left in 2005 as an Assistant Chief Intelligence Officer.

I have reviewed plans proposed for the Custom House with former Customs colleagues who now work for my company. We would unanimously and wholeheartedly support the proposed plans. The legacy of all that has been achieved on the Custom House site within the City must live on in a way that is fitting and appropriate to the current day and future. We find the plans are a fitting and appropriate legacy.

In particular, the plans for a museum that honours the public service that took place on site including the death of two officers killed on active duty really resonate with former officers. I understand the museum would honour the legacy of the Customs Investigation service that was head quartered there from 1990. From the site Customs undertook operations, not just across the UK, but the whole world resulting in the seizure of billions of pounds of drugs and the arrests of many major traffickers.



The Custom House site became a key centre for anti drug operations, and countering fraud and revenue evasion. There were sub offices run from Custom House as far afield as Afghanistan and Colombia. Many high profile visitors attended the site enjoying the atmosphere and buzz that can be recreated through the careful restoration planned and proposed to you.

As a building it is now time to move on. HMRC have decided it no longer serves their plans as an operational centre. The legacy lives on in the museum and the careful restoration as proposed of this magnificent building with careful attention to its history.

As an office resident of the City and as former Officer, I commend these plans to you.

Yours sincerely

Martin Dubbey

(Esig)

Martin Dubbey

Managing Director

Former Assistant Chief Intelligence Officer

HM Customs 1979 – 2005, SOCA now NCA 2005 -2010

Ms Sonia Williams
Department of the Built Environment
City of London Corporation

Our Ref: 11935.00001/YPW

Your Ref: 20/00631/FULMAJ & 20/00632/LBCJ

Date: 2 August 2021

By email only:
sonia.williams@cityoflondon.gov.uk

Dear Ms Williams

**Objection to Planning Application 20/00631/FULMAJ & 20/00632/LBC – Representations on Updated Application Material
Custom House – Proposed Change of Use from Office to Hotel-led Mixed Use Development**

We act for Tony Matharu, Chairman of Integrity International Group and former Managing Director of Grange Hotels. He remains a director of Globalgrange Ltd, the parent company of the brand Grange Hotels.

It should be noted that our client has no interest, or connection with the application, despite the apparent attempts to relate Grange Hotels or Globalgrange Ltd - and derivatives of the same - to GEM London, by the use of the name Globalgrange Hotels Limited by one of the Applicants. We note that name has since been changed to Globalgem Hotels Limited. The distinction is significant for reasons that will become clear below.

This representation is in response to additional material that has been submitted by the Applicant, and two changes to the proposed development:

1. A new “museum” in the ground floor of the original western wing with a café -this is effectively a café and not a museum;
2. Amendment of the Cultural and Community Strategy, developed with the operator, GEM Hotels, detailing measures to preserve and promote the historical significance of Custom House.

Our client upholds his objection to the application on the basis that the further measures proposed still do not remedy the material conflicts with the aims of local and national planning policy.

Further, the additions of the museum and revised Cultural and Community Strategy above fall short of adequately protecting and promoting this valuable heritage asset, and their operation and maintenance will be delegated to an inexperienced operator (GEM) without absolutely no track record of safeguarding cultural heritage.

1. Museum

- 1.1. The addition of the museum was only at the request of the City – clearly indicating that the application had failed to properly appreciate and protect the cultural and historical significance of this building and its local area.
- 1.2. The museum proposal, (while a welcome feature), appears to be a cosmetic change only. Because of the lack of detail regarding its content, operation and maintenance, it is essentially a café, described as a ‘museum with café’. The revised Cultural and Community Strategy dated May 2021 dedicates 5 pages to the purported museum, 2 of which are entirely images, and is insufficiently detailed to give any clarity or certainty about delivery of the museum, or the standard to which it must be delivered.
- 1.3. This feature is too critical to the impact on this listed building to be left to negotiation in the section 106 agreement. Yet the most important elements of the proposals are left to be deferred to later stages away from the scrutiny of public consultation. For example, in order to be acceptable in planning terms the Strategy should clearly state:
 - 1.3.1. The criteria for the selection of the ‘Heritage Partner’, such as demonstrable experience of a similar project and track-record of delivery;
 - 1.3.2. A timeframe within which the museum must be established and a restriction on occupancy of the hotel until the museum is operational to the satisfaction of the City;
 - 1.3.3. Details of monitoring, enforcement and accountability measures;
 - 1.3.4. Method for securing the delivery of the museum in perpetuity, such as restrictive covenant;
 - 1.3.5. Binding operational obligations to provide the museum as a museum and not a café – and to guarantee its primary use as a museum open to the public free of charge to be upheld at all times.
- 1.4. The Draft Heads of Terms of the Section 106 Agreement have not been updated to reflect the revised Strategy, and therefore the obligation with respect to the Strategy remains as:

“No later than three (3) months before the projected Opening Date, to submit a Culture and Community Strategy for approval by the City (such approval not to be unreasonably withheld or delayed).”
- 1.5. There is nothing in this obligation which binds the Applicant to submit the May 2021 Strategy, and therefore it is entirely possible that the version which is submitted for approval under the Section 106 Agreement may not even contain the museum proposal at all.
- 1.6. The museum is clearly a critical addition to the development in order to preserve the cultural and historic significance of the building, or it would not have been required by the City.
- 1.7. Now, having required it, the City and the Applicant have a duty to see that the museum will be delivered, and maintained, throughout the life of the development. In the absence of better security of that compliance, the obligation to provide the museum is manifestly unfit for purpose.

- 1.8. The Catch-22 of the museum however, is the impact that it will have on the viability of the project. The application is trying to have its cake and eat it. The Viability Assessment Addendum Part 1A dated June 2021 concludes at page 18 that (emphasis added):

*“The City requested that a museum be incorporated into the ground floor of the hotel scheme and on the basis that there was a positive margin between the hotel scheme and the Benchmark, the applicant has now included a museum to the north west of the Western wing of the building. This scheme has now been submitted as an amendment to the application scheme. The appraisal of this scheme shows that the inclusion of a museum, requiring the loss of 4 hotel bedrooms and the inclusion of an additional lift, **depresses the value of the application scheme to a level just above the Benchmark Land Value**, concluding that the amended application scheme is viable. **There is however little margin between the amended application scheme and the Benchmark Land Value** which confirms that the museum space provided in the ‘amended planning application scheme’ is the largest space that can be viably offered as part of the hotel scheme.”*

- 1.9. With such tight margins on viability with the museum included in the scheme there is clearly a risk that this is an obligation that could be revised in the future should the operator decide it is impacting on viability.
- 1.10. An operator which is inexperienced in providing this niche facility (such as the newly incorporated GEM) is unlikely to be able to balance this fine margin, which would lead to an unacceptable risk to the delivery of the heritage benefits of the proposals, if they are in fact a true long term intention and properly secured as such by the Section 106 Agreement.
- 1.11. It is therefore essential that the application demonstrates robust measures to guarantee and safeguard the deliverability of the museum and ensure it is not ‘sacrificed’ for viability reasons. However it clearly cannot be established that the development is viable with comfortable margins with the inclusion of the museum and therefore the application should be refused for lack of deliverability of this vital feature.

2. Cultural and Community Strategy

- 2.1. The Cultural and Community Strategy is a high-level, aspirational outline of general measures. It is a re-packaging of previous information, with the addition of the museum section. It still falls very significantly short of the level of detail that should be demonstrated for the preservation and protection of a listed building of this significance and in this location.
- 2.2. The safeguarding of public access and restoration of active frontage on the Thames is essential to delivering the public benefits that are required by Historic England, but the same very significant shortcomings of the application persist in this regard and have not been addressed by the Cultural and Community Strategy – it is still very heavily caveated with the potential for severe and discretionary restrictions on accessibility and enjoyment of the proposed development by members of the public.
- 2.3. In this context, where so many of the measures for cultural heritage and public access protection cascade down to the operator, the credibility and identity of the operator is an important factor in ensuring the objectives of the Strategy will be delivered properly.
- 2.4. The Statement of Community Engagement dated May 2021 noted that the identity of the hotel operator was a recurrent query of participants in the consultation. However, the proposals still do not provide adequate detail about the experience, track record and accountability of the currently selected operator, GEM, the identity of which is opaque. The

pre-application consultation process therefore appears to have been misleading at best because nothing more than statements of assurance have been provided to support the assertion that the operator is appropriately resourced and experienced. Insufficient information was provided to participants in this regard and therefore they were not able to give meaningful feedback on the museum proposals and how it would be operated.

- 2.5. In addition, GEM has no interest in the application land, and therefore does not need to be a party to the section 106 agreement. All of the measures with respect to the museum, public access and future use are supposed to be enforced by them, but there is a clear gap for the City in the chain of enforcement between the owner and the operator if the operator is not a party, irrespective of the credibility and identity of that party. As mentioned above, the Draft Heads of Terms for the Section 106 Agreement currently do not even have the effect of mandating the inclusion of the museum in the ultimate Strategy that is presented to the City for approval.
- 2.6. GEM is also meant to be responsible, via the funding of a Culture and Community Events Officer (“CCE Officer”), for the monitoring (section 6.4) and annual reporting (section 6.5) of the Cultural and Community Strategy.
- 2.7. The Draft Section 106 Heads of Terms require that the CCE Officer prepare and submit annual reports to a Culture and Community Committee. However the contents of the report (as stipulated by the Draft Heads of Terms) are effectively just a tally of events that have been held in the preceding 12 months.
- 2.8. The annual report of the CCE Officer is not required to contain any qualitative or quantitative targets for types of events or visitor numbers, there are no outcomes or performance measures, and there are no sanctions for under-utilisation, simply the ability for the Committee to “recommend to the Owner (from time to time) changes to the approved Culture and Community Strategy that it reasonably considers would enhance achievement of the Objectives”.
- 2.9. The Draft Heads of Terms have also not been updated to reflect the inclusion of the museum and therefore there is no requirement to include monitoring or reporting on it in the annual report.
- 2.10. Finally, the Draft Section 106 Heads of Terms only require the Culture and Community Committee to be constituted for **5 years** from the date it is first established. In addition, it is only first established if the first meeting is quorate – and there is no mechanism which compels the Applicant to actually hold the first meeting.
- 2.11. Assuming the Committee is ever established, the CCE Officer will essentially be unaccountable after five years.
- 2.12. Moreover, and very importantly, by the Applicant’s own admission the CCE Officer will only be part of a large events team. That is: the proposed scheme is including a café and events spaces, whereby the ‘Museum’ is merely an integral part of the hotel’s food and beverage operations as a café, and the events management, responsible for private, managed business and informal events as stated will be in reality be in control of the hotel’s large events team. Events and use of this entire accommodation, including on request “pre-arranged” tours will be at the “Hotel Manager’s discretion”. The operator, via the CCE Officer, will be unaccountable for this change of use after 5 years. This is far from the guarantees promised.

- 2.13. When viewed in the context of the vague and temporary Section 106 obligations, it becomes apparent that the Culture and Community Strategy is entirely without teeth or substance. The application cannot satisfy planning policy requirements to protect, preserve and promote the cultural and historic significance of the building.

3. Other Grounds of Objection

The further submissions make no attempt to address the other material planning consideration which weigh against the proposals, and which should, on balance, be viewed together with the above as an overall failure of the development to demonstrate this it is acceptable in planning terms:

- 3.1. Loss of office space - no element of office use and no alternative provision of equivalent or net additional space as required by Policy SD4. The current desire is for cellular structure offices with windows and natural ventilation – exactly what Custom House provides;
- 3.2. Lack of security and certainty of delivery of public benefits by the opaque operator;
- 3.3. Failure to provide free access and public right of way along the riverfront at all times, such as the nearby route along the frontage of Riverbank House and the Nomura building at Swan Lane. Leaving such important and fundamental matters to the hotel manager’s discretion – is not acceptable;
- 3.4. Failure to guarantee or to contribute to the greening of London by including urban greening as a fundamental element of site and building design, particularly in the context of the July 2021 revisions to the National Planning Policy Framework;
- 3.5. Failure to provide local employment, skills development and training opportunities in order to partially offset some of the detraction of the proposed use from the primary business function of the City;
- 3.6. Failure to provide for all of these matters in full detail at application stage. These important matters should not be deferred for negotiation via section 106 obligations, and risk their dilution.

Yours faithfully

A solid black rectangular box redacting the signature of Davitt Jones Bould.

Davitt Jones Bould

From:
To: [PLN -](#)
Subject: [Ren Application Consultation \(20/00631/FULMAJ\)](#)
Date: 13 August 2021 13:04:48

THIS IS AN EXTERNAL EMAIL

Dear Madam/Sir,

I thank you for your email dated 13/7/21. Due to circumstances beyond my control, I could not respond earlier for which I sincerely apologise.

As stated in my previous feedback dated 12/10/20, we are the owners of 123 Sugar Quay, EC3R 6AP. Our apartment is located on the first floor of the block and looks out directly onto the east facing wall of Custom House.

As immediate neighbours, we are in full support of the proposed development and are pleased how it has evolved with the added proposed ;

- New Museum.
- Cultural and Community Strategy.

We are aware the proposed Development means a change of use for the building/site and wish to add we are strongly in favour of the proposed change.

We hope our comments and remarks will be taken into consideration when you are reviewing the Planning Application and look forward to hearing from you with a favourable outcome.

Keep Safe and Well.

Kind Regards.

Pat

Pat Goldrick

On Tue, 13 Jul 2021, 12:40 , <PLNComments@cityoflondon.gov.uk> wrote:

Dear Sir/Madam

Please see attached consultation letter for planning application 20/00631/FULMAJ (Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE).

Kind Regards

Planning Administration
Department of the Built Environment
City of London

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly

prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

From: [Pat Goldrick](#)
To: [PLN - Comments](#)
Subject: CUSTOM HOUSE PLANNING APPLICATION; REFERENCE NUMBER 20/00631/FULMAJ
Date: 12 October 2020 18:16:40

Dear Madam/Sir,

We (Ros my wife and I) are the owners of 123 Sugar Quay, EC3R 6AP. Our apartment is located on the first floor of the block and looks out directly onto the east facing wall of Custom House.

We are writing to express our full support in favour of the Planning Application Number 20/00631/FULMAJ ; For the Sensitive Refurbishment and Repurposing of Custom House, which in our opinion is befitting of the Building and Locality. We have familiarised ourselves with the application and had all our specific questions and concerns satisfactorily answered, plus a comprehensive presentation from Matt Hawkins of Cannon Capital Developments together with the involved Professional Teams and wish to comment as follows :

- Construction Phase proposed, we do not have any concerns with the management or timeline.
- Public Riverside Walk; Proposed widening and enhancement is a major and necessary improvement which will enable pedestrians to comfortably stroll whilst absorbing the grandeur of the vicinity, taking in the views of Tower Bridge, H M S Belfast, the Shard and London Bridge plus an understanding of the importance of the busy and working functionality of the River Thames.
- New Hotel and Operation proposal; Gives guests and diners, whether foreign or British, the pleasure of enjoying this historic listed building, sensitively restored to capture the architecture and importance of this Custom House building, its location and role to past London.
- Roof Extension proposal; With bars and dining, will offer customers this unique Northside river rooftop views and enjoyment and not the normal crowding at pavement level.
- Traffic management; As immediate neighbours, our concerns with regards to traffic nuisance have been fully met in the proposed plan.
- Employment opportunities; We believe the proposed business will offer a cross-section of employment skills which is greatly needed in London.

We hope you find our input and views helpful and useful in reaching a favourable decision.

Please do not hesitate to contact us if you have questions or require any further information.

Keep Safe and Well

Kind Regards

Committee:	Date:
Planning and Transportation	26 October 2021
Subject: <p>Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE</p> <p>External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office to a hotel with ground floor internal north/south public route (sui generis), ground floor museum (Use Class F1 (c)), flexible ground floor and rooftop retail/restaurant/bar floorspace and public viewing terrace (Use Classes E and Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Use Class E) and new riverfront public realm including: External works: i.) removal of railings around existing riverside carpark, ii) demolition and re-building behind the retained facade of the 1960s East Block iii.) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions; iv.) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block (south elevation); v.) alterations to and raising of the flood defence wall; vi) facade alterations and associated works to create a first floor terrace on the Centre Block (south elevation) and reinstated door and new ramped access to West Block (west elevation); vii) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street viii.) associated works to the river wall ix) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) removal of 1990s glazed stair core and parapets, roofing over and reconfiguration of West Block courtyard, to include new service core and other works; ii) demolition and alteration of some existing walls and ceilings and erection of new across all floors in the West and Centre Blocks.</p>	Public
Ward: Billingsgate	For Decision
Registered No: 20/00632/LBC	Registered on: 8 September 2020
Conservation Area:	Listed Building: Grade I

Summary

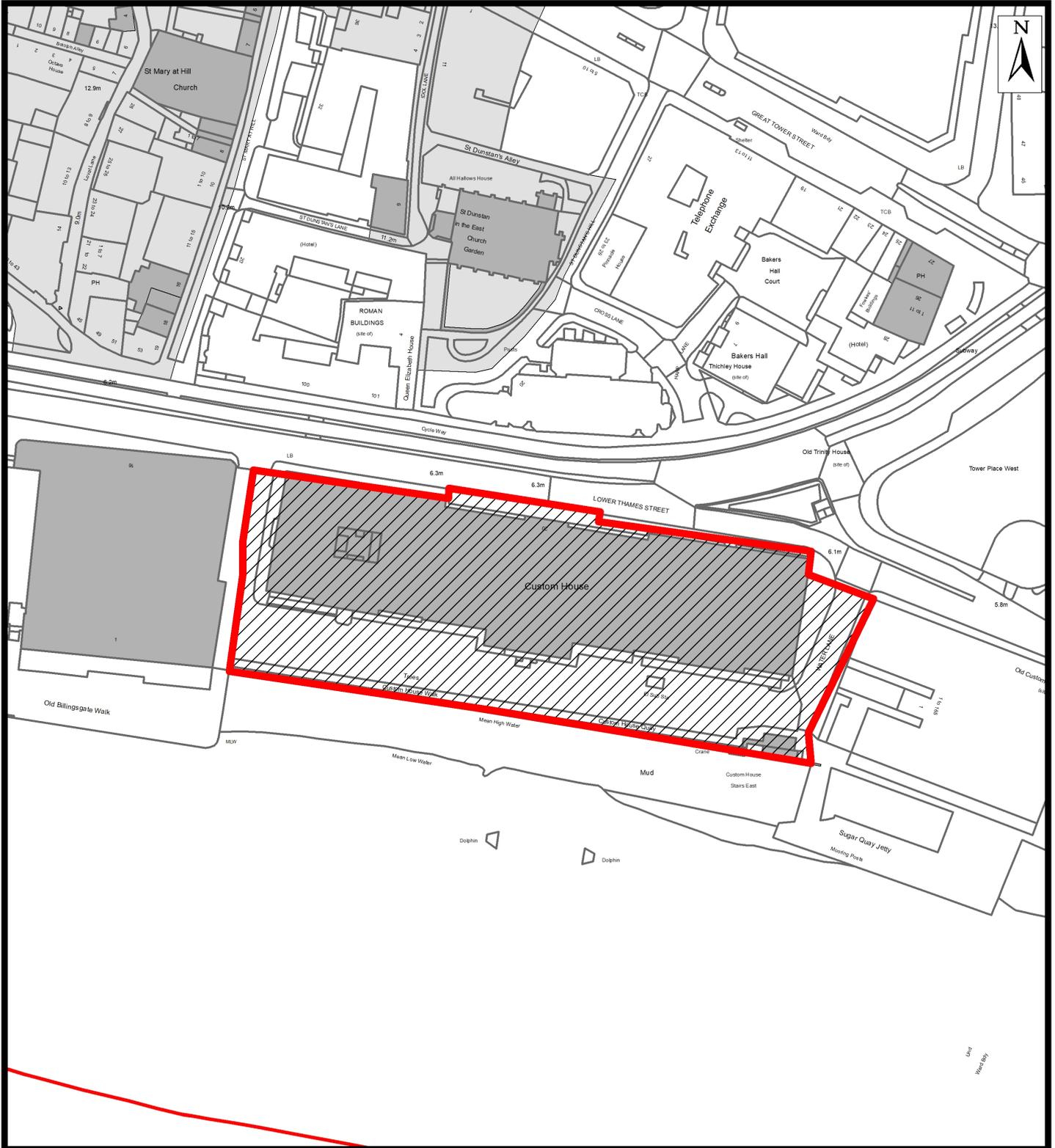
For full report please see 20/00631/FULMAJ.

Recommendation

RECOMMENDATION That the Committee resolves to inform the Planning Inspectorate that were it empowered to determine the application for Listed Building Consent the Council would have REFUSED permission for the reason set out below:

1. The proposed development would fail to preserve and would cause less than substantial harm to the exceptional special architectural and historic interest and setting of the Grade I listed London Custom House and the Grade II* listed River Wall, Stairs and Cranes at Custom House Quay which would not be outweighed by public benefits. The harm would result from external and internal extension, alteration and the loss of historic fabric, plan form and character. These proposals would be contrary to policies: London plan Policy HC 1; Local Plan Policies CS 12, DM 12.1, DM 12.3; Draft City Plan Policies S11 and HE1 and the NPPF.

Site Location Plan



© Crown copyright and database rights 2021 OS 100023243

ADDRESS:
Custom House

CASE No.
20/00632/LBC

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





Image 1



Image 2



Image 3



Image 4



Image 5



Image 6



Image 7



Image 8



Image 9



Image 10

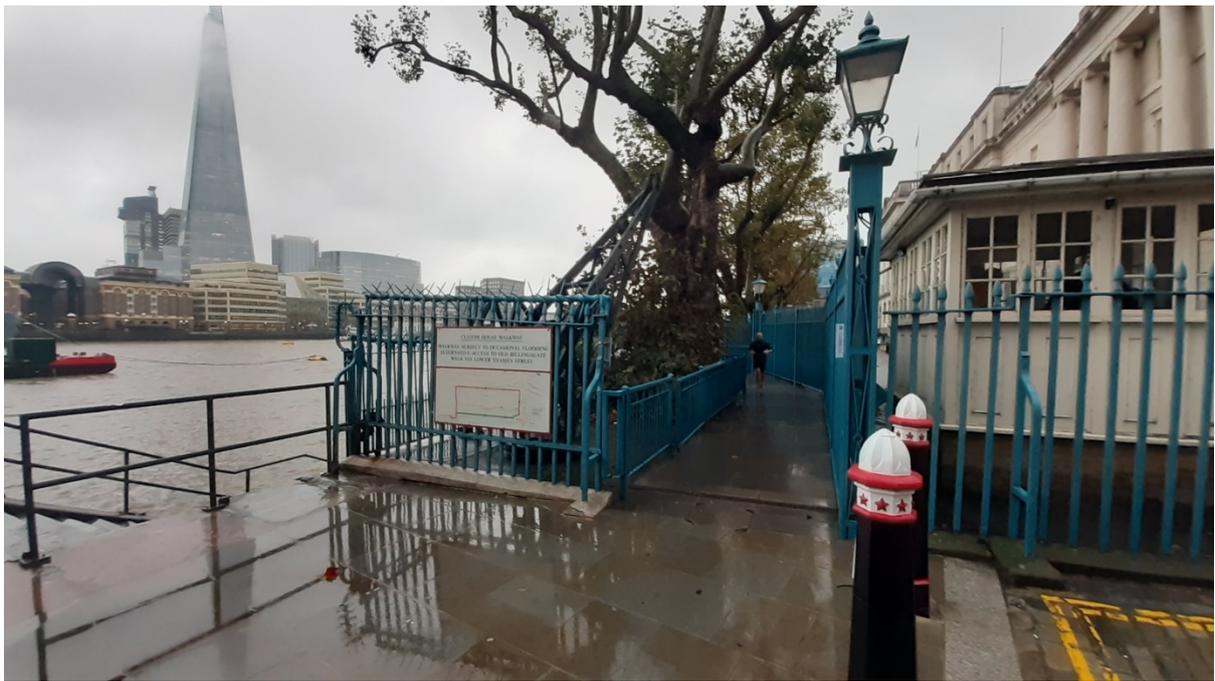


Image 11



Image 12



Image 13



Image 14



Image 15



Image 16

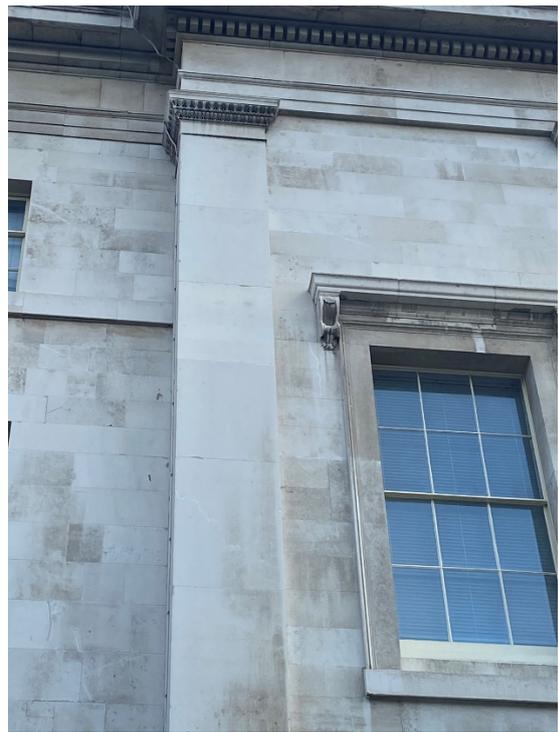


Image 17



Image 18



Image 19



Image 20

1. View from London Bridge
2. Internal office corridor
3. Flood wall and existing plant
4. Main entrance lobby off Lower Thames Street
5. Looking west from existing car park
6. Looking south towards Custom House from Lower Thames Street
7. View west from existing roof top with view of the Monument
8. Existing servicing ramp and basement entrance
9. View from the Thames Path looking west
10. View from the Thames Path looking towards the eastern block and Old Billingsgate Walk
11. View of the railings along the Thames Path
12. View south along Old Billingsgate Walk
13. View south along existing carriageway within Custom House site boundary adjacent to Old Billingsgate
14. View from Lower Thames Street looking south
15. View of the Thames Path, Grade II* listed River Wall, Stairs and cranes
16. Central Block view from within the car park
17. Façade detail
18. Existing entrance into the car park from the West Block
19. Entrances off of land adjacent to Old Billingsgate
20. The Long Room

Main Report

For report please see 20/00631/FULMAJ

Appendix A

Background Papers

12.10.2020 Gael Gamble
23.12.2020 Peter Wright
27.01.2021 Jennifer M. Freeman
15.07.2021 Jennifer M. Freeman
11.02.2021 Rosemary Yallop
12.02.2021 Philippa Woodcock
12.02.2021 Tracy Cowell
13.02.2021 J D Morris
13.02.2021 Susan Davenport
14.02.2021 John Kent
14.02.2021 Graham Taylor
14.02.2021 Don & Lizebeth Burch
14.02.2021 Peter Hilliard
14.02.2021 Pauline Robertson
14.02.2021 David Trillo
14.02.2021 Andrew Shields
14.02.2021 Josephine Eglin
14.02.2021 Melissa Delano
14.02.2021 Elizabeth Gaskill
14.02.2021 Jackie Randall
14.02.2021 Richard Wiseman
14.02.2021 Colin Eastaugh
14.02.2021 Lynda Bailey
14.02.2021 Helena Smith
14.02.2021 Vicky Stewart
14.02.2021 Jamie Surnam
14.02.2021 Shirley Collier
14.02.2021 Caroline Murray
14.02.2021 Patricia Kelly
14.02.2021 Peter Smith
14.02.2021 Alison Homewood
14.02.2021 Glen Leeder
14.02.2021 Steven Clarke
14.02.2021 Simon Ward
14.02.2021 Ruth Fleming
15.02.2021 Rachel James
15.02.2021 Mary Peskett Smith
15.02.2021 Charles Rumbles
15.02.2021 Deborah Merrett
15.02.2021 Jill Wilson
16.02.2021 Ann North
16.02.2021 John Petre
16.02.2021 Michael Hadfield
16.02.2021 Merlin Waterson

16.02.2021 Susan Mayer
16.02.2021 Jennifer Newbold
17.02.2021 Patricia Wilkey
17.02.2021 Alun Watkins
17.02.2021 James Emerson
18.02.2021 Michael Hahn
18.02.2021 Richard Kirker
18.02.2021 Julian Kirkby
18.02.2021 Stephanie Lawrence
18.02.2021 Rosemary Baird Andrea
18.02.2021 Ruth Hope
04.03.2021 Catherine Hopkin
23.03.2021 Davitt Jones Bould
11.03.2021 Andrew Wells
29.03.2021 Sarah Lambirth
29.03.2021 Andrew Lambirth
06.04.2021 Joanne Greene
09.10.2020 Edward Worthy
13.07.2021 Edward Worthy
02.08.2021 Davitt Jones Bould
21.09.2021 Vicki Fox LAMAS
17.10.2021 Eileen Spencer
17.10.2021 Kathleen Spencer

Development Plan Policies

London Plan Policies

Policy HC1 Heritage conservation and growth

Relevant Local Plan Policies

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

DM12.3 Listed buildings

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

Draft City Plan 2036 Policies

S11 Historic environment

HE1 Managing change to heritage assets

APPENDIX B

There is relevant GLA supplementary planning guidance and other policy in respect of:

- Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014),
- Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014),
- Sustainable Design and Construction (GLA, September 2014),
- Social Infrastructure GLA May 2015),
- 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);
- Mayor's Transport Strategy (2018):
- The Case for a River Thames Cultural Vision September 2019;
- Draft Public London Charter GLA February 2020.

Relevant City Corporation Guidance and SPDs comprises:

- Air Quality SPD (CoL, July 2017),
- Archaeology and Development Guidance SPD (CoL, July 2017),
- City Lighting Strategy (CoL, October 2018)
- City Transport Strategy (CoL, May 2019),
- City Waste Strategy 2013-2020 (CoL, January 2014),
- Protected Views SPD (CoL, January 2012),
- City of London's Wind Microclimate Guidelines (CoL, 2019),
- Planning Obligations SPD (CoL, adopted May 2021, Implemented 1 October 2021).
- Open Space Strategy (COL 2015),
- Office Use (CoL 2015),
- City Public Realm (CoL 2016),
- Cultural Strategy 2018 – 2022,
- Eastcheap Conservation Area Character Summary March 2013:
- Trinity Square Conservation Area Summary 2014;
- Statement of Community Involvement 5th July 2016;
- Flood Emergency Plans for New Development (Planning Advice Note June 2020).
- Freight and Servicing SPD (CoL Feb 2018).
- Tree Strategy SPD (CoL May 2012);
- Thames Strategy SPD (CoL 2015);
- Riverside Walkway Enhancement Strategy (CoL 2015);
- Open Space Strategy SPD (CoL 2015).

SCHEDULE

APPLICATION: 20/00632/LBC

Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London

External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office to a hotel with ground floor internal north/south public route (sui generis), ground floor museum (Use Class F1 (c)), flexible ground floor and rooftop retail/restaurant/bar floorspace and public viewing terrace (Use Classes E and Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Use Class E) and new riverfront public realm including: External works: i.) removal of railings around existing riverside carpark, ii) demolition and re-building behind the retained facade of the 1960s East Block iii.) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions; iv.) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block (south elevation); v.) alterations to and raising of the flood defence wall; vi) facade alterations and associated works to create a first floor terrace on the Centre Block (south elevation) and reinstated door and new ramped access to West Block (west elevation); vii) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street viii.) associated works to the river wall ix) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) removal of 1990s glazed stair core and parapets, roofing over and reconfiguration of West Block courtyard, to include new service core and other works; ii) demolition and alteration of some existing walls and ceilings and erection of new across all floors in the West and Centre Blocks.

REASONS FOR REFUSAL

- 1 The proposed development would fail to preserve and would cause less than substantial harm to the exceptional special architectural and historic interest and setting of the Grade I listed London Custom House and the Grade II* listed River Wall, Stairs and Cranes at Custom House Quay which would not be outweighed by public benefits. The harm would result from external and internal extension, alteration and the loss of historic fabric, plan form and character. These proposals would be contrary to policies: London plan Policy HC 1; Local Plan Policies CS 12, DM 12.1, DM 12.3; Draft City Plan Policies S11 and HE1 and the NPPF.

This page is intentionally left blank

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Gael Gamble

Address: Barkley House Castle Meadow Road Nottingham

Comment Details

Commenter Type: Other

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

Comment Reasons:

- Other

Comment: The Secretary of State is the freehold owner of the site and should be consulted on/or give consent on design alterations particularly affecting the structure and exterior.

The building contains significant historical artefacts. Alternative arrangements need to be put in place to preserve and safe guard these items before any works can commence.

The building will cease to be a HMRC operational site in July 2021.

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mr Peter Wright

Address: 24 Recreation Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I wish to object to the proposed development on the grounds it would result in unacceptable harm to the special architectural and historic interest of the grade I listed building. Although many aspects of the proposals are to be welcomed, including providing public access, the harmful aspects are wholly unwarranted and not outweighed by public benefits. It would be unthinkable to add a pair of highly visible glass boxes to the roof of Somerset House, which is entirely comparable in style and significance, so it is unclear why this is being contemplated here.

The low level of harm attributed to the proposed works by the applicant and HE is inaccurate. Harm should be assessed directly in relation to the significance of the heritage asset affected (NPPF para 193), which is mutually acknowledged as exceptionally high. The changes to the form of the building at roof level are undisputedly detrimental to the building's special interest. A key element of the building's significance is its Classical composition, with a clear hierarchy descending from the central block to the subsidiary wings. The PPG advises that "... in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special interest." With this in mind, the impact of the roof additions would arguably meet the test for substantial harm, or at least a high level of less than substantial harm. Furthermore, the imposition of the proposed rooftop additions would result in harm to the setting and significance of Billingsgate Market and the spire of St Dunstan in the East, which would be foregrounded by a reflective, illuminated box and associated roof terrace paraphernalia. The application does not convincingly demonstrate that a less harmful scheme, i.e. without incongruous changes to the roofline, would be any less achievable with the same benefits and I urge the City to reject it accordingly.

Begum, Shupi

From: Adjei, William
Sent: 08 February 2021 13:05
To: Begum, Shupi
Subject: FW: Billingsgate and Custom House

From: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Sent: 29 January 2021 13:48
To: DBE - PLN Support <DBEPLNSupport@int.cityoflondon.gov.uk>
Subject: FW: Billingsgate and Custom House

Please download to 20/00631/FULMAJ and 00632/LBC

Many thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Jennifer Freeman [REDACTED]
Sent: 27 January 2021 11:53
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: Fwd: Billingsgate and Custom House

Dear Ms Williams,

I write with reference to current planning proposals for the grade1 listed Custom House by David Laing,1813. on Lower Thames Street. (The east end was of course destroyed in WW11 and rebuilt with a restored facade).

I am familiar with Sir Horace Jones' former Billingsgate Fish Market which stands on the riverfront directly west of the Custom House. Following a repurposing of this building some years ago the terrace in front of the Market facing the River Thames was successfully opened, giving access to the public to admire the buildings and the view across the River.

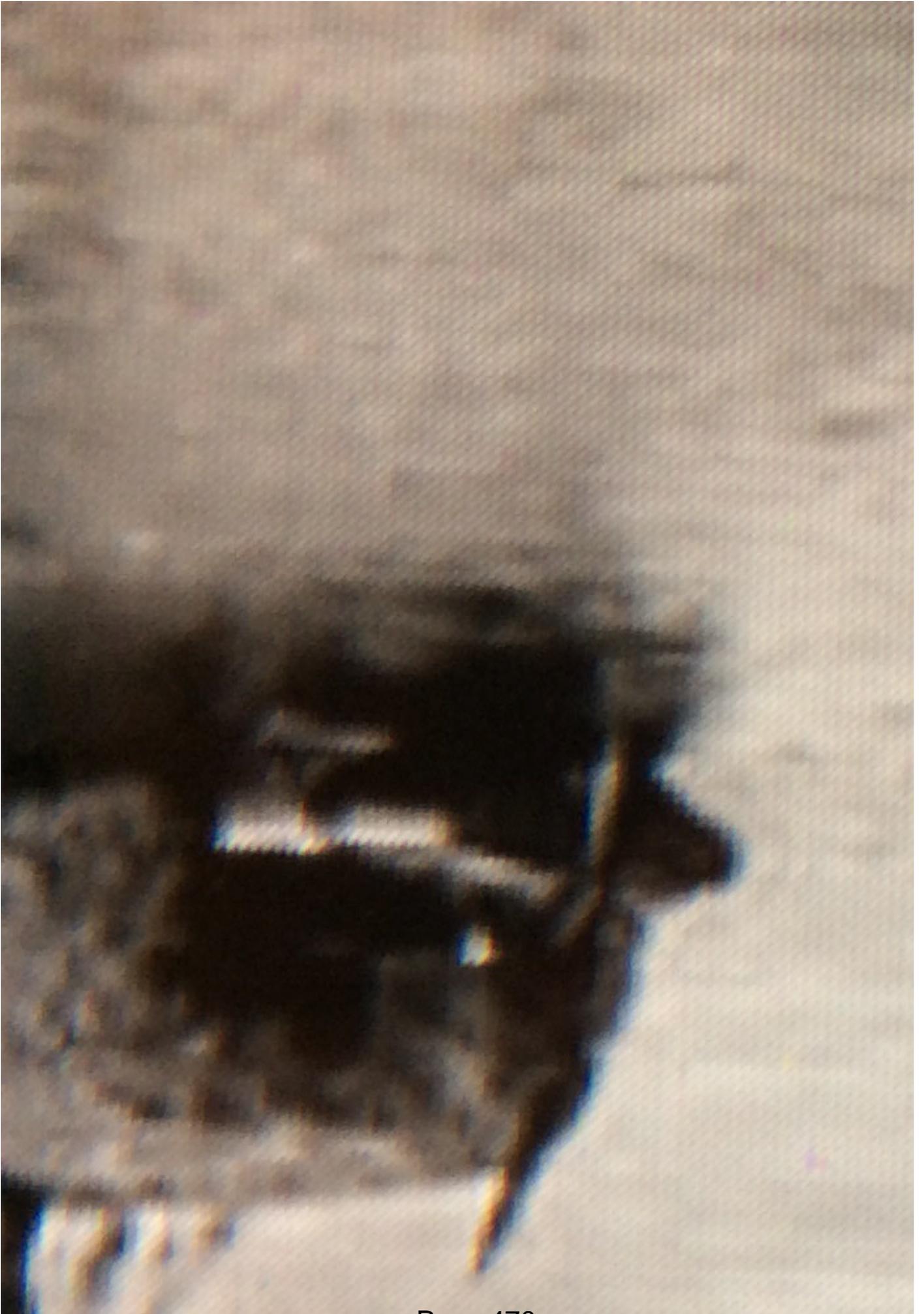
For many years the Custom House has been effectively closed to the public and the proposal to adapt it for hotel use offers a similar positive opportunity. There might also be pre-arranged access to the Long Room on HODS and other occasions.

I would be grateful if you could take these comments into account.

Yours sincerely'

Dr Jennifer M. Freeman OBE

Historic View of Custom House and Billingsgate Market from the South Bank



Begum, Shupi

From: Jennifer Freeman [REDACTED]
Sent: 02 February 2021 14:50
To: PLN - Comments
Subject: Custom House

My address is 8 Kensington Gate London W8 5NA

Jenny Freeman

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Re: Application Consultation (20/00632/LBC)
Date: 15 July 2021 15:08:32

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I respond in connection with the current proposals for the conversion of the listed Former Custom House on Lower Thames Street and associated river wall, stairs and crane.

Generally, it appears that the applicants have failed fully to 'take on board' the uncompromising, yet elegant classical language of the Custom House and seek to adapt the building, somewhat arbitrarily, to modern hotel 'requirements' and activities.

The application for additional rooftop newbuild seems excessive, given the large size of the Custom House, and will disrupt views across the Thames from shipping and the South Bank. Surely the existing envelope of the building offers scope for sufficient numbers of rooms?

There appears to be an attempt to 'prettify' the riverside terrace with 'soft' landscaping whereas its character as a unique, formerly 'working' yard with associated features might be retained with interesting reminders of past usages.

The proposed terrace at first floor level suggests an aggressive amount of intervention and 'over-conversion' to suit what are thought to be modern expectations.

The equal access requirements should be addressed in a less intrusive manner, retaining historic stairs etc.

The Custom House is a handsome, impressive, stern structure thus attempts to adapt it for hotel use should play to its strengths and uniqueness as a venue.

Provision must be made for the former Long Room, long hidden from view, to be open to the public on specified days and as much as possible of the original internal layout be retained and adapted sensitively for current uses.

Yours sincerely,

Dr Jennifer M. Freeman OBE HonDoctArts IHBC FRSA FSA BAHons DiplGrad
Cons(AA)

On Tue, 13 Jul 2021 at 14:49, <PLNComments@cityoflondon.gov.uk> wrote:

Dear Sir/Madam

Please see attached consultation letter for planning application 20/00632/LBC (Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE).

Kind Regards

Planning Administration
Department of the Built Environment
City of London

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Dr Rosemary Yallop

Address: 23 Norland Square London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I wish to record my objection to the scheme proposed for the re-purposing of this architecturally significant building which occupies such a sensitive position on the waterfront of the City of London.

As currently framed the scheme entails an intolerably high degree of intervention both internal and external. My reading of it is that it provides insufficient guarantees that internal detailing and proportion will be safeguarded; the proposed changes to the exterior and the roofline in particular

are out of scale and jeopardise the legibility of the historic design. While I applaud the wish to create a new and viable life for this historic building the current scheme is far too intrusive and the applicants should be encouraged to find a more sensitive solution.

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Philippa Woodcock

Address: 3 Lennox Row Edinburgh

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This is a magnificent building of national importance and I take the Georgian Society's view that it could be altered to something akin to the work that has been done for Somerset House. When the present government proposes to make the UK 'great' and reach out worldwide for trade, (not that we weren't anyway) would this not be a good place to celebrate such sentiment? In the current circumstances London cannot need any more hotels.

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Tracy Cowell

Address: 1 Harebell Close Minster Sheerness

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I do not feel another luxury hotel is needed especially at the expense of this amazing historic building.

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Ms J D Morris

Address: 24 Shad Thames London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: I am writing as a long-time resident based on the south side of the river. For decades I have regularly used both banks of the river as a public amenity, for leisure walking and transit between places. Any future development of the Custom House must ensure full public access to the riverside without constraint. It should also allow public access to at least some of the building - Somerset House at Waterloo is a good model to refer to. This is an opportunity to put the ideas of post-COVID "build back better" into practice. The current proposals do not meet this.

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Miss Susan Davenport

Address: 21 Bettridge Road London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I have read the objections that The Georgian Group has registered with the City of London Corporation and I would like to lend my endorsement of, and support to, the issues that it has raised. This is a Georgian gem and must be preserved at all costs.

Begum, Shupi

From: John Kent [REDACTED]
Sent: 14 February 2021 19:40
To: Williams, Sonia; Moss, Alastair
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Sir,

Id like to add my objections to the above.

There are plenty of hotels in London and only one custom house. There is a lot of history attached with this building that contains the first and greatest long room in HM Customs.

There is no customs museum and this would be a far better use for the building

John Kent

58 Elmdale close

#warsash

Southampton so31 9rx

Begum, Shupi

From: Graham Taylor [REDACTED]
Sent: 14 February 2021 18:45
To: Williams, Sonia
Cc: Moss, Alastair
Subject: PLANNING OBJECTION

Re: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I am writing to urge you to reject the above applications for redevelopment of the Custom House. These proposals would do unnecessary harm to Grade 1 listed building which is of central importance to the City of London's heritage. They would also remove all opportunity for public access, which seems counter to the Corporation's stated policy desire to do the opposite.

Yours sincerely

Graham Taylor

'Jeanie Deans'
Harbourmaster's Office
46 Goodhart Place
E14 8EG

Begum, Shupi

From: Lizebeth Burch [REDACTED]
Sent: 14 February 2021 18:11
To: Williams, Sonia
Cc: alistair.moss@cityoflondon.gov.uk
Subject: Customs House!

Is there no end to the WANTON DESTRUCTION of historic City Buildings? Now you propose to redevelop this magnificent structure to fit in with the financial aims of yet another person who isn't even a resident of London. We emphatically say "NO WAY" should this be allowed to happen.

You must surely recognise the heritage and value of this building. It should be used, at least in part, for the benefit of the public, and not compromised for future generations, as so many structures around London have recently been — or, completely pulled down. What is the point of having a London that looks like every other city in the world? Much of the East End has already been ruined by generic slab buildings which now will most likely stay largely empty after the pandemic, and will last only a few years before they, in turn, will be replaced.

DO NOT CHANGE THE EXTERIOR OR INTERIOR OF THE CUSTOMS HOUSE to suit a developer's whim. Do we need another hotel, at this point in time, anyway? SAVE Britain's Heritage have an alternate scheme which is of significant value in presenting a workable alternative. The Tate Modern and Somerset House already exist as very successful reimaginings of historic buildings. Please, we beg you not to add the Customs House to those which have succumbed to greed and a disregard for history.

Thank you for your attention.

Don and Lizebeth Burch
25, Maiden Lane
London WC2E 7NR

Sent from my iPad
History Belongs To The Public

Begum, Shupi

From: Peter Hilliard [REDACTED]
Sent: 14 February 2021 17:45
To: Williams, Sonia
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

To whom it may concern

I should like to object to the change of use of The Custom House , This building has played such an important part in our heritage that it needs to be kept accessible to the public and not become another pointless Hotel , I am a stonemason involved in conservation and am saddened at how our most important buildings are lost to big business and not celebrated .

Regards Peter Hilliard

9a Blurton Road
London E5 0NL

Begum, Shupi

From: [REDACTED]
Sent: 14 February 2021 16:41
To: Williams, Sonia
Cc: Moss, Alastair
Subject: OBJECTION

20/00632/LBC
20/00631/FULMAJ

CUSTOM HOUSE, LOWER THAMES STREET

For some while I worked as a tutor for HM Customs and Excise based at the Custom House and strongly object to the application to turn it into an hotel. The City does not need yet another "luxury" hotel and this historic building should be kept int the public domain.

I will also take this opportunity of saying how appalled I am at some of the truly hideous blocks which been allowed within the City with no apparent consideration for either scale or sympathetic design.

Pauline Robertson
Penthouse 2,
Cromwell Court,
Cromwell Road,
Hove,
East Sussex, BN3 3EF

Begum, Shupi

From: David Trillo [REDACTED]
Sent: 14 February 2021 15:57
To: Williams, Sonia
Cc: Moss, Alastair
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJyour The Custom House

Dear Ms Williams

The Custom House is a Grade 1 building. It is scandalous and bizarre that a developer based out of the UK should even think that he can turn it into a hotel. The building and its predecessors are steeped in centuries of English history. To turn it into a hotel will require the destruction of the inside of the building and to put another level on the roof will destroy the very fine external roofline of the building. The Custom House would lose all reason.

The City of London can lean on its own planning committee to agree with plans for buildings and has a record for doing so. It does not have a good record for retaining its heritage buildings. The Western Smithfield buildings are a good example and they were only saved because they were "called in". The City's plans for the future refer to "office led cultural use". If the City does not follow their plan the Custom House will become an ultra-expensive hotel at the expense its working history and its building heritage. It will be another loss to Londoners.

I write to express my deepest objections to the redevelopment being proposed for the Custom House.

Yours sincerely

David Trillo
45 Ellington Street
Islington
London N7 8PN
[REDACTED]

Begum, Shupi

From: Andrew Shields [REDACTED]
Sent: 14 February 2021 15:40
To: Williams, Sonia
Cc: Moss, Alastair
Subject: Custom House development - OBJECTION

I am writing to object to the proposal from the offshore leaseholders of the Custom House to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel. The building should be put back to public use for all Londoners, in line with the attractive alternative scheme developed by SAVE Britain's Heritage.

I object in particular to:

- The exclusivity of the luxury hotel development which contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development destroying suites of Georgian offices that are a unique survival.
- The hotel development adding two light box pavilions as bars on the roof which will compromise the principal frontage.

I wish to be kept informed of further developments relating to this proposal.

Andrew Shields
9 Hartley Road
London E11 3BL
[REDACTED]

Haven Cottage
Church Street
Norton Saint Philip
Bath
Ba2 7LU

14 February 2021

OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Sir/ Madam,

I understand that since HM Revenue and Customs vacated the Custom House it has been leased to an offshore property developer based in the Bermuda tax haven, the irony of which can not be lost on anyone. Further, I see that this developer has submitted a planning application to convert the Custom House into a luxury hotel. The Custom House is a grade 1 listed, publicly owned building with suites of unique Georgian offices which will be destroyed under the proposals. Moreover, the addition of two light box bars to the roof will seriously compromise the river frontage.

As I am sure you are aware, Save Britain's Heritage have prepared an exceptionally fine alternative scheme taking advantage of the location and the potential for turning the magnificent Long Room into a public space for all. This scheme also incorporates enhanced pedestrian access from the City to the Thames, something sadly lacking at present. Under these proposals the interior could be put to a variety of uses including small well ventilated office spaces, the need for which has become increasingly apparent during the Covid pandemic, alongside exhibition halls and galleries. The outstanding success of riverside precedents like Somerset House and the Tate Modern confirm the viability of the latter.

Another crass hotel depriving Londoners and visitors of a potentially splendid public space is highly undesirable, and I should like to object most strongly to the above planning applications. This wanton destruction would be a loss to us all and is both morally questionable and aesthetically repellent. I would urge you to do everything within your power to reject this application.

Yours faithfully,

Josephine Eglin

Begum, Shupi

From: Williams, Sonia
Sent: 15 February 2021 09:06
To: DBE - PLN Support
Subject: FW: 20/00632/LBC and 20/00631FULMAJ

Please download to 20/00631 and /632

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Melissa Delano [REDACTED]
Sent: 14 February 2021 20:37
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: 20/00632/LBC and 20/00631FULMAJ

Dear Ms. Williams, I write to urge that your committee reconsider turning your beautiful, historic Custom House into a "luxury" hotel. I have seen this phenomenon occur here in our beautiful "City Different", Santa Fe New Mexico USA. For example, the old Saint Vincent Sanatorium/Hospital was converted into a Drury Group hotel that we now refer to as the "Dreary". These types of developments do not in any way benefit or include the local community beyond the use of cheap labor. We need more housing for our local population and could really use more affordable work/live type spaces. Lots of cities are facing these same issues and wouldn't our historic properties be put to better use as something that would attract visitors and locals alike? We can't afford to alienate our local population and sometimes it is worth the effort to create more inclusive alternatives. At some point life has to be about more than the almighty buck. Thank you for your consideration. Sincerely, Melissa Delano PO Box 1820 Santa Cruz NM 87567 USA

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Objection
Date: 05 March 2021 17:44:35



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? [Complete our short form to request temporary vinyl signage](#)

From: Elizabeth Gaskill [REDACTED]
Sent: 14 February 2021 14:43
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

Dear Madam Williams,

I am writing to object to the plans to redevelop the Customs House into a luxury hotel. It is a Grade I historic building and should be made available to public use to all Londoners - and perhaps visitors as well.

I love London and have visited it more often than any other city since I moved to Amsterdam (from the United States) in 1986. I am now a Dutch citizen. It would sadden me to see this engaging historical building desecrated.

I heard about the proposed plans by reading the following and I am very much against this "unsympathetic and destructive conversion":

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel.

- **The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.**
- **The hotel development will destroy suites of Georgian offices that are a unique survival.**

- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

Please try to block these plans!

Sincerely yours,
Elizabeth Gaskill
Oeverpad 593
1068PM Amsterdam

Adjei, William

Subject: FW: Custom House Development proposed Hotel

From: jackie randall <
Sent: 14 February 2021 09:55
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: Custom House Development proposed Hotel

I object to this planning application on the grounds the building contains historical grade II listed architecture which is a part of London's heritage and is better used not for private financial gain but for the Community of London.

Kind Regards

Jackie Randall
65 Cherry Tree Rise
Buckhurst Hill, IG9 6EZ

Sent from my iPhone

Adjei, William

Subject: FW: Customs House redevelopment

From: Richard Wiseman
Sent: 14 February 2021 12:22
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Customs House redevelopment

20/00632/LBC and 20/00631/FULMAJ CUSTOMS HOUSE REDEVELOPMENT

I am writing to object in the strongest terms to the proposal. I do so on the following grounds:

This is an historical building of utmost importance. Yet, the developers propose to make changes which will permanently disfigure it. The external changes, particularly the light box pavilions, however well designed, are unnecessary, unhistorical and are intended to pander to hotel guests many of whom will come to London to experience what is left of the City.

The destruction of internal rooms and spaces, particularly offices will be an act of vandalism rarely seen on this scale in such an important building.

How can owners of other listed buildings be persuaded that conservation issues are to be taken seriously when something like these proposals are permitted or even encouraged.

I can think of only one building of its sort that was allowed to be destroyed in a similar way, namely Soane's Bank of England. At least in that case, the new architect had some sense of sympathy with the original exterior. How much better would the architecture of the City be if the building had been allowed to stand.

As is so often the case, the proposals are an act of hubris on the part of all concerned, with self-serving justification which bears not the slightest scrutiny.

Richard Wiseman

18 Reynolds Close, NW11 7EA

Adjei, William

Subject: FW: OBJECTION - proposed redevelopment of the Customs House

From: Colin Eastaugh
Sent: 14 February 2021 08:40
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION - proposed redevelopment of the Customs House

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Sirs

Do we need another luxury hotel along the River Thames? Of course the answer is no. Do we need more heritage space in the Lower Thames Street area? The answer is yes.

City of London's City Plan 2036 is proposing a preference for 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. Another luxury hotel in such a prominent position seems to go against the spirit of the City of London's proposals.

It is also disappointing to note that the property developer will destroy suites of Georgian offices and add two light box pavilions as bars on the roof which will compromise the principal frontage. In summary destroying both the interior and exterior fabric of the building.

It is a miracle that Customs House has survived so long, survived WWII and the planning authorities of the past. Fingers crossed the planning authorities of the 21st century don't end up destroying this wonderful building.

Regards.

Colin Eastaugh
58 Foyle Road
London
SE3 7RH

Adjei, William

Subject: FW: OBJECTION - proposed redevelopment of the Customs House

From: Colin Eastaugh
Sent: 14 February 2021 08:40
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION - proposed redevelopment of the Customs House

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Sirs

Do we need another luxury hotel along the River Thames? Of course the answer is no. Do we need more heritage space in the Lower Thames Street area? The answer is yes.

City of London's City Plan 2036 is proposing a preference for 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. Another luxury hotel in such a prominent position seems to go against the spirit of the City of London's proposals.

It is also disappointing to note that the property developer will destroy suites of Georgian offices and add two light box pavilions as bars on the roof which will compromise the principal frontage. In summary destroying both the interior and exterior fabric of the building.

It is a miracle that Customs House has survived so long, survived WWII and the planning authorities of the past. Fingers crossed the planning authorities of the 21st century don't end up destroying this wonderful building.

Regards.

Colin Eastaugh
58 Foyle Road
London
SE3 7RH

Adjei, William

Subject: FW: OBJECTION

From: Lynda Bailey
Sent: 14 February 2021 10:18
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Good morning

I have just heard of the proposed development of the Custom House to become a luxury, exclusive hotel. Please stop this.

The City Plan is for such places to be adapted to encourage more people and different types of people to enjoy our heritage. A hotel does none of this.

I am also disturbed that Georgian offices, pretty much untouched, will be damaged or removed altogether. These are precious!

Please stop London becoming ever more remote from the people who live in it. A Custom House has been an important part of our history since before Chaucer's time. Millions of Londoners could learn about what happened here – good and bad – and enjoy the marvellous spaces inside.

Regards

Lynda Bailey

Flat9, 2 Carpenters Place, London SW4 7TD

Adjei, William

Subject: FW: OBJECTION

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

From: Helena Smith

Sent: 14 February 2021 07:49

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

Subject: OBJECTION

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Ms Williams,

I am writing to say that I strongly object to the proposed redevelopment of the Customs House as a hotel. This building is part of London's history, and its development should benefit as many Londoners as possible, not a privileged wealthy few. In addition, the development should be made in such a way that acknowledges and explores the role of the building in London's history, and respects the architecture of the Customs House.

A great example of such a building being used for the public good is Somerset House. A reimagined Customs House would open up a wonderful stretch of the Thames as a promenade for Londoners, as well as an intriguing building. It is a great opportunity for the city, not simply an opportunity for a developer to make money.

Yours sincerely,

Helena Smith

--

10 Tomline House

Union Street

London SE1 0ET

Adjei, William

Subject: FW: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Vicky Stewart
Sent: 14 February 2021 10:20
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I am appalled at the proposal to convert the Custom House into an exclusive luxury hotel and believe this historically significant Grade 1 building should be restored for public use.

The City of London's 'City Plan 2036' ambition to 'open heritage spaces to attract a wider cultural demographic' would be ignored in favour of private use by the rich elite.

The Georgian offices would needlessly be destroyed.

The light-box pavilions on the roof would detract from the integrity of the principal frontage.

Please do not allow this development to take place.

Yours sincerely
Vicky Stewart
10c Petticoat Tower
Petticoat Square
London
E1 7EE

Adjei, William

Subject: FW: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Jamie Surman <
Sent: 14 February 2021 08:04
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Jamie Surman
122 Willoughby House
Barbican
London EC2Y 8BL

14 February 2021

Sonia Williams
The Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
London,
EC2P 2EJ

Dear Ms Williams,

REF: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Please accept this letter as an objection to planned proposals to alter the purpose of Custom House's use. Custom House is a Grade I listed building of national importance. Proposed plans seek to alter the fabric of the building irreparably and prevent it from being for public use.

The nature of the building is as a public space. Exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

Additionally, the original layout of Georgian offices would be destroyed by the plans and the addition of two light box pavilions on the roof would compromise the principle frontage.

SAVE Britain's Heritage have put forward excellent plans for an alternative, that would ensure the building is in public use, as has been successfully illustrated at Somerset House further down the river. This would also help regenerate a largely ignored stretch of the river past Tower Hill, and take full advantage of its excellent position for all to enjoy. I implore you and your colleagues to consider this as a serious option.

https://mcusercontent.com/9ea03bb11e3ccc82634488e2b/files/89340061-ef7a-407b-bf18-01a31aabd800/2003_SAVE_CUSTOM_HOUSE_6_.pdf

Yours sincerely,

Jamie Surman

Flat 1, 90 Bootham
York
YO30 7DG

For the attention of

Sonia Williams, Principal Planning Officer, City of London

Alastair Moss, Chairman Planning and Transportation Committee, City of London

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

14 February 2021

Dear Ms Williams and Mr Moss,

OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I write with regard to Planning Applications 20/00632/LBC and 20/00631/FULMAJ to object to the proposed redevelopment of the Custom House, a grade I listed building, and its conversion to a luxury hotel. The proposals will be destructive to the fabric of the grade I listed building and

- contradict the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic;
- will destroy suites of Georgian offices that are a unique survival;
- will compromise the principal frontage through the addition of two light box pavilions as bars on the roof.

I would ask you to consider this objection carefully and fully, bearing in mind that London is a place that millions call home, as well as being a major commercial centre and international travel destination. The fabric of buildings such as the Custom House constitutes a heritage asset which is "owned" by – and should be accessible to – us all. We have a responsibility of stewardship as citizens, to ensure that the asset is protected and shared widely.

Yours sincerely,



Shirley Collier MBE

Adjei, William

Subject: FW: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Caroline Murray
Sent: 14 February 2021 12:27
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Madam and Sir,

I note with complete dismay the plan to convert the Grade-I listed London Customs House into a 'luxury hotel', with severe internal destruction and the marring of the external appearance as part of this process.

It is disgraceful in the first instance that HMRC have offered the building to a private developer, rather than making it available for cultural public use, as defined in the City of London's policy outlined in the City Plan 2036. It is also completely unclear that London will have the need for yet another 'luxury hotel' (see for example the ludicrous proposal for the Whitechapel Bell Foundry in Tower Hamlets, currently up for appeal) for the foreseeable future.

But my main concern is that this is yet another example of the pursuit of profit by private developers which is being allowed to destroy the irreplaceable historic fabric of the city for their own short-tern gain and for no benefit (indeed, rather the reverse) to the inhabitants of London.

I very much hope that the planning committee will reject this proposal, and stand their ground if /when the developer lodges an appeal.

Yours sincerely,

(Dr) Caroline Murray

23 Tenison Avenue
Cambridge
CB1 2DX

Adjei, William

Subject: FW: Objection

From: tricia kelly <
Sent: 14 February 2021 11:31
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

Re: Planning applications 20/00631/FULMAJ and 20/00632/LBC

Though I am obviously not visiting much at present I have spent several years working at various points along the north bank of the Thames and value the many lesser-known historic elements to be found there.

I was horrified therefore to hear of the proposed changes to the Custom House being put before you in these applications. This little-known and much under-appreciated building has such potential to become a major public building, a flagship and long-term asset for the City. Instead, these proposals rip out its historic heart (the near uniquely intact Georgian offices in one wing of the building) and blemish its face with glass-box bars.

I can understand that there is not much hotel accommodation within the City itself, but there is plenty in the wider area. At best if the venture is successful it is likely to increase the number of coaches manoeuvring around Lower Thames St. However, the current pandemic means tourism is at its lowest ebb for over a generation and is unlikely to recover fully for several years. This proposal is therefore wrecking a Grade 1 listed building to create an hotel with what must now be a dubious business case. The proposal is also in contradiction to your own policy in the City Plan 2036, which looks to 'office-led cultural use'.

This building gives a magnificent opportunity to encourage the aims of the plan, steering the future of this building towards something that will give wider public access while maintaining its historic features. The Customs House in its various iterations on this site has been at the heart of London trading for centuries. Surely as the country is looking to widen its trading horizons once more there must be a use for it that embodies pride in its past glories while encouraging growth and celebrating its future? Using part of its office space for start-ups or small companies for instance, while opening up the Long Room, even if this means parts are shut at times for events.

I do hope this change of use will be voted down and this vital part of the City's history protected for Londoners.

Yours sincerely
Patricia Kelly
Oak Lodge
Mill Rd
Gt Totham
CM9 8BR

40 Rutherford house, 483 Battersea Park Road London SW11 4BT

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

14 February 2021

Dear Sirs,

**Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Objection**

I am writing to object to this planning application to convert the historic Customs House into a hotel.

Customs House is a listed building that has played an important part on the history of this country and is a star in the City's heritage. I understand that there are other better proposals that take account of the building's importance and would preserve it for the benefit of the City and its residents. Somerset House is an example of what is possible.

It would be wrong for a hotel development to destroy the building's unique suites of Georgian offices.

The future of the building should follow the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

Although I am retired now, my entire career was spent as a City solicitor. During this time I came to appreciate the City's history and magnificent buildings such as Customs House.

I hope the application will be refused.

Yours sincerely

Peter Smith



Adjei, William

Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

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

From: alison homewood <

Sent: 14 February 2021 06:36

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: alastair.moss@cityoflondon.gov.uk

Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I am writing to object strongly to the proposal by developers to redevelop the Grade-1 listed Customs House into a luxury hotel.

This would be a heritage sacrilege. This handsome, imposing building is a unique symbol of London's history, both maritime and commercial. In uncertain times for Britain as we step out into a post-Brexit world we need to safeguard these unique remnants of our history as they will be the magnet that bring back the tourists. London has an over-supply of elegant and expensive hotels in the city and on the river; it does not need another one.

SAVE Britain's Heritage has demonstrated what successful re-uses historic buildings can be put to, notably with Smithfield's Market and the Museum of London. Please refuse this planning application, don't let any more of my beautiful London be destroyed by overseas developers with no cultural soul and only seeking commercial profit.

ALISON HOMEWOOD

31 Colebrooke Avenue

London W138JZ

Adjei, William

Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Glenn Leeder

Sent: 14 February 2021 09:08

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>; Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I regularly walk along the Thames in front of the Custome House. It is a beautiful building.

It is my belief that the leaseholders of the Custom House want to undertake an ugly and destructive conversion of this listed Grade I historic building into a luxury hotel. I believe it should be put back to public use for all Londoners and visitors, not just the wealthy.

My points of objection are -

- The exclusivity of the proposed luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. The City of London has the opportunity to extend the area in close vicinity to the Tower of London to include cultural and visitor attractions within easy walking distance of the Tower. This is a unique heritage space and should not be lost to the public.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage. Surely these light boxes cannot be allowed to be added to a Grade 1 listed building. You are the guardians of our heritage. Please do not let developers destroy it.

I urge you to reject this proposed development.

Glenn Leeder
25 Folgate Street
LONDON E1 6BX

Adjei, William

Subject: FW: Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Stephen Clarke

Sent: 14 February 2021 12:12

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

Subject: Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I write to object to your plans to replace the London Custom House with another Hotel.

Efforts must be made to preserve our hereditary buildings in some form.

Steve - Sent from my iPad

53, Burwell Road, Leyton E10 7 QG

Adjei, William

From: PLN - Comments
Subject: FW: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Simon Ward
Sent: 15 February 2021 11:54
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams,
I am writing to object to the above planning applications regarding the redevelopment of the London Customs House building.

My objection centres on the concerns highlighted by the Georgian Group and others about the damage the plans would cause to a priceless and irreplaceable piece of our architectural heritage.

Furthermore if the proposed development proceeds the site would be inaccessible to the majority of the general public. This would be to waste a huge opportunity to revitalise an imposing historic riverside building. That this is achievable is amply demonstrated elsewhere on the river in Somerset House, a similar Georgian office building which has been completely reimagined, while retaining its intrinsic beauty and interest. Why should the Customs House not be treated with the same respect?

I urge the Corporation to reject these unsympathetic proposals and to reconsider how best this great building can be brought back into use, ensuring that it can be enjoyed for hundreds of years to come.

Yours sincerely,
Simon Ward
8 St Thomas's Place,
London
E9 7PW

Begum, Shupi

From: Williams, Sonia
Sent: 05 March 2021 17:45
To: PLN - Comments
Subject: FW: OBJECTION TO PROPOSED REDEVELOPMENT OF THE CUSTOM HOUSE

Categories: Red Category

Please download to 20/00631 and 00632 and acknowledge

Thanks

sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: Ruth Fleming [REDACTED]
Sent: 14 February 2021 14:32
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION TO PROPOSED REDEVELOPMENT OF THE CUSTOM HOUSE

I am writing to inform you of my objections to the proposed redevelopment of the Custom House REF 20/00632/LBC and 20/00631/FULMAJ.

I strongly object to this wonderful and historically significant building which is Grade 1 listed being converted into a luxury hotel. The offshore leaseholders have submitted applications to seek permission to convert this historically significant building to a luxury hotel. The plans reveal that the conversion will be destructive and is unsympathetic.

The City of London City Plan 2036 gives preference to 'office-led cultural use' as part of the City's ambition to open historic spaces to attract a wider cultural demographic. The Customs House should be put back into public use for all Londoners.

The hotel development will destroy rare suites of Georgian offices that are a unique survival.

The hotel development will add two light box pavilions as bars on the roof which will compromise the principle frontage.

London does not need another luxury hotel, and should not squander yet another important piece of our historical and cultural heritage.

Please acknowledge receipt of my objections.

Ruth Fleming

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Rachel James

Address: Eastington Farm Worth Matravers Swanage

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The importance of keeping public access and the integrity of an important Georgian building

Adjei, William

From: PLN - Comments
Subject: FW: OBJECTION to plans for the Customs House - 20/00632/LBC and 20/00631/FULMAJ

Dear Sonia Williams

I wish to object to the planning application to convert the historic Custom House on the Thames into a hotel, which will entail the demolition of parts of the Georgian building and the entirely inappropriate addition of two light-boxes on the roof. This historic building with its Thames frontage should be imaginatively re-developed as an amenity for Londoners and visitors alike; perhaps in the manner of the Somerset House which attracts large numbers of people to its cultural activities.

The development of luxury hotel seems inappropriate for the site and building, particularly as the building's importance is reflected by its Grade 1 listed status.

I would like this objected to be forwarded please.

Mary Peskett Smith

8 The Old School

Princeton Street

London

WC1R 4AY

Adjei, William

From: PLN - Comments
Subject: FW: OBJECTION to plans for the Customs House - 20/00632/LBC and 20/00631/FULMAJ

Dear Sonia Williams

I wish to object to the planning application to convert the historic Custom House on the Thames into a hotel, which will entail the demolition of parts of the Georgian building and the entirely inappropriate addition of two light-boxes on the roof. This historic building with its Thames frontage should be imaginatively re-developed as an amenity for Londoners and visitors alike; perhaps in the manner of the Somerset House which attracts large numbers of people to its cultural activities.

The development of luxury hotel seems inappropriate for the site and building, particularly as the building's importance is reflected by its Grade 1 listed status.

I would like this objected to be forwarded please.

Mary Peskett Smith

8 The Old School

Princeton Street

London

WC1R 4AY

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Subject: FW: OBJECTION
Date: 15 February 2021 17:03:13

From: Charles Rumbles
Sent: 15 February 2021 15:28
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Alistair.Moss@cityoflondon.gov.uk
Subject: OBJECTION

Dear Sonia,

PLANNING APPLICATIONS 20/00632/LBC and 20/00631/FULMAJ.

I wish to object to the planning application to convert the former Custom House building in Lower Thames Street, London into a hotel.

I moved from Scotland at age 18 to begin my career with HM Customs & Excise on 29 October 1973. Custom House, Lower Thames Street was my first office of employment. The building has a rich economic history and should be preserved as a Customs museum or similar social space.

Regards

Charles K Rumbles

6 Pitcaple Gardens
Bellsquarry, Livingston
West Lothian, EH54 9HW
Scotland, UK

Begum, Shupi

From: Williams, Sonia
Sent: 15 February 2021 09:04
To: DBE - PLN Support
Subject: FW: OBJECTION

Please upload to 20/00631 and 632

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Deborah Merrett [REDACTED]
Sent: 15 February 2021 07:47
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

To whom it may concern,

Regarding s Planning Applications 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

I wish to object to the above proposals. I set out my reasons below:

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel when it should be put back to public use for all Londoners.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. This proposal is contrary to the City Plan.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

For these reasons I am placing an objection to the above proposal.

Yours,
Deborah Merrett
9 Cookes Wood, Broompark. Durham DH77RL

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Subject: FW: Custom House Planning Application
Date: 15 February 2021 12:52:54

From: Jill Wilson
Sent: 15 February 2021 12:36
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>; Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Custom House Planning Application

Custom House Planning Application - 20/00632/LBC & 20/00631/FULMAJ

I am writing to you about the above application and the plans to turn The Customs House into a luxury hotel.

My initial reaction when I heard about it was that there must be something more imaginative which could be done with the building as there are so many other new hotels springing up all over London and hotel saturation point must be reached soon! Surely could be an alternative scheme which would have more benefit for the public? An art gallery? Exhibition space? Cultural/education centre? The possibilities are endless...

However having studied the plans and seen how much of the original building is going to be retained in the proposal, I have warmed to the hotel scheme and think that the Customs House could make a stylish and popular hotel, provided that they do actually adhere to the slightly worrying words that original features will be "reused if possible"... Who decides what is possible?

My hackles also rose when I saw the words "retaining the existing facade" on the eastern block as there has been a plague of ridiculous facadism happening recently when perfectly good buildings have been destroyed with only their facades remaining to hide soulless developments behind. But it sounds like the Eastern wing is already in the facaded category having been rebuilt since the war, so one hopes that the new building would be complementary to the existing Western wing and the original building.

There are several positives in the proposed scheme (provided the developers actually stick to them!!).

The river terrace could be a lovely new public space with great views over the Thames, and one hopes that people would be genuinely welcomed into the internal spaces like the Long Room.

I can also understand why the developers want to put the two cafes onto the roof as again these would provide some brilliant views over the City and the Thames. But why oh why do they have to be such a dull design?? At the moment they are an eyesore, and

completely out of keeping with the existing building, and would look particularly strange when lit up at night. With my designer's hat on I can see that it would make a huge difference if the roof line of the cafes were to continue on the same angle as the existing roof - if the plans are accepted, perhaps that could be a tweak you could stipulate?

Whatever the outcome of the application, I trust that you will do everything you can to protect this historic and interesting building for future generations.

Best wishes

Jill Wilson
Broadside
Kent Hatch Road
Oxted
Surrey RH8 0SZ

Begum, Shupi

From: Williams, Sonia
Sent: 17 February 2021 08:58
To: DBE - PLN Support
Subject: FW: OBJECTION TO PLANNING APPLICATION FOR LONDON CUSTOM HOUSE
Attachments: PLANNING APPLICATION CUSTOM HOUSE.docx

Categories: Red Category

Please download e mail and attachment to the 2 applications and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queuing outside your premises?
Complete our short form to request temporary vinyl signage

From: ann [REDACTED]
Sent: 16 February 2021 20:31
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION TO PLANNING APPLICATION FOR LONDON CUSTOM HOUSE

Dear Ms Williams

Please find attached my objection to the planning application **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

I worked in Custom House for some years and find the proposals very sad. Particularly the light boxes destroying the outside of such a fine building.

Yours sincerely

Ann North
Mrs Felicity Ann North



Virus-free. www.avast.com

**OBJECTION TO THE PROPOSED PLANNING APPLICATION TO CONVERT LONDON CUSTOM HOUSE
INTO AN HOTEL**

London Custom House is a wonderful historic building which deserves to be preserved as it is and not turned into a hotel for the rich and famous. The beautiful interior is full of character and historic importance particularly the Long Room and the basement. The Georgian rooms and the Main entrance Hall with memorials to Custom Officers who died both fighting for their country and in the course of their duties should be kept intact. Somerset House has not been sold off as a hotel but has become a venue for everyone. The Thames frontage is unique and should not be tampered with. The building is considered one of the pearls of the river and the building was often open to the public for the London Heritage weekend in September. Volunteers in period dress would act as guides and explain the history of the building particularly the wonderful Long Room.

Surely those in charge of the capital of our country should preserve its history and remind visitors of the wealth of beautiful and interesting places within it. Locals and visitors should be encouraged to use these wonderful spaces, for community space, museums, education etc. The City of London should look to its own citizens rather than always finding in favour of the money makers.

Please preserve London Custom House for us not as a hotel.

Begum, Shupi

From: Williams, Sonia
Sent: 11 March 2021 09:17
To: PLN - Comments
Subject: FW: OBJECTION - plans to redevelop Custom House

Categories: Red Category

Please download to 20/00631 and 00632 and acknowledge

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Jon Petre [REDACTED]
Sent: 10 March 2021 17:34
To: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>; Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION - plans to redevelop Custom House

Hello,

I want to lodge my objection to the City's plans to redevelop Custom House as a luxury hotel development, i.e. applications 20/00632/LBC and 20/00631/FULMAJ.

Custom House has been a unique and critically important part of the City of London's history, and it would be a massive loss to the heritage and the prestige of the City if it were to be redeveloped as an identikit chain hotel. Under current plans, the addition of lightboxes to the building will damage the historic frontage of the building and gutting the Georgian offices will erase another part of the city's history.

During the lockdown, I discovered St Dunstan-in-the-East. I think it's my favourite park in London. With all shops closed and very few places to go, public spaces like St Dunstan's have been a refuge: a rare place where you don't need to pay to enjoy yourself and you feel aware of the City's rich texture and accessibility. It's a testament to the City as a place to be lived in - a place where, no matter how times change, the environment is designed for everyone to enjoy. I view Custom House in much the same way: as, like St Dunstan's, an irreplaceable public asset that we can do so much with. I would love to see a restored Custom House once again open to the public, following the lead of Somerset House or the Southbank pavilion: a truly community-focused space that is for everyone in the city, a place to socialise, relax and learn. Please don't throw this opportunity away.

Do let me know if I can do anything else to help the development of Custom House. If there is to be a People's Hearing or similar regarding Custom House please do add me to a mailing list or a discussion group and I would be more than happy to give my opinion.

Best wishes and looking forward to hearing from you.

Jon Petre

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mr michael hadfield

Address: rosemary lane Rosemary Lane Petworth

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:Such a glorious Georgian Building should be maintained and kept to enhance the river Thames frontage for everyone

The Old Rectory,
Saxthorpe,
Norwich,
NR11 7BJ

16th February 2021

Sonia Williamson,
City of London

Planning application 20/00632/LBC
20/00631/FULMAJ

Customs House

Dear Sonia Williamson,

The proposals for Smirke's Custom's House are a matter of deep concern. This is not only a building of outstanding interest and importance, but it occupies an exceptionally prominent site.

My concerns are:

- the proposed bars on the roof will compromise the main elevation, particularly at night
- the interiors, including the Georgian offices, deserve rigorous protection
- the plans for the building should allow for a degree of general public, as opposed to exclusive, access.

It should be possible to improve the plans, to deal with these aspects far more sympathetically.

Yours faithfully,

Merlin Waterson, CBE, FSA

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 16 February 2021 16:09:20

From: Sue Mayer
Sent: 16 February 2021 16:03
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I am writing to object to the plans for this Grade 1 listed Customs House.

I understand the Georgian offices are unique so they should be preserved. I would not like to see the long room carved up.

Adding light pavilions to the roof will not be in keeping with the exterior of the building and will look awful.

This building is part of our heritage and as such should be used in a sympathetic way which we can all enjoy, not just the rich visitors who would stay in an expensive and exclusive hotel.

I am very depressed at the number of historical buildings that have been lost for ever in London. Please don't destroy our history.

I am sure this building could be used as a museum highlighting our importance in trade as after all this was a customs house.. It could also be used by the community. It just needs a bit of creative thought. Turning it into an exclusive hotel shows a lack of thought and is clearly just about making money.

This hotel plan contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to "office-led" cultural use", as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

Susan Mayer
81, Warburton Road, Poole, Dorset, BH17 8SD

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: OBJECTION
Date: 17 February 2021 08:55:59

From: Jennifer Newbold <>
Sent: 16 February 2021 22:01
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

16 February 2021

City of London Corporation
Guildhall, London
OBJECTION

Dear Honourable Members,

I am writing in objection to the scheme proposed by Planning Applications 20/00632/LBC and 20/00631/FULMAJ for the Custom House development.

Yet another financially driven, culturally insensitive proposal. London already has a number of Thames-fronted luxury hotels in which I cannot afford to stay. In the vicinity are the Savoy, Royal Horseguards, Rosewood, L'Oscar and the Four Seasons, amongst others. The Custom House deserves a better fate than to be made yet another exclusive haunt of the elite. This proposal is insulting, and will do irreversible damage to the integrity of this distinguished Grade I historic building.

The developers propose to destroy suites of Georgian offices that could, and should be, preserved. They propose to mar the appearance of the building with jarringly unsympathetic roof bars. Furthermore, the proposal contradicts policy as stated in the City Plan 2036, which aims to open heritage spaces to a wider demographic.

I wholly support the alternative proposal offered by SAVE Britain's Heritage. It would allow this structure to be reopened for public use, as was its original purpose. It offers a multi-use, sensitive conversion that takes into consideration the interior integrity of the building. It provides democratic access and offers multiple options to appeal to a wide range of persons, be they tourists, historians, gallery visitors, shoppers, or restaurant-goers. The business-hub portion of the proposal alone is brilliant, opening access to small- and independent business owners whilst preserving the surviving Georgian office suites. What I wouldn't give for a pop-up office in the Custom House!

I urge you to reject Planning Applications 20/00632/LBC and 20/00631/FULMAJ.

Respectfully yours,

Jennifer Newbold
124 Hillcrest Road
Concord, MA 01742
USA

Begum, Shupi

From: Patricia Wilkey [REDACTED]
Sent: 17 February 2021 16:08
To: PLN - Comments
Subject: RE: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear William,

So sorry, my address is noted below.

21 Winter Folly
Laindon
Basildon
Essex
SS15 5GL

Kindest regards,

Pat Wilkey

[Sent from Yahoo Mail on Android](#)

On Wed, 17 Feb 2021 at 12:18, PLN - Comments
<PLNComments@cityoflondon.gov.uk> wrote:

Dear Patricia,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

regards,

William Adjei

From: Patricia Wilkey [REDACTED]
Sent: 16 February 2021 17:20
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams,

I would like to lodge my objection to the above noted proposed redevelopment of The Custom House.

I was under the impression that the City of London was against exactly this kind of exclusivity, the kind a luxury hotel development of this sort offers.

The City Plan 2036 is being contradicted here in my opinion. The development will destroy the Georgian office suites that are a unique and very rare survival and the pavilion light boxes which will be used as rooftop bars will absolutely compromise the principal frontage.

I do hope that you make note of my objection and I thank you for your time in doing so.

Kindest regards,

Pat Wilkey

[Sent from Yahoo Mail for iPad](#)

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London

falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 08:40
To: PLN - Comments
Subject: FW: OBJECTION to planning app 20/00631/LBC & 20/00632/FULMA

Please download to 20/00631/FULMAJ and 00632/LBC and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: alun_watkins2003 [REDACTED]
Sent: 17 February 2021 16:45
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION to planning app 20/00631/LBC & 20/00632/FULMA

OBJECTION

Dear Ms Williams

I would like to register an objection in the strongest possible way to the planning application to convert the UK's most famous Custom House into a luxury hotel.

Custom House is an iconic building and sits on the same prime Thames side site

That has been occupied for many centuries by a Custom House. It is a Grade 1 listed building of huge cultural significance and the plan to give it to a private company register in a tax haven is an insult to the British population.

This building must be saved from destruction and returned as a space for the British public to utilise and enjoy. Having worked in this building for 30 plus years it is inconceivable that it can be sympathetically converted into a hotel; that this is to be done in the name of profit for an offshore tax haven based company is abhorant.

This magnificent building belongs to the British people and it should be conserved as such. It should never have been leased to an offshore entity many years ago and an equity should also be launched into this potentially corrupt action.

Custom House would provide a prime site for a museum or gallery, and also provide valuable public space much like how Somerset House and Tate Modern have been similarly converted in the past.

Regards
Alun Watkins
326 Richmond Rd
Kingston Upon Thames
KT2 5PP

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Dr James Emerson

Address: 141 Blackheath Park London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The building is a significant (national) historical and cultural asset, which should have been treated more sensitively by this application. In particular the external appearance, the main hall and the Georgian offices are all very worthy of preservation in essentially their current form. Because this application will damage all these it should not be approved.

Begum, Shupi

From: Michael Hahn [REDACTED]
Sent: 18 February 2021 23:57
To: PLN - Comments
Subject: Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Planning committee

I've been made aware of the planned redevelopment of the Custom House building without any apparent thought being given to its historic or characteristic existing features. The sole objective by the off shore owners to create another 'new' hotel without respect for the history of London. I feel that either sufficient guarantees are received to incorporate key original features or the planning permission be refused.

Thank you

Michael Hahn

7 Manor Park Gardens
Edgware
HA8 7NB

Tel: [REDACTED]

Begum, Shupi

From: Williams, Sonia
Sent: 19 February 2021 12:40
To: PLN - Comments
Subject: FW: Objection: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Please download to 20/00631/FULMAJ and 00632/LBC and acknowledge

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Richard Kirker [REDACTED]
Sent: 18 February 2021 23:29
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I am not persuaded that this plan merits planning approval.

The exemplary nature of this elegant and imposing Grade 1 building, its history, and iconic location should be put at the disposal of all Londoners and its visitors.

Much as Tate Modern and Somerset House have been converted into major public cultural attractions, to great acclaim, this building deserves a more noble fate than to become another and superfluous luxury hotel.

As a publicly owned building redevelopment costs would not include land or building purchase making the project financially feasible, with significant income generation potential from visitors and events/exhibitions.

The plans are an unsympathetic conversion which would be destructive to the fabric of the grade I listed building, erasing its meaning and significance. In particular, suites of Georgian offices which are a unique survival will be destroyed and two unsightly two light-box bars added to the roof, weakening the aesthetic appeal of the river frontage.

Richard Kirker
10 Coopers Close
LONDON
E1 4BB

Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 08:39
To: PLN - Comments
Subject: FW: OBJECTION

Please download to the 2 applications referenced and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: jlk1972 [REDACTED]
Sent: 18 February 2021 08:36
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Madam and Sir,

I am writing to record my objection to the requested unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel when it should be put back to public use for all Londoners.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal

Yours sincerely,

Julian Kirkby
23 Sherwood Avenue
London
E18 1PB

Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 18:33
To: PLN - Comments
Subject: FW: OBJECTION 20/00632/LBC and 20/00631/FULMAJ

Please download to both apps and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Stephanie Lawrence [REDACTED]
Sent: 18 February 2021 18:29
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams and Mr Moss,

I would like to strongly object to the proposed plan to turn Customs House into a luxury hotel with bars on the roof - planning applications 20/00632/LBC and 20/00631/FULMAJ.

I was lucky enough to visit Customs House on one of the Open London weekends and it is a stunning building with Georgian suites of offices that I understand would be removed in the development. With so few Georgian suites of offices even remaining that simply cannot be allowed. It is a beautiful place that deserves preservation and admiration in its current form.

I work in St George's hospital and, as I'm sure you can imagine, this year has been the most challenging of my career and continues to be so. When there is the opportunity, I will need time to stop and recuperate. Beautiful buildings and history are two things that bring me peace and healing, and I'm sure I cannot be alone in that. My NHS salary is insufficient to afford luxury hotels in London, such as the proposal for Customs House. Thus if it is turned into one, I am excluded from yet another building in London due to financial limitations and I am absolutely certain that I am not alone in that either.

It is my understanding that such a development is not even permitted as it contradicts the City of London's policy outlined in the City Plan 2036, whereby preference is given to office-led cultural use. Opening this building up to the public in the manner stipulated in the City Plan 2036 would enable someone like myself to visit there.

We are fighting the biggest medical fight of our time, I am fighting the biggest personal fight of my time. Please do not permit it to happen that I emerge from this fight to find myself excluded from yet another part of the city that I have worked tirelessly to help.

Please deny the proposal for a hotel in Customs House.

With kindest regards and hope of a positive outcome,
Stephanie Lawrence

44 Chester Close, Pixham, RH4 1PP

Get [Outlook for Android](#)

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Rosemary Baird Andreae

Address: 13 Pelham Place London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I like the idea that the Customs House should be restored and repurposed but am nervous about it becoming a hotel, with inevitable compromise to the historic interiors. The West wing should not be so sub-divided and original fabric will be lost. There should be public access to the historically interesting Long Room. The glazed pavilions on the roof are not a visually satisfactory solution. This is a great opportunity but needs a more public-facing solution, as at Somerset House or Greenwich.

Begum, Shupi

From: Hope, Ruth (PUT) Staff [REDACTED]
Sent: 19 February 2021 10:15
To: PLN - Comments
Subject: Objection regarding the Customs House

Dear William

Thank you for flagging up that you need my details. Apologies for not providing my address.

It is
97 Claverdale Road
London
Sw22dh

Please let me know if you need anything further.

Kind regards
Ruth Hope

Sent from my iPad

Important Notice

This message and any files transmitted with it are confidential to the addressee.

If you are not the intended recipient, any disclosure copying or distribution is prohibited and may be unlawful. You should notify the sender immediately and delete this message and any attachments without retaining a copy.

Please note that any views or opinions expressed in this message are solely those of the author and may not represent those of the Company or School.

No liability is accepted by The Girls' Day School Trust for any loss or damage incurred through use of this e-mail.

The Girls' Day School Trust. A limited company Registered in England No. 6400 Registered Charity No. 306983.
Registered Office: 10 Bressenden Place, London SW1E 5DH

Begum, Shupi

From: Adjei, William
Sent: 19 February 2021 09:37
To: Hope, Ruth (PUT) Staff
Cc: Williams, Sonia
Subject: RE: Objection

Dear Ruth ,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

regards,

William Adjei

From: Hope, Ruth (PUT) Staff [REDACTED]
Sent: 14 February 2021 10:03
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

Planning Applications 20/00632/LBC and 20/00631/FULMAJ PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Sonia Williams

I am writing in strong objection to the proposed redevelopment of the Customs House.

This building should be put back to public use for all Londoners, and London really is not short of luxury hotels so this idea should be rejected. This Grade I listed building could be redeveloped in the same way that for example Tate Modern has been. There are other examples of sympathetic redevelopments, and the proposed luxury hotel is not sympathetic or inclusive.

In addition,

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

I strongly object and I know many others will do too.
Sincerely
Ruth Hope

Sent from my iPad

Important Notice

This message and any files transmitted with it are confidential to the addressee. If you are not the intended recipient, any disclosure copying or distribution is prohibited and may be unlawful. You should notify the sender immediately and delete this message and any attachments without retaining a copy.

Please note that any views or opinions expressed in this message are solely those of the author and may not represent those of the Company or School. No liability is accepted by The Girls' Day School Trust for any loss or damage incurred through use of this e-mail.

The Girls' Day School Trust. A limited company Registered in England No. 6400
Registered Charity No. 306983. Registered Office: 10 Bressenden Place, London SW1E 5DH

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Objection to planning application 20/00632/LBC20/00631FULMAJ
Date: 04 March 2021 12:20:26

Dear Ms Williams,

I am writing to object to the proposed conversion of the Customs House into a hotel. This is an unsympathetic and destructive conversion which would dramatically change the Grade 1 listed buildings appearance on the outside as well as destroying a suite of Georgian rooms inside. This is London's historical heritage and we lose it at our peril.

Londoner's and visitors to London should be able to use and enjoy this historical space.

Please reject this application and support applications that put restoration, preservation and Londoners at the heart of their application. Benefiting us all.

Yours sincerely
Catherine Hopkin
31 Camp Road
St Albans
Herts
AL1 5DX

Ms Sonia Williams
Department of the Built Environment
City of London Corporation

Our Ref: 19/00116/FULL

Your Ref: 20/00631/FULMAJ

Date: 22 March 2021

By email only:
sonia.williams@cityoflondon.gov.uk

Dear Ms Williams

**Objection to Planning Application 20/00631/FULMAJ & 20/00632/LBC
Custom House – Proposed Change of Use from Office to Hotel-led Mixed Use Development**

We act for Tony Matharu, Chairman of Integrity International Group and former Managing Director of Grange Hotels. It should be noted that our client has no interest, or connection with the application.

Our client does have a long and distinguished track record of investment in London and, while he is highly supportive in principle of the refurbishment of Custom House, cannot support the current application.

The proposals are in material conflict with the aims of local and national planning policy, and fail to protect and promote both this valuable heritage asset, and the exceptional importance of the office-led area around it. The City is urged to refuse the application for the reasons set out below.

1. Loss of Office Space

1.1. All adopted and emerging local and national planning policies relevant to this site are heavily weighted towards the protection of office-led use, chiefly (our emphases):

1.1.1. Policy DM 1.1 of the City of London Local Plan 2015: *“To refuse the loss of existing (B1) office accommodation to other uses where the building **or its site** is considered to be suitable for **long-term** viable office use”* and paragraph 3.1.10: *“The **riverside** is an attractive location for offices and office-led commercial mixed use development”*

1.1.2. Policy DM 11.3 of the City of London Local Plan 2015: *“Proposals for new hotel and apart-hotel accommodation will only be permitted where they: • do not prejudice the primary business function of the City; • are not contrary to policy DM1.1;*

1.1.3. Strategic Policy S18 of the Draft City Plan 2036: *“The Pool of London Key Area of Change will be regenerated through...1. Enabling **office-led** redevelopment or refurbishment of the existing building stock, including the provision of retail, cultural and leisure uses*

LONDON

MANCHESTER

BIRMINGHAM

TAUNTON

Main switchboard: 0344 880 8000 • Website: www.djblaw.co.uk

All correspondence to be directed to: 12-14 The Crescent, Taunton, TA1 4EB • DX 32129 Taunton

*which are complementary to, and **do not detract from, the primary business function of the City.***"

1.1.4. Policy SD4 of the London Plan 2021: "B. The **nationally and internationally significant office functions** of the CAZ should be **supported and enhanced** by all stakeholders, including the **intensification** and provision of sufficient space to meet demand for a **range of types** and sizes of occupier and rental values."

1.2. Policy SD4 of the London Plan 2021: "Residential or mixed-use development proposals should **not lead to a net loss of office** floorspace in any part of the CAZ unless there is no reasonable and **demonstrable** prospect of the site being used for offices. To achieve this, alternative **provision of equivalent or net additional** office space can be made (including through swaps and credits – see Part H below). This should be within the CAZ and near the development"

1.3. The policy presumption is therefore a difficult one to rebut, but clearly it has not been sufficiently rebutted in this case:

1.3.1. the Viability Assessment submitted with the application purports to have determined that *no* viable options existing for any continued office use, and that the *only* viable use is that of a hotel. This somewhat beggars belief given the site's current use and location;

1.3.2. the City of London's Chair of the Planning and Transport Committee reported on 9 March 2021¹ that "so far this year, it has given planning consent for the equivalent of almost 80% of the total office floorspace it approved for the whole of last year; demonstrating the City office market remains resilient despite new ways of working being adopted throughout the coronavirus pandemic.";

1.3.3. it cannot be said that there is no demonstrable prospect of continued use as office-led development when no attempt has been made to market an office-led alternative;

1.3.4. the proposal contains *no element of office use* and no alternative provision of equivalent or net additional space as required by Policy SD4.

2. Public Benefits

2.1. It is acknowledged that Historic England's view is that harm to the listed building would be likely to be 'less than substantial', engaging the test under paragraph 196 of the NPPF to weigh the harm against the public benefits of the proposal.

2.2. It is with respect to the weighting of those public benefits that the application is misguided and inadequate.

¹ <https://news.cityoflondon.gov.uk/city-office-floorspace-surges-as-developers-back-the-square-miles-future/>

- 2.3. At first glance, the proposals will open up the riverfront, give access to the interior of the building and remove the parking.
- 2.4. However, on closer scrutiny, the terms on which it is proposed to afford public access are heavily constrained and entirely within the discretion of the operator. For example, the draft heads of terms for the section 106 agreement provide that:
 - 2.4.1. Public access to the hotel foyer on the ground floor is only open from 11am to 6pm on normal trading days (subject to frequent closure for events;
 - 2.4.2. Further access is by prior booking only, and then also at the owner's discretion;
 - 2.4.3. Public tours will only be available once per months and by prior booking;
 - 2.4.4. Public access to the quayside will be subject to operating times of the hotel – and the owner has complete discretion to close it at any time and for any purpose;
 - 2.4.5. The owner specifically negates the creation of any public rights of way over the quayside area.
- 2.5. When viewed in the context of the intention to operate a large number of events (public and private), these restrictions on accessibility and enjoyment of the proposed development further diminish any public benefits.
- 2.6. Particularly with respect to the heavily caveated access to the quayside, it is clear that the benefits fall far short of outweighing the 'less than substantial harm'.
- 2.7. Another key concern is that the current commitment to these measures through the draft heads of terms only extends to 5 years and makes no commitment after that.
- 2.8. Compare this for example to The Ned, where there is extensive public access to a large indoor dining area, and to 55 Broadway, where public access is in perpetuity.

3. Thames Riverside – Activation of the River Front

- 3.1. A much-touted benefit of the proposal is the public realm and access to be provided on the river frontage. However as explained above, the result of the restrictions on access to the quayside public realm area effectively mean that it cannot truly be considered a 'public benefit'.
- 3.2. The London Plan 2021 at paragraph 9.16.5 refers to the Mayor's 'Case for a River Thames Cultural Vision' and clearly aims to increase engagement of Londoners with the river.
- 3.3. The London Plan 2021 at paragraph 9.16.4 also refers to the importance of London's waterways for walking routes, health and well-being and linkages to transport.

- 3.4. If the quayside public realm were truly a public benefit of the proposal, public access would connect with and continue the river paths either side of it, and ensure free access and public right of way at all times, such as the nearby route along the frontage of Riverbank House and the Nomura building at Swan Lane.

4. Urban Greening Factor

- 4.1. Adopted Policy G5 of the London Plan confirms that all major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. It confirms that predominately commercial developments, such as Custom House, should target a UGF score of 0.3.
- 4.2. The current proposals for Custom House proposed an UGF score of 0.08, which falls short of this target by 0.22. The project ecological consultant, Olivia Guindon from Greenage, even acknowledges in her January 2021 letter that other solutions to increase the UGF score are available including more planting as well as vertical greening on suitable elevations of the building.
- 4.3. This should be considered and explored further prior to the determination of the planning application given the current low level of UGF proposed. The proposal is not policy-compliant in this respect, particularly given its position next to the River Thames and the proposed riverfront public open space proposed.

5. Employment and Training

- 5.1. Adopted Policy E11 of the London Plan emphasises the need for strategic development proposals to support local employment, skills development and training opportunities.
- 5.2. Policy GG1 of the London Plan good growth objective clearly states that everyone should benefit from economic opportunities in London to ensure a fairer and more equal city. In these terms, the GLA in their Stage 1 report have sought a recruitment and training strategy, or an alternative approach, that demonstrates how the development would provide training and employment opportunities during the lifetime of the development, which should be secured through planning conditions or legal agreement. I
- 5.3. No such details appear to have been made available, but in light of the total loss of office space this obligation takes on a greater significance, and is necessary in order to partially offset some of the detraction of the proposed use from the primary business function of the City.
- 5.4. It is therefore a highly material and relevant that these details are not left for later submission via section 106 obligations, and that they are fully considered prior to determination of the application.

6. Conclusions

- 6.1. Far from recognising the nationally and internationally significant office function of the City, the proposal detracts from the primary business function of the City and leads to a net loss of office floorspace.
- 6.2. The application contains no element of office use and no alternative provision of equivalent or net additional space as required by Policy SD4 of the London Plan 2021.
- 6.3. The proposals for providing and securing public access fall far short of that required to meet the level of benefit require to outweigh the 'less than substantial harm'.
- 6.4. The loss of office space, together with the severely limited opportunities for public access and enjoyment, would result in a use that effectively isolates this historic building from commercial or cultural integration with the Thames, London and Londoners.
- 6.5. The harm occasioned by the loss of office space, and the lack of full permanent public access to the quayside, cannot be outweighed by the minimal public benefits of this scheme.
- 6.6. The policy non-compliance of this application, coupled with the inadequate supporting information and public access proposals, are fatal to this scheme, and it should be refused.

Yours faithfully

A solid black rectangular box redacting the signature of Davitt Jones Bould.

Davitt Jones Bould

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mr Andrew Wells

Address: Brookside Cottage, Mill Lane Corston Malmesbury

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Dear Ms Williams

As a former director of a company owning a unique small Grade I building of 1780, near the Custom House and open by appointment to the public, I object to the proposals to convert the Custom House. The external integrity of this important Grade I building, the creation of Laing and Smirke two of the leading architects of their day, will be badly compromised. I will not go into detail since this has already been covered extensively by many other objectors, and particularly by

SAVE and the Georgian Group, which I support wholeheartedly.

There is less and less evidence along the riverfront of the heyday of London as a great international port and centre of the shipbuilding industry from the 16th to the 19th centuries. What remains is being dwarfed and largely eclipsed by the tall office buildings and luxury and other extensive housing developments of recent decades. I will only emphasise a few of my concerns. The Custom House is a cultural and historic beacon on the north bank and I consider its exterior should not be altered as proposed, especially with the addition of unsympathetic glazed pavilions on the roofs of the two wings. No justification is made for any benefit these would add from an architectural or historic point of view. While I agree that the riverside terrace proposals are an improvement as a space to be enjoyed by the public, there is no convincing evidence that the building itself will be available for the broad education and enjoyment of visitors. The internal proposals will largely obliterate the grandeur of the early 19th-century design which has survived through various changes of use since it was built.

The Custom House has outlived two world wars, despite the blitz damage, and many more recent buildings in the City. I would encourage the Corporation to re-examine the proposals to ensure that it remains a monument to a period in history on which so much of the City of London's success is based.

Yours sincerely

Andrew Wells

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Sarah Lambirth

Address: 32 Long Street Devizes Devizes

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Desecration of an important piece of architectural history. Quite shocking that such vandalism could be even contemplated. Enough hotels in London already and better if they are purpose built in the outskirts rather than wrecking existing buildings. The removal of war memorials is also a very sad idea which runs counter to all common sense and decency. Some other use should be found for this building which does not sacrifice its character. If it could be done with Somerset House, then it can be done here.

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mr Andrew Lambirth

Address: 32 Long Street Devizes

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This great building deserves to be preserved as part of our cultural heritage with rights of public access. It used to contain a Smuggling Museum and the public could visit the principal rooms of the Custom House. This should be possible again. Why must a splendid building such as this be reduced to a crass commercial statement in the form of a hotel and lose its historic identity and even the integrity of its river facade? It is also essential that access is made once again possible to the building's river terrace that traditionally has been such a popular feature. Why

cannot this important building become a treasured part of the cultural fabric of our capital city, used for a variety of purposes, its celebrated architecture and fabric treated with proper respect? London needs its fine buildings and the Custom House is clearly a great resource. It should be treated as such and cherished.

From: [William, Sonia](#)
To: [DL - Customers](#)
Subject: FW: OBJECTION
Date: 06 April 2021 15:16:02

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

From: [jimmie.gilmore](#)
Sent: 06 April 2021 17:42
To: 'William, Sonia' <Sonia.Williams@cityoflondon.gov.uk>
Cc: Miss. Alastair <Alastair.Mason@cityoflondon.gov.uk>
Subject: OBJECTION

Dear Ms Williams,

Re: Planning Applications 20/00632/L/BC and 20/00631/FUL/MAJ

I would like to register my objections to the proposed redevelopment of Custom House, Lower Thames Street, EC3R 6EE.

It is a building of national historic significance and should be sympathetically restored and put back to public use for all Londoners.

Having worked in Somerset House and lately Custom House, I have seen first hand what can be done with a national historic building converted for public use.

I urge you to consider an alternative proposal.

Yours sincerely,

Jimmie Gilmore
16, Berkeley Close, Abbots Langley, Hertfordshire, WD5 0XA

Begum, Shupi

From: Ed Worthy [REDACTED]
Sent: 09 October 2020 11:56
To: PLN - Comments
Subject: Custom House

Reference: [20/00631](#)/FULMAJ;
[20/00632](#)/LBC:

I live around the corner from this development and have just seen the planning application for Custom House. My main concern is accessibility to local residents. It only seems to have the front area as public, whereas the hotel and rooftop seem to be private. Who is submitting the application? This is at the bottom of my road so I'm concerned about it being done improperly.

My address is Flat 23, 31 Monument Street, EC3R 8BT.

Kind regards,

Edward Worthy

From: [Edward Worthy](#)
To: [PLN - Comments](#)
Subject: Re: Application Consultation (20/00632/LBC)
Date: 13 July 2021 12:18:07

THIS IS AN EXTERNAL EMAIL

This looks good to me, I withdraw any prior objections I had and am in support of this development.

Kind regards,

Edward Worthy

On Tue, 13 Jul 2021 at 12:13, <PLNComments@cityoflondon.gov.uk> wrote:

Dear Sir/Madam

Please see attached consultation letter for planning application 20/00632/LBC (Custom House [20 Lower Thames Street](#) & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE).

Kind Regards

Planning Administration
Department of the Built Environment
City of London

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail.

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

Ms Sonia Williams
Department of the Built Environment
City of London Corporation

Our Ref: 11935.00001/YPW

Your Ref: 20/00631/FULMAJ & 20/00632/LBCJ

Date: 2 August 2021

By email only:
sonia.williams@cityoflondon.gov.uk

Dear Ms Williams

**Objection to Planning Application 20/00631/FULMAJ & 20/00632/LBC – Representations on Updated Application Material
Custom House – Proposed Change of Use from Office to Hotel-led Mixed Use Development**

We act for Tony Matharu, Chairman of Integrity International Group and former Managing Director of Grange Hotels. He remains a director of Globalgrange Ltd, the parent company of the brand Grange Hotels.

It should be noted that our client has no interest, or connection with the application, despite the apparent attempts to relate Grange Hotels or Globalgrange Ltd - and derivatives of the same - to GEM London, by the use of the name Globalgrange Hotels Limited by one of the Applicants. We note that name has since been changed to Globalgem Hotels Limited. The distinction is significant for reasons that will become clear below.

This representation is in response to additional material that has been submitted by the Applicant, and two changes to the proposed development:

1. A new “museum” in the ground floor of the original western wing with a café -this is effectively a café and not a museum;
2. Amendment of the Cultural and Community Strategy, developed with the operator, GEM Hotels, detailing measures to preserve and promote the historical significance of Custom House.

Our client upholds his objection to the application on the basis that the further measures proposed still do not remedy the material conflicts with the aims of local and national planning policy.

Further, the additions of the museum and revised Cultural and Community Strategy above fall short of adequately protecting and promoting this valuable heritage asset, and their operation and maintenance will be delegated to an inexperienced operator (GEM) without absolutely no track record of safeguarding cultural heritage.

1. Museum

- 1.1. The addition of the museum was only at the request of the City – clearly indicating that the application had failed to properly appreciate and protect the cultural and historical significance of this building and its local area.
- 1.2. The museum proposal, (while a welcome feature), appears to be a cosmetic change only. Because of the lack of detail regarding its content, operation and maintenance, it is essentially a café, described as a ‘museum with café’. The revised Cultural and Community Strategy dated May 2021 dedicates 5 pages to the purported museum, 2 of which are entirely images, and is insufficiently detailed to give any clarity or certainty about delivery of the museum, or the standard to which it must be delivered.
- 1.3. This feature is too critical to the impact on this listed building to be left to negotiation in the section 106 agreement. Yet the most important elements of the proposals are left to be deferred to later stages away from the scrutiny of public consultation. For example, in order to be acceptable in planning terms the Strategy should clearly state:
 - 1.3.1. The criteria for the selection of the ‘Heritage Partner’, such as demonstrable experience of a similar project and track-record of delivery;
 - 1.3.2. A timeframe within which the museum must be established and a restriction on occupancy of the hotel until the museum is operational to the satisfaction of the City;
 - 1.3.3. Details of monitoring, enforcement and accountability measures;
 - 1.3.4. Method for securing the delivery of the museum in perpetuity, such as restrictive covenant;
 - 1.3.5. Binding operational obligations to provide the museum as a museum and not a café – and to guarantee its primary use as a museum open to the public free of charge to be upheld at all times.
- 1.4. The Draft Heads of Terms of the Section 106 Agreement have not been updated to reflect the revised Strategy, and therefore the obligation with respect to the Strategy remains as:

“No later than three (3) months before the projected Opening Date, to submit a Culture and Community Strategy for approval by the City (such approval not to be unreasonably withheld or delayed).”
- 1.5. There is nothing in this obligation which binds the Applicant to submit the May 2021 Strategy, and therefore it is entirely possible that the version which is submitted for approval under the Section 106 Agreement may not even contain the museum proposal at all.
- 1.6. The museum is clearly a critical addition to the development in order to preserve the cultural and historic significance of the building, or it would not have been required by the City.
- 1.7. Now, having required it, the City and the Applicant have a duty to see that the museum will be delivered, and maintained, throughout the life of the development. In the absence of better security of that compliance, the obligation to provide the museum is manifestly unfit for purpose.

- 1.8. The Catch-22 of the museum however, is the impact that it will have on the viability of the project. The application is trying to have its cake and eat it. The Viability Assessment Addendum Part 1A dated June 2021 concludes at page 18 that (emphasis added):

*“The City requested that a museum be incorporated into the ground floor of the hotel scheme and on the basis that there was a positive margin between the hotel scheme and the Benchmark, the applicant has now included a museum to the north west of the Western wing of the building. This scheme has now been submitted as an amendment to the application scheme. The appraisal of this scheme shows that the inclusion of a museum, requiring the loss of 4 hotel bedrooms and the inclusion of an additional lift, **depresses the value of the application scheme to a level just above the Benchmark Land Value**, concluding that the amended application scheme is viable. **There is however little margin between the amended application scheme and the Benchmark Land Value** which confirms that the museum space provided in the ‘amended planning application scheme’ is the largest space that can be viably offered as part of the hotel scheme.”*

- 1.9. With such tight margins on viability with the museum included in the scheme there is clearly a risk that this is an obligation that could be revised in the future should the operator decide it is impacting on viability.
- 1.10. An operator which is inexperienced in providing this niche facility (such as the newly incorporated GEM) is unlikely to be able to balance this fine margin, which would lead to an unacceptable risk to the delivery of the heritage benefits of the proposals, if they are in fact a true long term intention and properly secured as such by the Section 106 Agreement.
- 1.11. It is therefore essential that the application demonstrates robust measures to guarantee and safeguard the deliverability of the museum and ensure it is not ‘sacrificed’ for viability reasons. However it clearly cannot be established that the development is viable with comfortable margins with the inclusion of the museum and therefore the application should be refused for lack of deliverability of this vital feature.

2. Cultural and Community Strategy

- 2.1. The Cultural and Community Strategy is a high-level, aspirational outline of general measures. It is a re-packaging of previous information, with the addition of the museum section. It still falls very significantly short of the level of detail that should be demonstrated for the preservation and protection of a listed building of this significance and in this location.
- 2.2. The safeguarding of public access and restoration of active frontage on the Thames is essential to delivering the public benefits that are required by Historic England, but the same very significant shortcomings of the application persist in this regard and have not been addressed by the Cultural and Community Strategy – it is still very heavily caveated with the potential for severe and discretionary restrictions on accessibility and enjoyment of the proposed development by members of the public.
- 2.3. In this context, where so many of the measures for cultural heritage and public access protection cascade down to the operator, the credibility and identity of the operator is an important factor in ensuring the objectives of the Strategy will be delivered properly.
- 2.4. The Statement of Community Engagement dated May 2021 noted that the identity of the hotel operator was a recurrent query of participants in the consultation. However, the proposals still do not provide adequate detail about the experience, track record and accountability of the currently selected operator, GEM, the identity of which is opaque. The

pre-application consultation process therefore appears to have been misleading at best because nothing more than statements of assurance have been provided to support the assertion that the operator is appropriately resourced and experienced. Insufficient information was provided to participants in this regard and therefore they were not able to give meaningful feedback on the museum proposals and how it would be operated.

- 2.5. In addition, GEM has no interest in the application land, and therefore does not need to be a party to the section 106 agreement. All of the measures with respect to the museum, public access and future use are supposed to be enforced by them, but there is a clear gap for the City in the chain of enforcement between the owner and the operator if the operator is not a party, irrespective of the credibility and identity of that party. As mentioned above, the Draft Heads of Terms for the Section 106 Agreement currently do not even have the effect of mandating the inclusion of the museum in the ultimate Strategy that is presented to the City for approval.
- 2.6. GEM is also meant to be responsible, via the funding of a Culture and Community Events Officer (“CCE Officer”), for the monitoring (section 6.4) and annual reporting (section 6.5) of the Cultural and Community Strategy.
- 2.7. The Draft Section 106 Heads of Terms require that the CCE Officer prepare and submit annual reports to a Culture and Community Committee. However the contents of the report (as stipulated by the Draft Heads of Terms) are effectively just a tally of events that have been held in the preceding 12 months.
- 2.8. The annual report of the CCE Officer is not required to contain any qualitative or quantitative targets for types of events or visitor numbers, there are no outcomes or performance measures, and there are no sanctions for under-utilisation, simply the ability for the Committee to “recommend to the Owner (from time to time) changes to the approved Culture and Community Strategy that it reasonably considers would enhance achievement of the Objectives”.
- 2.9. The Draft Heads of Terms have also not been updated to reflect the inclusion of the museum and therefore there is no requirement to include monitoring or reporting on it in the annual report.
- 2.10. Finally, the Draft Section 106 Heads of Terms only require the Culture and Community Committee to be constituted for **5 years** from the date it is first established. In addition, it is only first established if the first meeting is quorate – and there is no mechanism which compels the Applicant to actually hold the first meeting.
- 2.11. Assuming the Committee is ever established, the CCE Officer will essentially be unaccountable after five years.
- 2.12. Moreover, and very importantly, by the Applicant’s own admission the CCE Officer will only be part of a large events team. That is: the proposed scheme is including a café and events spaces, whereby the ‘Museum’ is merely an integral part of the hotel’s food and beverage operations as a café, and the events management, responsible for private, managed business and informal events as stated will be in reality be in control of the hotel’s large events team. Events and use of this entire accommodation, including on request “pre-arranged” tours will be at the “Hotel Manager’s discretion”. The operator, via the CCE Officer, will be unaccountable for this change of use after 5 years. This is far from the guarantees promised.

- 2.13. When viewed in the context of the vague and temporary Section 106 obligations, it becomes apparent that the Culture and Community Strategy is entirely without teeth or substance. The application cannot satisfy planning policy requirements to protect, preserve and promote the cultural and historic significance of the building.

3. Other Grounds of Objection

The further submissions make no attempt to address the other material planning consideration which weigh against the proposals, and which should, on balance, be viewed together with the above as an overall failure of the development to demonstrate this it is acceptable in planning terms:

- 3.1. Loss of office space - no element of office use and no alternative provision of equivalent or net additional space as required by Policy SD4. The current desire is for cellular structure offices with windows and natural ventilation – exactly what Custom House provides;
- 3.2. Lack of security and certainty of delivery of public benefits by the opaque operator;
- 3.3. Failure to provide free access and public right of way along the riverfront at all times, such as the nearby route along the frontage of Riverbank House and the Nomura building at Swan Lane. Leaving such important and fundamental matters to the hotel manager’s discretion – is not acceptable;
- 3.4. Failure to guarantee or to contribute to the greening of London by including urban greening as a fundamental element of site and building design, particularly in the context of the July 2021 revisions to the National Planning Policy Framework;
- 3.5. Failure to provide local employment, skills development and training opportunities in order to partially offset some of the detraction of the proposed use from the primary business function of the City;
- 3.6. Failure to provide for all of these matters in full detail at application stage. These important matters should not be deferred for negotiation via section 106 obligations, and risk their dilution.

Yours faithfully



Davitt Jones Bould



To whom it may concern

Re: Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE
Listed Building Consent reference: 20/00632/LBC
Full Planning Permission reference: 20/00631/FULMAJ

We have written previously expressing our objection to the conversion of the Grade I listed Custom House into a hotel. The Custom House is an asset of national importance, and the impacts of any proposed development must be assessed with this in mind.

Together with Somerset House, The Custom House is one of the oldest purpose-built office buildings in the London and as such, should be considered as having the highest significance. Within the West Wing, the proposed changes and creation of hotel rooms and bathrooms will result in the loss of the original layout of the office spaces resulting in significant harm to the building.

The proposed change of use (Use Class E) to a hotel (Use Class C1) will restrict the access of the internal spaces to hotel guests only, for example the Long Room on the first floor, and will not deliver the public benefits that would outweigh the harm or loss to the building. We would maintain that the harm caused to the building by the proposed alterations and its conversion into a hotel will not provide the required substantial public benefits required by Paragraph 202 of the NPPF-July 2021.

Externally, the proposals include the addition of two glazed pavilions which will be visible from the riverside of the building and seriously despoil the external aspect of the building, resulting in substantial harm to the asset. Paragraph 199 of the NPPF-July 2021 applies.

We do not consider that the proposals for managed public access to the terrace meet the objectives of the City of London Corporation as outlined in Riverside Walk Enhancement Strategy which proposes that *'the opportunity should be explored to bring the private forecourt entirely or in part (thus retaining some access for servicing) into public use, thus creating a continuous string of spaces for public use from Montague House to Sugar Quay.'*

The Committee remains of the opinion that the applicant has failed to appreciate the significance of the Custom House building as a nationally listed Grade I building in a World Heritage Site setting, as required by Paragraph 206 of the NPPF-July 2021.

Therefore, in view of the requirements of NPPF-July 2021 paragraphs 199 & 202, the Committee requests that Listed Building and Full Planning consents be refused on the grounds of the harm it would cause to this designated historic asset.

We further recommend that the City of London consider the establishment of a public consultation process to reconsider the proposed conversion of Custom House into a hotel and to consider other alternative uses for such an iconic building.

Vicki Fox (Hon. Secretary)

LAMAS – Historic Buildings & Conservation Committee 20 September 2021

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office to a hotel with ground floor internal north/south public route (sui generis), ground floor museum (Use Class F1 (c)), flexible ground floor and rooftop retail/restaurant/bar floorspace and public viewing terrace (Use Classes E and Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Use Class E) and new riverfront public realm including: External works: i.) removal of railings around existing riverside carpark, ii) demolition and re-building behind the retained facade of the 1960s East Block iii.) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions; iv.) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block (south elevation); v.) alterations to and raising of the flood defence wall; vi) facade alterations and associated works to create a first floor terrace on the Centre Block (south elevation) and reinstated door and new ramped access to West Block (west elevation); vii) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street viii.) associated works to the river wall ix) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) removal of 1990s glazed stair core and parapets, roofing over and reconfiguration of West Block courtyard, to include new service core and other works; ii) demolition and alteration of some existing walls and ceilings and erection of new across all floors in the West and Centre Blocks.|cr|

Case Officer: Jessica Robinson

Customer Details

Name: Miss Eileen Spencer

Address: 63 Broseley Grove Sydenham London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I object to the Customs House being developed as described. I believe it should be used in a similar manner to Somerset House and that the riverwalk way should not be blocked from public use.

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

Address: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office to a hotel with ground floor internal north/south public route (sui generis), ground floor museum (Use Class F1 (c)), flexible ground floor and rooftop retail/restaurant/bar floorspace and public viewing terrace (Use Classes E and Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Use Class E) and new riverfront public realm including: External works: i.) removal of railings around existing riverside carpark, ii) demolition and re-building behind the retained facade of the 1960s East Block iii.) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions; iv.) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block (south elevation); v.) alterations to and raising of the flood defence wall; vi) facade alterations and associated works to create a first floor terrace on the Centre Block (south elevation) and reinstated door and new ramped access to West Block (west elevation); vii) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street viii.) associated works to the river wall ix) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) removal of 1990s glazed stair core and parapets, roofing over and reconfiguration of West Block courtyard, to include new service core and other works; ii) demolition and alteration of some existing walls and ceilings and erection of new across all floors in the West and Centre Blocks.|cr|

Case Officer: Jessica Robinson

Customer Details

Name: Miss Kathleen Spencer

Address: 63 Broseley Grove Sydenham London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to the Customs House being re-developed as described. Too many of the old London buildings are being destroyed and redeveloped. Is it really necessary to have yet another luxury hotel in London? The riverside walk should not be kept open for public access.

Agenda Item 5

Committee:	Date:
Planning and Transportation	26 October 2021
Subject: 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. 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.	Public
Ward: Castle Baynard	For Decision
Registered No: 21/00538/FULEIA	Registered on: 21 June 2021
Conservation Area: Fleet Street	Listed Building: No

Summary

For information: this report includes an application for planning permission (21/00538/FULEIA) and an application for Listed Building Consent (21/00524/LBC). See the separate report for recommendations and conditions in respect of the Listed Building Consent application.

Planning permission is sought for: 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. 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.

Listed building consent is sought for: 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, demolition of level 06 landing and extension to existing oval staircase to provide access to new roof with new core on north side incorporating new lift between roof top level and basement level 01, installation of new staircase between rooftop level and basement level 02, demolition of mezzanine at basement level 01, removal of internal partitions and associated works.

The proposed development is for an office-led scheme comprising ground and 20 upper storeys which includes demolition of the existing building comprising Rivercourt building at 120 Fleet Street, including part demolition of the basement and construction of a new building arranged over two basement levels, ground floor plus 20 upper storeys comprising commercial, business and service use (Class E), alterations to and refurbishment of the existing Grade II* listed Daily Express building at 120 Fleet Street which include works to physically detach the building from the River Court building, creation of publicly accessible roof garden and change of use and public realm and highway works including the creation of new pedestrian routes through the site at ground floor level.

The gross floor area would be 78,456sq.m GIA comprising:

2,368sq.m Commercial, Business and Service Use (Class E)
2,051sq.m Retail Use (Class E (a), (b) and (c))
61,135sq.m Office Use (Class E)
1,331sq.m Learning and non-residential institutions Use (Class F1)
429sq.m Flexible learning and non-residential institutions use / retail purposes / bar (Use Classes F1/E (a), (b), (c) and Sui Generis)
2,776sq.m Flexible learning and non-residential institutions use / commercial, business and service use (Classes F1/E)
8,366sq.m Plant, BOH and Storage

An Environmental Statement accompanies the scheme.

The scheme delivers a high quality, commercial building within the City, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. The scheme features a number of attractive features including greening, new roof terraces, cycle house parking facilities and new routes. It provides a significant increase in office and retail floorspace meeting primary objectives of the City's Local Plan and London Plan policies. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers.

The buildings would be designed to high sustainability standards, exceeding GLA and Local Plan policies in terms of operational and embodied carbon emission reduction and targeting a BREEAM rating of "Outstanding" for the new building.

The development includes a well-considered and innovative approach to integrating green infrastructure and urban greening both within the public realm and on all the building's terraces, significantly increasing the biodiversity on site that would contribute to improvements of the wider area.

The scheme delivers significant public realm enhancements, including generously proportioned accessible new east-west public routes through the site, connecting Shoe Lane with St Bride.

Objections have been received from Historic England, Twentieth Century Society, City of London Conservation Area Advisory Committee and London and Middlesex Archaeological Society (LAMAS).

23 Letters of objection have been received from local residents, objecting on the grounds of heritage, bulk and massing, loss of daylight and sunlight, noise and other various issues detailed in the consultation section of this report.

A letter of support has been received from Landsec.

Objections have been received from statutory consultees and third parties, relating to the design of the development; its impact on designated and non-designated heritage assets; the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and the S106 Agreement.

The scheme benefits from high levels of public transport accessibility, would be car-free (other than disabled parking spaces and parking for operational vehicles) and would promote cycling and walking as healthy modes of travel. The provision of a cycle house is welcome as an innovative way to meet short stay cycle parking requirements while maintaining a high-quality public realm.

There are a small number of major and moderate adverse impacts, on flats at 5 & 6 Poppins Court. Where there are moderate or major adverse impacts, retained levels of VSC and NSL are appropriate to the local context. As such the extent of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. When considered against the wider benefits of the scheme, including the significant public benefits and new routes through the site, these impacts are considered to be acceptable.

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 would minimise any adverse impacts.

It is considered that the proposal would preserve the special architectural and historic interest and heritage significance to all heritage assets as listed in this report.

It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-compliance with planning policies. In arriving at a decision, it is necessary to have regard to all the policies in the development 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 heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraph 202 of the NPPF. As a result, if a proposal results in any harm to the significance of a heritage asset it will result in conflict with the heritage policies. The application proposals conflict with London Plan policy HC1 and with Local Plan policies CS12, and DM12.1. Whilst in this case, the proposals are in compliance with a number of policies, conflict has also been identified with a number of other development plan policies as outlined above in this conclusion. It is the view of officers that taken as whole the proposal does not comply with the development plan as a whole.

The LPA must determine the application in accordance with the development plan unless other material consideration indicate otherwise. 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, and the other material considerations which do not support the proposal. Other material considerations are set out below.

Paragraph 10 of the NPPF sets out that there is a presumption in favour of sustainable development.

As set out in paragraph 199 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 200, that any harm should require clear and convincing justification. The weight to be given to a designated heritage assets conservation should increase with its importance.

The NPPF, paragraph 202, requires that harm be balanced against the public benefits. The paragraph 202 NPPF balancing exercise is also to be applied when considering the harm to non-designated heritage assets, designated heritage assets and impacts on the Fleet Conservation Area and processional routes within St Paul's Conservation Area. That balancing exercise is set out in the body of this report. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the setting of listed buildings and to the desirability of preserving or enhancing the character or appearance of the conservation areas, the identified harm to the significance of the designated heritage assets is outweighed by the public interest benefits associated with the proposed development. That is the case whether harm to the significance of the designated heritage assets affected is considered cumulatively or on an

asset by asset basis.

This means that notwithstanding the conflict with the heritage policies within the development plan, the NPPF would not support the refusal of this application for planning permission on heritage grounds.

The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.

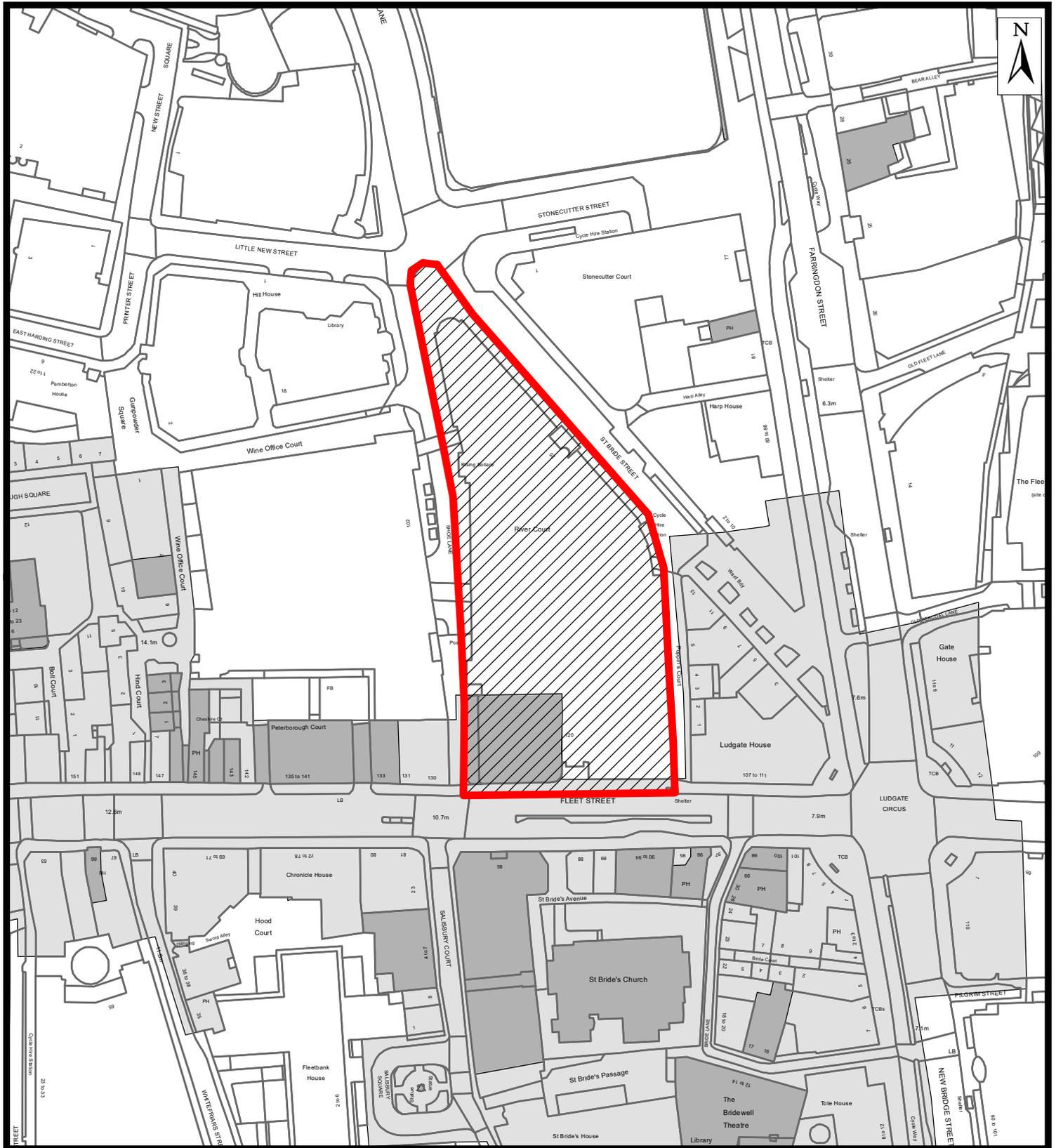
Taking all material matters into consideration, officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan and other material considerations which weigh against the grant of planning permission. Benefits include: Rejuvenation of the Grade II* Daily Express Building as a publicly accessible cultural destination, with complementary uses and a landscaped public roof garden, an improved public realm including new pedestrian routes through the site and increased pavement widening on Fleet Street which improves pedestrian movement and comfort, increased active ground floor frontages providing flexible retail, promotion of active travel through the delivery of a prominently located Cycle House, contributions towards further public realm improvement works to St Bride Street secured through the S278 agreement, use of off-site consolidation centres to minimise vehicle movements, delivery of a Cultural Implementation Strategy which would provide details on how further consultation and delivery plans would be adopted which is secured via a S106 agreement, delivery of an exemplar new office building demonstrating high sustainability credentials, high standards of architecture and design which provides high quality internal and external environments which embed health and wellbeing through the provision of unique south facing landscaped external amenity terraces for office occupiers.

The proposed development represents sustainable development. Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied.

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) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);
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 agreement under Section 278 of the Highway Act 1980.
3. That the accompanying application for listed building consent is granted (Reference: 21/00524/LBC).
4. That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

Site Location Plan



© Crown copyright and database rights 2021 OS 100023243

ADDRESS:
120 Fleet Street

CASE No.
21/00538/FULEIA

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





Image 1: View of existing listed Daily Express Building and Rivercourt southern elevation's, fronting Fleet Street



Image 2: View looking south from St Bride Street, with the existing Rivercourt building on the right



Image 3: View looking south from halfway down St Bride Street With the existing River Court building and Poppins Court on the right and Ludgate Circus in the distance



Image 4: View looking south from Shoe Lane, with the Listed Daily Express building to the left and Fleet Street in the distance



Image 5: Shoe Lane looking south

Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by the EIA Regulations require the local planning authority to undertake the following steps:
 - a) To examine the environmental information
 - b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
 - c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters referred to in the previous paragraph. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.
5. Representations made by any person about the environmental effects of the development also form part of the environmental information to be considered and taken into account by your Committee.
6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.

Site and surroundings

The Site

7. The site lies on the north side of Fleet Street, located between St Bride Street and Shoe Lane. The site is bounded by Fleet Street to the south, Shoe Lane to the west, St Bride Street to the east and the junction of Shoe Lane, St Bride Street, Stonecutter Street and Little New Street to the north.
8. The site comprises of two adjoining buildings, The Grade II* Listed Daily Express Building and Rivercourt. The Daily Express building is located in the Fleet Street Conservation Area.
9. The site is located within the London Central Activities Zone (CAZ).
10. Fleet Street is designated as a Principal Shopping Centre (PSC) in the Local Plan and a District Centre in the London Plan.
11. The northern half of the site is located within the Background Wider Setting Consultation Area for the London View Management Framework Protected Vista 5A.2 from Greenwich Park to St Paul's Cathedral, which cuts diagonally across the site.
12. Fleet Street is designated as a Local Distributor Road and a Strategic Cycle Route in the Local Plan.

Existing Buildings

13. The site is currently occupied by two adjoining buildings, one of which is listed.

The Daily Express Building

14. The Daily Express Building is a Grade II* Listed Building, constructed in 1932. The building is located on the south west side of Rivercourt, which wraps around the building.
15. The building has undergone various alterations since its original construction. The Daily Express were one of the last newspapers to leave Fleet Street in 1989, a subsequent failed redevelopment project left the building that previously joined the Daily Express Building to the north and east demolished and the Daily Express Building's concrete frame exposed for a number of years. The site was redeveloped in 2000 which included attaching the north and eastern sides of the Daily Express Building to the newly constructed Rivercourt Building. The building was occupied in their entirety as offices by Goldman Sachs, who vacated in March 2020.

Rivercourt

16. Rivercourt was constructed in 2000. The building wraps around the listed Daily Express buildings north and east facades and narrows to the north where it fronts the junction of Shoe Lane and St Bride Street. It is a commercial building set across two basement levels, ground,

upper ground and nine upper floors. There is a retail unit at ground floor level fronting Fleet Street and the remainder of the entire Rivercourt building is in office use, having recently been vacated by Goldman Sachs.

Surrounding Area

17. The area is identified in the London Plan as a specialised economic cluster within the Central Activities Zone (CAZ) with a strong legal character.
18. The predominant land use around the site is office accommodation with ground floor retail uses along Fleet Street, and a limited amount of residential uses. In the immediate vicinity of the site, to the south is Fleet Street, a royal and state ancient processional route that links the Palace of Westminster to St Paul's Cathedral. Fleet Street is a Conservation Area lined with a series of medium rise commercial buildings, several of which are Grade II listed. To the south of Fleet Street is Bride Lane, which contains residential units. 100m to the south of the development site lies the Salisbury Square City of London Police Headquarters and Courts scheme. To the east of the site is predominantly medium rise buildings including Ludgate House as well as residential units along Poppins Court. To the west of the site lies Peterborough Court, a Grade II listed 1920's office building. To the north and west of Peterborough Court are residential units within Wine Office Court.
19. St Paul's Cathedral (grade I) is located approximately 400m to the east of the site.
20. There are a number of listed buildings in relatively close proximity to the site, including:
 - 82 – 85 Fleet Street (Grade II);
 - 90 – 94 Fleet Street (Grade II);
 - The Old Bell Public House (Grade II);
 - The Punch Tavern and offices above (Grade II);
 - 2 – 7 Salisbury Court (Grade II);
 - Mersey House (Grade II);
 - The Daily Telegraph Building (Grade II);
 - St Bride's Church (Grade I); and
 - St Paul's Cathedral (Grade I).

Proposals

21. Planning permission is sought for (application reference 21/00538/FULEIA):

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.

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.

22. Listed building consent is sought for the following works to 120 Fleet Street (application reference 21/00524/LBC):

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, demolition of level 06 landing and extension to existing oval staircase to provide access to new roof with new core on north side incorporating new lift between roof top level and basement level 01, installation of new staircase between rooftop level and basement level 02, demolition of mezzanine at basement level 01, removal of internal partitions and associated works.

23. This report deals with the considerations for both applications.
24. The combined scheme provides 78,456sq.m GIA floorspace, comprising:
- 2,368sq.m of Commercial, Business & Service Use (Class E);
 - 2,051sq.m of Retail uses under Class E (a), (b) and (c);
 - 61,135sq.m of Office Use under Class E (g);
 - 1,331sq.m of Learning and non-residential institutions Use (Class F1);
 - 429sq.m of Flexible Learning and non-residential institutions Use/Retail purposes/Bar (Classes F1/E(a), (b), (c)/Sui Generis
 - 2,776sq.m of Flexible learning and non-residential institutions Use/Commercial, Business & Service Use (Classes F1/E); and
 - 8,366sq.m of Plant, Back of house and Storage

The proposed new building

25. The maximum height of the proposed development would be 83.60m AOD. The proposed new building would be an office-led, mixed use commercial building comprising of two basement levels, ground and 20 upper storeys. Retail and flexible commercial use space is proposed at

ground floor and offices are proposed on the upper levels 01 to 17. The top three levels (18-20) would house mechanical building plant.

26. South facing external amenity terraces accessible to the office occupiers are provided on levels 06 to 17. Basement level 01 contains retail floorspace and back of house ancillary storage, mechanical building plant, cycle parking and associated facilities. Basement level 02 comprises of mechanical building plant, a refuse store and a service yard with vehicle parking spaces accessed via vehicle lifts from Shoe Lane.
27. The proposed new building provides 73,187sq.m GIA floorspace, comprising:
 - 2,368sq.m Commercial, Business and service Use (Class E);
 - 1,926sq.m Retail Uses (Class E (a), (b) and (c));
 - 61,135sq.m Office use (Class E (g)); and
 - 7,758sq.m Plant, BOH and storage.
28. The proposed new building steps up from five storeys fronting Fleet Street to 21 storeys at the site's northern bullnose end. The proposed building is arranged architecturally as a series of layers of differing sizes, with each layer being a slightly different shape.
29. At ground floor, large retail units would be situated on the corners of the building, within the new arcade street north of the Daily Express Building and in the north at the bullnose with frontage onto Shoe Lane and St Bride Street. Smaller kiosk retail units are proposed along the south of the pedestrian passageway connecting the arcade street with St Bride Street.
30. A Cycle House is proposed on the north side of the new pedestrian passageway, with its principal entrance and frontage located on St Bride Street. The Cycle House would provide a front of house amenity dedicated to active travel for users of the building and local community. The Cycle House would provide access to the proposed new buildings cycle parking and facilities for the building occupiers. It would provide maintenance stations, a café/retail offer, valet parking for visitors and a concierge service for cargo cycles.
31. A large lobby occupies the ground floor with entrances fronting the new arcade street, Shoe Lane and St Bride Street. The lobby provides a connecting route to the retail unit to the north with the arcade street and Cycle House.
32. Basement 01 would provide retail floorspace adjacent to the site's southern boundary, back of house ancillary storage, mechanical building plant, cycle parking and associated facilities. Basement level 02 would comprise of mechanical building plant, refuse store and a service yard with vehicle parking spaces accessed by vehicle lifts from Shoe Lane.
33. Level 01 to 17 would provide Grade A Office workspace, in a wide range of sizes which are flexible and of high quality that promote health and well-being. The office space would have natural ventilation, access

to landscaped terraces and offer flexibility. The floorplates are adaptable and would accommodate new linkages between floors to suit tenant demands.

34. Landscaped, external, south facing amenity terraces are proposed at levels 06 to 17 which are accessible to office occupiers. The external terraces range in size and offer a comprehensive landscaping and greening strategy, incorporating robust green infrastructure.
35. A large biosolar roof would be integrated into the architecture at level 18. At level 05 there would be a biodiverse green roof terrace fronting Fleet Street.

The Daily Express Building (Grade II*)

36. Following demolition of River Court, it is proposed that the Daily Express Building would become a standalone building. It is proposed the building would be opened up to the public for the first time in its history and it is proposed to provide a landmark cultural destination for Fleet Street with a new publicly accessible roof garden.
37. The Daily Express Building will provide 5,269sq.m GIA of floorspace, comprising:
 - 125sq.m Retail use (Class E (a), (b) and (c));
 - 1,331sq.m Learning and non-residential institutions Use (Class F1);
 - 429sq.m Flexible learning and non-residential institutions use/retail/bar (Class F1/E(a), (b), (c)/Sui Generis);
 - 2,776sq.m Flexible learning and non-residential institutions use/commercial, business and service use (Class F1/E); and
 - 608sq.m Plant, BOH and storage.
38. The Daily Express Building is proposed to become a publicly accessible, cultural destination. A cultural plan is submitted with the planning application which sets out an evidence based cultural vision for the building's future.
39. New elevations would be installed on the northern and eastern façade and would take inspiration from the original elevations to the south and west.
40. The overall height of the Daily Express Building would increase from 39.8m to 42.7m, this is due to the lift overrun at rooftop level which provides inclusive access to the public roof garden, the overrun is set back from Fleet Street.
41. The interior curtains at ground floor level would be removed to reveal views of the Art Deco interior to the passing public. The Fleet Street entrance would be reinstated as the building's principal entrance.
42. A new retail unit would be introduced on the east elevation, fronting Fleet Street and the new Arcade Street and a second retail unit is proposed in the north west of the ground floor, with frontage on to Shoe Lane, located beneath the cantilever.
43. At roof top level, the modern roof installed in the 2000 redevelopment

would be replaced. The oval stair would continue up to rooftop level which forms part of the public route from the Art Deco ground floor lobby.

44. At Basement 01, there would be flexible event and exhibition space, providing seating for circa 200 people.
45. At ground floor level the lobby would be opened up allowing public free access to the historic Art Deco Foyer, which would house a rotating exhibition of local partners within the window vitrines.
46. Upper ground to level 04 would provide flexible, complimentary uses to the cultural destination within use class F1 and E.
47. Level 05 would house a café and bar space with additional creative industry and artisan shops and bookstores or newsagent.
48. Level 06 it is proposed that an exhibition space for photography, print, typography, artefacts and spoken performances would be housed here.
49. Rooftop level would provide a free, accessible rooftop amenity space allowing the public to access the roof with views of the west of the City, the processional route and St Paul's Cathedral.

Pedestrian Access

50. The proposed development looks to maximise pedestrian connectivity where possible, whilst maintaining the access, security and operational requirements needed for the new building.
51. The proposals include the creation of the new, activated pedestrian routes through the site at ground floor level, linking Shoe Lane to the west with St Brides Street to the east. A new link, lined with retail units would be provided between the two buildings, increasing the permeability of the site. These routes would improve the site's pedestrian permeability by facilitating east-west movements whilst avoiding Fleet Street and are integrated into the wider public realm development.

Car Parking

52. The proposal would remove the provision of car parking spaces at basement level and would be a car free proposal. The development provides provision for two Blue Badge parking space within the service yard at basement level.

Consultations

53. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders including consultation with statutory and non-statutory bodies including the GLA, TfL, Historic England, City of London Police, the Surveyor of the Fabric of St Paul's Cathedral and the 20th Century Society. Public consultation was carried out during a time when face to face interaction was not possible due to

COVID19, a consultation website featuring the proposal launched on 28th April 2021 until 14th May 2021.

54. Following receipt of the applications they have been advertised on site and in the press and have been consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letters and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the Officer's response is set out in the table below.
55. The views of other City of London departments have been taken into account in considering the scheme and detailed matters will be covered under conditions.
56. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

Consultation responses	
Historic England	<p>Historic England welcome the proposed works associated with the listed building and have no objection in principle to the redevelopment of the Rivercourt House. However, state that the proposed increase in scale will cause some (less than substantial) harm to the significance of designated heritage assets further afield and they believe this harm could be largely mitigated through a reduction in height of the proposed building.</p> <p>Historic England state that the proposals would enhance the significance of the Grade II* listed former Daily Express Building by detaching it from the large office development behind, and by providing it with a separate cultural use and associated public access. The public realm in this part of the City could also be much enhanced through the provision of new routes through the site and better connectivity.</p> <p>The scale of the proposed new building, however, means that it would have an impact on designated heritage assets further away. In particular, it would appear as a large element in the backdrop of Strand (WCC) and Temples (City of London) Conservation Areas when viewed from LVMF 16B.1, dominating the skyline of these historic areas and harming their significance. Based on the information submitted, Historic England believe this harm is in the middle of the less than substantial spectrum.</p> <p>Impacts such as these described here can progressively and fundamentally erode the character of conservation areas and the significance of nearby listed buildings, and it is important to recognise therefore that the harm identified above is a serious issue. Robust justification for any such harm is required under national planning</p>

	<p>policy.</p> <p>Historic England state that they have no objection in principle to the redevelopment of the existing Rivercourt House building and welcome the proposals for the Grade II* listed former Daily Express Building. They recognise the potential for a range of public benefits (including heritage enhancements and public realm improvements) resulting from the proposals and they note, however, that the proposed new building will result in an appreciable increase in scale here, which will have an impact on the settings of the conservation areas at Strand and Temples when viewed from Gabriel's Wharf. The significance of the historic environment when seen from this important river prospect is informed by a balance between low scale traditional buildings plus parkland and modern backdrop buildings. The visual balance is currently in favour of the foreground consisting of river, parkland and low scale buildings. The proposals would add a significant amount of new development on the skyline that would undermine that balance and cause harm.</p> <p>HE state that the harm would be in the middle of the less than substantial spectrum in the terms of the Framework, and would be contrary to the intent of the Framework's policies for the conservation of the significance of designated heritage assets, something to which great weight should be accorded (NPPF paragraphs 199, 200).</p> <p>Such harm requires clear and convincing justification and should be accepted only if the local authority concludes that there is such justification and that the harm would be outweighed by the public benefits the proposals would secure (NPPF paragraphs 200).</p> <p>Historic England state that a reduction in scale of the proposed Rivercourt House replacement building would mitigate the harm identified above and could also result in a less abrupt transition between the Grade II* listed former Daily Express building and the new development beyond. This would also enable a more appropriate balance between harm and public benefits.</p> <p>Response to comments: Consideration of the impacts identified in Historic England's response are contained in the following sections of this report: Heritage, Fleet Street Conservation Area, Temples Conservation Area and Designated Heritage Assets.</p>
<p>The Greater London Authority</p>	<p>The GLA are broadly supportive of the scheme and the principle of a proposed office-led redevelopment within the CAZ, delivering high quality office floorspace, new cultural floorspace and enhanced public realm.</p> <p>GLA officers consider that the proposal will improve the visual appearance and setting of a Grade II* listed building, deliver a new building of high architectural quality and provide improved public realm</p>

	<p>and permeability throughout and around the site. The proposal would not result in harm to the significance of heritage assets or impact upon locally important or strategic views.</p> <p>They welcome the car free development however have concerns with the relocation of bus stops during the construction period. They have requested a contribution towards the upgrade of the Cycle Hire Docking Station on St Bride Street. Furthermore, GLA officers have suggested conditions surrounding Sustainability and Environmental issues.</p>
Transport for London	<p>Transport for London confirms that the proposed cycle and car parking is acceptable and complies with the London Plan. They have requested a highways improvement plan be secured through the S.106 agreement and object to the relocation of the Bus Stop on Fleet Street to facilitate pit lanes.</p>
Natural England	<p>No objection</p>
Ancient Monument Society	<p>The Ancient Monument Society have no objection to the principle of redeveloping the 1990's River Court building and welcome the proposed separation of the Grade II* listed former Daily Express Building from the adjoining development and state that this is a positive outcome that will enhance both the significance and appearance of this important heritage asset.</p> <p>However, the AMS is deeply concerned about the substantial increase in the size and scale of the replacement building on the River Court site and the impact it would have on the settings of the Daily Express Building, the adjacent conservation areas, and wider views of the area.</p> <p>They state that the proposed building is designed as a series of stepped terraces increasing in height from 6 storeys at Fleet Street to its highest point at 21 storeys at the north end of the site. Whilst separate, the new building still surrounds and 'dwarfs' the Daily Express Building. The proposed context elevations (drawing PA-70-200) clearly show that a single building of this height that extends the full 140m length of this site is simply too big and out of context with the surrounding development and the adjacent conservation areas. The predominant built form around Fleet Street, including the existing building, is of much smaller individual building units, and this should be reflected in any redevelopment of the site. Likewise, the monotonous design of the ground floor level provides little in the way of interesting, active or distinctive street frontages that are needed to create a sense and distinctive sense of place as a continuation of the conservation area. It runs the risk of replicating the poor building/ pedestrian interface now experienced along much of Bisphosphate.</p> <p>AMS state that of particular concern is the way the proposed building</p>

	<p>intrudes into view 16B of St Paul’s Cathedral, Temple Gardens, St Bride’s Church and the Embankment, as identified in the London View Management Framework Supplementary Planning Guidance (March 2012). This part of London is characterised by low scale and traditional buildings and the significant intrusion of the proposal on the skyline that would cause considerable harm to this important vista across the River Thames and to the character of the conservation areas.</p> <p>They state that they do not believe that clear and convincing justification has been provided for this level of harm, nor is it outweighed by the benefits of the new pedestrian access around the Daily Express Building and upgrade to the surrounding laneways. They therefore recommend a reduction in height and scale of the replacement building, including articulation to the long side elevations to St Bride Street and Shoe Lane, in order to mitigate the harm caused to the Grade II* listed former Daily Express building, the adjacent conservation areas, and wider views of the area.</p> <p>Response to comments: Consideration of the impacts identified in Ancient Monument Society’s response are contained in the following sections of this report: Heritage and Designated Heritage Assets.</p>
<p>Twentieth Century Society</p>	<p>The Twentieth Century Society welcomes the proposals to facilitate the reuse of the Daily Express Building and has no objection in principle to the redevelopment of the neighbouring River Court Building.</p> <p>However, raises concerns that the proposed design for the new building will harm the setting of the Daily Express Building and considers the design to be too overbearing. Furthermore, they state that the proposal would harm the buildings setting and will have a detrimental impact on the nearby Fleet Street Conservation Area.</p> <p>Response to comments: Consideration of the impacts identified in Twentieth Century Society’s response are contained in the following sections of this report: Heritage and Designated Heritage Assets.</p>
<p>London and Middlesex Archaeological Society (LAMAS)</p>	<p>LAMAS endorse wholeheartedly the comments made by Historic England (HE) regarding the heritage impact of the proposed development. They state at 22 storeys, the maximum height of the new building comfortably exceeds anything else in the vicinity and therefore risks being overly intrusive and harmful to the settings of nearby Conservation Areas as well as other designated heritage assets. As the HE letter makes clear, such harm constitutes a serious issue. Similarly, the height of the new building relative to the Grade II* listed Daily Express Building would appear to be overly dominant and hence harmful to its setting, counteracting the benefits that could derive from the improved treatment of the rear of the listed building.</p>

	<p>LAMAS note the relevance of National Planning Policy Framework paragraph 196 regarding the weighing of less than substantial harm to the significance of a designated heritage asset against the public benefits of a proposal development and state that a less lofty design that seeks to emulate rather than exceed the heights of the existing buildings in the vicinity would cause less harm to the settings of the Daily Express Building and nearby Conservation Areas while delivering the key project aims of new, better quality office spaces and public realm. In this regard it is noteworthy that the Design and Access Statement speculates about the ‘post-pandemic workplace’ (page 22) yet fails to consider surely the most important change — the reduced demand and hence need for large offices.</p> <p>LAMAS has concerns regarding the environmental sustainability of the proposed development. They state that the embodied carbon represented by the already very large existing building is far from negligible and becomes an even more relevant consideration in the context of a climate emergency being declared by many public institutions. They note the goals of City of London’s recently adopted Climate Action Strategy include supporting the achievement of net zero for the Square Mile by 2040’; planning decisions would seem to have a key role to play in making this happen. Surely elements of the River Court building, constructed no more than 30 years ago, are capable of being creatively repurposed instead of the whole building being demolished in order to be replaced by in essence a larger version of the same structure.</p> <p>They conclude that the proposed demolition of River Court and its replacement by an even larger and taller office building would result in harm being caused to the settings of the Temples and Strand Conservation Areas, as well as to the nationally significant Daily Express Building. Furthermore, the proposed development comes across as out of step with the times when it comes to future working practices and the climate crisis. A scaled-down version of the scheme, such as proposed already by HE but perhaps also incorporating retained elements of the existing 1990s building, would deliver much the same benefits only to far less harmful effect and that planning permission therefore should not be granted for the development in its present form in order to stimulate the production of more environmentally-appropriate proposals.</p> <p>Response to comments: Consideration of the impacts identified in LAMAS response are contained in the following sections of this report: Heritage and Designated Heritage Assets.</p>
Environment Agency	No comments
Thames Water	Raised no objections and have provided conditions to be included
Lead Local Flood	Conditions are recommendation requiring details to ensure that sustainability, flood risk reduction and water runoff rates are improved.

Authority	
National Air Traffic Services (NATS)	The proposals do not conflict with the current safeguarding criteria and so there is no objection.
Heathrow Airport	The proposals do not conflict with the current safeguarding criteria and so there is no objection.
London City Airport	The proposals do not conflict with the current safeguarding criteria and so there is no objection.
Transport for London Crossrail Safeguarding	No comments
City of Westminster	No comments
Tower Hamlets	No comments
London Borough of Southwark	The London Borough of Southwark state that the proposal does not affect any of the LVMF views where Southwark Council is a statutory consultee. They acknowledge that the proposal is visible from certain locations on the Southbank including from the Oxo Tower and the Sea Containers part of the River Walk but does not affect the viewers ability to recognise and appreciate any of the strategic landmarks in these views. No objection is raised.
London Borough of Lambeth	The London Borough of Lambeth raise no objection to the development but would like to draw to the City's attention the potential impacts on the appreciate of view towards the City from Lambeth. They state that the proposal may appear in the backdrop of the spire of St Bride's Church from the east of the riverfront promenade and that the proposal is visible in locally designated views NE from The National Theatre terrace to St Pauls Cathedral. They state that the foreground skyline would be negatively impacts and that proposal would introduce a new, tall massing amongst the cluster of historic spires.
London Borough of Camden	Raises no objection.
Royal Borough of Greenwich	Raises no objection.
City of London Conservation Area Advisory Committee	The Committee had no objections to the change of use but objected strongly to the proposal considering it to be excessively large and out of proportion and denigrated the importance of the listed Daily Express building in the streetscape. The Members considered that the scale and style of the building was inappropriate in this location as it would be twice the height of the proposed Central Criminal Court building and that the proposed façade was incongruous in this location and would detrimentally affect the character and appearance of this Conservation Area.

	Response to comments: Consideration of the impacts identified in The City of London Conservation Area Advisory Committees response are contained in the following sections of this report: Heritage, Fleet Street Conservation Area, Temples Conservation Area and Designated Heritage Assets.
Landsec	Are supportive of the scheme which they consider would provide valuable regeneration benefits to the area of Fleet Street, the wider City of London and beyond.

57. A total of 26 representations have been received objecting to the application. The objections and the responses to these issues are summarised in the table below.

Letters of representation		
Representations received	Number	Response
Noise	19	Addressed in paragraphs 471 – 474
Heritage and massing	14	Addressed in paragraphs 110 – 320
Disturbance from terraces	14	Conditions are proposed which control the hours of use of the proposed amenity terraces and public roof terrace.
Overshadowing	13	Addressed in paragraphs 430 – 432
Loss of daylight	11	Addressed in paragraphs 387 – 423
Disturbance during construction	12	Addressed in paragraph 369
Pollution	12	Addressed in paragraph 456, 487 & 493
Detrimental to residential amenity	10	Addressed in paragraphs 370 – 521
Harm to the Fleet Street Conservation Area	7	Addressed in paragraphs 228 – 240
Anti-social behaviour	9	This would be addressed through the management plan secured through a S.106 agreement.
Effect on property prices/ability to rent	8	This is not a material planning consideration.
Close proximity to residential	6	Addressed in paragraphs 370 – 521
Harm to other nearby heritage assets	3	Addressed in paragraphs 110 – 320
Harm to Grade II* Listed Daily Express Building	1	Addressed in paragraphs 191 – 209
Detrimental to visual amenity	3	Addressed in paragraphs 110 – 320
Environmental impact of demolition	1	Addressed in paragraphs 471 – 474, 478 & 521

Inadequate active frontage	1	The proposed active frontage increases from the current building. An uplift of 1,068sqm Class E (a, b, c) retail uses is proposed with an enhanced retail presence directly onto Fleet Street as well as on surrounding streets including Shoe Lane, which is welcomed. In addition, 429sqm flexible Class F1/E (a,b,c/sui generis) provides scope for further retail floorspace to be delivered.
Health concerns	1	Addressed in paragraphs 475 – 479
Damage to neighbouring buildings	1	Addressed in paragraphs 110 – 320

58. Not all the representations above are material planning considerations. Those that are have been dealt with in this report.

Policy Context

59. The development plan consists of the London Plan 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
60. The City of London has prepared a draft plan which is a material consideration to be taken into account.
61. The draft City Plan 2036 was subject to pre-submission consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, between March and May 2021. As such, the draft City Plan is a material consideration in the determination of applications alongside the adopted Local Plan.
62. Government Guidance is contained in the National Planning Policy Framework (NPPF) 2021 and the Planning Practice Guidance (PPG) which is amended from time to time.
63. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

64. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, October 2021), Open Space Strategy (COL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Culture Mile Strategy (2018); Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.
65. In respect of sustainable development, the NPPF states that paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' At Paragraph 11(c) the NPPF states that for decision making this means 'approving development proposals that accord with an up-to-date development plan without delay'. Paragraph 11(d) of the NPPF is not engaged since the policies which are most important for determining the application are not out of date; rather they are up to date.
66. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
67. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
68. 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".
69. 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".
70. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that "The creation of high-quality buildings and places is fundamental to what the planning and development process

should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.

71. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.
72. Paragraph 134 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
73. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 155 states that new developments should increase the use and supply of renewable and low carbon energy and heat through measures including renewable and low carbon energy sources and identifying opportunities to draw energy supply from decentralised supply systems.
74. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. 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.
75. 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.”
76. 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”.

77. 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.”
78. 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. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable importance and weight should be given to the desirability of preserving or enhancing the character or appearance of the conservation area.
79. 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.”

Considerations

80. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
81. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

82. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
83. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).
84. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
85. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.
86. The principal issues in considering this application are:
 - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
 - The need for the proposed development.
 - The economic benefits
 - The appropriateness of the proposed uses.
 - The appropriateness of the bulk, massing and design of the proposals.
 - The impact on strategic views in the Local Views Management Framework and on local townscape views.
 - The impacts of the proposal on designated and non-designated heritage assets.
 - The impacts of the proposal on the Fleet Street Conservation Area.
 - The proposed public realm benefits and cultural offer.
 - The accessibility and inclusivity of the development.
 - Transport, servicing, cycle parking provision and impact on highways.
 - The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise, overlooking, daylight, sunlight and light pollution.
 - The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability.

Economic Issues and Strategic need for the development

87. The City of London is the world's leading international financial and professional services centre and a driver of the national economy, continually innovating and developing new business areas and flexible ways of working. The quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.
88. 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.
89. The London Plan 2021 recognises London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning.
90. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. London Plan Policy SD4 recognises the CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.
91. The City Plan 2036 Spatial Strategy states the City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK. Subsection 2 of the Spatial Strategy promotes the delivery of sustainable growth following the Covid-19 pandemic, including a minimum of 2 million metres squared net additional office floorspace, and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone. Subsection 3 promotes broadening the City's appeal by ensuring new office developments deliver healthy working environments and meet the needs of different types of businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses.

92. The London Plan projects future employment growth across London, projecting an increase in City employment of 116,000 between 2016 and 2035, a growth of 22%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
93. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
94. 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.
95. A total of 61,135sq.m GIA of high-quality office floorspace (Class E) is proposed across the two buildings. The existing office floorspace is 57,835sq.m GIA so there would be an uplift of 3,300sq.m GIA in office floorspace across the site.
96. Despite the short term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations and as outlined in the City of London document: London Recharged: Our Vision for London 2025.

Proposed uses

The proposed new building

97. The proposed new building has been designed to provide a flexible workplace-led mix of uses. The 20 storeys above ground would predominantly provide office use (Class E) with flexible retail use (Class E (a), (b) and (c)) and Cycle House (Class E) at ground floor level. The top three levels (18 to 20) would contain mechanical plant. South facing external terraces are provided on levels 06 to 17 for the amenity of office occupiers. Two new pedestrian routes are created, one external east to west passageway is provided at ground floor,

connecting Shoe Lane to St Bride Street and secondly, an internal north south route provided through the new building, connecting the retail unit at the northern bull nose to the new arcade street and east to west passageway.

Daily Express Building

98. The Daily Express Building is proposed to become a publicly accessible, cultural destination. A cultural plan is submitted with the application and a Cultural Implementation Strategy is secured via a S.106 agreement. The proposed uses provide flexibility that is required in the planning stage as it is acknowledged that the proposed cultural uses are indicative at this stage and subject to refinement as a viable cultural operator develops. The proposed indicative uses envisaged within the Daily Express Building include flexible mid-scale event and exhibition space, public access to the Art Deco Foyer, public exhibitions, flexible complimentary uses (Class F1/E), café and bar space and an accessible public roof garden.

Provision of Office Accommodation

99. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the London Plan.
100. The proposed development combined would provide 61,135sq.m GIA of office floorspace comprising well designed, flexible office accommodation in a sustainable building, further contributing to the nationally significant economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and emerging City Plan policy S4.
101. The office floors range in sizes and have been designed to fit future trends, the design maximises flexibility and allows for a multiple tenancy per floor. As a result of the building's form the floors vary in area, creating a diverse offer to suit the needs of different potential tenants. The offices have natural ventilation, access to nature and external amenity terraces are provide on levels 06 to 17, allowing for natural ventilation when the external conditions are right, an important element of post Covid workplaces. The terraces would provide high quality amenity space for City workers and would contribute to the urban greening of the building. The proposed office provision

addresses the needs of international business in accordance with Local Plan policy DM1.2 and emerging City Plan 2036 strategic policy S4 and policy OF1.

102. The office entrances are located on St Bride Street, Shoe Lane and the new arcade street. The St Bride Street elevation would include a Cycle House (Class E) at ground floor and basement 01 level. The improved office accommodation supports the aims of Local Plan Policy CS1: Offices 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 adopted and emerging Local Plan policies.

Retail Uses

103. The existing site contains one retail unit on Fleet Street that is in the former A1 use class, the unit is located within the Fleet Street Principal Shopping Centre (PSC). The existing total area of retail floor space is 983sq.m GIA.
104. The proposed scheme would provide 2,051sq.m of new retail Class E space, across six units at ground floor level, fronting Fleet Street, Shoe Lane, St Bride Street and the new east to west arcade street. There would be an uplift of 1,068sq.m GIA retail floorspace at ground floor level in the PSC.
105. Adopted Local Plan Policies CS20 and DM20.1 prioritise A1 uses within PSCs and seek to resist the loss of retail frontage and floorspace and aims to maintain at least 70% of retail frontage within a PSC in A1 use. The adopted Local Plan aims to maintain at least 70% of retail frontage within a PSC in A1 use. The proposal would accord with the requirements of Policies CS20 and DM20.1 of the Adopted Local Plan.
106. The emerging proposed Draft City Plan 2036 Strategic Policy S5 seeks to improve the quantity and quality of retailing and the retail environment, promoting the development of the City's four PSCs and the linkages between them. Policy RE1 seeks that the loss of ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complementary uses that increase footfall and provide active frontages.

Cycle House

107. The proposed new building would include a Cycle House, Class E use for use by the local community, workers and visitors. The Cycle House is accessed via St Bride Street and would include facilities for building occupiers, incorporating maintenance stations, a café/retail offer, valet parking for visitors and a concierge service dedicated to cyclists, including cargo bike delivery. The cycle house would be linked internally to the northern bullnose retail unit and lobby area. In total, the cycle house would be able to accommodate 234 bicycles, of which 85 would be short stay cycle spaces and 149 long stay cycle parking spaces. The proposed cycle house is in line with London Plan Policy T5, and DCP Policy W2 and W3. The provision and details of the cycle

house would be secured by S106 obligation.

108. The cycle house is an innovative concept, providing a dedicated internal space within the commercial building footprint for use by visitors to the two buildings and to the wider area, and within close proximity to two major cycleways. The area would provide secure cycle parking sheltered from the elements. A cycle house management plan will be secured by S106 obligation. In the plan, the applicant would be required to detail the arrival experience and how the hub would be highlighted as a public facility. The City's Strategic Transportation team will develop a common approach to signage and branding to identify cycle parking that is available for public use. It is expected that this signage would be used at this development and across the City on future developments to create a consistent, legible signpost for visitor cycle parking within private developments.

New Public Routes

109. Local Plan policies CS19 and DM19.1, draft City Plan 2036 policies S8(3 and 5), OS1, S14 and D3, London Plan Policy 7.18 and London Plan Policies D3, D8 and G4, seek to increase the quality, quantity and accessibility of public open space, including new streets and routes in places. This scheme provides an accessible north south route through the building, connecting the northern retail unit with the new arcade street and provides a new external east to west route through the site, connecting Shoe Lane with St Bride Street providing an alternative to using Fleet Street. The new route through would be open 24hours, 7 days a week with the applicant retaining the right to close the route periodically for maintenance and the purpose of retaining title ownership under law.

ARCHITECTURE AND URBAN DESIGN

Principle of a Tall Building

110. The proposal is defined a tall building under the adopted Local Plan (CS 14, para 3.14.1) and draft City Plan 2036 (S12(1), 75m AOD>) – as at its highest the building would be c.95m AOD. The current building is 58.75m AOD at its highest.
111. The part of the site containing the former grade II* listed Daily Express Building is in the Fleet Street Conservation Area, while a part of the remainder breaches the Wider Setting Consultation Area (Background) of the LVMF Protected Vista from Greenwich Park. Local Plan Policy CS 14 and City Plan Policy S12 deem such areas inappropriate for a tall building.
112. The listed former Daily Express Building is the only part of the site in a Conservation Area and is proposed to be physically detached from the tall building element, and so would not constitute a tall building in the Conservation Area – the tall building element would be outside a conservation area.
113. In relation to the LVMF impact from Greenwich Park, a breach of the Wider Setting Consultation Area (Background) of the Protected Vista is

subject to a qualitative, rather than a quantitative, judgment-based assessment of impact. For the reasons given at paragraphs 139 – 142, it is not considered the tall building element would injure the relevant view, according with relevant policies and associated guidance.

114. The proposal is opposite and nearby tall buildings, at Peterborough Court (c.75m AOD), the Deloitte Building (c.85m AOD) and at New Street Square (c.85m AOD). Given the exceptional breadth of the site, a contextual height is achieved via a cascading from c.95m AOD to a shoulder height of c.31m AOD on Fleet Street. For the reasons at paragraphs 228 – 240, it is considered that the proposal would preserve and enhance the character, appearance and significance of the Fleet Street Conservation Area.
115. It is considered that a tall building of this form is acceptable in principle, having regard for the criteria set out in CS 14(3) and S12(2-6), and the wider provisions of the Development Plan.

Design Approach:

116. It is considered the scheme would represent 'Good Growth' by-design, in accordance with the London Plan Good Growth objectives GG1-6, that is growth, which is socially, economically and environmentally inclusive. It would promote a high standard of design and sustainable buildings, streets and spaces, which are contextual and appropriate to character and surrounding amenities, making an effective use of limited land resource, in accordance with Core Strategic Local Plan Policy CS 10 (Design) and City Plan Policy Strategic Policy S8 (Design).
117. The scheme would comprise a commercial modern workplace-led mixed-use scheme, delivering a diverse mix of complementary retail and cultural uses of a composition, disposition and layout which would deliver a new dynamic and vibrant destination for Fleet Street, day and night, in accordance City's broader visions to deliver outstanding places and diverse ecosystems in 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021). It will be an essential ingredient in transforming the fortunes of Fleet Street as a 'Key Area of Change'.
118. The cultural transformation of the Daily Express Building into a new cultural landmark, not just for the City, but for London, would add an essential new ingredient facilitating the diversification of the wider offer on Fleet Street, adding further interest and vibrancy. Secured via section 106, the final cultural offer would have a social and educational outreach remit which is socially and economically inclusive, drawing in a wider audience and demographic to this part of the City, complementing and enabling and enriching that existing ecosystem of cultural provider around Fleet Street.
119. The height, bulk, form and massing, in accordance with CS 10, DM 10.1 and City Plan Policies S8 and DE2, would make an appropriate contextual response to a large island site, transitioning and mediating from a shoulder height response to the building line, prevailing grain,

scales and cornice datum of Fleet Street, while cascading in a dramatic and sublime manner from a summit at the northern end which is a response to the current and emerging heights in the vicinity of New Street Square. The new tall building would deliver a new signifier for Fleet Street, an attractive architectural landmark on the London riparian skyline.

120. A fundamental architectural 'move' is to detach the larger neighbour, River House, which over time subsumed and annexed the Daily Express Building, liberating and allowing the Daily Express Building a renewed integrity and freedom of expression. This will accentuate its presence as a key Fleet Street historical landmark. New (and re-used) work would be to match the distinctive original host, delivering a coherent character in composition and appearance, of appropriate modelling and detailed design, subject to detail reserved for condition. The roof extension comprising the public roof garden core, would adopt the character of the host, be subservient and would not be visible from street level.
121. The form, disposition of public realm, detailed design and landscaping approach have been designed to optimise microclimatic conditions, including delivering optimal wind and thermal comfort conditions, whilst canopies and oversailing is creatively used for dramatic effect, whilst providing shading and protection from inclement weather, enhancing open spaces and views in accordance with London Plan Policy D3 and City Plan Policy S8.
122. The proposal would transform an impermeable and introvert 'groundscraper', with new public realm carved out at street level, taking the appropriate form of an extension to Fleet Street's iconic, human-scaled and pedestrianised courts and alleys – better stitching the site into that rich fine urban grain. Externally, the memory of lost City courts would be reimaged in the form of a north-south route between Fleet Street and the office entrance and a continuous west-east route between Shoe Lane and the junction of Poppin's Court and St Bride's Street. Complementing this would be time-limited publicly accessible ground floor interiors, which would include cultural curation/programming secured via the Cultural Implementation Strategy, as a continuation of the north-south route and another cut through west-east between the north end of Shoe Lane and Harp Alley via St Bride's Street, building on the City's tradition of inclusive accessible buildings. These would provide more pedestrian-focused streets which promote active travel and are comfortable, convenient and attractive, in accordance with London Plan Policy D3 and City Plan Policy S8.
123. These routes and the current streets would be substantively enclosed by public-facing, active, usable, permeable, visually interesting and well-lit active frontage, which would provide a good level of interest and passive natural surveillance. In association with the uses, their disposition and layout, and secured via the Cultural Plan Implementation Strategy, the proposal would deliver positive relations

between what happens inside the building and outside in the public realm, with frontage which defines and activates the edge and animates and generates liveliness in the public realm, in accordance with London Plan Policy D3 and D8, Local Plan Policies CS 10(3) and DM 10.1(Bullet 5) and City Plan Policies S8(6) and DE2(2,Bullet 4).

124. This has been optimised with consideration of site constraints, in particular the difficult levels and the accommodation of essential building servicing. For example, where level change prevents extended access, the building 'plinths' (or stall risers) are being detailed to allow an architectural interaction between social independent retail spaces inside and provide outside incidental seating/dwell spaces to provide a useable active edge. Cultural vitrines/micro-exhibitions, including those original Express vitrines to Fleet Street, will be installed to allow the cultural use to permeate the wider business ecosystem and allow for year-round dynamic interest, the detail of which is reserved for condition.
125. Irrespective of the approved drawings, full details of the ground floor frontages are reserved for condition to ensure these are well-detailed and can successfully integrate signage, building services and are useable.
126. The new routes and the disposition of uses have been designed with character and connectivity in mind - making an appropriate response to the nature and scale of the street, making wider pedestrian-orientated connections across Fleet Street's courts and between here and Thameslink to the north and south. These routes would open new experiences of Fleet Street, including a central enclosed vista centred on the distinctive steeple of St Bride's, creating a townscape moment helping 'knit' the proposal into the intrinsic character of the locale.
127. Much animation of the ground plane will be generated by the strategic relocation of servicing away from residents on the Poppin's Court/St Bride's Street junction to Shoe Lane. This repurposes the most generous retained ground floor volume, the current servicing bay, transforming it into the sustainable transport 'hub', an integral part of the principal arrival experience from all directions, but in particular from what is considered be the main entrance, from St Bride's Street. Whilst facilitating the retention of as much structure, and thus embedded carbon, as possible, this orientation is well-suited to building on proximity and sightlines from those most sustainable transport modes – from the Cycle Superhighway and Thameslink/Blackfriars to the south and east. The hub would incorporate prominent and seamless level access, a café, cycle repair/maintenance and an innovative mixed private/public long and short term stay autonomous cycle rack, contributing a bit of street theatre in the local context, constituting a celebrated cyclist/pedestrian arrival experience which is convenient and attractive, delivering the City's Transport Strategy by-design.
128. The re-location of servicing to Shoe Lane would subdue its visual and physical influence on the wider public realm, lessening the current conflict between pedestrian/cyclist and vehicular traffic at the junction

of Poppin's Court and St Bride's Street. The consolidated and off-peak servicing offer, addressed at paragraphs 341 – 348, allows St Bride's and Shoe Lane to become more pedestrian priority. This also allows for wider transformative public realm works which would enhance the immediate setting and approaches, making a public realm which is more comfortable, convenient, green and attractive.

129. New public realm would comprise a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Technical Guide, with final detail reserved for condition.
130. An appropriate management, curation and programming of the public realm, both internal and external, would be ensured via section 106 Visitor Management Plan and Cultural Implementation Strategy, to ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8(H) and guidance in the (draft) Public London Charter.
131. In accordance with Local Plan Policy DM 10.3(2) and CS19 and City Plan 2036 Policies S8(3) and DE5(3) the proposal would optimise the amount of accessible roof terraces offering access to clean fresh space, openness, nature and views, including the new public 'pocket garden' on the roof of the Daily Express Building providing spectacular mid-range views accessible to all and with independent access from the cultural anchor. Irrespective of the approved drawings, final landscaping details would ensure high quality dwell space, including the provision of informal play for children.
132. The proposal would deliver green infrastructure as integral to the site and building design, subject to landscaping and wider public realm works secured through section 278, including a significant focus on optimising the quantum and planting pallet of the extensive south-facing terraces in a manner which is human-centred, seeking to improve health and wellbeing, whilst maximising admittance of natural light both inside and out. Final details, including planting palettes, specifications and fit out, are reserved for condition with the intent to optimise the inherent biodiversity and wellbeing benefits.
133. M&E plant and building services would be accommodated so as to deliver a coherent and well-detail roofscape, visually integrated into the roof and overall design when viewed from the street and high level, screened from general view, in accordance with Local Plan Policy DM 10.1 and DM 10.3 and City Plan Policies S8 and DE2.
134. Appropriate lighting, in accordance with Local Plan Policy DM 10.1 and City Plan Policies S8(11), DE3 and DE9, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respect context and enhance the unique character of the City by night. Irrespective of the approved drawings, a detailed Lighting Strategy would be subject to condition to ensure final

detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy, "Light + Darkness in the City / A Lighting Vision for the City of London (2018). The proposed 'direction of travel' seeks to build on those special spatial lighting design expectations of the Fleet Street Character Area, seeking low level and architectural illumination which enhances the pedestrian experience.

135. Overall, the proposal would optimise the use of land to deliver a transformative new mixed-use destination for Fleet Street, delivering a new contextual architectural landmark to signify the Key Area of Change. It would respect Fleet Street's heritage while providing a dynamic vision of the future. It would result in an inclusive form of development, the result of the diverse mix, disposition, management, curation and programming of the uses and public realm, internal and external, transforming a banal, introvert and impermeable monolith into a sleek and striking architectural companion to a regenerated Daily Express Building itself put over to a new cultural hub for the City and London, which would enrich and enable the wider cultural ecosystem around Fleet Street, marrying commerce and culture in an engaging way which would activate and animate the public realm. It would deliver a significant uplift in new public realm, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy.
136. It is considered the proposal would constitute Good Growth by design high in accordance with Local Plan Policies CS 10 and DM 10.1 and City Plan Policies S8 and DE2, policies contained in the NPPF and guidance in the National Design Guide, contextualised by the Good Growth objectives, GG1-6.

Strategic Views:

London View Management Framework (LVMF) – Impact:

137. The LVMF designates pan-London strategic views deemed to contribute to the Capital's character and identity at a strategic level. Those relevant strategic views where there would be a material impact are addressed here against London Plan Policy HC 4 and associated guidance in the London View Management Framework Supplementary Planning Guidance (the SPG).
138. The proposal is potentially visible in some of those wider London Panoramas, in particular via magnification. These have been assessed and it is considered that the impact would be neutral and so these have been scoped out of this detailed assessment.

View 5 (5A.2), London Panorama, Greenwich Park:

139. The impact would be from Assessment Point 5A.2, at the eastern extent of the panorama towards central London and St Paul's Cathedral, which is the sole Strategically Important Landmark (SIL), inclusive of a Protected Vista. Other relevant identified landmarks include Tower Bridge, the Monument, the Shard and the City Cluster. The proposal would breach the Wider Setting Consultation Area (Background) of the Protected Vista.

140. The visual management guidance identifies the background of St Paul's as mostly unimpeded, with a clear silhouette afforded to the dome (above peristyle) and western towers, whilst the sky etched silhouette is considered crucial to the ability to recognise and appreciate the Cathedral (paragraph 42). The proposal would be sited south and west of the Cathedral, appreciated at a noticeable distance from the Cathedral not to 'crowd' it, or to create a sense of a 'canyon effect', in particular as it is 'shadowed' by other tall built development around New Street Square, where it would consolidate this clustering of taller built development with a new high quality building, in accordance with paragraphs 57, 60, 61, 63 and 146 of the SPG.
141. On renewed focus or via magnification, the height would fall below that of the Cathedral, which would still rise above surrounding built form in its strategic siting atop Ludgate Hill, whilst its distinctive silhouette would remain unaffected, in accordance with paragraph 147 of the SPG. The proposal would not unacceptably impose on a landmark, all of which would still be given appropriate context, preserving their setting and contribution to the special characteristics of the view, in accordance with paragraphs 57 and 58 of the SPG.
142. Overall, the proposal would not harm the characteristics or composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

View 11 (11A.1), River Prospect, London Bridge (upstream):

143. St Paul's Cathedral is the sole SIL, while other landmarks include the Cannon Street Station towers, the Old Bailey and St Bride's Church in a broad and deep riparian composition. The visual management guidance identifies the skyline presence of St Paul's and the positive visual interaction it has with the 'Wren-esque' Cannon Street Station (para 191), which the proposal would not dilute, in accordance with paragraph 193-4. The proposal, situated at a discernible distance to the west of the Cathedral and of an appropriate height and attractive form on the horizon, would not visually dominant the Cathedral in accordance with paragraphs 194 and 197, consolidating a small cluster of taller buildings around New Street Square.
144. The proposal would not obscure or detract from a contributing landmark in the composition, in accordance with paragraph 195, whilst the tiered summit form of the architecture would offer an appropriate and welcome vertical skyline inflection helping address the overt horizontal emphasis and create a more interesting skyline, in accordance with paragraph 196.
145. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

View 12 (12A.1-2), River Prospect, Southwark Bridge (upstream):

146. St Paul's Cathedral is the sole SIL, whilst other landmarks include Millennium Bridge and St Bride's Church in a broad riparian

composition.

147. The visual management guidance, paragraph 209, describes the broad expanse of the River as dominated by St Paul's which, as a result of the recessive backdrop presence of the proposal in this view, is a situation which would remain intact. In accordance with the guidance, the proposal would neither dominate nor impose on the Cathedral - the viewers ability to recognise and appreciate it would be unharmed, while the high-quality architecture would complement its wider skyline setting, in accordance with paragraphs 211, 213 and 214.
148. The proposal would add further complementary built form in a busy jostling and juxtaposition of architectural elements which convalesce to form a strong striated layering in the general fore and middle ground townscape identified at paragraph 210. The proposal would not obscure or detract from a contributing landmark or feature in accordance with paragraph 212, while the distinctive vertical presence of St Bride's steeple would be complemented, the proposal consolidating that small cluster of tall buildings around New Street Square.
149. View 12A.2 is orientated south west, and the proposal would have no additional impact.
150. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

Millennium Bridge and Thames Side at Tate Modern (13A.1):

151. St Paul's Cathedral is the sole SIL, while wider landmarks and contributing features are Millennium Bridge and several Wren church towers and spires which contribute greatly to the wider setting of St Paul's.
152. The visual management guidance identifies the dominance of the bridge and St Paul's, whereby the St Paul's Heights has preserved an appreciation of the Cathedral above cornice line, whilst some tall buildings, including the Barbican Towers, compromise that backdrop (paragraph 225). It recognises how the Heights has led to an unrelenting horizontal emphasis of those middle ground buildings relieved by the spires and towers of the City churches (paragraph 226).
153. The proposal would be on the far western periphery of the broad prospect and would not 'crowd' close to St Paul's and would not undermine the visibility or dominance of the Cathedral in accordance with paragraphs 227-29 of the visual management guidance in the SPG. The proposal would not harm the contribution of a landmark or contributing feature, preserving the historic skyline and the juxtaposition of elements including river frontage and landmarks, whilst allowing these to continue to be enjoyed in their context, in accordance with paragraphs 68, 69 and 70 of the SPG.
154. The striking tiered form and silhouette of the proposal would add high quality new architecture which would assist in relieving that 'unrelenting

horizontalities' referred to in the SPG.

155. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including preserving an ability to recognise and appreciate St Paul's Cathedral as the SIL.

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

156. St Paul's Cathedral is identified as the sole SIL, whilst other relevant elements are St Bride's Church and Temple Gardens.
157. The visual management guidance describes the dominance of the River in the foreground, with those buildings on the north side providing a rich and intricate skyline. Reference is made to the subtle transition of scale between the Temples and the more recent commercial development on Fleet Street/Ludgate. It is considered that the proposal would preserve the pre-eminence of the open prospect over the River and skyline presence of the Temples and other Victorian/Edwardian buildings defining the Victoria Embankment. It would comprise an attractive part of the established backdrop of larger commercial/institutional buildings transitioning in scale from that foreground to Fleet Street and the more recent developments around New Street Square. Its attractive tiered sloping form would offer a new high-quality piece of architecture with a skyline presence that would complement the varied layering of the townscape from here and would complement and off-set the striking verticality of the steeple of St Bride's.
158. At some apparent distance away, it is considered that the proposal would preserve the ability to recognise and appreciate St Paul's as the SIL, which would remain the pre-eminent focus, its townscape presence preserved in accordance with paragraphs 280-283 of the LVMF SPG.
159. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

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

160. St Paul's Cathedral is identified as the sole SIL in this iconic London view and River Prospect, with other landmarks and contributing features including Temple Gardens, St Bride's and the Old Bailey. The River defines the foreground, while the eye is drawn towards Temple Gardens, St Paul's Cathedral and the City Cluster.
161. The proposal would emerge into view during the kinetic experience between 15B.1 and 15B.2. Here it would rise above the foreground buildings enclosing the River in the middle ground, consolidating that lesser coherent cluster around New Street Square. The whole twisted, streamline form of cascading landscaped terraces would contribute a high-quality new piece of architecture in accordance with paragraph 263 of the SPG.

162. The proposed green landscaped terraces would rise out of and complement the foreground foliage of the Victoria Embankment, sloping away from the pre-eminent foreground setting of the River, contributing to the spaces and buildings fronting the River in accordance with paragraph 262 of the SPG.
163. The proposal would not bring a cluster of tall buildings closer to St Paul's, preserving the composition of the view, including the sky backdrop of St Paul's, avoiding a 'canyon effect' and would not dominate the SIL, in accordance with the relevant visual management guidance at 264 of the SPG.
164. The proposal, in baseline and cumulative scenarios, would further screen some of the Barbican tower composition (Shakespeare and Lauderdale), albeit a viewer could still read their skyline presence alongside a new high-quality neighbour. Those landmarks and contributing features would have their settings preserved, including the juxtaposition between elements and the river frontage which would still be enjoyed in their context, in accordance with paragraphs 68-70 of the SPG.
165. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

View 17 (17B.1 and 17B.2), River Prospect, Golden Jubilee / Hungerford Footbridges (Downstream)

166. St Paul's is the sole SIL, while given the raised and broad panorama here there are many landmarks and contributing features, including St Bride's, the Royal Courts of Justice and the Old Bailey, amongst others. The SPG describes the River as defining the foreground and middle ground, enlivened by Waterloo Bridge and the Embankment trees creating a significant sense of horizontality. It identifies St Paul's as rising above the general townscape, including the City Cluster off to the right, while St Bride's and Old Bailey are identified as distinctive vertical elements seen against sky as are, to the Barbican's trio of towers.
167. The setting of St Paul's, as the singular most important structure, would be preserved in accordance with paragraph 301, the proposal being of an appropriate height, set at some apparent distance from the Cathedral. It would strengthen the sense of a smaller cluster of taller built development around New Street Square, and would have no impact on Somerset House, in accordance with paragraph 302.
168. The proposal would not obscure or detract from a landmark, and would still allow the distinct vertical skyline presence of St Bride's and the Old Baily be appreciated and, whilst it would slightly reduce the skyline presence of the Barbican tower composition, this this could still be read and appreciated, accompanied by a new high-quality neighbour on the skyline. Otherwise the landmarks and contributing features would have their settings preserved, including the juxtaposition between elements

and the river frontage which could still be enjoyed in their context, in accordance with paragraphs 68-70 of the SPG.

169. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

View 18 (18B.1), River Prospect, Westminster Bridge: The Downstream Pavement:

170. The River dominates the foreground whilst in the middle ground the prominence of Country Hall and the London Eye capture the view, alongside the Shell Centre in the background. In the wider prospect there is a consistent formal and civic scale character to the buildings enclosing the meander of the River as Westminster transitions to the City. This has a largely consistent but lively skyline datum, relieved by some more vertical built form, such as the fleche of the Royal Courts.
171. The proposed high-quality architectural form comprising the sloping contoured terracing would provide a new attractive silhouette which would contribute to that distant skyline, creating a distinctive vertical inflection appropriate to the wider scale of built form enclosing the River and within the tolerance of that lively skyline datum.
172. The proposal would relate well to the setting of those foreground and middle ground landmarks and would contribute positively to the setting of heritage assets, in accordance with paragraphs 323-24 of the visual management guidance. It would respect and enhance the civic nature of those north bank buildings and would not dominate a landmark or their relationship with the River.
173. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements.

Summary of LVMF Impacts:

174. The proposal would not harm, and in places would make a positive contribution to, the characteristics and composition of relevant strategic views and their landmark elements. It would also preserve the viewers ability to recognise and appreciate St Paul's Cathedral as the relevant Strategically Important Landmark (SIL). It would ensure that the juxtaposition between elements, including the river frontage and key landmarks, can be appreciated in their wider London context. This is in accordance with Local Plan Policy CS13(1), London Plan Policy HC4, emerging City Plan Policy S13 and guidance contained in the LVMF SPG.

Other Strategic Views (Local)

The Monument to the Great Fire:

175. The Protected Views SPD identifies views of and approaches to the

Monument which are deemed important to the strategic character and identity of the City.

Views from the Monument:

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

View 5: North West to St Paul's Cathedral – Impact

177. From here St Paul's and St Bride's Church are identified as the Key Features. The visual management guidance at paragraphs 4.12 and 4.13 of the Protected Views SPD identified other features in this panorama as St Mary le Bow, the cupola of the Old Bailey, the BT Tower and St Mary Aldermanry, none of which would be obscured or detracted from by the proposal, their skyline presence undiluted.
178. At paragraph 4.13 it identifies the drum, peristyle and dome alongside the tops of the western towers. At present the dome is on the whole seen rising above a horizon datum to reign pre-eminent on the skyline as the central focus, albeit the drum, peristyle and south west towers are, on the whole, shadowed by taller built development around New Street Square, diminishing the presence of the Cathedral silhouette on the skyline. The proposal would add a significant new element to this backdrop of built development, causing some erosion of clear sky silhouette of the south west tower.
179. As a whole panorama composition, it is considered that the proposals would accord with paragraphs 4.3 and 4.4 of the Protected Views SPD, in that the proposal would not obstruct it, nor would it detract from the general open prospect and those landmark elements as a result of appropriate bulk and massing. Neither would it intrude upon a Key Feature, with the exception of St Paul's.
180. The proposal would result in a small amount of additional erosion the sky silhouette of St Paul's, diminishing its skyline presence, albeit it would still be recognised and appreciated as the central focus and the pre-eminent skyline feature, though it's clarity and integrity slightly eroded, causing a lower level of harm to Monument View 5. This would fail to protect and enhance a significant local view from the Monument, causing a degree of conflict with Local Plan Policy CS 13 and emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.

Views of and Approaches to the Monument:

181. The proposal is not in the defined Immediate Setting of the Monument and would have no impact on those identified views of/approaches to the Monument as identified in the Protected Views SPD.

St Paul's Cathedral:

St Paul's Heights and the Processional Approach:

182. The proposal is not in the defined St Paul's Heights Policy Area.
183. It would be visible in views of the Cathedral on approach from Fleet Street along the Processional Route. The site has a significant

frontage on the northern side of Fleet Street, addressing the Processional Route between Westminster and the City of London to St Paul's Cathedral. The Processional Route is of London and National heritage significance. The viewing experience has been subject to long-term curation as a kinetic townscape sequence and experience in the English Picturesque tradition.

184. It is considered that the proposal would add a high-quality new landmark and skyline presence to the unfolding sequence of the Processional Route townscape experience. It is considered no harm would be caused.

St Paul's Cathedral - Views From:

185. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral.
186. It would be a prominent new building in the mid-distance when viewed from the Stone and Golden Galleries. It would not detract from the general open prospect of the viewing experience. It would not obscure any important landmark feature or element, those principal aspects along the Processional Route and south west towards Westminster would remain undiluted. As a result of good architecture, the proposal would replace a banal and vapid roofscape with a much a more intricate and inspiring roofscape transitioning of the scale between Fleet Street and New Street Square, resulting in a more interesting roofscape enclosing the Processional Route.
187. It is considered it would preserve the composition and character of these views and would pay special attention to the roofscape, in accordance with the Protected Views SPD.

Other publicly accessible elevated viewing areas - Views from:

Tate Modern:

188. It would replace an uninspiring and flat roofscape of no townscape value into a contoured and sculpted vertiginous form, enhancing the skyline presence of the cluster of taller built development around New Street Square, comprising an improved backdrop to those heritage landmarks around Fleet Street which would be undiluted. It is considered the character and composition of the viewing experience here would be preserved and enhanced.

One New Change:

189. From the public roof terrace, the proposal would be a prominent feature to the north of the Cathedral, which would remain pre-eminent in the foreground. It would not obscure or detract from another landmark and would create an attractive landmark in its own right. The essential character and compositional qualities of this view would be preserved and enhanced.

120 Fenchurch Street Public Garden:

190. Viewed from the western terrace, the proposal would be a prominent new backdrop feature to the north and west of the dome of St Paul's

Cathedral on the distant skyline. The proposal for part of the viewing experience travelling north along the western side of the Sky Garden terrace would slightly erode the sky silhouette of the lantern of St Paul's. This would result in some slight harm to the setting of St Paul's when viewed from here.

HERITAGE:

Former Daily Express Building (Grade II*):

Heritage Significance:

191. The former Daily Express Building is of high national special architectural and historic interest and heritage significance.
192. Completed 1932, by Ellis and Clark, with engineer Sir Owen Williams, it is a Fleet Street landmark, with a prominent situation on the corner with Shoe Lane, of four main storeys and three stepped back. It is easy to underestimate, in a world of ubiquitous glazed curtain wall commercial architecture, how radical and daring this would have appeared in 1932. It immediately made its fellow extrovert and neighbouring HQ for the Daily Telegraph, completed 1928, appear twee and out-of-date in comparison, and together they form a striking juxtaposition in the transition from traditionalism to modernity in modern commercial architecture.
193. It is a seminal London example of the Art Deco-inspired 'streamline moderne' style which was then emerging more on the European continent. It is considered to be London's first experiment in glass curtain walling - the origin of the modern City office garb. The facade comprises of mixture of flush black Vitrolite (pigmented glass) and clear glazed panels fixed with chromium strips with matching trimmings, including the distinctive main entrance canopy. The distinctive superstructure of reinforced concrete portal frame comprising a series of tapering posts, beams and cantilevers carrying flat floors.
194. It is a good example of an aspiring leading national newspaper HQ at the heart of the historic Fleet Street press quarter, built during the interwar zenith of competing Newspaper buildings jostling for attention along Fleet Street, to be located at the heart of the Capital between the political (Westminster) and commercial (City) centres. It was the commission of William Maxwell Aiken, first Baron Beaverbrook (Lord Beaverbrook), an influential figure in British media and politics, as the dedicated headquarters offices and printing works for the Daily Express, the largest and most successful mass circulation newspaper in the world. Beaverbrook apparently commissioned a sign during construction to herald the building as 'Britain's most modern building for Britain's most modern newspaper'.
195. It was extended in the 1970s north and east and was known as 'Aitken House', with the extension adopting the guise of the original. In 1997-98, a scheme by John Robertson Architects, praised at the time for its rigorous approach to conservation, saw the demolition of Aitken House and the erection of the current commercial offices known as 'River Court', with a glazed connection and linked internally. As part of this the 6th floor, originally a plant screen in matching guise, was internalised

and a roof terrace placed on top with an extension to the main stair. It also involved the wholesale replacement of the black Vitrolite and clear glass facades. Now infilled, there was once a servicing bay allow carts/trolley buses direct access to the basement print works off Shoe Lane.

196. The interiors were by Robert Atkinson, of which the impressive Art Deco main foyer and original stair core survive with a good degree of integrity, albeit altered and include a dramatic ceiling pendant, exotic chrome detailing such as the writhing chrome snakes either side of the main lifts (now risers), and British sculptor Eric Aumonier-designed relief sculptures representing 'Britain' and 'Empire'. The elliptical stair is of terrazzo with original detailing, including lighting, and doors of the main stair. Otherwise the original interiors either do not exist, or have been masked by a heavy-handed, sometimes oppressive, modern fit out of the office floorplates.
197. It is of high architectural, artistic and historic significance, the result of its architectural appearance, superstructure and original surviving décor.

Contribution of Setting:

198. It is considered the elements of setting collectively make a significant contribution to significance and an appreciation of it. The following elements of setting make a contribution in descending order of contribution:
 - Prominent siting of Fleet Street, at the heart of the national conversation, on that national spine between the centre of Governance and commerce. Makes a significant contribution to significance and an appreciation of it.
 - Its brazen modern idiom, in stark contrast to its traditionalist neighbours, and agreement to differ within a recognised tolerance of behaviour, is the essence of the early modern movement in art and architecture, that tension accentuating its architectural effect and juxtaposition. This makes a significant contribution to significance and an appreciation of it.

Impact:

199. The impact here would be direct, via the alteration of the asset, and indirect, via change in setting. It is considered the change would be radical, bold and transformative, in the daring spirit of the original building, both preserving and enhancing it. It would do so by liberating it from its annexing and subsuming larger neighbour, giving it a warranted independence and freedom of expression, and greater architectural coherence and integrity. Otherwise, the additional new massing of the detached River Court building would ensure it remained a pre-eminent feature of Fleet Street in the immediate and wider setting. For those detailed reasons below, it is considered the special interest/heritage significance of the Daily Express Building would be preserved and enhanced.

200. Externally, the main architectural move is to detach the Daily Express Building from its larger neighbour, liberating it to be a standalone set-piece on Fleet Street, installing a sense of architectural integrity. Officers agree with Historic England and the 20th Century Society, that this is an enhancement. The proposal would not result in the loss of authentic historic fabric, given the much original fabric was replaced, building on the materials and language of the host to deliver a seamless and organic extension to be read as a whole, including a symmetrical composition to Fleet Street. The new fenestration is to match and is considered appropriate, subject to detail reserved for condition.
201. It is proposed to dismantle and rebuild the sixth-floor plant screen which, whilst a modern addition, is sympathetic. The proposed seventh floor extension, comprising a raised core providing access to the roof level public garden, is proportionate, subservient and in an appropriate matching guise. It would not be visible from the street, preserving the original composition and proportions. The proposed balustrades to the terraces would be lightweight and of appropriate material and appearance subject to detailed condition.
202. In terms of in-direct impact via change in setting, the proposal would enhance that sense of prominent siting on Fleet Street, at the heart of the processional route and former press quarter, enhancing this element of settings significant contribution to significance (setting element 1). It would do so by divorcing it from its larger neighbour, liberating it to form a greater freedom of expression. The scholarly matching of the original curtain wall façade detail would enhance that striking streamline moderne image, whilst the original massing and datum arrangements would be respected, accentuating and sharpening that positive juxtaposition with its more traditional neighbours, enhancing that element of settings significant contribution to significance (key element 2).
203. Some concern has been raised to the height of the new River Court building by Historic England, the 20th Century Society and the Ancient Monuments Society, as a result of change in setting. Officers disagree that harm would be caused as a result of the height, bulk and massing of the new River Court, which has been expressly designed to make a local and macro-level townscape heritage response.
204. On Fleet Street the principal shoulder height and set-back massing of the new River Court building is a direct response to the height, scale and datums of the Daily Express Building, ensuring that in that local Fleet Street context the proposal would not dominate or overwhelm the Daily Express Building in terms of bulk. Comprising two complementary yet contrasting forms, the cantilevering, jettisoning and dynamic form of the new architecture would contrast in a pleasing manner with the simple, sleek unrelieved planes of the Daily Express Building. The adoption of a dramatic curtain-wall façade pays homage to its daring neighbour and that modern spirit of utility and function in honest expression. It draws attention to the Daily Express Building,

both sharing a familial yet independent identity, reinforcing the integrity of the Daily Express Building as a detached and liberated building. The adoption of lightweight floor-to-ceiling glazing and expressive metal spandrels would be built on the streamline moderne character of the neighbour without aping it. It is anticipated that the strips would be a high quality finished finish, of similar appearance to the edge of a 'iPhone', with a tonal contrast to the very distinct jet black Vitrolite of the Daily Express Building.

205. The final architectural detail, materials, finishes, module sizes, jointing and incorporation of servicing will be fundamental to the quality of the final effect, and the details are reserved for condition.
206. In the interior, the principal features of significance, the original foyer and stair core, would be preserved and refurbished. A Condition Survey and associated Schedule of Works for the main foyer and stairs is reserved for condition.
207. The incidental-sounding removal of the non-original net curtains installed by the outgoing occupier on the main foyer fenestration would result in a disproportionately dramatic enhancement of the presence of the interior to the street (albeit a natural consequence of reuse). Minimal intervention is proposed here, and the detail of their refurbishment is reserved for condition, and it is considered that significance would be preserved.
208. Over the remaining original floors, the proposal is also both light-touch but radical. It is proposed to remove later modern building services, including oppressive bulkheads, and to expose and celebrate the innovative and dramatic original superstructure and curtain wall. This would restore a sense of original volume, allowing more natural light to ensure and forming a better relationship with the distinctive curtain wall façade. Subject to final detail reserved for condition, this would be an enhancement.
209. Overall, the proposal would liberate a 'high note' in the lively score of Fleet Street. It would result in a moderate enhancement to heritage significance and the contribution of setting.

St Paul's Cathedral (Grade I):

Heritage Significance

210. London's and one of the Nation's most famous landmarks, it was London's first Cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother Cathedral of the national and international Anglican Church, a ceremonial centre and backdrop of Royal and State ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and craftspeople overtime) and of the distinct English Baroque-style. It was central to the adoption of

classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital.

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

Contribution of Setting

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

- Those wider strategic pan-London riparian views from the Thames, its embankments and bridges which are often iconic and London-defining, and where St Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
- The ancient processional route of Royal and State national significance along the Strand/Fleet Street, a 'national spine' of pomp and parade, of celebration and contemplation, along a route between the heart of Government in Westminster and commerce in the City, where St Paul's is the pre-eminent culmination/destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
- Those wider pan-London views and approaches where the dome offers a skyline presence in broad identity-defining London panoramas, for example from those strategic views identified in the LVMF, including Parliament Hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. This include old and newer high level appreciations of the London skyline which allow the Cathedral to be better understood as part of London's wider natural and cultural topography, including from the Monument and higher level

public viewing galleries such as the Sky Garden at 20 Fenchurch Street, One New Change and emerging viewing terraces in the City Cluster. These make a significant to moderate contribution to significance and an appreciation of it.

- Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted ad-hoc and some active townscape curation over the generations, in particular from St Peter's Walk (south transept axis), Cannon Street, the Paternoster Square development, amongst others, where the Cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This make a moderate/significant contribution to significance and an appreciation of it.

Impact

213. In terms of the wider riparian setting (setting element 1), from the River, its embankments and bridges, the proposal would in no instance challenge the pre-eminence of St Paul's on the skyline, being of an appropriate scale and set away from it. It would also not obscure or detract from a landmark which contributes to the setting of St Paul's in these views. These impacts are covered in detail under the relevant strategic LVMF views at paragraphs 137 – 174. It is considered the wider riparian setting in pan-London views would be preserved.
214. In terms of the Procession Route (setting element 2), the proposed Fleet Street interface massing follows a compositional form and massing which responds to the prevailing scale and building line of Fleet Street, picking up on the prevalent shoulder datum heights which enclose the vista east towards St Paul's, without impeding on it. At no point would it obscure or detract from the pre-eminence of the unfolding composition or on the skyline presence of the Cathedral this kinetic viewing experience. This element of setting and its contribution to significance would be preserved.
215. The proposal would have a more significant impact on those wider pan-London (higher level) experiences of St Paul's (setting element 3) and the more locally strategic townscape setting (setting element 4). This would manifest in views from the Cannon Street approach, from the Monument Viewing Gallery and from the Sky Garden at 20 Fenchurch Street.
216. The proposal would backdrop an appreciation of the emerging, unfolding composition above main balustrade level comprising south west tower, south transept and dome, on approach via the Cannon Street axis, along Eastcheap (in part) and Cannon Street. On the southern pavement it would be visible between Eastcheap, travelling west, until the junction of Cannon Street and College Hill. From the northern pavement the breach would be localised, around the junction of Cannon Street and Walbrook. This impact has fundamentally informed the massing and modelling of the proposal.
217. On the south side, at the junction with Eastcheap and King William

Street, the south west tower is a distant termination of a deep townscape perspective, whilst the proposal would be distant background and non-prominent, seen also (as atmospheric conditions allow) in association with the top of the BT Tower. Via motion parallax and the unfolding townscape along Cannon Street the proposal would gradually move in behind St Paul's. On arrival at the Bush Lane junction, where the dome emerges into view, the proposal would have moved largely in behind the silhouette, in a recessive manner, its striated rectilinear manner a subservient contrast to the strong verticality of St Paul's picturesque composition of elements. Just beyond the junction with Dowgate Hill, where the full dome silhouette emerges into view, the proposal would move entirely in behind the silhouette, leaving an awesome appreciation of the full composition to define the experience from thereon in until a sublime culmination at St Paul's Churchyard. From that limited interface around Walbrook, the proposal would be somewhat incidental, allowing a full appreciation of south west tower and south transept pediment and statuette.

218. For much of the approach St Paul's is the pre-eminent skyline landmark on what is a rare off-centre townscape axial moment through a strategic City artery, accentuated by the (near) splendid isolation of a towering sky-etched silhouette. This is a rare moment whereby the exquisite open lantern western towers and dome can be seen alongside the pediment and crowning disciples all in a single, coherent and almost gothic picturesque. The central pediment, containing the phoenix rising from the ashes, is well placed, on Wren's orientation of the Cathedral, to pick up morning sun which basks the stone and accentuates the silhouette. The three-dimensional south west tower, which symbolically or not, contains the clocks associated with a bell which reputedly rings only on the death of an incumbent monarch or Lord Mayor, is prominent and helps turn the vista. Whether this symbolic whole was a design-intent of Wren is conjecture - nevertheless the end result is a symbolic townscape moment of strategic importance to the character and identity of the City.
219. The introduction of a new prominent background element would distract from the splendid isolation, causing some eroding of pristine silhouette, causing some diminishment in integrity, authenticity and clarity. The streamline, clean and rectilinear design of the proposed, seen tiering up to a complementary crescendo on the backdrop skyline, would assist in mitigating the impact, introducing a distinct and high-quality architectural neighbour.
220. Overall, the proposal would result in notable, albeit less than substantial, harm, at the lower end of the spectrum, the result of a modest diminishment in the Cannon Street approach which makes a significant contribution to heritage significance.
221. In terms of those pan-London views (setting element 3), the proposal would not undermine an appreciation of St Paul's strategic wider skyline setting from London's broad cityscape panoramas, as discussed in 137 – 174 and in detail in relation to Greenwich Park

(paragraphs 139 – 142).

222. However, from the Monument Viewing Gallery the proposal would cause some minor further erosion of the sky silhouette of the Cathedral in views west. The Cathedral here is already somewhat compromised on the skyline and would still be appreciated in the foreground. This would cause some slight harm to the clarity and pre-eminence of an appreciation of the Cathedral from this important higher-level viewing location.
223. From the Sky Garden's western terrace, the Proposal would also backdrop the Cathedral. This is a kinetic experience as an observer ascends the western terrace with intermediate landings between the main south and north terrace. The proposal would not block the view of St Paul's and would still allow the observer to readily recognise and appreciate it in relation to that wider topographical setting, including complementary landmarks. However, it would slightly reduce that clarity and skyline presence of the cathedral, with some erosion of the sky silhouette of the lantern, causing negligible harm overall.
224. Otherwise it would not obscure or detract from a topographical landmark which contributes to the setting of St Paul's. Overall, the harm would be very slight, in of itself very much at the lower end of less than substantial.
225. At One New Change the proposal would rise prominently in the background to the north of the dome silhouette, would be unfettered, and would continue to define the viewing experience. Otherwise it would not detract from a landmark or skyline feature which contributes to the setting of St Paul's and no harm would be caused from here.

St Paul's Conclusion of Impact

226. The proposal, by virtue of its height and presence when viewed from the Cannon Street approach, and to a lesser degree from the Monument Viewing Gallery and Sky Garden at 20 Fenchurch Street, would collectively fail to preserve the significance and setting of St Paul's from those identified local townscape views and higher level pan-London views - elements of setting which make a moderate to significant contribution to heritage significance. This impact is mitigated by the form and detailed design, in particular the distinctive landscaped terrace summit form, which would otherwise deliver a high-quality architectural neighbour.
227. Combined, the harm is considered modest and less than substantial, at the lower end of the spectrum, albeit not insignificant.

Fleet Street Conservation Area:

228. The impact here would be direct, as a result of works to the former Daily Express building, which is in the Conservation Area, and in-direct, as a result of change in the wider setting of the Conservation Area.

Heritage Significance, Character and Appearance:

229. The character and appearance and heritage significance of the Fleet Street Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summaries that core significance and character stem from:
- 1.) The focus of Fleet Street, a processional route between Westminster and St Paul's of Royal and State significance since the Middle Ages, and its ceremonial grandeur and commercial bustle created in particular by views of St Paul's Cathedral, St Dunstan's in the West and St Bride's, some of the City most notable ecclesiastical buildings.
 - 2.) The evocative, fine grain network of historic streets, courts, lanes and alleys either side of Fleet Street, and their contrasting intimacy, and which have developed over hundreds of years once developed outside the City walls.
 - 3.) The exceptional richness and variety of architecture of all ages and styles and the contrast between them, ranging from domestic Georgian to monumental 20th Century newspaper buildings.
 - 4.) The long association with the press industry and other literary figures such as Dr Johnson and Oliver Goldsmith and of course medieval institutions, namely the Knights Templar, the Whitefriars, the Inns of Court and the legal sector.
230. The Conservation Area is of outstanding local and national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric, and to a lesser but significant degree via setting.

Contribution of Setting:

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

Impact:

232. Most of the Conservation Area's significance, character and appearance, would remain 'untouched' and undiluted. This is given in particular the tight-knit urban grain and often intimate sense of enclosure, the proposal would have no visual or other influence over much of it.
233. In terms of direct/indirect impact, the liberation of the Daily Express Building as a standalone architectural set piece, divorced from its annexing neighbour, the opening up (visually and physically) of the main entrance and foyer to Fleet Street once more, and the creation of a series of courts/alleys around the Daily Express Building in the vein and tradition of the Conservation Area, would result in a moderate enhancement to significance, overall. The proposed alterations and extensions at roof level would be sympathy, additional bulk not visible at all from within the Conservation Area. The result of the direct impact then is an enhancement to a significant Fleet Street architectural landmark, contributing to those core elements of significance including that rich architectural cornucopia along Fleet Street, whilst enhancing an appreciation of that historic association with the press and reinforcing the characterful fine grain structure.
234. Otherwise, the massing presenting an enclosing façade to much of Fleet Street is of a building line, principal datum and shoulder height which would assimilate with the wider lively jostling of frontages along Fleet Street. In terms of those approaches east and west along the Processional Route (setting element 1), the proposed shoulder height, building line and receding massing, would form an appropriate contextual response to the Conservation Area. It would not obscure or detract from a landmark/monument in either direction on this approach which complements the wider setting of the Conservation Area.
235. For much of the western part of Fleet Street the sloping terraced massing rising to a crescendo further north around Stonecutter Court, would be high-level, often incidental, often glimpsed and peripheral presence in a dynamic viewing experience. In no immediate streetscene context or approach would the proposed additional massing dominate or overwhelm the Conservation Area, whose arresting enclosure and strong, coherent and rich historic context would remain pre-eminent and undiluted.
236. For reasons established at the assessment of St Dunstan in the West as a listed building, the proposal, on approach to the Conservation Area from the Strand, would cause a slight diminishment of the skyline presence of the Church's soaring and elegant gothic tower, eroding it's sky silhouette. As a result, the proposal would result in some slight harm to the Processional Route element of setting and its significant contribution to significance.
237. In terms of that wider riparian setting (setting element 2), Historic England considered that from the South Bank, in particular from LVMF View 16 (Gabriel's Wharf), the proposed would "dominate" the skyline

backdrop of historic areas here (albeit only referring to the Strand (WCC) and Temples Conservation Areas, rather than Fleet Street. It stated the harm was less than substantial, in the middle of the spectrum. Whilst this accusation from HE has been taken very seriously, Officers disagree that harm would be caused as a result of increased height and massing of the River Court building.

238. In terms of those wider riparian views from the South Bank (Queen's Walk), the proposal would, on the whole, not obscure, distract or detract from some of those skyline features of the Conservation Area, in particular St Dunstan in the West and St Bride's, allowing this expression of the Conservation Area to still be read in the context of wider skyline monuments such as the Royal Courts of Justice and St Paul's Cathedral. Where it would interact with the spire of St Bride's it would form a complementary high-quality architectural neighbour which would try its massing in a deferential manner allowing the distinct vertical skyline presence of St Bride's to be preserved. It would take an appropriate place as part of an established backdrop of a modern taller build development off Fleet Street and around New Street Square, adding a high-quality new piece of modern architecture. This element of setting which makes a significant contribution to significance would be preserved.
239. Overall, the character and appearance of the Fleet Street Conservation Area would be preserved. The modest enhancement would be caused to the heritage significance of the Conservation Area as a result of the works to the Express building.
240. However, as a result of a small infringement on the contribution of the skyline presence of St Dunstan in the West to the Processional Route element of setting, the proposal would also result in some slight harm to significance. That slight harm is balanced against the more significant moderate enhancement to the heritage significance of the Fleet Street Conservation Area as a result of the works to the Express.

Whitefriars Conservation Area:

Heritage Significance:

241. The heritage significance of Whitefriars Conservation Area is covered in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summarises its significance as stemming from:
- An impressive collection of consistently high quality late Victorian/Edwardian commercial and institutional buildings on land reclaimed and comprehensively planned by the Corporation resulting in a more regular grid plan, a rare more formal townscape in a City context, in contrast to the more organic, evolutionary Fleet Street environs which it abuts.
 - The setting of grand Victorian urban infrastructural, engineering and urban planning interventions, namely Blackfriars Bridge, Victoria Embankment and New Bridge Street.

- An important wider context to the Temples and as foreground to St Paul's Cathedral from sensitive riparian views.
 - A varied assortment of land uses including the former Whitefriars friary precincts, domestic tenements, industrial works and commercial HQs, in addition to a historic association with the press and newspaper production
242. The Conservation Area is of a high level of local and even national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric of the Conservation Area and its archaeology, and to a lesser but significant degree via setting.

Contribution of Setting:

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

Impact:

244. The Conservation Area comprises land due south of the proposal, sharing no direct visual interaction from inside the Conservation Area. The proposal would not be visible in any identified view in the Conservation Area SPD.
245. The proposal would appear in the near wider setting as part of an established backdrop to the Conservation Area from broad riparian river prospects from the South Bank Queen's Walk. From here Whitefriars and the adjoining Temples Conservation Area command the foreground setting and scale of an open prospect across the River. Their respective pre-eminent skylines would be preserved on the whole. Even where there is a significant interface with the former City School for Boys on the Embankment, its height, and distinctive form and silhouette would complement and be subservient to its distinctive skyline presence.
246. From Hungerford and Waterloo Bridge's, the proposal would assimilate with that mediation of scale between the Embankment and those taller skyline structures on raised land to the north of Fleet Street and would

not dilute or overwhelm the Conservation Area in the foreground. The same applies to those views from the South Bank, where the sculpted tried summit form would make an appropriate response in creating an impressive skyline backdrop to the Conservation Area, mediating in scale as part of a complementary modern backdrop. Setting element 1, wider riparian views, would be preserved.

247. In term of setting element 2, those views south from Fleet Street would be undiluted given the high level and peripheral nature of the proposals in the opposite direction. In term of the approach from the embankment, the proposal would also be a peripheral high-level background feature, even less so when the trees are in leaf, and would preserve an appreciation of the coherence of the immediate historic setting to the Conservation Area. As such, it is considered setting element 2 would be preserved.
248. Overall, the proposal would preserve the contribution made by setting to significance.

Temples Conservation Area:

Heritage Significance, Character and Appearance:

249. Of ancient origin, the Temples is perhaps the most distinctive City conservation area and has a character that is not only unique to the City, but rarely found elsewhere. It has a restrained, dignified, private and often tranquil character, in pleasant contrast to the bustle of Fleet Street or the Embankment. It comprises an exceptional collection of outstanding buildings as part of a lush open landscape setting comprising the Inner and Middle Temples and the Temple Church. To summarise the outstanding significance of the Temples derives from:

- It has a distinct and venerable legal quarter of ancient origin resulting in a collection of outstanding authentic survivals from the 17th, 18th and 19th Centuries comprising rare legal chambers, domestic quarters and buildings associated with the Inns of Court.
- An outstanding townscape of collegiate character comprising courts, squares and streets, and strong sense of domestic human scale, of complementary architectural styles and materials, all set in the verdant, arcadian setting provided by the Inner Temple Gardens.
- Its connections with the Knights Templars and the focus on the Temple Church, based on one of the holiest places in the Crusader world, the Church of the Holy Sepulchre in Jerusalem, it is one of the oldest and most significant ancient churches in the City.

Contribution of Setting:

250. Elements of setting make a significant contribution to significance and an appreciation of it, in the form of environmental qualities, in particular views of and through it, but also of wider intangible qualities. In relative order of contribution, those elements comprise:

- Strategic pan-London kinetic views from Hungerford and Waterloo Bridges and the South Bank Queen's Walk looking north and east, where it is seen as part of the Victoria Embankment and as part of the wider skyline. These make a significant contribution to significance and an appreciation of it.
- Those views out of and through the Conservation Area of the sky, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the Conservation Area ensemble. These make a significant contribution to significance.
- Views into the Temples which act as 'portals' which transition between the bustle of Fleet Street / the Embankment, accentuating the sharp contrasts in character and appearance. The peaceful, restrained and often tranquil intangible qualities of the public realm, and their contrast with the bustle of the City around it, draws on significance. These make a significant contribution to significance and an appreciation of it.

Impact:

251. It is obvious to state that there would be no direct, tangible alteration or change to the physical asset, whose ancient and rare historic fabric would be untouched. For that matter, in most views from within the intimate enclosure and tight-knit grain, the proposals would be imperceptible, the impact being none.
252. As discussed, Historic England represented that the proposal would dominate the historic context when viewed from the South Bank, in particular from Gabriel's Wharf, LVMF View 16 (B1-2). It was stated that the harm is less than substantial, in the middle of the spectrum. Officers disagree and find it hard to understand how a more limited setting impact could allow for what would be significant and serious harm to the Conservation Area if substantiated. Officers consider the impact from LVMF View 16 (Gabriel's Wharf) at paragraphs 156 – 159 and find no conflict with the LVMF.
253. In those kinetic views from the Hungerford and Waterloo Bridge's, and the South Bank between Waterloo Bridge and Blackfriars Bridge, via Gabriel's Wharf, the proposal would be an appropriate backdrop skyline feature, complementing, and reading part of, a collection of taller modern built form in and around New Street Square. The open prospect across the breadth of the River Thames and the arcadian riparian scene created by the enclosing combination of the Victoria Embankment and Temple Gardens would remain pre-eminent. Without undue prominence, the high-quality architecture and tiered landscaped massing would assist the assimilation of the proposal into this scene, whereas it's silhouette would take its place as part of a high-quality backdrop. It is considered that setting element 1, pan-London strategic riparian views, would be preserved.
254. In terms of those views out of and through the Conservation Area

(setting element 2), the proposal would be a limited visual consequence, at high level, almost always incidental and often peripheral to the viewing experience which is commanded by the rich foreground. Where it would be visible, which is from parts of the Inner Temple Gardens, in particular the southern part and south of on the Victoria Embankment, the current backdrops are not at present pristine and it would by no means dominate or overwhelm, and for much of the year when the trees are in leaf would be screened from all but the most focused and glimpsed of views. From those more intimate settings in the Conservation Area, for the vast majority of it, it would not be visible at all. It is considered that setting element 2 would be preserved.

255. In term of setting element 3, the experience of the transitional portals and the intangible qualities of the public realm in contrast with the surrounding bustle of the modern City, it is considered that these would be unaffected and thus preserved by the proposals.
256. Overall, it is considered that the proposal would preserve the heritage significance of the Temples Conservation Area and an appreciation of it, leaving it unharmed.

Strand Conservation Area (City of Westminster):

Heritage Significance:

257. The Strand Conservation Area incorporates the grand early 20th Century project of improvements to the Strand and the creation of Aldwych and Kingsway, a grand continental style half circus and boulevards defined by formal and robust Portland Stone-faced classical architecture of a civic scale, north towards Lincoln's in Fields, whilst incorporating the ancient Strand, Somerset House and part of the Victoria Embankment and the Royal Courts of Justice to the east. It is of outstanding architectural, historic and artistic heritage significance, considered to principally derives from:

- The central 'national spine' comprising the Strand, an ancient Processional Route of Royal and State significance, lined by its often grand and formal architectures of institutions of state, cultural and commercial significance, with a picturesque townscape with infolding vistas of important landmarks, including the Churches of St Mary Le Strand, St Clement Dane and the Royal Courts of Justice, alongside rich statute of national significance.
- The Victoria Embankment and Waterloo Bridge as remarkable piece of urban infrastructural and planning improvements and the iconic London views they contain.
- Somerset House as a seminal London and landmark of the River Thames and one of the finest survivals of Georgian London.
- The contrast between the larger formal architectural some of the that humbler and more informal architectural from a variety of ages.

258. The Strand Conservation Area Audit SPD is a material consideration.

Contribution of Setting:

259. Elements of setting from which the Strand Conservation Area can't be divorced make a significant contribution to significance, in particular an appreciation of it. In order of relative contribution these are considered:
- Views into the Conservation Area from west and east in particular, where the Strand itself forms an integral part of a ceremonial processional route of Royal and State significance, part of an unfolding sequential townscape national monuments and landmarks. This makes a significant contribution to architectural and historic significance.
 - More incidental and formal views from the immediate streetscape on approach from the south (the Embankment) and the north (Covent Garden/Holborn). This makes a moderate contribution to architectural and historic significance.
 - Those pan-London riparian views from the River Thames, its embankments and bridges, including identified strategic LVMF views from the South Bank, Gabriel's Wharf, Waterloo, Hungerford and Westminster Bridges (downstream). These make a moderate contribution to architectural and historic significance.

Impact:

260. As discussed in the sections of St Mary Le Strand and St Clement Dane, these form part of an emerging skyline along the Processional Route. For the reasons established there the proposals diminishing, contoured architectural form would provide a complementary juxtaposition in this townscape sequence, which would not obscure or detract from that picturesque townscape experience. It is considered the proposal would preserve this element of setting.
261. The proposal would have no influence on those more incidental or formal localised townscape views through the Conservation Area and this element of settings contribution to significance would be preserved.
262. In terms of setting element 3, HE in its letter identify a single impact on significance, when viewed from LVMF View 16B.1, from Gabriel's Wharf (assessed also at Strategic Views), from where it said the proposal would be an appreciable increase in scale which would tip the balance between low scale traditional buildings plus parkland and modern backdrop buildings. It is said that the increase in scale would tip an balance currently in favour of the foreground of river, parkland and low scale buildings, with harm arising from a significant new skyline development which would undermine that balance, with the proposal said to dominate the skyline. It is then said that a reduction in scale could mitigate harm which it is believed is less than substantial harm in NPF terms, in the middle of any 'spectrum'. Officer have given this considered consideration and weight and are not of the opinion there would be harm.
263. The proposal would be seen as a high-quality new backdrop skyline

addition, consolidating and read as part of an established backdrop of taller modern built development, whilst the rich and strong character of the historic foreground defining the River would remain pre-eminent. The skyline presence of the Strand Conservation Area would be appearing at a significant distance to the west of the proposal and would not be obscured or detracted from. Otherwise, for reasons established under the Strategic Views section, the proposal would not cause harm to those wider riparian views from the Thames and its embankment, Waterloo, Hungerford or Westminster Bridge. Overall, it is considered that setting element three's contribution would be preserved.

264. Overall, it is considered the proposal would preserve the heritage significance of the Strand Conservation Area as a result of change in the setting.

St Paul's Cathedral Conservation Area:

Heritage Significance:

265. The character and appearance and heritage significance of St Paul's Cathedral Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2013), which is a material consideration. It summarises that significance as stemming from:

- A focal point in the CoL of international significance and the cumulation of the Processional Route of Royal and State significance since the Middle Ages, a focus of national celebration, with strong associations with nationally significant culture, events and persons.
- The immediate setting to St Paul's, of international architectural and cultural significance and long-established site of Christian worship, including important related archaeology.
- A significant concentration highly significant architecture, predominantly masonry in traditional styles, from all periods, alongside a visual character and groundscape enriched by a wealth of historic monuments, sculpture and other public realm structures.
- A varied urban grain and townscape from tightly knit historic streets and alleys to open spaces around St Paul's.

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

Contribution of Setting:

267. Elements of setting make a substantial contribution to significance, and views and vistas deemed integral to that significance are identified in the SPD. The main contribution comes via the below:

- The Processional Route approach from Fleet Street and the related townscape experience and views east on approach to the Conservation Area. This makes a substantial contribution to the significance of the Conservation Area.
- Wider strategic pan-London riparian Thames-scape views from around the banks of the River Thames, in particular from the South Bank Queen's Walk. These make a substantial contribution to significance.
- The approach to St Paul's from Cannon Street carved out in the mid-19th Century (note View 20 in the SPD). This makes a significant contribution to significance.
- More immediate, even intimate, local townscape views/vistas, either planned or fortuitous, on those secondary approaches to the Cathedral from the north, south and east (Note for example Views 16, 17 and 21 of the SPD). These are considered to make a moderate contribution to overall significance.
- Higher level viewing locations of the Conservation Area, including St Paul's Cathedral, in its wider natural and cultural topographical London-wide setting. These make a modest contribution to significance and an appreciation of it.

Impact:

268. The proposed Fleet Street shoulder height would seamlessly assimilate in the subtle variance of datums and lively rhythm of Fleet Street and would not obscure or otherwise detract from the Processional Route or the relevant landmarks culminating in St Paul's. Any additional bulk would be high level, fleeting and peripheral to this rich and dynamic experience so that this element of setting would be preserved.
269. As discussed, the proposal would make a positive architectural contribution to the backdrop skyline setting of those historic contexts which provide the pre-eminent foreground setting to the Cathedral when viewed in those kinetic, dynamic pan-London river prospects from the South Bank. This element of setting would be preserved.
270. As established above the proposal would dilute a relatively pristine pre-eminence of the sky-etched compositional silhouette of St Paul's comprising south west tower, south transept and dome, when approached from Cannon Street. This is a principle approach to St Paul's, at the heart of the Conservation Area. It would result in modest harm to this element of setting and its contribution to the significance of the Conservation Area.
271. As established, the proposal would not harm or distract from those wider strategic pan-London riparian views from the South Bank Queen's Walk, where the Conservation Area provides the foreground setting to the Cathedral, which would remain pre-eminent. This element of setting would be preserved.
272. In terms of those immediate, often more intimate or incidental views of

the Cathedral in the surrounding Conservation Area, the proposal would exert little influence. It would not be visible at all in Views 16, 17 and 21 of the SPD. It would be part of a more distant backdrop in views St Paul's Churchyard, in front of the imposing west front. From here, it would be peripheral to the experience. The proposed tired summit of the proposal would interface with Wren's tower and spire of St Martin's in kinetic, rather transitory, views from St Paul's Churchyard, where it would remain subservient and provide a complementary architectural backdrop to the church. It is considered that no harm would be caused to this element of setting.

273. The proposal would result in some modest harm to the Cannon Street approach to the Conservation Area, which makes a significant contribution to significance. It would otherwise preserve those elements which make up the substantial contribution of setting, in particular the Processional Route and strategic riparian and other local views.
274. Finally, as established the backdrop and erode the skyline setting of the Cathedral in views from the Monument Viewing Gallery and the Sky Garden at 20 Fenchurch Street. The impact is slight harm, a subtle reduction in pre-eminence of the Cathedral in the context of the Conservation Area from these views.
275. Overall, accounting for the Conservation Area as a whole, the proposal would result in slight, less than substantial harm, at the very lower end of the spectrum.

Former Telegraph Building, Fleet Street (Grade II):

Heritage Significance:

276. Purpose-built HQ of The Telegraph newspaper from the heyday of Fleet Street when it was synonymous with the press. Dated 1928, by Elcock C. Sutcliffe and Thomas Tait, it comprises a Fleet Street landmark at seven storeys tall, faced in Portland Stone in a striking fusion Art Deco with exotic flourishes, including Egyptian detail representative of the hype around the discovery of Tutankhamun's tomb just previous. It has good carved allegorical and figurative relief of primitive heads representing 'The Past' and 'The Future' by Samuel Rabinovich.
277. It is of a high level of architectural, artistic and historic significance.

Contribution of Setting:

278. Elements of setting make a significant contribution to significance and it is considered this derives from, in descending order of contribution:
 - Prominent siting on Fleet Street, at the heart of the national conversation, on that national spine between the centre of governance and commerce as part of a grouping of competing historic national press HQs. Makes a significant contribution to significance and an appreciation of it.

- Its bold Art Deco Neo-Egyptian style and scale in stark contrast humbler, more restrained smaller neighbours, accentuating the sharpness in juxtaposition between both. This makes a significant contribution to significance and an appreciation of it.

Impact:

279. In easterly views of the listed building from Fleet Street, the proposed building would be largely screened by the listed building, with only a small amount of the diminishing upper parts visible to the north as well as the new Fleet Street frontage. It would be seen as a high-level backdrop feature in the context of the former Telegraph building being a dominant foreground building enclosing Fleet Street. In westerly views from Ludgate Hill and Circus, the frontage of the listed building would appear as part of the merry ensemble along Fleet Street, while the proposed building would terrace back from this in a manner which would not impinge upon the listed building.
280. The proposed building would preserve the special architectural and historic interest of the listed building and the contribution made by setting.

St Bride's Church (Grade I):

Heritage Significance:

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

Contribution of Setting:

283. Elements of setting make a significant contribution to architectural and historic significance, in particular an appreciation of it. In relative order of contribution, it is considered that this derives from:
- Pan-London broad riparian views from the River Thames, its embankments and bridges, including strategic LVMF River Prospect views from Waterloo Bridge, Gabriel's Wharf, Hungerford Bridge

Southwark Bridge and London Bridge, where it can be appreciated as a landmark steeple atop the rising banks of the Thames, denoting the processional route and seen in complementary juxtaposition with Wren's masterpiece, St Paul's. These make a significant contribution to architectural/aesthetic and historical significance.

- Local, often glimpsed, sudden and fleeting local views from Fleet Street, St Bride's Avenue, Bride's Passage and Bride Lane allow for the full force of Wren tower and steeple to be appreciated in an intimate townscape context conjuring the sublime. This makes a moderate contribution to architectural and historic significance, especially an appreciation of it.
- The local topography and change in levels which allow for an appreciation of the burial site and it marking a climb from the riverside making a modest contribution to architectural/aesthetic, historical and archaeological significance.

Impact:

284. At no point would the proposals interface and obscure an appreciation of the distinctive steeple in those designated strategic LVMF River Prospects. In dynamic, kinetic views from the South Bank, the proposed 'modern steeple' summit form would offer a brief backdropping interface with St Bride's for a moment outside the Oxo Building, where a minor eroding of sky-etched silhouette would be accompanied by a coherent architectural juxtaposition of forms on the skyline, enhancing an appreciation of both.
285. Whilst no existing local view would be changed, the proposal would create a new, prominent north-south route off Fleet Street with a characterfully vernacular off-axis vista terminating on St Bride's tower, utilising its dramatic architecture in a new landmark view conjuring a sense of the sublime. This would enhance those local views which contribute to significance.
286. Overall, the proposal would preserve and deliver a slight enhancement to the setting and significance of St Bride's Church.

St Martin's Within Ludgate Church (Grade I)

Heritage Significance:

287. Of Medieval origin, it was rebuilt following the Great Fire, by Wren's office, 1677-1703. Of the preferred Portland Stone, it is unusually embedded in the built-up street frontage and is famed in particular for its distinctive lead-clad octagonal cupola and slender tapered spire. It stood adjacent to the Medieval Lud-gate, the westernmost of the City's Roman/Medieval Walls, in the awe of St Paul's Cathedral. It is the subject of discussion around the Wren's intention for the spire as part of an evolving design of the rebuilt St Paul's Cathedral, with which it shares a strong architectural and historic relationship. The interior contains original and historic fixtures and fittings, including work by

Grinling Gibbons, which makes a significant contribution to significance.

288. It is of outstanding national architectural/aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

Contribution of Setting:

289. Elements of setting make a significant contribution to the architectural/aesthetic, artistic and historic significance. In relative order of contribution, it is considered that this derives from:

- Views from the processional approach to St Paul's, of Royal and State significance, as part of a picturesque, unfolding townscape experience in which Wren's fine spire offer an architectural 'foil' and 'dances' around the principal west front composition. This makes a significant contribution to significance and an appreciation of it.
- Views from in and around St Paul's Churchyard in which there is an architectural and historical relationship with St Paul's make a modest contribution to significance and an appreciation of it.

Impact:

290. As discussed, the taller building would comprise a tiered massing stepping back from an appropriate shoulder height picking up on the lively but neighbourly rhythm of datums along Fleet Street, successfully scaling into the streetscene. It would seamlessly knit into the prevailing enclosure of Fleet Street and would not detract from an appreciation of the unfolding 'Wren-scape' focused on St Paul's and St Martin's spire, which would be undiluted. This significant setting contributor to the significance, the processional route, would be preserved.
291. The proposed taller building would have a (relatively) limited townscape 'moment' where it would interface with the spire from St Paul's Churchyard (south side), taking part in a rich and varied scene. Whilst it would cause a minor infringement of sky silhouette, though would comprise a subservient, recessive backdrop element, whose tapered summit would establish a complementary architectural form and foil to the punchy verticality of the spire. Thus, this contributing element of setting to significance would also be preserved.
292. Overall, the Proposals would preserve the setting and significance of St Martin's Ludgate.

St Andrew's Church, Holborn (Grade I)

Heritage Significance:

293. Church, formerly mid-fifteenth century, ruinous and dilapidated by the time of the Great Fire which it escaped. Nevertheless, it was rebuilt to the design of Sir Christopher Wren in 1686-7, preserving the fifteenth century tower which Wren refaced in 1703-4. The building was damaged by bombing in the Blitz and restored by Seeley and Paget. As well as these architects, the church has associations with a number of

important historical figures such as former Prime Minister Benjamin Disraeli, who was baptised there in 1817, and James Somerset, the former enslaved African who was central to the significant legal ruling in 1772 that slavery lacked a firm foundation in English law. Archaeological excavation has revealed evidence for Roman use of the site and a timber church is documented on the site in 959.

294. It is of outstanding national architectural/aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

Contribution of Setting:

295. Elements of setting make a significant contribution to the architectural/aesthetic, artistic and historic significance. In relative order of contribution, it is considered that this derives from:

- Views of the church and churchyard from the north, west and south, in which it is seen as a group with Holborn Viaduct, Shoe Lane Bridge and the City Temple (the latter grade II listed) and S.S. Teulon's grade II listed Court House, Rectory and Vestry Clerk's complex of 1868-71. These immediate elements of setting make a high contribution to the significance of the church.
- To the north, the tranche of historic townscape in the London Borough of Camden, comprising Hatton Garden and Ely Place, makes a medium contribution to the significance of the church.
- Otherwise, the setting of the church is now characterised by large office developments which make a neutral contribution to significance.

Impact:

296. In short views from Holborn Circus the proposed development would appear as a sliver on the skyline above the existing modern buildings to the south of the church. In longer views from the north, the upper tip of the proposed development would begin to appear above the nave; in longer views looking south from Ely Place, the proposed development would begin to appear in the gap of clear sky between the church tower and the existing mass of Plumtree Court. Nevertheless, the historic form of the church would continue to be clearly legible against a backdrop of modern architecture, with an interesting fission between the two, of two complementary vertical forms.
297. The proposals would preserve the significance and setting of St Andrew Holborn.

St Dunstan in the West Church (Grade I):

Heritage Significance:

298. Church dating from 1830-3 by John Shaw senior and has a Ketton stone Gothic tower in the Gothic style and is surmounted by an octagonal stone lantern. Occupying the site of a church first attested in c.1170, the building incorporates monuments from the earlier church

and statues and masonry from the nearby Ludgate, demolished in 1760 for road widening, including of Queen Elizabeth (c.1586) and King Lud and his Sons. The church's date, architectural form and surviving monuments are rare in a City context. So too is the octagonal lantern with its delicate Gothic tracery. This is a significant presence on the local Fleet Street skyline when viewed from east and west – forming part of the Processional Route from St Paul's Cathedral to Westminster Abbey – and it is identified in the Protected Views SPD as a City church considered to have presence on the wider skyline.

299. It is of outstanding national architectural/aesthetic, artistic, historic and to a lesser extent communal significance.

Contribution of Setting:

300. Elements of setting make a significant contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:

- Views on approach from the West, from the Strand, and from the east, along Ludgate Hill, Ludgate Circus and Fleet Street. St Dunstan's, with St Brides and the Royal Courts of Justice are key connected landmarks and their lofty spires are prominent above the varied eclectic Fleet Street townscape experienced along Fleet Street as well as from the River. This wider setting with other landmarks contributes to their overall architectural and historic significance. This makes a significant contribution to significance.
- Pan-London riparian views from the South Bank Queen's Walk which it contributes to that wider historic setting of the Temples and Fleet Street making a moderate contribution to significance.
- Fleeting glimpses in the courts and alleys north of Fleet Street making a modest contribution to significance.

Impact:

301. The distinctive tower emerges into prominent view from the environs of St Clement Danes, forming part of a rich and exciting Victorian spirescape in union with the intricate skyline of the Royal Courts of Justice, which steals the show. In higher level and transient view, the proposed tiered architectural massing backdrop the sky silhouette of the dramatic tower composition, encroaching on the pre-eminence of the tower and its contribution to the wider roofscape.
302. Otherwise it would have little influence over its setting on approach from east or on those strategic riparian views from the South Bank, causing no harm to these elements of setting.
303. Overall, harm would be caused via a setting impact on approach from the west along the Strand. That harm would be less than substantial, at the lower end of the spectrum.

Church of St Clement Dane (Grade I):

Heritage Significance:

304. Church of 1680-82 by Sir Christopher Wren, reusing but refacing fifteenth century masonry of the west tower, with a spire of 1719 by James Gibbs. The building is therefore a work of two of the outstanding architects of the age. It was heavily damaged by bombing in World War Two and restored by W A S Lloyd in 1955. Upon re-consecration the church became the Central Church of the Royal Air Force. It is of Portland Stone in Wren's characteristic English Baroque manner, with an elegant steeple with a skyline presence. Restored interior with broad tunnel vault, galleries and groin vaulted aisles, the latter, uniquely in a Wren church, being continued as ambulatory round east end with further semi-domed apse added
305. It is of outstanding architectural, artistic, historic and archaeological heritage significance, on the whole contained in the external and internal physical fabric, but with a substantial contribution from setting.

Contribution of Setting:

306. Elements of setting make a substantial contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:
- An important architectural and historic landmark on the Processional Route with a prominent central position on the Strand, where it is appreciated as an important part of the 'pomp' and ceremony of this route with a skyline presence. This makes a substantial contribution to significance and an appreciation of it.
 - Wider pan-London riparian skyline views from as far west as Westminster Bridge and also from the South Bank and Waterloo Bridge. These make a significant contribution to significance and an appreciation of it as part of central London's historic skyline.

Impact:

307. The proposal would provide a prominent, at least more so when the trees are not in leaf, on approach from the west (travelling) east along the Processional Route of the Strand. The distinctive, attractive and high-quality summit form and 'crescendo' of the tower would form a complementary backdrop neighbour to these sequential, unfolding pieces of architectural theatre. At no point would it erode the prominent sky silhouette of the church tower and would read subservient to it as the commanding presence moving into foreground view via motion parallax. The proposal would not affect views of the Church on approach from the east along Fleet Street. The proposal would preserve the emerging views of the Church from the Processional Route, leaving this element of settings contribution to significance unharmed.
308. The steeple's skyline presence in those wider pan-London riparian strategic views from the River, its embankments and relevant bridges,

the second element of setting contributing to significance, would be preserved. At no point would the steeple be obscured, or detracted from, by a proposal set at some distance from it in these views.

309. Overall, the proposal would preserve the special architectural and historic interest, heritage significance and setting of St Clement Dane as a result of change in setting.

Church of St Mary Le Strand (Grade I):

Heritage Significance:

310. Church, of 1714-17, by renowned Georgian architect and landscape designer, James Gibbs, thought to reflect his experience in Rome, whilst paying tribute to Wren. It is of Portland Stone and is symmetrically composed with a tower and steeple rising in 3 diminishing open stages with aedicules in elegant Corinthian order and distinctive Wren-like flaming urns. It has a main west front, exceptionally situated on a central island commanding the vista west along the Processional Route of Royal and State significance, and an important part of an unfolding, sequential townscape setting of rare London formality, but in the English Picturesque tradition.
311. Aisleless interior with the apse framed by superimposed orders of coupled columns and coupled columns carrying balcony over west door. Panelled walls with pilasters to upper register and coffered ceiling.
312. It is of outstanding architectural, historic, artistic and archaeological heritage significance, on the main contained in the physical fabric of the exterior and interior, but with a substantial contribution from setting.

Contribution of Setting:

313. Elements of setting make a substantial contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:
- An important architectural and historic landmark on the Processional Route with a prominent central position on the Strand, where it is appreciated as an important part of the 'pomp' and ceremony of this route with a skyline presence. This makes a substantial contribution to significance and an appreciation of it.
 - More limited glimpses the steeple from Waterloo Bridge and the Queen's Walk, in particular where this is seen in complementary architectural juxtaposition with Somerset House in the foreground. This make a moderate contribution to significance and an appreciation of it.

Impact:

314. Would have a transient impact on the kinetic approach towards the church from the northern pavement of the Strand resulting in a transient, even fleeting, erosion of a sky-etched silhouette below

shoulder height of the principal composition. It would appear at some distance as a backdrop feature to the Church, which would remain pre-eminent in the foreground. It would be read in context of the unfolding layers of monumental institutions of state and commerce which characterise the viewing experience of the Processional Route, where there is interactions of the steeple with other skyline features such as the Deloitte Building (New Street Square) and the Royal Courts of Justice. At no point would it challenge the steeple silhouette. This principal contributing element of setting to significance would be preserved.

315. Those more limited glimpses of the steeple, including in association with Somerset House, from the River, Waterloo Bridge and the South Bank, would not be obscured or detracted from, preserving this element of settings contribution to significance.
316. Overall, the proposal would preserve the special architectural and historic interest, heritage significance and setting of St Clement Dane as a result of change in setting.

Other Designated Heritage Assets

317. The definition of setting is the extent to which an asset is 'experienced', which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is within the setting of an enormous amount of heritage assets, and it would be disproportionate to assess them all. As part of a scoping exercise, this assessment is in accordance paragraph 194 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact on significance. In accordance with paragraph 195 we scoped a great number of potentially affected assets accounting for the evidence and necessary expertise. This included:

- The Royal Courts of Justice (Grade I),
- the Punch Tavern (Grade II),
- the Old Bell Public House (Grade II),
- 90-94 Fleet Street (Grade II),
- 80-81 Fleet Street (Grade II),
- 9 Salisbury Court (Grade II),
- Mersey House (Grade II),
- 143-144 Fleet Street (Grade II),
- Ye Olde Cheshire Cheese Public House (Grade II),
- 146 Fleet Street (Grade II),
- Tipperary Public House (Grade II),
- former Glasgow Herald Officer (Grade II),
- 49-50 Fleet Street (Grade II), amongst others, including all the various listed building which substantially comprise the Temples, Whitefriars and Strand Conservation Areas where the proposal could be seen in setting.

318. The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to the relative distance of the proposal where it would not appear unduly prominent, would not impact on the roofscape silhouette of the listed buildings and existing built fabric blocking the view of the proposed development in the backdrop. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings.
319. The assets assessed in detail here are considered sufficient to understanding the impact on significance. Where it is deemed there would be no harm to the assets above then there are no material differences with other related or nearby heritage assets which would have drawn a different conclusion.

Archaeology

320. The site is in an area of archaeological potential, to the west of the Roman and medieval walled City and to the north of the main route to the west, now modern Fleet Street. It is close to a known Roman cemetery.
321. The proposed development would retain the existing two-level basement and reuse existing foundations. The basement slab would be reinforced in the central area to take the proposed new structure. In the northern part of the site the existing basement slab would be replaced.
322. Archaeological excavation was carried out on the site prior to construction of the existing building and an Archaeological Status Report has been submitted with the application. The report examines the findings of the previous work on the site and concludes that no archaeological remains would have survived due to the depth of the existing basements and foundation construction and that it is highly unlikely that any cut features would have survived.
323. The proposed development is considered to have no impact on archaeological remains and an informative is recommended in the event that any changes to the development are proposed, a potential archaeological impact is considered.

Cultural Strategy

324. Adopted Local Plan policy CS11 seeks to provide, support and further develop a wide range of cultural facilities and events in the City. Policy S6 of the draft City Plan 2036 seeks to enhance cultural experiences and access to a range of arts and heritage. The policy requires developers to submit Cultural Plans for major development outlining how the development will contribute to the enrichment and enhancement of the City's inclusive cultural offer. These should set out how the development will contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or

displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.

325. A Cultural Plan has been prepared for the proposed development which outlines a strategic framework for the cultural use and activation of 120 Fleet Street, encompassing both the Daily Express Building and the River Court building, as well as a cultural space operator model that will interface with programming partnerships developed with local cultural stakeholders within the City and wider London.
326. The Cultural Plan proposes to open up the Daily Express Building to the public with event and exhibition space in the basement, interpretation of the building's history and exhibition displays in the ground floor lobby, uses complementary to the cultural uses on the 2nd to 4th floors, a café/bar and creative artisan's shops on the 5th floor and exhibition space on the 6th floor, as well as a publicly accessible rooftop.
327. The submitted Cultural Plan sets out the initial direction of travel for the cultural use and activation of the development. It states that the site's programme retains the principles of free access at the point of entry and accessibility at its core. The public benefits of the site and wider site include: Rejuvenation of the Grade II* Daily Express Building as a publicly accessible cultural destination, with complementary uses and a landscaped public roof garden, an improved public realm including new pedestrian routes through the site and increased pavement widening on Fleet Street which improves pedestrian movement and comfort, increased active ground floor frontages providing flexible retail, promotion of active travel through the delivery of a prominently located Cycle House, contributions towards further public realm improvement works to St Bride Street secured through the S278 agreement, use of off-site consolidation centres to minimise vehicle movements, delivery of a Cultural Implementation Strategy which would provide details on how further consultation and delivery plans would be adopted which is secured via a S106 agreement, delivery of an exemplar new office building demonstrating high sustainability credentials, high standards of architecture and design which provides high quality internal and external environments which embed health and wellbeing through the provision of unique south facing landscaped external amenity terraces for office occupiers.

Transport, Servicing & Parking and Impact on Public Highways

Cycling

328. 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.

329. The proposed level of cycle parking is compliant with the London Plan, as is shown in the table below.

London Plan long stay cycle parking	Proposed long stay cycle parking	London Plan short stay cycle parking	Proposed short stay cycle parking
1029	1037	85	85

330. The cycle parking for the new office building would be accessed from St Bride Street via a new cycle house. The cycle house would occupy a prominent location adjacent to the St Bride Street office entrance, enhancing the visibility of the cycle parking and celebrating cycling as a mode choice. The entrance to the cycle house would be conveniently located towards the bottom of the St Bride Street frontage and be well linked to the nearby cycleway 6 running along New Bridge Street and Farringdon Street.
331. 234 parking spaces would be located within the cycle house at ground floor level, comprising the 85 short stay cycle parking spaces and 149 long stay cycle parking spaces. A mix of cycle parking would be provided, including 106 spaces in an automated 'Velominck' cycle parking system, 78 folding bicycle lockers, 30 spaces provided by Sheffield stands and 20 spaces for larger adapted bicycles. The provision of the automated cycle parking system is a welcome innovation as a space efficient solution.
332. Spaces within the cycle house would be free to use for the general public. Access to the automated cycle parking system and the space for larger bicycles would be managed by a concierge. The concierge desk would be open during the building's public opening hours to ensure this cycle parking is accessible when required. Further detail on the operation of the concierge desk will be provided in the cycling promotion plan, which will be secured by a S106 obligation.
333. 882 long stay cycle parking spaces would be provided at basement level. Access to the cycle parking would be provided via two lifts and a staircase from the Cycle House at ground floor level. A mix of cycle parking would be provided, including 664 spaces on two tier racks, 93 spaces provided by Sheffield stands, 57 spaces provided by raised wheel/ wall mounted stands, 42 spaces for folding bicycles and 32 spaces for larger adapted cycles.
334. 5% of the cycle parking spaces are accessible for larger adapted cycles and this arrangement would be secured by planning condition in line the London Plan Policy T5 (Cycling), the London Cycling Design Standards 8.2.1, and the draft City Plan 2036.
335. The proposals include 90 showers, and 1029 lockers at basement level

The London Plan Policy 10.5.7 recommends a minimum of 2 lockers per 3 long-stay spaces, and at least 1 shower per 10 long-stay spaces. The proposals do not meet the London plan recommendations for the number of showers. The applicant has demonstrated that the number of showers can be increased, however the access and circulation would be worsened. These would represent an important part of a cyclist's experience of using the facilities and on balance the number of showers is considered acceptable. The proposed number of lockers exceeds the London Plan recommendations.

336. The applicant would be responsible for promoting the use of the cycle parking spaces through a Section 106 obligation to produce a Cycling Promotion Plan, which would be a cycling focused Travel Plan. The Cycling Promotion Plan would include details of how visitors to the office can access internal cycle parking. It would be submitted to the City for approval in line with London Plan Policy T4 (Assessing and mitigating transport impacts).

Vehicular Access

337. 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.
338. The development would be car free except for 2 blue badge car parking spaces that would be provided at the basement level 2. Occupants and visitors to 120 Fleet Street and the Daily Express Building would have access to this parking space. 24-hour access to the blue badge parking spaces would be provided.
339. The proposed development would be policy compliant in respect of the proposed car parking arrangement and would represent an improvement on current circumstances as the existing 27 car parking spaces would be removed.

Servicing and Deliveries

340. 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.
341. The servicing of both the office building and the Daily Express Building would take place off-street accessed from Shoe Lane. Vehicles would access the servicing area via two vehicle lifts, one for vehicles entering and one for exiting. The lifts would take vehicles to and from the second basement level where the servicing area is proposed. The servicing area would accommodate 3 vehicles up to 8m in size. The servicing area would provide space for vehicles to manoeuvre and enter and exit the vehicle lifts from Shoe Lane in a forward gear.
342. The servicing area would be equipped with electric charging points for delivery and servicing vehicles. This will be secured by condition.

343. Access for cargo bike deliveries is provided from St Bride Street within the cycle house. These goods would be received by the concierge desk within the cycle house.
344. 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.
345. The applicant is proposing to use an off-site consolidation centre in order to reduce the number of deliveries to the development per day. The applicant has agreed to a cap of 70 deliveries per day. A requirement to use off-site consolidation and the cap on daily vehicle numbers will be secured in the Section 106 agreement.
346. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy for both parts of the development.
347. The submission of a delivery and servicing plan, further detailing how deliveries would be managed to reduce their impact on the surrounding highway network, would be secured in the Section 106 agreement.

Waste Collection

348. Refuse collection would be undertaken from within the servicing areas, which would accommodate a 7.75m refuse vehicle and a 7.5T truck.
349. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities comply with their requirements.

Public Transport

350. 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 Blackfriars and Chancery Lane underground stations and City Thameslink, Blackfriars and Farringdon national rail stations. The site is close to several bus routes running close by on Fleet Street and Farringdon Street.
351. The submitted transport assessment indicates that the overall increase in trips across all modes would have an acceptable impact on the surrounding highway and public transport network capacities.

Trip Generation and Pedestrian Comfort

352. The Transport Assessment includes an estimation of trip generation for the existing and proposed developments. The proposed development would be expected to result in an increase in approximately 548 trips in the AM peak hour and 778 trips in the PM peak hour.
353. Transport for London's Pedestrian Comfort Guidance recommends a minimum Pedestrian Comfort Level (PCL) of B+ for all areas but defines a C+ comfort level as acceptable in office and retail areas. Proposal 2 of the City of London Transport Strategy aims to achieve a minimum PCL of B+.
354. A pedestrian comfort assessment has been conducted for the site. The applicant was unable to undertake their own pedestrian survey data during the pandemic. Data has been collected from surveys undertaken prior to the pandemic. Pedestrian flows for Fleet Street, Shoe Lane and Poppins Court were taken from the recent application for the Salisbury Square Development. Pedestrian flows for St Bride Street were taken from a report from 2016.
355. Existing pedestrian comfort levels (PCL) are impacted by the security bollards and planters on St Bride Street and by narrow footways on Shoe Lane. The analysis shows that following the removal of the HVM and the proposed changes to the building line, the PCLs on St Bride Street and Shoe Lane would achieve at least a B+ in most locations surveyed in the future with development scenario.
356. The retention of Daily Express Building and desire to achieve a consistent building line across the new Fleet Street frontage means that the pedestrian comfort levels would be expected to fall below the targeted B+ along Fleet Street. A PCL of C+ is expected along the Daily Express Building frontage and a PCL of B along the 120 Fleet Street frontage. The bus stop on Fleet Street close to the south eastern corner of the site creates a pinch point with a resulting PCL of D. While below the targeted level of B+, a PCL of B is considered comfortable and a PCL of C+ is considered acceptable within an office and retail environment, according to TfL's pedestrian comfort technical guide. The PCL of D created by the bus stop is no worse than existing and covers a short distance.
357. Overall the scheme would deliver improvements to pedestrian comfort on St Bride Street and Shoe Lane and through the S278 design and evaluation process options to improve the pedestrian comfort level on Fleet Street by widening the footway and rationalising the existing street furniture will be explored and if feasible these works will be funded by the applicant.

Stopping Up

358. The development would not require the stopping up of any public highway.

Public Realm, Security and Hostile Vehicle Mitigation (HVM)

359. A 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.

360. 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.
361. The existing security bollards and planters surrounding the site on St Bride Street and Shoe Lane are scheduled to be removed as a condition of the former building owner's S278 agreement.
362. Bollards are shown where Shoe Lane, the new route to the east of the Daily Express Building and Poppin's Court meet Fleet Street. The existing bollards on Shoe Lane and Poppin's Court would be retained. The existing bollards to the east of the Daily Express Building, where the new Y passage is proposed to meet Fleet Street, would be replaced by new bollards. These would be located off the public highway. New bollards are proposed at the entrances to the new passageways from Shoe Lane and Fleet Street, in both cases off the public highway. The bollards are proposed to prevent vehicular access to the new passageways and are considered acceptable.

Section 278 Agreement

363. The applicant will be required to enter into a Section 278 agreement to mitigate the impact of additional pedestrian flows in the surrounding area and to contribute towards the delivery of the London Plan policies T2 and D8. The detailed design of the S278 works will be developed alongside the forthcoming healthy streets plan for the Fleet Street and Temple area. The scope of the S278 agreement will cover St Bride Street, Shoe Lane and Fleet Street;

St Bride Street

364. Pedestrian priority measures will be introduced along St Bride Street. The City's Transport Strategy details the approach to be taken for pedestrian priority streets;

Pedestrian priority streets will allow access for motor vehicles, with all vehicles, including cycles, expected to give way to people walking. In some instances, streets will be fully pedestrianised or not allow motor vehicle access at certain times. The access requirements for each pedestrian priority, fully pedestrianised or timed pedestrianised street will be fully assessed as part of the project delivery process.

Subject to further detailed design through the S278 evaluation and design works, the extension of the pedestrianised section of St Bride Street further north beyond the proposed cycle hub entrance will be explored. The impact on neighbouring occupiers will be fully assessed

as part of this process and the provision of areas for servicing of neighbouring premises will be a key consideration in the evaluation and design of this area. The construction phase represents a chance to better understand the access requirements of neighbouring premises and surveys will be commissioned during this period as part of the S278 works. The developer has committed to funding these extended works should they prove feasible.

Works to St Bride Street will include footway widening along the western footway along the full length of the street to provide additional space to maximise tree planting while maintaining acceptable levels of pedestrian comfort. Carriageway resurfacing and additional greening will also be explored to help emphasise priority for pedestrians. The applicant will be required to fund tree planting along the length of the south western St Bride Street footway and opportunities to incorporate seating will be explored, again fully funded by the applicant.

Shoe Lane

365. Works to Shoe Lane will include, but not be limited to; Enhanced urban greening, either through tree planting or raised planters; Any works required to the highway to accommodate the new servicing access; and Any works required to the highway to facilitate the spill out of active uses onto the highway and a potential market operation

Junction of Shoe Lane/St Bridge Street

366. The proposals would require the reprofiling of highway at the northern tip of the site to provide level access into the new retail unit. As part of works to the area the S278 will also explore opportunities to provide additional seating and greening.

Fleet Street

367. Works to Fleet Street will include, but not be limited to; Widening of the northern Fleet Street footway across the site frontage, the scope for which will be determined within the developing Healthy Streets Plan; Any works required to facilitate step free access to the Daily Express building; A rationalisation of existing street furniture to declutter the footway; and Enhanced urban greening, subject to the maintenance of acceptable levels of pedestrian comfort.

Construction Logistics Plan

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

Environmental Impact of Proposals on Surrounding Area

369. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar

glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Wind Microclimate

370. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within the immediate area surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
371. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, building entrances, public open space and private roof terraces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
372. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
373. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
374. Assessments have been carried out for both the windiest (winter) and summer seasons, and this is covered in Chapter 9 of the Environmental Statement and Volume 3, Annex 3 of the Environmental Statement.
375. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

Wind Conditions at Ground Level

376. In the existing baseline conditions the wind tunnel tests and CFD show that conditions around the site are suitable for their intended use, primarily occasional and frequent sitting. To the north of the site at the junction of Shoe Lane, Stonecutter Street and Little New Street there are three locations categorised as standing in the windiest season.
377. Early testing of the effects of the development on wind microclimate led to the incorporation of a number of features into the design of the building and landscaping. These include:
- Façade offset and 50% open mullions around the northern entrance;
 - 50% open façade on the west and east cores;
 - Increase in width and change of orientation for the public passageway through the proposed development;
 - Mullions incorporated along the public passageway through the proposed development
 - Screens installed on the Daily Express Building terraces;
 - Planters installed on the Daily Express Building terraces;
 - Screens embedded in the planters on the private amenity terraces on the new development; and
 - 50% open railing around the private amenity terraces.
378. In considering the completed development, in most locations the wind conditions would remain either in the same categories as existing or become windier but would continue to fall within a category suitable for their intended use.
379. With the proposed mitigation measures in place, all locations at street level would experience wind conditions appropriate to the intended use and there would not be any safety exceedances resulting in unsafe conditions.
380. In testing the proposed development and cumulative schemes within 400m of the site, with proposed mitigation measures in place, there would be no material change in wind conditions from the scenario of the proposed development with existing buildings.
381. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level, and so no additional mitigation above that proposed is required.
382. A Wind Audit would be secured in the S.106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the ES.
383. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with Local Plan

Policy 7.6, London Plan Policy D8, Local Plan Policy DM10.1 and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Daylight, Sunlight, Overshadowing, Radiance, Solar Glare and Thermal Comfort

384. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether harm is likely to occur. The approach indicated by planning policy is that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan 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 its context. The residential buildings to be considered are those at:
- a. Sovereign House, 7-13 St Bride Street (also known as 5-6 Poppins Court);
 - b. 26 Farringdon Street;
 - c. 7 Wine Office Court;
 - d. 1, 2 and 3 Wine Office Court;
 - e. St Bride's Church Rectory;
 - f. The Old Bell Public House, 95 Fleet Street;
 - g. 24 Bride Lane;
 - h. 30 Bride Lane;
 - i. The Punch Tavern Public House, 99 Fleet Street;
 - j. 101 Fleet Street; and
 - k. 2 and 9 Bride Court.
385. Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such

the daylight and sunlight impact is not subject to the same test requirements as residential premises. 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. The proposed development provides a degree of separation with the neighbouring commercial occupier, Peterborough Court, 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. Levels of daylight and sunlight to the commercial premises would remain appropriate to the context of the City. As such the proposal is not considered to conflict with Local Plan Policy CS10.

Daylight

386. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), These are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane.
387. The BRE Guidance state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction.)
388. Both the London Plan 2021 and the draft City Plan 2036 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.
389. The impact on each neighbouring residential building is outlined below.

Old Bell Tavern Public House, 95 Fleet Street

390. A total of 5 windows serving 4 rooms were assessed for daylight.
391. All four rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
392. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

The Punch Tavern Public House, 99 Fleet Street

393. A total of 12 windows serving 6 rooms were assessed for daylight.
394. All six rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
395. Overall, the effect of the proposed development on daylight to this

building is considered to be negligible.

101 Fleet Street

396. A total of 17 windows serving 4 rooms were assessed for daylight.
397. All four rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
398. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

5 & 6 Poppins Court

399. A total of 48 windows serving 17 rooms were assessed for daylight.
400. A total of 31 windows would meet the BRE Guidelines for VSC. 17 Windows are considered to experience a minor-major scale of effect.
401. Of the 17 windows a detailed analysis of the overall effect on rooms is found to have a negligible or minor scale of effect which is not significant, for all but 8 windows serving 5 bedrooms located on the third to fifth floors.
402. The 8 windows currently experience a very low VSC in the existing condition between 2.80% and 6.37%, when compared to the BRE Guidelines recommended criteria of 27%. A low existing daylight value, when looking at the percentage reduction criteria, can mean a small reduction is likely to result in a large, disproportionate percentage change.
403. The greatest percentage reduction occurs to a bedroom on the fifth floor. However, the actual reduction is small at 2.48% VSC. Therefore, the percentage reduction results show a disproportionate effect from what will actually be experienced. The effects are unlikely to be noticeable and therefore considered acceptable.
404. Overall, the effect of the proposed development is considered to be moderate-major adverse for these 8 windows when compared to the baseline situation. The overall effect, when considering the room use and the small actual losses of light can be considered acceptable.
405. For NSL, all rooms except five bedrooms on the first, second, third and fifth floors would experience either a small reduction that is within the 20% reduction criteria or will experience no change.
406. The five bedrooms above would experience a reduction that exceeds the 20% reduction criteria and would experience reductions of a major scale of effect. Overall, these rooms currently enjoy very small NSL in the existing condition with only 1.5%-6.6% of each room being able to see some sky, when compared to the BRE Guidelines of 80%.
407. The actual reduction to each room is therefore small and unlikely to have a noticeable effect on the natural light enjoyed within each room and the effects are considered to be negligible.

3 Wine Office Court

408. A total of 7 windows serving 5 rooms were assessed for daylight.

- 409. All five rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 410. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

2 Wine Office Court

- 411. A total of 7 windows serving 5 rooms were assessed for daylight.
- 412. All five rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 413. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

1 Wine Office Court

- 414. A total of 7 windows serving 5 rooms were assessed for daylight.
- 415. All five rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 416. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

26 Farringdon Street

- 417. A total of 15 windows serving 6 rooms were assessed for daylight.
- 418. All six rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 419. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.
- 420. The adverse impacts experienced by 5 and 6 Poppins Court are considered to be existing levels of direct daylight to the Poppins Court façade are already very low with the averages being 4% VSC or lower. Therefore, most of the daylight enjoyed within these properties will be from reflected daylight, rather than direct daylight which is what is measured when using the VSC test. The 8 windows which would experience a moderate/major effect currently experience a very low VSC in the existing condition between 2.80% and 6.37%, when compared to the BRE Guidelines recommended criteria of 27%.
- 421. When considering the percentage reductions of VSC against the significance criteria, 8 windows within 5&6 Poppins Court which serve 5 bedrooms would experience a moderate/major adverse significance of effect. However, as discussed, these 8 windows currently experience a very low VSC in the existing condition, meaning that even a small actual reduction is likely to result in a large disproportionate percentage reduction. Overall, when considering the actual reductions of daylight using the VSC test, the effects can be considered acceptable.
- 422. In addition, the No Sky Line (NSL) assessments show that these 8 windows, which serve 5 bedrooms, will experience percentage reductions of a major effect which is significant. However, each of these rooms currently enjoy a very small NSL in the existing condition,

well below the BRE Guidelines recommended criteria of 80%. The actual reduction to each room, regardless of the percentage reduction, is small and unlikely to have a noticeable effect on the natural light enjoyed within each room. Overall, when considering the actual reductions of daylight distribution, the effects can be considered acceptable.

Sunlight

423. The BRE Guidelines state that to assess loss of sunlight to an existing building all main living rooms of dwellings should be checked if they have a window facing 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. To quantify the available sunlight, the BRE Guidelines advise measuring the percentage of Annual Probable Sunlight Hours (APSH), which is defined as “the total number of hours in the year that the sun is expected to shine on unobstructed ground, allowing for average levels of cloudiness for the location in question”.
424. The BRE Guidelines state that sunlight to neighbouring buildings will be adversely affected if the centre of the window will receive less than 25% of APSH (calculated over the whole year) or less than 5% APSH during the winter months (between 21st September and 21st March); and less than 0.8 times its former sunlight during either period; and the reduction in sunlight over the whole year would be greater than 4%.
425. APSH has been calculated over the whole year (annual sunlight) and between 21st September and 21st March (winter sunlight). All rooms within the neighbouring residential properties that have a window facing within 90 degrees of due south have been included in the assessment.
426. Due to orientation, there are 63 windows serving 23 residential rooms, in 2 individual residential properties surrounding the site which are material considerations in sunlight terms.
427. Of the sensitive residential properties surrounding the site, only 5&6 Poppins Court and 26 Farringdon Street have site facing windows that are within 90 degrees south.
428. The results of the assessment show that both of these properties would experience alterations which, in accordance with BRE Guidelines would not be noticeable to the occupants. The effects are therefore considered negligible.

Overshadowing

429. BRE Guidelines recommend that for an external space to appear well lit at least 50% of the area should receive at least two hours of sunlight on March 21st. If as a result of development an amenity area does not meet the above and the area which receives two hours of direct sunlight is reduced to less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.
430. The sun on ground assessment to the proposed rooftop terraces shows that each amenity space would enjoy at least 2 hours of sunlight to over 50% of the total area. these levels of sunlight exceed what is

requested by the BRE Guidelines and the space would continue to enjoy good levels of sunlight throughout the year.

431. Due to the orientation, bulk and massing of the proposed development good levels of sunlight will generally be enjoyed throughout the day.

Radiance Study

432. A radiance study was also carried out by the applicants to complement the daylight and sunlight assessments undertaken. The results of the radiance study demonstrate that the majority of rooms currently experience low levels of daylight, with Average Daylight Factor (ADF) levels typically around 0.1% ADF to 0.4% ADF. The living rooms to the northern end of the building receive slightly higher levels of daylight as they receive additional light from the north and east across St. Bride Street.
433. The radiance analysis shows that only 5 bedrooms are likely to experience a reduction to their ADF if the proposal is built. In each case, the reduction would be small, at no more than 0.1%. This scale of reduction is unlikely to be noticeable by the occupants.

Solar Glare

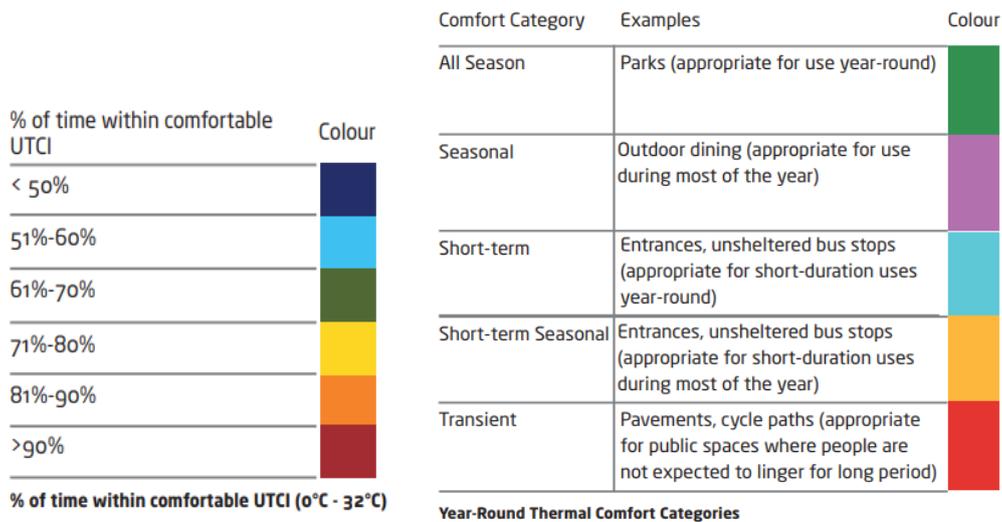
434. Due to the orientation of the proposed development and the position of the roads, details solar glare assessments were not considered to be required.
435. An annex on Solar Glare is included within the ES for completeness. It details that the orientation and position of the site and surrounding roads were considered, and no instances of solar glare were likely to be perpendicular to the line of travel, occurring for very limited periods of time or blocked by other buildings. The annex confirms that there are no material or significant effects to the safe movement of pedestrians and vehicles on the pavements and roads surrounding the proposed development.

Thermal Comfort Assessment

436. London Plan Policy D8 and D9 and the emerging 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. 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.
437. 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.

438. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location:



439. Four configurations have been assessed including; the existing site with existing surrounding buildings, existing buildings with any buildings with planning permission built out, the proposed development with the existing surrounding buildings and the proposed development with cumulative surrounding buildings.

440. Both the landscaping and the wind mitigation measures considered during the wind microclimate assessments have been included in the study.

Public Street Level

Shoe Lane

441. On Shoe Lane most of the street experiences comfortable conditions between 81-100% of the time for spring and autumn seasons.
442. For both the existing site and proposed development schemes, the resulting year-round comfort grade is largely 'Seasonal', which is appropriate for outdoor dining.

St Bride Street

443. On St Bride Street most of the area experiences comfortable conditions for at least 81% of the spring to autumn seasons.
444. For the existing site, the resulting year-round comfort grade is largely

seasonal, which is appropriate for outdoor dining conditions. The windier conditions around the proposed development reduces the period of comfortable conditions for autumn to spring seasons, resulting in and overall 'Short-term' comfort grade, which is appropriate for sedentary uses.

Fleet Street

445. On Fleet Street and the proposed arcade street the thermal conditions are suitable for at least 90% of the time for spring to autumn seasons.
446. For both the existing and proposed development, year-round comfort grade for the area remains predominantly 'Seasonal' which is suitable for outdoor dining.

Poppins Court

447. For Poppins Court, conditions are comfortable for at least 81% of the spring to autumn seasons.
448. The overall comfort grade 'Short-term' can be seen for the proposed development. Poppins court is a narrow footpath which would not be appropriate for sitting.

Northern Bullnose

449. For the northern bullnose area, most of the area maintains the same comfort grade (short term) with a small area that becomes 'Short-term' seasonal due to the winder conditions in the winter.

Public Route through the proposed development

450. The combination of calm wind conditions and sheltering from the sun allows for comfortable conditions along the passageway for at least 90% of the spring to autumn seasons, and 81% of winter. The resulting year-round comfort grade of 'All-season' and 'Seasonal' reflects this.

Daily Express Building

451. The proposed development provides public space to the rooftop, which is predicted to be comfortable for use nearly all year round. The thermal conditions on the publicly accessible roof are comfortable for at least 90% of spring to autumn seasons.
452. The resulting year-round comfort grades vary between 'All-season' and 'Seasonal', indicating conditions suitable for amenity spaces or outdoor seating.

Private terraces

453. The thermal conditions on the private terraces are comfortable for at least 90% of spring to autumn seasons. The resulting year-round comfort grades vary between 'All-season' and 'Seasonal' indicating conditions suitable for amenity spaces or outdoor dining.
454. It is considered that the thermal comfort in and around the site, would be acceptable in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Air quality

455. Heating and power will be provided from off-site sources to avoid the need for on-site combustion. The emissions associated with the vehicle trips have been assessed and should have negligible impact on the local air quality. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

Access and Inclusive Design

456. 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, HL1 and S8 of the draft City Plan 2036 and policy 7.2 and D5 of the London Plan. The City's Access Officer has been involved throughout the evolution of the scheme.
457. The proposed development seeks to maximise pedestrian connectivity and permeability where possible, whilst maintaining the security and operational requirements needed for both buildings.
458. All horizontal and vertical access within both buildings have been designed to the recommendations set out in the Approved Document M and BS8300. Lifts would be the main means of vertical circulation within the building and have been designed to accommodate a variety of users, including wheelchair users.

Daily Express Building

459. The Daily Express Building is located to the south west of the application site. The building has two entrances: the historic South Lobby and an East Lobby. The South Lobby fronts onto Fleet Street, where it is proposed to install a ramp for the left-hand set of doors to provide wheelchair access. The East Lobby would be accessed from a new part of public realm.
460. The creation of new passageways to the north and east of the Daily Express Building increase the permeability of the site and provide level access to the East Lobby and a commercial unit. The passageway to the north of the building would need two ramps to ensure the public realm is step free and they would be 10m apart. These would have a gradient of 1:14.
461. The building would utilise a double-sided firefighting lift that would benefit users of larger wheelchairs and mobility scooters. Areas of refuge would be provided within the lobbies of the firefighting staircase, and the lift would allow evacuation of disabled people in line of the London Plan Policy D5. Disabled access to the roof garden would be made via this lift.
462. Wheelchair-accessible WCs would be provided on every floor.

New Office Building

463. The new Office Building would incorporate new retail uses around the ground floor as well as a large lobby running from north to south. The varying levels of the surrounding public realm have meant that the entrances are also on different levels. The proposed retail unit to the north can be accessed from Shoe Lane and via an internal staircase and platform lift connecting it to the lobby. This is also the case for retail unit situated on Shoe Lane. The Cycle House fronting St Bride Street would be connected to the lobby via two internal ramps.
464. Evacuation lifts are to be provided to ensure compliance with London Plan Policy D5. These would serve the entire office building, including any potential tenancy splits.
465. Wheelchair-accessible WCs would be provided on every office floor.
466. Roof terraces would feature on most of the office floor levels. Each of these would utilise a 1:21 slope to provide step-free access between the interior and the slightly raised floor of the terrace.

Disabled parking bays and cycle spaces

467. London Plan 2021 Policy T6.5, London Plan 2015 Policy DM16.5 and draft City Plan 2036 Policy VT3 reference to car-free developments except for disabled persons/ Blue Badge parking.
468. The proposals include the provision of two accessible parking spaces within the basement of the Office Building.
469. Cycle parking is located in the basement and would be accessed through the Cycle House on St Bride Street. Stairs and two lifts would provide access between the Cycle House and the basement level. A mix of stands would be provided, and would accommodate adapted bikes and/or trikes, in line with the standards set out by the London Plan.

Noise and Vibration

470. The submitted Environmental Statement includes an assessment of the impact from noise and vibration on the surrounding area, including noise and vibration from the enabling works, demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.
471. Generally, in City redevelopment schemes most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Construction Management Plan to be approved by condition.
472. The proposed development includes a large amount of mechanical plant which would be located at both roof and basement levels, and

would include extract fans, air handling units, heat pumps and condenser units. To ensure that noise from plant is adequately closed and minimised, conditions are required related to plant noise and vibration.

473. All deliveries would take place within dedicated loading bays at basement level and would be therefore have a negligible impact in terms of noise associated with unloading.

Health Impact Assessment

474. Policy HL9 of the Draft City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. The applicants have submitted a Health Impact Assessment, based on the Healthy Urban Development Unit's criteria, which demonstrates that health and well-being issues have been adequately addressed.

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

476. Positive impacts include:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment.
- Provision of cycle facilities within the Cycle House which will encourage and support active transport by the buildings users and offering services and amenities to the wider local community (café, maintenance etc).
- Servicing and logistics strategy have been designed to minimise delivery vehicle trips to the Site and access points have been designed to avoid conflict with pedestrians and cyclists.
- The Site is well located with good pedestrian and cycle routes, promoting users to choose active modes of travel coming to and from the Proposed Development.
- Provision of high-quality public realm at the ground floor and a new route through the Site improving the physical environment and contributing to social cohesion.
- Provision of open space through the terraces at various levels (levels 7 -17) through the Proposed Development. This will offer workers good access to open space, fresh air and amenity space throughout the day. This would have a beneficial impact on workers physical and mental health. The terraces have been designed to be flexible to tenants needs,

with options for curating spaces for use as social spaces, areas for urban agriculture, outdoor meeting spaces, amenity spaces etc. Publicly accessible open space will be delivered on the roof terrace of the Daily Express Building.

- A Cultural Plan has been submitted to support the delivery of a significant cultural offer as part of the Proposed Development particularly in the context of opening up the Daily Express Building for public access. This would have a positive health benefit of promoting social integration for both the buildings occupants and the wider local community.
- A car-free development (with the exception of two Blue Badge parking spaces for disabled access) minimising vehicles travelling to the Site.
- Building design considering the context of the Site and maximising benefits including employing systems to reduce energy usage (i.e. Double skin facade and passive ventilation). The Proposed Development targets a BREEAM Excellent rating with aspirations to achieve BREEAM Outstanding rating.
- Building has been designed to facilitate achieving a platinum rating under the WELL Building Certification.
- Consideration to sustainability and inclusive design.

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

- Implementation of a Construction Environmental Management Plan (CEMP) to minimise any environmental effects including dust (via Dust Management Plan), noise and vibration;
- Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction works;
- Implementation of a Delivery and Servicing Management Plan;
- Implementation of a Framework Travel Plan to minimise vehicle trips – as the Site has good access to public transport and active travel modes, the target focus is to maximise uptake of active travel options (walking and cycling);
- Local Procurement Strategy and Local Training, Skills and Jobs Brokerage Strategy to be agreed through the Section 106 to maximise the economic benefits locally; and
- Legible London signage to be delivered through Section 106 Agreement.

478. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions. The development seeks to improve the health and addresses health inequalities, the

residual impact would be acceptable, and the proposals would comply with London Plan policy 3.2 and London Plan policy GG3 and emerging City Plan 2036 policy S1.

Sustainability

Circular Economy

479. Emerging New 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.

480. 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:

Option 1: Light refurbishment of the Existing River Court building, mainly fabric upgrades and new central plant (boilers + chillers), retained distribution of services

Option 2: Refurbishment with new central plant (boilers and chillers) and retained distribution of services, plus lightweight extension to provide additional lettable space, new façade and thermal elements, new services (heat pump + chiller top up) – achievable floorspace 10,000sqm GIA lower than in option 3

Option 3: Redevelopment with retained basement structure, new superstructure, new façade, thermal elements and services (the proposed design)

481. The details of the 3 options in terms of extent of alterations to existing building elements and to new services have been selected to provide the best possible, balanced outcome with respect to embodied and operational carbon emissions savings for each scheme. The Whole Life-Cycle carbon emissions were calculated as of the beginning of the implementation works and include 'Use' (B1-B5) and 'End of life' (C1-C4) stages. The unknown Whole Life-Cycle carbon emissions of the retained parts of the building prior to the works are considered as spent carbon and are not included into the calculations.

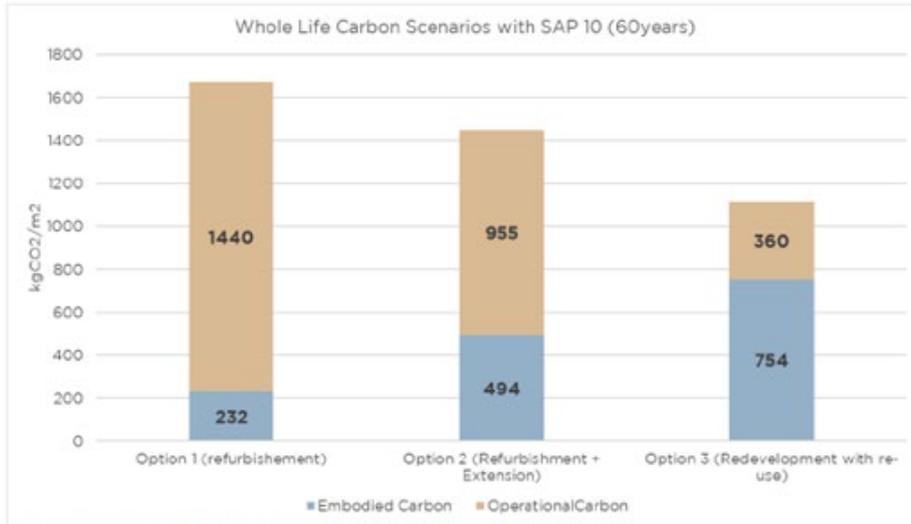


Figure 2-1 Whole Life Carbon for various design scopes

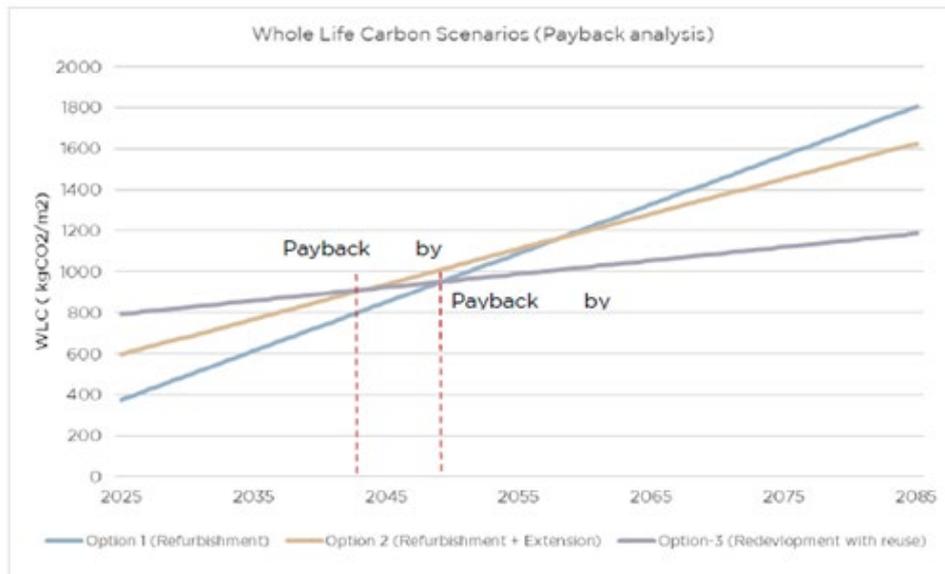


Figure 2-2 Cumulative carbon over the life span of assessed design scopes

482. The whole life-cycle carbon emission projections for the 3 options (see figures 2-1 and 2-2 copied from the submitted Circular Economy Statement above) show that option 3 (grey line) would have the least carbon emissions over a 60-year lifespan while option 1 (blue line) would have the most, due to a very high percentage of operational carbon emissions over this time span. When considering the higher embodied carbon impact, options 2 and 3 would achieve paybacks – reduced carbon emissions compared to option 1, after 19 years for option 3 and 24 years for option 2. The applicants therefore decided to pursue redevelopment option 3.
483. The submitted circular economy strategy includes the following commitments:
- The retention of the foundations and basement retaining walls (the retained substructure is 10.9% of the total elemental mass of the

building) and a new lightweight structure with low embodied carbon and material efficiency

- a pre-demolition audit that has been carried out to identify the percentage of demolition and strip out waste which can be reused or recycled on site or offsite.
- Diversion of 90% (by tonnage) of the non-demolition waste and 95% (by tonnage) of the demolition waste from going into the landfill.
- the use of 30-50% cement replacement products
- 20% recycled steel in columns and beams and 97% in rebar
- Achieving flexibility and adaptability by providing a large grid size and soft spots in the structure
- Prioritising sustainably sourced material e.g. FSC or PEFC certified timber, suppliers who operate a compliant environmental management system.

484. A resource efficiency and site waste management plan will be implemented on site to minimise waste generation and then manage waste responsibly. Further, an operational waste strategy will be implemented to ensure municipal waste is managed sustainably. The confirmation of details of the proposed initiatives outlined in the statement to reduce waste and encourage reuse is requested by condition as part of a detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments. The detailed assessments 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

485. The Energy Statement accompanying the planning application demonstrates that the new building has been designed to achieve an overall 44% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

486. The proposed energy demand reduction strategy would reduce the new building's operational carbon emissions by 19% compared to a Building Regulations compliant building and includes the following main elements:

- High level envelope insulation and minimising solar gain with a ventilated cavity façade system with integrated, automated blinds. The double-skin façade is considered to be the optimum system that can incorporate natural ventilation while protecting from noise and pollution
- Incorporation of full-height side-hung windows to allow for passive ventilation for parts of the office floors

- Mechanical ventilation with high rate of heat recovery through air source heat pumps and water-cooled chillers connected to cooling towers
 - High thermal mass provided by exposed concrete slabs to moderate cooling loads.
487. 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 in a plant room in the basement of the proposed development.
488. A low temperature communal heating network consisting of 4 air source heat pump systems would serve the whole site to meet the energy demand for space heating. Hot water would be provided by 2 water to water heat pumps. Additional renewable energy would be provided by 91 PV panels (7 No on the Daily Express Building's roof and 84 No panels on the new building as part of a biosolar roof on level 18 and on the top of plant level 19, equating to an overall panel area of approx. 161sqm.). These technologies would contribute carbon emissions savings of 25% compared to a Building Regulations compliant building.
489. The refurbished Daily Express Building would achieve an overall 56% reduction in carbon emissions compared to a Building Regulations compliant building, 40% of which through energy demand reduction and 16% through renewable energy technologies. Due to the listing of the building, further passive design measures to reduce cooling demand cannot be incorporated. The building would be served by the heat pumps and chillers on the roof and basement of the new building.
490. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 obligation 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

491. A BREEAM New Construction 2018 pre-assessment for the new shell and core office building and BREEAM Non-Domestic Refurbishment and Fit-Out 2014 pre-assessments for the Daily Express office use and the Daily Express Leisure use have been prepared.
492. The strategy aims to achieve at least an "Excellent" rating for all uses; however the new office building's aspiration is to achieve an "outstanding" rating, targeting a score of over 90%. The applicants will be able to confirm this after the detailed design stages of the development. The pre-assessment indicates a score of 90.40% for the

new built River Court building and 75.73%/75.31% for the Daily Express refurbishment office/leisure. The River Court building is on track to achieve a high number of credits in the CoL's priority categories of Energy, Water, Pollution and Materials. Further credits could be targeted in the detailed design phase of the development.

493. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. Post construction BREEAM assessments, based on a fully fitted-out development are requested by condition.

Whole Life-Cycle carbon emissions

494. Emerging New London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.
495. The proposed Whole Life-Cycle carbon reduction strategy is based on reducing embodied carbon impacts by minimising operational energy demand, by the retention of the existing basement retaining walls, by increasing the use of cement replacement in concrete from 25-50% and of recycled content of structural steel as well as by specifying the fabrication of steel. Further opportunities will be investigated with regard to minimising quantities of steel, concrete and aluminium and raising recycled contents as much as possible.
496. Over the proposed building's whole life cycle, the embodied carbon emissions calculations at planning stage would be 753 kgCO₂/m², demonstrating emissions that are lower than the GLA's Aspirational WLC benchmark of 800 kgCO₂e/m². 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

497. 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.

498. The new development offers plenty of opportunities to embed robust green infrastructure within the new architecture and enhance urban greening and biodiversity on the large terraces located on levels 6 to 17, to include a biosolar roof on level 18, perimeter planting on levels 18-20, as well as a public terrace with landscaping on the roof of the Daily Express building. The terraces would be accessible to all occupants and are designed to provide a mix of amenity spaces and native, biodiverse planting, including wildflower/sedum, herbaceous planting, shrubs and small trees as well as wildlife boxes.
499. Details of a holistic scheme of green roofs, hedges, amenity planting and biodiverse habitats, and of a rainwater harvesting system to support high quality urban greening and appropriate maintenance of the proposals, are required by condition.
500. The proposed development includes a range of green infrastructure measures such as terrace planting and biodiverse green roofs that would contribute to cooling the building, resulting in an Urban Greening Factor of 0.34 that exceeds the GLA and the City of London's requirements. The biodiverse features would provide a green and attractive setting as there are many hard roof surfaces on the existing and surrounding buildings and would result in a net gain in biodiversity to the site.

Climate Change Resilience

Water Resources

501. The proposed development will significantly reduce its demand on mains water supply through the use of water efficient fittings. The proposed fittings will ensure the new development will consume 40% less potable water than a baseline building water consumption. A major leak detection system will also be installed.

Flooding

502. Two rainwater storage tanks are proposed, one for later slow release of the water into the sewer, the other for rainwater harvesting to use for irrigation. The tank volumes are selected to be able to achieve greenfield discharge condition under the 1-in-100-year (plus 40 % climate change) storm event. Details of opportunities to incorporate blue roofs on the terraces of the development in order to further reduce water-run-off are requested by condition.

Heat Stress

503. The sustainability statement outlines measures to prevent overheating through the double-skin façade with integrated blinds and potential for opening window sections within the inner skin of the façade, ventilating through gaps in the outer skin. The proposed measures will provide natural ventilation as well as reduce excessive solar gains thus reducing the cooling demand.

504. Natural Capital and Pest & Diseases
505. The proposed development will incorporate urban greening that would improve significantly on the existing quantity and quality of urban greening on site. 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.
506. 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

507. 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.
508. 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 exceeds current and new London Plan policies as well as Local Plan policies in most aspects, and it is on track to achieve an “outstanding” BREEAM assessment rating.
509. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced in line with the GLA’s aspirational benchmark. The existing building has been assessed and found to be unsuitable to be transformed into a sustainable development over and beyond a lifetime of 60 years. However, Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible and adaptable development. While the proposed development presents a well-considered and innovative approach to integrating green infrastructure and urban greening across the scheme and its response to climate resilience is considered to be acceptable, a more innovative approach to incorporating resilience measures would be welcomed and an assessment is requested by condition. Passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

Security

510. Details of the overall security strategy will be required by condition and a Visitor Management Plan will be required by S106 which will detail more specifically the measures to protect the public roof terrace and public realm.
511. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

Fire Statement

512. 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.
513. The applicant has consulted with the District Surveyors Office in relation to the design, and the London Fire Brigade and the City's fire safety advisor have given their input. There are no issues with the fire safety measures proposed.

Equality Impacts

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

514. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
515. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case inclusive and accessible design principles have been incorporated to ensure people with a mobility restriction, and any other limiting considerations can use the new facilities with ease. The proposed development will have step-free access to all parts of the buildings, including the terraces.
516. As set out in the considerations section of the report the Committee is required to have due regard to its obligations under the Equality Act 2010. An Equalities Impact Assessment has been carried out in respect of the scheme and is appended to this report.
517. It has considered that the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability,

whether you are pregnant, race, sex, sexual orientation and gender reassignment and marital status.

518. This would be achieved through measures such as:
- The provision of level access or step free access and lifts where this cannot be achieved due to building and site constraints. This would include accessible routes through the site and step free access to all parts of each building including the roof terraces;
 - The commitment to provide accessible parking and public realm improvements
 - The provision of accessible facilities including toilets, wheelchair store and accessible cycle parking
 - Safe evacuation procedures for people with physical disabilities or impairment
 - The provision of community and cultural uses.
519. Final details of access to the Daily Express Building and the new office building would be secured by condition in order to ensure equality of access.
520. Conditions, informatives and a S278 agreement would be required to cover matters such as the accessible parking, final layout of supporting facilities such as the toilets and access into the Daily Express and new office buildings. An informative would be placed on the permission reminding future occupiers of their duty under the Equality Act 2010. This would be particularly relevant as the future occupiers of the buildings are unknown.
521. The Corporation needs to ensure that dialogue with the neighbours is maintained. A suitable programme of highway works and conditions relating to construction and demolition management and logistics are recommended in order to minimise the impact of the scheme on the neighbouring residents and occupiers.

Assessment of Public benefits and the paragraph 202 NPPF balancing exercise

522. 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".
523. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great

weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 196 NPPF balancing exercise.

524. When considering the listed building consent applications, the duty imposed by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies and in considering whether to grant listed building consent special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. As the application site lies in part within the Fleet Conservation Area, the duty imposed by section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged in relation to that part of the application site which lies within the conservation area. As a result, when carrying out the paragraph 196 NPPF balancing exercise in relation to that part of the application site lying within the conservation area, considerable importance and weight must be given to the desirability of preserving or enhancing the character or appearance of that conservation area.

525. An assessment of the significance of designated heritage assets has also been undertaken and less than substantial harm of different degrees has been identified to designated heritage assets and this is summarised below.

- Modest, less than substantial, harm would be caused to the heritage significance of St Paul's Cathedral by virtue of in-direct impacts on setting, the result of the height and presence of the proposed development on the silhouette of the Cathedral from the Cannon Street approach, the Monument and the Sky Garden at 20 Fenchurch Street. **It is considered that this less than substantial harm would be at the lower end of the spectrum.**
- Slight, less than substantial, harm would be caused to the heritage significance of the St Paul's Conservation Area by virtue of in-direct impacts on setting, the result of the height and presence of the proposed development on the silhouette of the Cathedral from the Cannon Street approach, the Monument and the Sky Garden at 20 Fenchurch Street. **It is considered that this less than substantial harm would be very much at the lower end of the spectrum.**
- Slight, less than substantial, harm would be caused to the heritage significance of St Dunstan in the West by virtue of in-direct impacts on setting, the result of the height and presence of the proposed development on the silhouette of the church

tower when approached from the Strand. **It is considered that this less than substantial harm would be very much at the lower end of the spectrum.**

- Slight, less than substantial, harm would be caused to the heritage significance of the Fleet Street Conservation Area by virtue of in-direct impacts on setting, the result of the height and presence of the proposed development on the silhouette of the church tower when approached from the Strand. **It is considered that this less than substantial harm would be very much at the lower end of the spectrum.**

526. In this case, the less than substantial harm ranges from slight to modest caused to a number of designated heritage assets and paragraph 196 requires this harm should be weighed against the wider public benefits of the proposal including, where appropriate, securing its optimum viable use.”

527. The key social, environmental and economic public benefits of the proposal are considered to be:

- Heritage Benefits: the proposal would result in a moderate enhancement to the significance of the former Daily Express Building as a result of direct and indirect enhancement of significance and setting. The proposals for the Daily Express Building would also result in modest enhancement to the Fleet Street Conservation Area overall. It was also found that there would be a slight enhancement to the significance of St Bride’s Church as a result of change in its setting. Together, the heritage benefits are attributed substantial weight.
- Heritage Understanding: the proposed inclusive form of development for the Daily Express Building, reimagined as a new cultural hub on Fleet Street, would allow a wider public a greater understanding and appreciation of the heritage significance of the Daily Express building. This is attributed significant weight.
- Provision of a public cycle house which would promote active travel. The house is an innovative concept, providing a dedicated internal space within the commercial building footprint for use by visitors to the two buildings and to the wider area, and within close proximity to two major cycleways. The area would provide secure cycle parking sheltered from the elements. This is a benefit that would attract moderate weight.

528. In terms of the harm found in particular to St Paul’s Cathedral, but also to St Dunstan in the West, given they are Grade I listed buildings and designated assets of the highest order, particular force has been attributed to the failure to accord with the statutory test at s.66 of the Act, and the need to give considerable importance and weight. Together with the residual harms caused to the St Paul’s and Fleet Street Conservation Areas respectively, the heritage harm is given

considerable weight.

529. When carrying out the Para 202 balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable importance and weight should be given to the desirability of preserving or enhancing the character or appearance of the conservation area. It is considered that the public benefits described, and attributed weight above would outweigh the heritage harm identified, thus passing the test at paragraph 202 of the NPPF.
530. In terms of the Development Plan, the proposal would draw some conflict and some lesser support from heritage policies, namely Local Plan Policies CS 12, DM 12.1 and DM 12.3 and London Plan Policy HC1. The heritage harms would not be outweighed by the heritage benefits in this instance, given the particular force which must be given to the considerable importance and weight afforded to the preservation of St Paul's Cathedral as a Grade I listed designated heritage asset of the highest order, which is less than substantially harmed. Therefore, it is considered that the proposal would be contrary to those heritage policies in the Development Plan.
531. In conclusion, the wider public benefits as material consideration would outweigh the conflict with the development plan. The public benefits of the site and wider site include: Rejuvenation of the Grade II* Daily Express Building as a publicly accessible cultural destination, with complementary uses and a landscaped public roof garden, an improved public realm including new pedestrian routes through the site and increased pavement widening on Fleet Street which improves pedestrian movement and comfort, increased active ground floor frontages providing flexible retail, promotion of active travel through the delivery of a prominently located Cycle House, contributions towards further public realm improvement works to St Bride Street secured through the S278 agreement, use of off-site consolidation centres to minimise vehicle movements, delivery of a Cultural Implementation Strategy which would provide details on how further consultation and delivery plans would be adopted which is secured via a S106 agreement, delivery of an exemplar new office building demonstrating high sustainability credentials, high standards of architecture and design which provides high quality internal and external environments which embed health and wellbeing through the provision of unique south facing landscaped external amenity terraces for office occupiers.

Planning Obligations

CIL and Planning Obligations

532. 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.

533. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
534. 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).
535. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (Excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£3,365,757	£3,231,127	£134,630

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£1,472,850	£1,399,207	£73,643
<u>City Planning Obligations</u>			
Affordable Housing	£981,900	£972,081	£9,819
Local, Training, Skills and Job Brokerage	£589,140	£583,249	£5,891
Carbon Reduction Shortfall (<i>as designed</i>) - <i>Not indexed</i>	£1,207,228	£1,207,228	£0
Section 278 (Evaluation and Design) - <i>Not indexed</i>	£100,000	£100,000	£0
S106 Monitoring Charge	£5,500	£0	£5,500

Total liability in accordance with the City of London's policies	£4,356,618	£4,261,765	£94,853
---	-------------------	-------------------	----------------

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations
- *(incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc)*
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy *(Demolition & Construction)*
- Delivery and Servicing Management Plan *(including Consolidation)*
- Cycling Promotion Plan
- Legible London Contribution *(£20,000 excl. indexation)*
- Relocation of Cycle Hire Docking Station *(£45,000 excl. indexation)*
- Cycle Hire Network Improvements Contribution *(£220,000 excl. indexation)*
- Construction Monitoring Costs
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement
- Public Route & Public Realm *(Specification, Access & Management Plan)*
- Public Roof Terrace *(Access & Management Plan)*
- Lobby Entrance, Exhibition and Amenity Spaces *(Access & Management Plan)*
- Cultural Implementation Strategy
- Cycle House *(Provision, Access & Management Plan)*
- Incubator Space
- Wind Audit
- Solar Glare
- Television Interference Survey

- ‘Be Seen’ Energy Performance Monitoring

537. 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.

538. The scope of the s278 agreement may include, but is not limited to, improvements to footways/carriageways of St Bride Street, Shoe Lane and Fleet Street to accommodate increased pedestrian and cyclist movements, and the provision of additional seating, greening and planting of street trees where appropriate.

Monitoring and Administrative Costs

539. 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.

540. 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

541. 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.

Human Rights Act 1998

542. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights (“ECHR”)).

543. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of the properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City’s primary business and professional services function, outweighs the Minor Adverse impact and that such impact is

necessary in the interests of the economic well-being of the country and is proportionate.

544. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

Conclusion on Planning Permission and Listed Building Consent

545. 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, and the emerging Local Plan and considering all other material considerations.
546. The proposed development comprises the demolition of an unremarkable and outmoded office development and the replacement proposed delivers a high quality, office-led development on Fleet Street, with a robust cultural officer which would meet the growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers.
547. The building has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. The office space would be complemented by publicly accessible commercial, cultural and permeable spaces adding vibrancy to the City's streets and benefitting the City's diverse communities.
548. The buildings would be designed to high sustainability standards, adopting Circular Economy principles, targeting a BREEAM "Outstanding" rating for the new building and a BREEAM "Excellent" rating across all buildings as the highest feasible and viable rating based on the use and complexity of demands especially for the listed building.
549. Dedicated areas of planting and greening would be incorporated into the development through a combination of urban greening of the public realm. On all the buildings terraces and tree planting, thereby significantly increasing the biodiversity on site that would contribute to improvements of the wider area.
550. The scheme delivers significant public realm enhancements, including a generously proportioned east to west route through the site, connecting Fleet Street with Shoe Lane to St Bride Street. Further enhancements include improving pedestrian movement and comfort on Fleet Street by setting the new building line back at ground floor level and the creation of a publicly accessible roof top garden on the Daily

Express Building, with views of the processional route and St Pauls Cathedral.

551. The increase in floorspace and occupation of the development places extra pressure on the comfort and safety of the City's streets. The overall width of the routes permeating through site and provision of additional routes would increase their capacity and improve pedestrian comfort levels. Overall, the pedestrian experience around the site is expected to improve as a result of the proposals.
552. 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 a cycle house is welcome as an innovative way to meet short stay cycle parking requirements while maintaining a high-quality public realm and attractive front of house.
553. Objections have been received from statutory consultees, residents and third parties relating to the design of the development, its impact on designated and non-designated heritage assets, daylight and sunlight implications and the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.
554. The proposals would deliver an uplift in retail floorspace in the Principal Shopping Centre.
555. The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.
556. There are a small number of major and moderate adverse impacts, in terms of loss of daylight and sunlight, on flats at 5 & 6 Poppins Court. Where there are moderate or major adverse impacts, retained levels of VSC and NSL are appropriate to the local context. As such the extent of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. When considered against the wider benefits of the scheme, these impacts are considered to be acceptable.
557. 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 would minimise any adverse impacts.
558. It is considered that the proposal would cause harm to the significance of St Paul's Cathedral as a grade I listed building of outstanding special interest, failing to preserve its setting. It would result in moderate enhancement to the Daily Express Building and Fleet Street Conservation Areas, and a slight enhancement to St Bride's Church.
559. It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-

compliance with planning policies. In arriving at a decision, it is necessary to have regard to all the policies in the development 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 heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraph 202 of the NPPF. As a result, if a proposal results in any harm to the significance of a heritage asset it will result in conflict with the heritage policies. The application proposals conflict with London Plan policy HC1 and with Local Plan policies CS12, and DM12.1. Whilst in this case, the proposals are in compliance with a number of policies, conflict has also been identified with a number of other development plan policies as outlined above in this conclusion. It is the view of officers that taken as whole the proposal does not comply with the development plan when taken as a whole.

560. The LPA must determine the application in accordance with the development plan unless other material considerations indicate otherwise. 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, and the other material considerations which do not support the proposal. Other material considerations are set out below.
561. Paragraph 11 of the NPPF sets out that there is a presumption in favour of sustainable development.
562. As set out in paragraph 199 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 200, that any harm should require clear and convincing justification. The weight to be given to a designated heritage assets conservation should increase with its importance.
563. The NPPF, paragraph 202, requires that harm be balanced against the public benefits. The paragraph 202 NPPF balancing exercise is also to be applied when considering the harm to non-designated heritage assets, designated heritage assets and impacts on the Fleet Conservation Area and processional routes within St Paul's Conservation Area. That balancing exercise is set out in the body of this report. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the setting of listed buildings and to the desirability of preserving or enhancing the character or appearance of the conservation areas, the identified harm to the significance of the designated heritage assets is outweighed by the public interest benefits associated with the proposed development. That is the case whether harm to the significance of the designated heritage assets affected is considered cumulatively or on an asset by asset basis.
564. Officers also consider that applying paragraph 203 in respect of harm to the significance of the non-designated heritage assets the harm to their significance is outweighed by the public interest benefits

associated with the proposed development. That is the case whether the harm to the significance of the non-designated heritage asset is considered cumulatively or on an asset by asset basis.

565. This means that notwithstanding the conflict with the heritage policies within the development plan, the NPPF would not support the refusal of this application for planning permission on heritage grounds.
566. The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.
567. Taking all material matters into consideration, officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan the and other material considerations which weigh against the grant of planning permission.
568. Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied.

Background Papers – 21/00538/FULEIA:

Memo, 16/07/2021, Contract and Drainage Service
Email, 16/07/2021, Heathrow Airport Ltd
Email, 16/07/2021, London City Airport
Email, 19/07/2021, NATS Safeguarding
Letter, 26/07/2021, Ian and Mrs Debra Starkey
Letter, 27/07/2021, Historic England
Letter, 29/07/2021, Environment Agency
Email, 29/07/2021, Thames Water
Letter, 30/07/2021, City of Westminster
Memo, 30/07/2021, Sustainability Officer
Letter, 02/08/2021, London Borough of Tower Hamlets
Memo, 03/08/2021, Lead Local Flood Authority
Letter, 03/08/2021, Natural England
Email, 04/08/2021, Chris Rogers
Letter, 04/08/2021, Twentieth Century Society
Email, 05/08/2021, Ancient Monuments Society
Email, 09/08/2021, Xiaobing Liu and Lei Yao
Email, 10/08/2021, Tom Whall
Letter, 11/08/2021, LAMAS
Email, 13/08/2021, Tom Street
Letter, 13/07/2021, Landsec
Letter, 14/08/2021, Susannah Bond
Letter, 18/08/2021, Christopher and Alison Edwards
Letter, 18/08/2021, Ludovica Attanasio
Memo, 18/08/2021, Environmental Health Officer
Email, 19/08/2021, Tom Street
Letter, 23/08/2021, Greater London Authority
Email, 24/08/2021, Thames Water
Memo, 25/08/2021, Access Team
Online Comment, 25/08/2021, Kirsty Mann
Letter, 27/08/2021, Royal Borough of Greenwich
Memo, 31/08/2021, Air Quality Officer
Online Comment, 31/08/2021, Alexander Scurlock
Online Comment, 31/08/2021, Henrietta Fudakowski
Letter, 01/09/2021, Allen White
Online Comment, 01/09/2021, Timothy Parker
Online Comment, 01/09/2021, Allan O'Neill
Online Comment, 01/09/2021, Rosemarie Hutchinson
Email, 02/09/2021, Santwana Palit
Email, 02/09/2021, Stuart Atkinson
Email, 02/09/2021, Vanessa Roguska
Online Comment, 02/09/2021, Sarah Field
Online Comment, 02/09/2021, Toby Brown

Online Comment, 03/09/2021, Darren Shapland
Letter, 07/09/2021, London Borough of Camden
Letter, 17/07/2021, Conservation Area Advisory Committee
Memo, 22/09/2021, London Borough of Southwark
Memo, 23/09/2021, District Surveyors Office
Letter, 24/09/2021, London Borough of Lambeth
Email, 29/09/2021, Tom Whall

Application Documents – 21/00538/FULEIA:

Planning Application Forms, DP9, 21/06/2021
Community Infrastructure Levy (CIL) Form, DP9, 21/06/2021
Design and Access Statement, BIG, 21/06/2021
Planning Statement, DP9, 21/06/2021
Cultural Plan, Futurecity, 21/06/2021
Environmental Statement Volume 1 – Chapters 1-12, Bjarke Ingels Group, 21/06/2021
Environmental Statement Volume 2 – Townscape and Visual Impact Assessment & Built Heritage Assessment, Bjarke Ingels Group, 21/06/2021
Environmental Statement Volume 3 – Technical Appendices, Bjarke Ingels Group, 21/06/2021
Environmental Statement Non-Technical Summary, Bjarke Ingels Group, 21/06/2021
Statement of Community Involvement (SCI), Kanda, 21/06/2021
Transport Assessment, Velocity, 21/06/2021
Waste Management Strategy, Velocity, 21/06/2021
Energy Statement, chapmanbdsp, 21/06/2021
Sustainability Statement, chapmanbdsp, 21/06/2021
Circular Economy and Whole Life Carbon Statement, chapmanbdsp, 21/06/2021
Thermal Comfort Assessment, AKTII, 21/06/2021
SUDS Drainage Strategy, AKTII, 21/06/2021
Flood Risk Assessment, RMA Environmental, 21/06/2021
Arboricultural Impact Assessment, schofield lothian, 21/06/2021
Fire Statement, chapmanbdsp, 21/06/2021
Draft Construction Management Plan, Real PM, 21/06/2021
Radiance Assessment, Point 2, 26/08/2021
Daylight Note, Point 2, 15/09/2021
Fire Statement, Bjarke Ingels Group, 16/09/2021
Daylight and Sunlight Note, Point 2, 22/09/2021
Response to GLA Energy/Whole Life Carbon Comments with supporting PDFs, 23/09/2021
Response to COL Access Comments with supporting PDFs, Bjarke Ingels Group, 23/09/2021
Response to Heritage Groups, DP9 Ltd, 24/09/2021

DEB Lift Traffic Study, chapmanbdsp, 29/09/2021
Transport Technical Note, Velocity, 29/09/2021
Response to TfL/GLA, DP9 Ltd, 29/09/2021
Solar PV Solutions Document, Bauder, 01/10/2021
Addendum to Design and Access Statement, Bjarke Ingels Group, 01/10/2021
Equality Statement, Bjarke Ingels Group, 01/10/2021
SUDS Drainage Strategy for Planning, AKTII, 01/10/2021

Appendix A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted. An objection received states that it be recognised within all noise and vibration assessments that Receptor E (the objector) is also a place of residence. Any assessment of the impacts of noise and vibration to that Receptor should be reassessed within the Environmental Statement should its sensitivity to noise and vibration be altered given its categorisation for occupation by 'Residents' in addition to its 'Users'.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The applicant submitted an ES Addendum under Regulation 25 of the EIA Regulations which addressed the proposed amendments contained within the submission and sets out additional assessment of traffic and transport, wind microclimate effects including thermal comfort and noted in respect of noise that St Bride's Church (Receptor E), was assessed both as a place of worship and as a place of residence. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES and ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted a scheme for protecting nearby residents (Receptors) and commercial occupiers from noise, dust and other environmental effects of the proposed development would be required.

Conditions are recommended that requires the development to be implemented only in accordance with Demolition and Construction Environmental Management Plans thereby approved.

The local planning authority is satisfied that the environmental statement and addendum correctly identifies the Sensitive Receptors and assesses the effects of the proposed development on the environment.

APPENDIX B

Relevant London Plan Policies

Policy GG1 (Building strong and inclusive communities) encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals, seeking to ensure positive changes to the physical environment and provide access to good quality community spaces, services, amenities and infrastructure. In addition, it supports London continuing to generate a wide range of economic and other opportunities promoting fairness, inclusivity and equality.

Policy GG2 (Making the best use of land) supports the prioritisation of well-connected sites for development including intensifying the use of land to support, amongst other things, workspaces, and promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Policy GG3 (Creating a healthy city) seeks to *"ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold"* and to *"promote more active and healthy lives for all Londoners and enable them to make healthy choices."*

Policy GGS (Growing a good economy) recognises the strategic aim to *"promote the strength and potential of the wider city region"*, including the support and promotion of *"sufficient employment and industrial space in the right locations to support economic development and regeneration."*

Policy SD4 (The Central Activities Zone (CAZ)) states that *"the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values"*

Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states that *"offices and other CAZ strategic functions are to be given greater weight relative to new residential development."*

Policy D4 states that *"design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan."*

Policy D5 (Inclusive Design) seeks to achieve the highest standard of accessible and inclusive design across new developments.

Policy D8 (Public Realm) establishes criteria for proposals which include public realm space. These criteria include making public realm "well-designed, *safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.* Lighting, *including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.*"

Policy D11 (Safety, security and resilience to emergency) states that "*development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development 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. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.*"

Policy D12 (Fire Safety) encourages proposals to achieve the highest standards of fire safety and ensure that they: "*1) identify suitably positioned unobstructed outside space for fire appliances to be positioned on and which is appropriate for use as an evacuation assembly point; 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire.*"

Policy D14 (Noise) seeks to avoid significant adverse noise impacts on health and quality of life, and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

Policy S1 (Developing London's social infrastructure) states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Policy E1 (Offices) explicitly supports increases in the current office stock, noting 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."*

Policy E2 (Providing suitable business space) states that Boroughs should seek to *"support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand."* The policy also states that *"development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises."*

Policy E3 (Affordable workspace) outlines the requirement for affordable workspace. It is noted that leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with submarket rents

Policy E9 (Retail, markets and hot food takeaways) states that development proposals should enhance local and neighbourhood shopping facilities and prevent the loss of retail. Proposals should also bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres.

Policy HC1 (Heritage conservation and growth) requires development proposals "should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings."

Policy HC2 (World Heritage Sites) requires that "development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes." The policy also states that "development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the

Heritage Impact Assessment."

Policy HC3 (Strategic and Local Views) states that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

Policy HC4 (London View Management Framework) states that "development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

Policy G1 (Green infrastructure) states that "development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network."

Policy G4 (Open space) identifies that "development proposals should 1) not result in the loss of protected open space; 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency."

Policy GS (Urban greening) states that "major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

Policy G6 (Biodiversity and access to nature) states that "development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process."

Policy SI1 (Improving air quality) states that "development proposals should not: a) lead to further deterioration of existing poor air quality; b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; c) create unacceptable risk of high levels of exposure to poor air quality."

Policy SI2 (Minimising greenhouse gas emissions) requires that all new major development should be net zero-carbon. Major development proposals should also include a detailed energy

strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

Policy SI3 (Energy infrastructure) states that "development proposals should: 1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure; 2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks."

Policy SI4 (Managing heat risk) identifies that "development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure." The policy also states that "major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems."

Policy SI7 (Reducing waste and supporting the circular economy) identifies that "referable applications should promote circular economy outcomes and aim to be net zero-waste."

Policy SI13 (Sustainable drainage) states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features.

Policy SI12 (Flood risk management) requires development proposals to "ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses."

Policy SI13 (Sustainable drainage) states that "development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible."

Policy TI (Strategic approach to transport) highlights that development "should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated." Development that promotes walking through improved public realm is also supported.

Policy T2 (Healthy streets) encourages development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Proposals should "1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; 2) reduce the dominance of vehicles on

London's streets whether stationary or moving; 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

Policy T3 (Transport capacity, connectivity and safeguarding) states that "development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed."

Policy T4 (Assessing and mitigating transport impacts) notes that "where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified."

Policy TS (Cycling) supports increases in cycling across London through the provision of secure, integrated, convenient and accessible cycle parking facilities as well as associated changing and facilities and showers.

Policy T6 (Car parking) sets out parking standards which need to be complied with and that "car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport."

Policy T7 (Deliveries, servicing and construction) states that "development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments."

Relevant GLA Supplementary Planning Guidance (SPG):

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

Relevant Draft City Plan 2036 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

Policy HL9 Health Impact Assessments

S2 Safe and Secure City

S22 Fleet Street and Ludgate Key Area of Change

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities
S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE5 Terraces and viewing galleries
DE6 Shopfronts
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular transport and servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
Policy VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HE3 Setting of the Tower of London World Heritage Site
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Spaces
OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR3 Sustainable drainage systems (SuDS)
S16 Circular economy and waste
CE1 Zero Waste City
S21 City Cluster
S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

City of London's Wind Microclimate Guidelines (2019);

Planning Obligations SPD (July 2014);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).

Fleet Street Conservation Area Character Summary and Management Strategy SPD 2015

Whitefriars Conservation Area Character Summary and Management Strategy SPD 2016

St Paul's Cathedral Conservation Area Character Summary and Management Strategy SPD 2013

Temples Conservation Area Character Summary

Other

Tower of London World Heritage Site Management Plan

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.

DM1.1 Protection of office accommodation

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

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

DM1.2 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 subdivision 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.

CS2 Facilitate utilities infrastructure

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

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
 - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
 - b) reasonable gas and water supply considering the need to conserve natural resources;
 - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
 - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
 - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

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

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

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

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

f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

CS10 Promote high quality environment

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

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;

- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

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

- a) the predominant use of the space, surrounding buildings and adjacent spaces;

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

DM10.5 Shopfronts

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

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

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

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

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.

DM12.3 Listed buildings

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

DM12.4 Archaeology

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

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

DM15.2 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.

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

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

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

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

DM16.2 Pedestrian movement

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

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

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

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

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

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.

CS17 Minimising and managing waste

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

DM17.1 Provision for waste

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

DM17.2 Designing out construction waste

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

- a) reuse of existing structures;

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

CS18 Minimise flood risk

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

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
 - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
 - b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

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

DM18.3 Flood protection and climate

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

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.

DM20.1 Principal shopping centres

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:

- a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
- b) the contribution the unit makes to the function and character of the PSC;
- c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

CS21 Protect and provide housing

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

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.

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.

DM1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term

viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

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

DM1.2 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.

CS2 Facilitate utilities infrastructure

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

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
 - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
 - b) reasonable gas and water supply considering the need to conserve natural resources;
 - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
 - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
 - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City

Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

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

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

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

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

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;

- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

CS10 Promote high quality environment

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

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

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

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;

- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.5 Shopfronts

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

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

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

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

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

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.

DM11.1 Visitor, Arts and Cultural

- 1) To resist the loss of existing visitor, arts and cultural facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
 - b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
 - c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
- 2) Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

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.

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement

building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

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

DM12.4 Archaeology

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

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.

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
 - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

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.

CS17 Minimising and managing waste

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

DM17.1 Provision for waste

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

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

- a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
- b) the benefits of the development outweigh the flood risk to future occupants;
- c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

- a) all sites within the City Flood Risk Area as shown on the Policies Map; and
- b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

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

DM18.3 Flood protection and climate

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

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.

DM20.1 Principal shopping centres

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:
 - a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
 - b) the contribution the unit makes to the function and character of the PSC;
 - c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

CS21 Protect and provide housing

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

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: 21/00538/FULEIA

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.

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.

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Prior to any stripping-out or demolition of the existing building, an updated material audit of the building should be submitted to and approved in writing by the Local Planning Authority to understand the value of it as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, with the presumption that as little waste as possible is generated and the development shall be carried out in accordance with the approved details.
REASON: To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plans: London Plan; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction start.

- 3 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.
- 4 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA at ZeroCarbonPlanning@london.gov.uk and 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 GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.
- 5 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels

at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

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

- 6 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 7 Prior to the commencement of development, an updated Energy Assessment confirming the detailed design stage opportunities for carbon reduction from the building's is required to be submitted to and approved by the Local Planning Authority.

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

- 8 No cranes shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.

REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace

- 9 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 10 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction

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

also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

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

- 12 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
- 13 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.
- 14 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 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.

- 15 No development other than demolition shall take place until the detailed design of all wind mitigation measures and a tree planting plan 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 and location, 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 and to protect the approved new public realm within the site, arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

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

- 17 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.7 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 100m³;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works; and
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
- REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.
- 18 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;
 - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required, and the costs incurred to maintain the system.
- REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.
- 19 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.
- REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 20 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 21 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;
 - (b) details of the proposed new facades including details of a typical bay of the development for each facade, fenestration, soffits, handrails and balustrades;
 - (c) details of canopies;
 - (d) irrespective of approved drawings, typical facade details, including jointing and any necessary expansion/movement joints;
 - (e) irrespective of approved drawings details of ground and first floor elevations including all entrances, integrated seating, vitrines and information boards;
 - (f) full details of the public roof terrace, including all elevations, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
 - (g) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
 - (h) details of all drainage, irrigation and rainwater harvesting;
 - (i) details of the integration of M&E and building services into the external envelope;
 - (j) irrespective of approved drawings, final details and layout of the publicly accessible roof terrace and core to the Daily Express Building
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 22 Before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.
 REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
- 23 All unbuilt surfaces, including the amenity terraces, public roof terrace, arcade street/new public route and trees approved for wind mitigation, shall be treated in accordance with a landscaping scheme, including details of:
- (a) Additional tree planting and public seating on the proposed new routes, Fleet Street, St Bride Street and Shoe Lane
 - (b) Irrigation;
 - (c) Provision for harvesting rainwater run-off from road to supplement irrigation;
 - (d) Spot heights for ground levels around planting pit;
 - (e) Soil;
 - (f) Planting pit size and construction;
 - (g) Tree guards; and
 - (h) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.
- to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
 REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
- 24 Details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for
- (a) the cascade of roof terraces and surfaces, to include green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;
 - (b) the incorporation of blue roofs into roof surfaces; and
 - (c) the landscaping of the public realm
- 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.

- 25 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.

- 26 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.

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

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

- 28 No cooking shall take place within any Class E or sui generis use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 29 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

- 30 Prior to first occupation confirmation shall be provided that either: all water network upgrades required to accommodate the additional flows to serve the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water to allow occupation. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

- 31 Once the building construction is completed and prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development shall submit the post-completion report in line with the criteria set out in the GLA's Circular Economy Statement Guidance that shall be approved in writing by the Local Planning Authority, and that confirms the targets and actual outcomes achieved, clearly indicates where and why any variation has occurred and provides a summary of important lessons learned.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been

achieved to demonstrate compliance with Policy SI 7 of the London Plan.

- 32 Before any retail units are occupied the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) A signage strategy for the retail units within the development shall be submitted;
 - (b) The signage relating to the public roof terrace shall also be included within the overall strategy.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.
- 33 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.
- 34 (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.
- 35 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

- 36 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 37 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 38 Post construction BREEAM assessments for all uses, demonstrating that a target rating of 'Outstanding for the new office building and 'Excellent' for the other uses has been achieved, shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 39 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.
Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

- 40 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 1,037 long stay pedal cycle spaces, and a minimum of 85 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.
- 41 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.
- 42 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.
REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan policy: T5
- 43 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 90 showers and 1029 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 44 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.

- 45 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 46 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
- 47 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.
- 48 Three electric charging points must be provided within the delivery and servicing area and retained for the life of the building.
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2036 Policy VT2.
- 49 No servicing of the premises shall be carried out between the hours of 07:00 - 10:00, 12:00 - 14:00 and 16:00 - 19:00 on Monday to Friday. 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: the Local Plan: DM16.1, draft City Plan 2036: VT2 - 4
- 50 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 51 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.

- 52 The two car parking space suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors.
REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, Draft Local Plan: VT3, London Plan: 6.13D and 6A.2 and London Plan: T6.5.
- 53 Two electric charging points must be provided for the blue badge parking spaces and retained for the life of the building.
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2036 Policy VT2.
- 54 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 55 The pass doors shown adjacent to or near the to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.
REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.
- 56 The roof terraces within 120 Fleet street on levels 07 to 17 and within the Daily Express Building levels 4-7 hereby permitted shall not be used or accessed between the hours of 23:00 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.
- 57 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.
- 58 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not

employees of the premises licence holder and the event is promoted to the general public.

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

- 59 No live or recorded music that can be heard outside the premises shall be played.

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

- 60 Fumes from Use Class E / Sui Generis affecting offices or residential:

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

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

- 61 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.

- 62 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July (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.
- 63 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 64 The areas within the development marked as retail on the floorplans at ground and basement level hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and sui generis (pub and drinking establishment, and take-away) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.
- 65 Unless otherwise approved in writing by the Local Planning Authority, no more than 50% of the areas marked as retail on the floorplans hereby approved shall be occupied as Food and Beverage uses.
REASON: To ensure that a varied mix of retail types is provided within the development in accordance with the following policies of the Local Plan: CS20 and of the emerging policies of the City Local Plan: S5, RE2.
- 66 The areas shown on the approved drawings above ground floor as offices, flexible retail use (Class E, drinking establishment (sui generis),

hot food takeaway (sui generis)) and public viewing gallery and winter garden with ancillary space, and as set out in Condition 64 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

- 67 The development shall provide:
- 2,368sq.m Commercial, Business and Service Use (Class E);
 - 2,051sq.m Retail Use (Class E (a), (b) and (c));
 - 61,135sq.m Office Use (Class E);
 - 1,331sq.m Learning and non-residential institutions Use (Class F1);

 - 429sq.m Flexible learning and non-residential institutions use / retail purposes / bar (Use Classes F1/E (a), (b), (c) and Sui Generis);
 - 2,776sq.m Flexible learning and non-residential institutions use / commercial, business and service use (Classes F1/E); and
 - 8,366sq.m Plant, BOH and Storage
- REASON: To ensure the development is carried out in accordance with the approved plans.

- 68 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:
- PA-10-000, Existing 120 Fleet Street Location Plan
 - PA-10-010, Existing Basement 02 Floor Plan
 - PA-10-011, Existing Basement 01 Floor Plan
 - PA-10-012, Existing Basement 01 Mezzanine Daily Express
 - PA-10-013, Existing Ground Level Floor Plan
 - PA-10-014, Existing Upper Ground Level Floor Plan
 - PA-10-015, Existing Level 01 Floor Plan
 - PA-10-016, Existing Level 02 Floor Plan
 - PA-10-017, Existing Level 03 Floor Plan
 - PA-10-018, Existing Level 03 Mezzanine Daily Express
 - PA-10-019, Existing Level 04 Floor Plan
 - PA-10-020, Existing Level 05 Floor Plan
 - PA-10-021, Existing Level 06 Floor Plan
 - PA-10-022, Existing Level 07 Floor Plan
 - PA-10-023, Existing Level 08 Floor Plan
 - PA-10-024, Existing Level 09 Floor Plan
 - PA-10-025, Existing Roof Plan
 - PA-10-100, Existing N-S Section
 - PA-10-101, Existing E-W Section
 - PA-10-200, Existing Fleet Street Elevation
 - PA-10-201, Existing St. Bride Elevation

PA-10-202, Existing Shoe Lane Elevation
PA-10-210, Existing Daily Express North Elevation
PA-10-211, Existing Daily Express East Elevation
PA-10-212, Existing Daily Express South Elevation
PA-10-213, Existing Daily Express West Elevation
PA-20-010, Demolition Basement 02 Floor Plan
PA-20-011, Demolition Basement 01 Floor Plan
PA-20-012, Demolition Basement 01 Mezzanine Daily Express
PA-20-013, Demolition Ground Level Floor Plan
PA-20-014, Demolition Upper Ground Level Floor Plan
PA-20-015, Demolition Level 01 Floor Plan
PA-20-016, Demolition Level 02 Floor Plan
PA-20-017, Demolition Level 03 Floor Plan
PA-20-018, Demolition Level 03 Mezzanine Daily Express
PA-20-019, Demolition Level 04 Floor Plan
PA-20-020, Demolition Level 05 Floor Plan
PA-20-021, Demolition Level 06 Floor Plan
PA-20-022, Demolition Level 07 Floor Plan
PA-20-023, Demolition Level 08 Floor Plan
PA-20-024, Demolition Level 09 Floor Plan
PA-20-025, Demolition Roof Plan
PA-20-100, Demolition N-S Section
PA-20-101, Demolition E-W Section
PA-20-200, Demolition Fleet Street Elevation
PA-20-201, Demolition St. Bride Elevation
PA-20-202, Demolition Shoe Lane Elevation
PA-30-B2, Demolition Daily Express Basement Level 02 Plan
PA-30-B1, Demolition Daily Express Basement Level 01 Plan
PA-30-B1M, Demolition Daily Express Basement Level 01 Mezzanine
Plan
PA-30-000, Demolition Daily Express Ground Level Plan
PA-30-001, Demolition Daily Express Upper Ground & Level 01 Plans
PA-30-002, Demolition Daily Express Level 02-03 & 04 Floor Plans
PA-30-003, Demolition Daily Express Level 05 & 06 Floor Plans
PA-30-004, Demolition Daily Express Terrace Level & Roof Plans
PA-30-100, Demolition Daily Express N-S Section
PA-30-101, Demolition Daily Express E-W Section
PA-30-200, Demolition Daily Express Fleet Street Elevation
PA-30-201, Demolition Daily Express Shoe Lane Elevation
PA-50-B2, Proposed Basement Level 02 Floor Plan
PA-50-B1, Proposed Basement Level 01 Floor Plan
PA-50-000 Rev 01, Proposed Ground Floor Level Floor Plan
PA-50-UG, Proposed Upper Ground Level Floor Plan
PA-50-001, Proposed Level 01 Floor Plan
PA-50-002, Proposed Level 02 Floor Plan
PA-50-003, Proposed Level 03 Floor Plan
PA-50-004, Proposed Level 04 Floor Plan
PA-50-005, Proposed Level 05 Floor Plan
PA-50-006, Proposed Level 06 Floor Plan
PA-50-007, Proposed Level 07 Floor Plan

PA-50-008, Proposed Level 08 Floor Plan
 PA-50-009, Proposed Level 09 Floor Plan
 PA-50-010, Proposed Level 10 Floor Plan
 PA-50-011, Proposed Level 11 Floor Plan
 PA-50-012, Proposed Level 12 Floor Plan
 PA-50-013, Proposed Level 13 Floor Plan
 PA-50-014, Proposed Level 14 Floor Plan
 PA-50-015, Proposed Level 15 Floor Plan
 PA-50-016, Proposed Level 16 Floor Plan
 PA-50-017, Proposed Level 17 Floor Plan
 PA-50-018, Proposed Level 18 Floor Plan
 PA-50-019, Proposed Level 19 Floor Plan
 PA-50-020, Proposed Level 20 Floor Plan
 PA-50-RF Rev 01, Proposed Roof Plan
 PA-60-100, Proposed Section AA'
 PA-60-101, Proposed Section BB'
 PA-60-102, Proposed Section CC'
 PA-60-103, Proposed Section DD'
 PA-70-200, Proposed Context Elevations
 PA-70-201, Proposed North Elevation
 PA-70-202, Proposed East Elevation
 PA-70-203, Proposed South Elevation
 PA-70-204, Proposed West Elevation
 PA-80-B2, Proposed Daily Express Basement Level 02 Plan
 PA-80-B1, Proposed Daily Express Basement Level 01 Plan
 PA-80-000, Proposed Daily Express Ground Level Plan
 PA-80-001, Proposed Daily Express Upper Ground & Level 01 Plans
 PA-80-002, Proposed Daily Express Level 02-03 & 04 Floor Plans
 PA-80-003, Proposed Daily Express Level 05 & 06 Floor Plans
 PA-80-004, Proposed Daily Express Terrace Level & Roof Plans
 PA-80-100, Proposed Daily Express N-S Section
 PA-80-101, Proposed Daily Express E-W Section
 PA-80-200, Proposed Daily Express North Elevation
 PA-80-201, Proposed Daily Express East Elevation
 PA-80-202, Proposed Daily Express South Elevation
 PA-80-203, Proposed Daily Express West Elevation
 PA-90-001, Daily Express Building Typical Façade Detail
 PA-90-002, Proposed New Building Typical Façade Detail
 PA-90-003, Proposed New Building Typical GF Façade Detail
 PA-90-004, Proposed New Building Louvered Façade Detail
 PA-90-005, Proposed New Building Ground Floor Façade Details
 8353-PL-GA-100, Landscape General Arrangement - Ground level
 8353-PL-GA-101 Rev 01, Landscape General Arrangement - Terrace levels
 8353-PL-UGF-102, Landscape General Arrangement - Urban Greening Factor
 8353-DE-SD-301, Soft landscape details - Edge planter details
 8353-DE-SD-302, Soft landscape details - Edge planter details
 8353-DE-SD-303, Soft landscape details - Edge planter details
 8353-DE-SD-304, Soft landscape details - Edge planter details

8353-DE-SD-305, Soft landscape details - Edge planter details
8353-DE-SD-308, Soft landscape details - Terrace sections
8353-DE-SD-309, Soft landscape details - Terrace sections

INFORMATIVES

- 1 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.
 - to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;
 - aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;
 - or where the procurement of goods and services is contracted out
 - ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our 'Guidance note for developers').For additional details please refer to the City of London's 'Local Procurement Charter' and 'Local Procurement - Guidance Note for City Developers'. These documents can be found at http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning
Further guidance can be obtained by contacting the 'City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.
To access free support in procuring locally please call 020 7332 1532 or email city.procurement@cityoflondon.gov.uk

- 2 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.
The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:
Office £185 sq.m
Retail £165 sq.m
Hotel £140 sq.m
All other uses £80 per sq.m
These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.
The City of London Community Infrastructure Levy is set at a rate of £75 per sq.m for offices, £150 per sq.m for Riverside Residential, £95 per sq.m for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy.

Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

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

- 3 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:
detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;
a full pre application advice service has been offered;
where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
- 4 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
- 5 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 Environment Department in order to determine whether further consents are required and if the proposed works have archaeological implications.
- 6 If a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096.

- 7 Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) .
The following details should be provided before the crane is erected:
- the crane's precise location
 - an accurate maximum height
 - start and completion dates
- 8 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 9 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.
- 10 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 11 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 12 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
- (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
- (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.
- (c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath,

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

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

(d) Bridges over highways

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

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

(g) Carriageway crossovers.

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

13 In accordance with S153 of the Highways Act 1980 no doors, gates or windows at ground floor level shall open over the public highway.

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

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

(b) Installation of engine generators using fuel oil.

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

(d) Alterations to the drainage and sanitary arrangements.

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

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;

- provision for window cleaning (internal and external) to be carried out safely.

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

(g) Use of the premises for public entertainment.

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

(i) The detailed layout of public conveniences.

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

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

(l) Methods of odour control.

- 15 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:
- Noise and Dust
- (a)
The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.
- (b)
Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.
- (c)
Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.
- (d)
Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.
- Air Quality
- (e)
Compliance with the Clean Air Act 1993
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.
- Boilers and CHP plant
- (f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

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

(i)

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

Standby Generators

(j)

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

(k)

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

Cooling Towers

(l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof

level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

- 16 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 17 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 18 The investigation and risk assessment referred to in the schedule of conditions must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:
 - (i) a survey of the extent, scale and nature of contamination;
 - (ii) an assessment of the potential risks to:

- human health,
 - property (existing or proposed) including buildings, open spaces, service lines and pipes,
 - adjoining land,
 - groundwaters and surface waters,
 - ecological systems,
 - archaeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

- 19 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification:

London Fire Brigade, Fire Prevention Branch
5-6 City Forum
City Road
London EC1N 2NY

(b) Public houses, wine bars, etc.

City of London Corporation
Trading Standards and Veterinary Service
PO Box 270
Guildhall
London EC2P 2EJ

(c) Inflammable materials (e.g., petroleum)

London Fire Brigade, Petroleum Department
5-6 City Forum
City Road
London EC1N 2NY

(d) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

(e) Works affecting a GLA road:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

- 20 The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.

- 21 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.
- 22 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

From: [ROSSI, Sacha](#)
To: [PLN - Comments](#)
Cc: [NATS Safeguarding](#)
Subject: RE: Planning Application Consultation: 21/00538/FULEIA [SG30411]
Date: 19 July 2021 17:59:56
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: LHR4969 - SG30411

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully
S. Rossi
NATS Safeguarding Office

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS

Sacha Rossi
ATC Systems Safeguarding Engineer

D: 01489 444205

E: sacha.rossi@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL



NATS Public

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 14 July 2021 12:53

To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Subject: Planning Application Consultation: 21/00538/FULEIA

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Dear Sir/Madam

Please see attached consultation for 120 Fleet Street London EC4A 2BE .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Kurt Gagen
Department of the Built Environment
City of London

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any

losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

26 July 2021

Mr K Gagen
Development Division
Department of the Built Environment
City of London

By email to PLNComments@cityoflondon.gov.uk

Dear Mr Gagen,

Re: 120 Fleet Street and Daily Express building EC4A 2BE

Your ref: 21/00538/FULEIA

Thank you for your notice of 14 July 2021. We are residents of Sovereign House at 5 Poppins Court.

120 Fleet Street is a substantial property but is currently unoccupied. We therefore recognise the benefits to the area of a development of this building and the regeneration that will accompany it. However, we note that there are significant impacts on the environment, local residents and neighboring businesses that will result from the proposal. We expect these aspects to be taken into consideration in the determination of the application.

In particular, we would want you to take into account the following points:

1. We object to the height of the proposed new building. Even with its stepped design, a building of 21 floors will be overbearing in this setting and detrimental to the visual appearance of the area, particularly to St Brides Street.
2. The proposed development will adversely affect the amenities of occupiers of residential properties in the vicinity through loss of light, sunlight and overshadowing due to its nearness to Poppins Court:
 - a. Poppins Court will be narrowed, especially from the second to fifth floors of the proposed building.
 - b. The existing building at 120 Fleet Street (the "GS building") is 4 storeys at the Poppins Court elevation and the proposed building would increase this to six, plus a further 7 floors slightly tapering away.
 - c. The resulting loss of daylight, sunlight and overshadowing that will occur is acknowledged in the application as having a major impact (chapter 11 para. 11.13 of the ES). This will be permanent. Several of the Sovereign House apartments have windows onto that elevation, including ours on the third floor. We attach photographs. Amendments to the scheme should be sought to address this issue.
3. The proposed scheme will have a significant impact on local residents and businesses during the refurbishment, demolition and construction (see para 11.8 of the ES). No mitigation is proposed but the applicant seeks conditions. We believe the noise and disturbance will be intolerable without amendments to Sovereign House, which is an old building poorly equipped to neighbour such a scheme. For example, double glazing and air conditioning would go some way to mitigate noise and dust pollution.
4. We welcome the proposed improvements to passageways, new walkways and the permeability of the building. Ground floor retail would also add interest to the street scene in St Brides Street, Poppins Court and Shoe Lane. However, the concept of increased retail in

this area should be regarded with caution as most existing stores are closed at weekends through lack of footfall.

5. Similarly, we welcome public access to the listed building. However, we do question the proposed uses of the space; are exhibition and event spaces viable in this predominantly commercial area?
6. Conditions should be imposed on the permitted uses of the non-commercial elements to protect the amenity of local residents. Potential uses in particular that we would object to are:
 - a. Restaurant, café or drinking establishments should not be permitted above ground floor (for example on the roof-top green spaces)
 - b. Roof-top green spaces are planned but should not be used outside office hours for events
 - c. The inevitable increase in food retail will bring litter to Poppins Court. The scheme should incorporate a cleaning programme to address this.
7. We like the design of the proposed new building fronting Fleet Street with its horizontal banded façade, but feel that this should have a stronger vertical element to reflect the Daily Express building.
8. We support in principle the proposal to restore the Daily Express building. The conservation of this grade ii* heritage asset must be given great weight in the scheme and if approved it should be undertaken prior to the new building being occupied.
9. We support the principle of urban greening but feel that 1,950sqm out of 50,550sqm is insignificant. A greater proportion of the building needs to be dedicated to green space to increase biodiversity in a meaningful way.

Please acknowledge receipt of this letter.

Yours sincerely,

Ian and Debra Starkey



Subject:
Date:

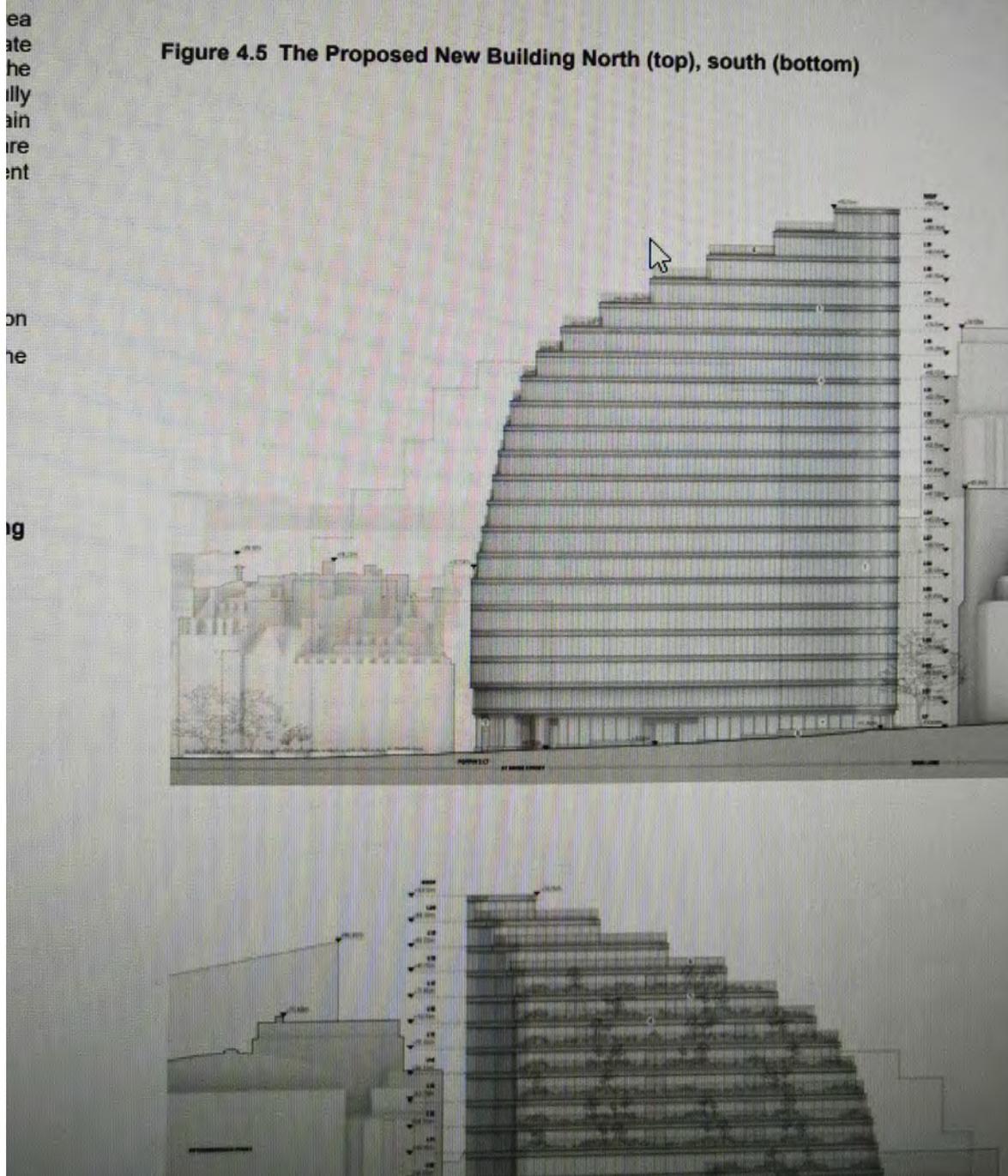


Photos
26 July 2021 17:37:14



120 Fleet Street Chapter 4: The Proposed

Figure 4.5 The Proposed New Building North (top), south (bottom)



Get [Outlook for Android](#)



Mr Kurt Gagen

Direct Dial: 020 7973 3774

City of London Corporation

PO Box 270

Our ref: P01433606

Guildhall

London

EC2P 2EJ

27 July 2021

Dear Mr Gagen

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**120 FLEET STREET, LONDON, EC4A 2BE
Application No. 21/00538/FULEIA**

Thank you for your letter of 14 July 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

In summary, we welcome the proposed works associated with the listed building, and have no objection in principle to the redevelopment of the Rivercourt House. However, the proposed increase in scale will cause some (less than substantial) harm to the significance of designated heritage assets further afield. We believe this harm could be largely mitigated through a reduction in height of the proposed building.

Historic England Advice
Significance



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



The principal significance of the site is reflected in the Grade II* listed building. Completed in 1932 to a design by Sir Owen Williams and Ellis E. Clarke for the headquarters of the Daily Express, this building, with its innovative and stylish glass and Vitrolite exterior and its expressive interiors (designed by Robert Atkinson), is considered to be one of the most important Art Deco office buildings in London.

Its current form, partially embedded within Rivercourt House, is a result of restoration works from 1999 that reinstated the original Fleet Street frontage following demolition of Aitken House. Aitken House had in 1977 extended the original Daily Express building significantly to the east and reduced its prominence along Fleet Street. The 1999 restoration created a rounded corner to the east (to match the existing to the west), thereby providing the building with a stand alone presence for the first time.

Whilst the 1999 restoration works were widely welcomed, they resulted in the historic building remaining embedded in the new Rivercourt House behind, with the fine Art Deco interiors restored but inaccessible to the public.

Rivercourt House currently occupies a large block to the north of the listed building and is part of an area that has been comprehensively redeveloped in recent years. It lies outside the boundaries of Fleet Street Conservation Area.

The development site is visible from well beyond the immediate area. In particular, the site forms part of the skyline beyond the Embankment when viewed from Gabriel's Wharf in a protected view (LVMF 16B.1). The relatively low backdrop is important to the setting of the historic areas at Embankment and the Temple, and contributes to the significance of these conservation areas.

The proposals and their impact

The proposals are to demolish the existing Rivercourt House and replace it with a 22 storey office building that steps down from the north to form a series of terraces. New permeable routs are proposed through the currently impenetrable block, including the creation of space at the back of the Grade II* listed building and physically separating it from the new development.

The proposals would enhance the significance of the Grade II* listed former Daily Express Building by detaching it from the large office development behind, and by providing it with a separate cultural use and associated public access. The public realm in this part of the City could also be much enhanced through the provision of new routes through the site and better connectivity.

The scale of the proposed new building, however, means that it would have an impact on designated heritage assets further away. In particular, it would appear as a large element in the backdrop of Strand (WCC) and Temples (City of London) Conservation



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Areas when viewed from LVMF 16B.1, dominating the skyline of these historic areas and harming their significance. Based on the information submitted, we believe this harm is in the middle of the less than substantial spectrum.

Impacts such as these described here can progressively and fundamentally erode the character of conservation areas and the significance of nearby listed buildings, and it is important to recognise therefore that the harm identified above is a serious issue. Robust justification for any such harm is required under national planning policy.

Relevant policy

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 make it a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving the listed building or its setting.

Section 72 of the Act requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Paragraph 199 states that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. Any harm or loss should require clear and convincing justification (paragraph 200).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at paragraph 197 that local authorities, when considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal.

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. The phrase "less than substantial harm" describes all harm that is not "substantial". This encompasses a wide range of harm from the very minor to the extremely serious. Any finding of harm is a consideration to which the decision-maker must give "considerable importance and weight" and "less than substantial harm" in NPPF terms does not imply "a less than substantial objection".



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



If the harm is deemed to be less than substantial, paragraph 202 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

Historic England position

We have no objection in principle to the redevelopment of the existing Rivercourt House building, and welcome the proposals for the Grade II* listed former Daily Express Building. We recognise the potential for a range of public benefits (including heritage enhancements and public realm improvements) resulting from the proposals.

We note, however, that the proposed new building will result in an appreciable increase in scale here, which will have an impact on the settings of the conservation areas at Strand and Temples when viewed from Gabriel's Wharf. The significance of the historic environment when seen from this important river prospect is informed by a balance between low scale traditional buildings plus parkland and modern backdrop buildings. The visual balance is currently in favour of the foreground consisting of river, parkland and low scale buildings. The proposals would add a significant amount of new development on the skyline that would undermine that balance and cause harm.

The harm would be in the middle of the less than substantial spectrum in the terms of the Framework, and would be contrary to the intent of the Framework's policies for the conservation of the significance of designated heritage assets, something to which great weight should be accorded (NPPF paragraphs 199, 200).

Such harm requires clear and convincing justification, and should be accepted only if the local authority concludes that there is such justification and that the harm would be outweighed by the public benefits the proposals would secure (NPPF paragraphs 200,).

A reduction in scale of the proposed Rivercourt House replacement building would mitigate the harm identified above, and could also result in a less abrupt transition between the Grade II* listed former Daily Express building and the new development beyond. This would also enable a more appropriate balance between harm and public benefits.

However, we are unable to support the current proposal for the reasons set out above.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

Your authority should take these representations into account and seek amendments,



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Michael Dunn

Principal Inspector of Historic Buildings and Areas

E-mail: michael.dunn@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Kurt Gagen
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2021/133479/01-L01
Your ref: 21/00538/FULEIA
Date: 29 July 2021

Dear Kurt,

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. 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. (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 institutions/commercial business and service; Total floorspace 78,456sq.m GIA. Overall height 93.15m AOD). The application is accompanied by an Environmental Statement.

120 Fleet Street, London, EC4A 2BE.

Environment Agency Position

The Environment Agency is a statutory consultee on all development projects subject to Environmental Impact Assessment. There are, no environmental constraints within our remit on this site and we therefore have no comments at this time.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

Cont/d..

George Lloyd
Planning Advisor

Number: +44 20302 54843

E-mail: HNLsustainablePlaces@environment-agency.gov.uk



Your ref:
My ref: 21/04817/OBS

Please reply to: Nikki Mitchell
Tel No: 07866037846
Email: southplanningteam@westminster.gov.uk

Kurt Gagen
City of London
PO Box 270,
Guildhall,
London
EC2P 2EJ

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

30 July 2021

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 21/04817/OBS **Application Date:**
Date Received: 14.07.2021 **Date Amended:** 14.07.2021

Plan Nos: Letter from City of London dated 14 July 2021.

Address: 120 Fleet Street, London, EC4A 2BE,

Proposal: 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.

Yours faithfully



Deirdra Armsby
Director of Place Shaping and Town Planning

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



Kurt Gagen
City Of London Corporation
Department of Planning & Transportation
Development Control Team East
P O Box 270
Guildhall, London
EC2P 2EJ

Place Directorate
Development Management
Town Hall, Mulberry Place
5 Clove Crescent
London
E14 2BG
www.towerhamlets.gov.uk

Application Number: PA/21/01639
Your ref: 21/00538/FULEIA

Enquiries to: Benjamin Coffie
Tel: 0207 364 5009
Email: Benjamin.Coffie@towerhamlets.gov.uk

2 August, 2021

Dear Kurt Gagen,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

**Location
Proposal**

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.

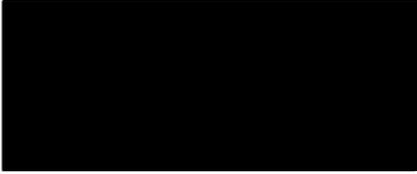
Change of use of Daily Express Building from office (Use Class E) to learning and non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E), Alterations to and refurbishment of the existing Grade II* listed Daily Express Building 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.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out above into consideration:-

1. The Local Planning Authority has no comments to make.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Jennifer Peters, Divisional Director, Planning and Building Control

Date: 03 August 2021
Our ref: 360284
Your ref: 21/00538/FULEIA



Planning Department
City of London Council
PLNComments@cityoflondon.gov.uk

Fao Kurt Gagen

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr Gagen

Planning consultation: Demolition of the existing River Court building 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.

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.

Location: 120 Fleet Street London EC4A 2BE

Thank you for your consultation on the above dated 14 July 2021 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

European sites

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

James Moulton
Consultations Team

Annex - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under s28G of the Wildlife & Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states that development likely to have an adverse effect on SSSIs should not normally be permitted. Natural England's SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.

Protected Species

Natural England has produced standing advice¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found here². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Protected landscapes

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

For developments within or within the setting of a National Park or Area of Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a 'major developments test' to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

Paragraph 170 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [*Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.

Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

From: [REDACTED]
To: [PLN - Comments](#)
Subject: OBJECTION to both 21/00524/LBC and 21/00538/FULEIA
Date: 04 August 2021 10:47:35

THIS IS AN EXTERNAL EMAIL

Please log the below against each application, and confirm when done. Thank you.

As an architectural historian, author and lecturer with a special interest in and knowledge of the City, I object to this development. My principal concern is that the façade treatment of the 'Proposed New Building' – described in the application as showing “some reference to” and taking “inspiration” from the Daily Express building – is in fact far too similar to the Daily Express building in materials, form and colour and so will, when combined with the sheer scale of the Proposed New Building, have the effect of diminishing the appearance of the Daily Express building in its urban context and thus harming a Grade II*-listed heritage asset as a result.

The application specifically accepts that the Daily Express building is currently the “most noticeable [...] presence on this stretch of the street” and “a singular building in this context, of unique design and materiality”. It also correctly remarks that the existing River Court building, constructed in 1998-2000 next to the Daily Express building, “sought to re-express the distinctiveness of [the latter’s] original frontage” by using stone rather than glass and thus “providing a counterpoint” to the Daily Express building.

Despite these admissions, the proposed scheme ignores the accepted principle that new insertions in historic architecture should be distinct visually from the existing fabric and it is apparent from the computer-generated imagery provided that if the application is granted visual confusion will arise between

- the alternating, horizontal layers of clear and very dark opaque glass, thinly framed in metal and curved in plan at the corners, of the Proposed New Building and
- the alternating, horizontal layers of clear and very dark opaque glass, thinly framed in metal and curved in plan at the corners, of the Daily Express building.

It is therefore impossible to understand how the application can claim to “enhance the setting of the listed building”, or allow it to “truly stand alone” and “‘go solo’ rather than remaining a mere appendage to a more substantial neighbour”, since the exact opposite would be the case – the Daily Express building would be not merely an appendage to but actually subsumed within ‘a more substantial neighbour’, namely a vastly over-scaled (more than twice the size of the existing River Court) pastiche of itself.

This approach is justified by stating that this is the only option that permits “a unified and coherent façade treatment” that is “capable of resolving the differing scales and characters of surrounding buildings. This is simply not the case as other material and form choices are available that could achieve this aim without producing a weak copy of the Daily Express building. It is also unclear to me how the Proposed New Building can be claimed to have “its own distinct character” and “its own identity”.

It should be recorded that the River Court scheme was specifically designed to centre and celebrate the Daily Express building by removing a previous weak copy of it, Aitken House, and using stone cladding on the replacement, this last with clear direction from Corporation planners. The current application thus turns the clock back as if the previous twenty years had not happened.

The application also shows a poor understanding of and respect for the Daily Express building overall, notwithstanding the Built Heritage report. The “sensitive addition of a small area of ramped access at the Fleet Street steps to afford inclusive access to the lobby” is proposed, along with a vertical extension of the original staircase, yet no illustration of either appears. Contrary to the stated desire to restore the lobby, a significant portion of it to the south east is to be permanently walled off and used for

retail. That the same report states the building's cladding was "made possible by the use of Vitrolite panels -- a material that resembles glossy stone, but has properties more akin to glass" is highly concerning, since of course Vitrolite IS glass.

In summary, the applicant says "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." The applicant concludes that "Section 5 of [the Built Heritage report] provides this clear and convincing justification, in our view" but it does not in mine and nor, I hope, in officers' and members' in light of the facts I have outlined.

The application should be rejected.

Chris Rogers



Kurt Gagen
City of London Corporation
Guildhall
Gresham Street
London, EC2V 7HH

Sent by email: PLNComments@cityoflondon.gov.uk

04 August 2021

Our ref: 98 10 08

Dear Kurt Gagen,

21/00524/LBC and 21/00538/FULEIA - DAILY EXPRESS BUILDING, FLEET STREET, THE CITY, LONDON

The Twentieth Century Society has been notified of the above applications for Listed Building Consent and Full Planning Permission for alterations and refurbishment of the Grade II* listed Daily Express to facilitate its change of use from office to learning and non-residential institutions use, retail, flexible learning and non-residential institutions and commercial use, and for the demolition of the neighbouring River Court Building and erection of a new building comprising two basement levels and ground floor plus 20 upper storeys for retail, commercial, office and service use. The Society was consulted on the scheme at pre-application stage and provided feedback based on the comments of its advisory Casework Committee which met to review the proposals on the 17th May 2021. It appears that the pre-application scheme was not revised in response to our letter and so we repeat here some of the comments we made in May.

Background

The Daily Express was built in the early 1930s in a streamlined Art Deco style by (Sir) Owen Williams, with interiors created by Robert Atkinson. It was commissioned by the owner of the Express William Maxwell Aitken (first Baron Beaverbrook) to provide the paper with new offices and printing works. When completed in 1932, the building's east side abutted a 19th-century newspaper office. In the late 1970s, buildings on the site were demolished to allow the Express to be extended to the north and east. Known as 'Aitken House', this extension was designed in an imitation Art Deco style. In 1997-8, a new scheme was carried out by John Robertson Architects (JRA) which saw the demolition of Aitken House and construction of the existing commercial office known as 'River Court'. River Court is attached and linked internally to the Express.

The Express is of 6 storeys with a basement, and its upper 3 floors are set back on its principal elevation (its 6th floor was originally open but was internalised in the 1990s/early 2000s). In the 1990s, its black Vitrolite and clear glass cladding was largely replaced, its interiors refurbished and its extravagant 1930s entrance foyer restored. Surviving internal fixtures include original doors on the upper office levels, the principal stair (with original light fittings), landings and passenger lifts, and entrance lobby with its Eric Aumonier-designed relief sculptures representing 'Britain' and 'Empire'. River Court is restrained and stripped-back in its design and is built from stone to contrast with, and complement, the Express. It is several storeys taller than the Express but its upper storeys respectfully step back from the road elevation.

The Twentieth Century Society
70 Cowcross Street, London EC1M 6EJ



The Daily Express was Grade II* listed in 1972 and falls within the Fleet Street Conservation Area. River Court sits just outside this conservation area.

Policy

The local authority should note paragraphs 199 and 200 of the National Planning Policy Framework (NPPF) 2021 which relate to designated heritage assets:

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) (paragraph 199)

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 (paragraph 200)

Comments

The Twentieth Century Society welcomes the proposals to facilitate the reuse of the Daily Express and has no objections in principle to the redevelopment of the neighbouring River Court Building.

However, the Society is concerned that the proposed design for the new building will harm the setting of the Express. We consider the design to be too overbearing with its stepped elevation projecting out into the street and across the arcade space towards the listed building. The Society believes the existing stone River Court building provides an appropriate counterpoint to the Express stylistically and materially. The proposed Art Deco-inspired design will, the Society believes, lessen the impact of the Express, which stands out in terms of both style and materials as a striking streamlined curtain-walled building within an otherwise quite architecturally conservative area.

The Daily Express Building is designated Grade II* which puts it within the top 8% of listed buildings. The conservation of the building and its setting should therefore be of the utmost importance. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 advises the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses".

In the Society's opinion, the new development will also have a detrimental impact on the nearby Fleet Street Conservation Area. The Fleet Street Conservation Area Strategy states that the Express provides a "powerful visual statement", being so different in character to other buildings in the conservation area. The existing River Court building is noted in the Fleet Street Conservation Area Strategy for its "well-detailed stone-clad street frontage of proportionate scale to its neighbours". The new development will be visible from within the conservation area and we believe it will have a harmful impact on its character and significance.

The City of London's Local Plan (2015) outlines the council's commitment to good design, by "Ensuring 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." and by "Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces." (Core Strategic Policy CS10: Design).

Summary

While the Twentieth Century Society welcomes the proposals for the Grade II* Express Building, it believes that the proposed neighbouring development will harm the building's setting and will have a detrimental impact on the nearby Fleet Street Conservation Area. We therefore encourage the local authority to refuse the current application for the new building (ref: 21/00538/FULEIA) and

urge the architects to reduce the proposed building's massing and height and to revise its design to be more sympathetic to its sensitive historic environment.

We hope that these comments are of use to you. Please don't hesitate to contact us if you have any questions.

Yours sincerely,



Coco Whittaker
Caseworker
Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



From: [REDACTED]
To: [PLN - Comments](#)
Subject: Application Ref: 21/00538/FULEIA - 120 Fleet Street London EC4A 2BE
Date: 05 August 2021 10:57:47

THIS IS AN EXTERNAL EMAIL



Ancient Monuments Society
Defending Historic Buildings of all Ages and all Types

FAO: Kurt Gagen

By email: PLNComments@cityoflondon.gov.uk

Re: 120 Fleet Street London EC4A 2BE
Application Ref: 21/00538/FULEIA

Thank you for consulting us on this application. We have reviewed the documents available on your website and the Ancient Monuments Society provides the following comments:

We have no objection to the principle of redeveloping the 1990's River Court building and welcome the proposed separation of the Grade II* listed former Daily Express Building from the adjoining development. This is a positive outcome that will enhance both the significance and appearance of this important heritage asset.

However, the AMS is deeply concerned about the substantial increase in the size and scale of the replacement building on the River Court site and the impact it would have on the settings of the Daily Express Building, the adjacent conservation areas, and wider views of the area.

NPPF (2021) paragraph 130: *“Planning policies and decisions should ensure that developments: (c) 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); (d) 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?”*

The proposed building is designed as a series of stepped terraces increasing in height from 6 storeys at Fleet Street to its highest point at 21 storeys at the north end of the site. Whilst separate, the new building still surrounds and ‘dwarfs’ the Daily Express Building. The proposed context elevations (drawing PA-70-200) clearly show that a single building of this height that extends the full 140m length of this site is simply too big and out of context with the surrounding development and the adjacent conservation areas. The predominant built form around Fleet Street, including the existing building, is of much smaller individual building units, and this should be reflected in any redevelopment of the site. Likewise, the monotonous design of the ground floor level provides little in the way of interesting, active or distinctive street frontages that are needed to create a sense and distinctive sense of place as a continuation of the conservation area. It runs the risk of replicating the poor building/ pedestrian interface now experienced along much of Bishopsgate.

Of particular concern is the way the proposed building intrudes into view 16B of St Paul's Cathedral, Temple Gardens, St Bride's Church and the Embankment, as identified in the London View Management Framework Supplementary Planning Guidance (March 2012). This part of London is characterised by low scale and traditional buildings and the significant intrusion of the proposal on the skyline that would cause considerable harm to this important vista across the River Thames and to the character of the conservation areas.

NPPF paragraph 195 notes 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.*”

Paragraph 199 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*”

We do not believe that clear and convincing justification has been provided for this level of harm, nor is it outweighed by the benefits of the new pedestrian access around the Daily Express Building and upgrade to the surrounding laneways. We therefore recommend a reduction in height and scale of the replacement building, including articulation to the long side elevations to St Bride Street and Shoe Lane, in order to mitigate the harm caused to the Grade II* listed former Daily Express building, the adjacent conservation areas, and wider views of the area.

Please do consult the AMS again on any amended scheme.

Regards,

Ross Anthony

Case Work

Ancient Monuments Society
Registered Charity no. 209605



a: St Ann’s Vestry Hall, 2 Church Entry, London EC4V 5HB

The Ancient Monuments Society (AMS) is one of the National Amenity Societies and, as such, is a consultee on all Listed Building Consent applications involving an element of demolition as required by the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. The Society also takes an interest in planning applications affecting historic buildings in conservation areas and undesignated heritage. We concern ourselves with historic buildings of all types and ages.

From: [REDACTED]
To: [Gagen, Kurt](#)
Cc: [PLN - Comments](#); [REDACTED]
Subject: Flat E, Sovereign House / 120 Fleet Street Development
Date: 09 August 2021 06:30:09

THIS IS AN EXTERNAL EMAIL

Dear Mr Gagen

We're the residents at flat E, Sovereign House, 5 Poppins Court EC4A 4AX.

With regards to the new development of 120 Fleet Street we're writing to make the following representations:

1, We request COMPENSATION due to the significant impact of demolition, construction and refurbishment works for 120 Fleet Street.

You've been aware the construction site is too close to Sovereign House building where we live. My flat windows on Poppins Court side is only 5 metres away from the boundary of construction site. The air pollution, dust, noise and any other unpredictable accidents/damages during the long lasting construction period will make my home UNLIVABLE and UNINHABITABLE! It doesn't make sense that the Developer/Contractors promise to take mitigation actions against those disturbance, as it's clear the disturbance and nuisance will definitely be inevitable whatever mitigation measures to be taken.

Our property has a buy to let mortgage in place. Sadly, no tenants would like to live in a flat just 5 metres away from a giant construction site with intolerable noise, dust and other safety and mental health problems. As a result, I would most likely have no rental income caused by the construction, which is really a disaster for us! Also it might be extremely difficult to sell our property with a normal market value in this circumstance. It's absolutely unfair! That's why we must get COMPENSATION.

Please ask the Developer to set out a detailed compensation plan before the construction works get started.

2, We object to the proposed height of new development which will make significant impact on the privacy and sufficient daylight for the residents in Sovereign House. The higher buildings will make the environment deteriorated in Fleet Street Conservative Area.

3, We object to the retail units designed in the new development. Opening retail units will inevitably bring about social problems such as tranquility of nearby residences, a cleaning surrounding, anti social behavior incidents, etc.

4, We request to make the pathway of Poppins Court widened to reach approximately 10 metres between the Development boundary and Sovereign House border. It's clear the root of all problems originates the narrow space between Sovereign House block and the construction site on Poppins Court side.

We do think the above requirements are reasonable and need to be met. We looking forward to hearing from you.

Kind regards

Xiaobing Liu & Lei Yao
Flat E, Sovereign House
5 Poppins Court EC4A 4AX
[REDACTED]

Sent from my iPad

From: [Gagen, Kurt](#)
To: [DBE - PLN Support](#)
Subject: FW: 120 Fleet Street proposals
Date: 10 August 2021 16:07:18

Sent: 09 August 2021 11:26

To: Gagen, Kurt <<mailto:Kurt.Gagen@cityoflondon.gov.uk>>

Subject: 120 Fleet Street proposals

THIS IS AN EXTERNAL EMAIL

Hello Kurt, I run the barbershop out of Poppins court, next to 120 Fleet Street, due to the covid restrictions we are hoping to re open in September. I understand the old GS building is going to be demolished and re built in what seems on the surface a new building, it's more the process and the time this will take that concerns us. We were there when the old daily express was converted to GS so I know first hand what that looks like.

Our principal concerns are based around access, noise and pollution. Also the visibility of our shop for customers. The works are proposed to take place over a number of years which is not ideal but I suppose to be expected. Whilst we support the change over in principal I hope the concerns of local business and residents are being listened too. Any thoughts you guys have on how we should proceed would be appreciated.

Many thanks

T.F.W

Tom Whall

Leonard and Michael Barbershop

Manager

From: [PLN - Comments](#)
To:
Subject: RE: Redevelopment of 120 Fleet Street London EC4A 2BE
Date: 13 August 2021 13:26:00

From:
Sent: 10 August 2021 18:26
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Redevelopment of 120 Fleet Street London EC4A 2BE

THIS IS AN EXTERNAL EMAIL

Dear Sirs

I am taking the opportunity of writing to outline my comments and concerns regarding the above proposed scheme.

I am a resident of Sovereign House, Poppins Court which is directly adjacent to this development and this proposed scheme will have substantial impact on all people who reside there.

Whilst there is an acceptance that redevelopment within the City of London area is an inevitability there are a number of elements I would ask the planning committee to take into consideration.

Firstly the maintenance of the quality of life for local residents must be at the forefront of any scheme and it is concerning that it will be taking place at the same time as the adjacent redevelopment on St. Brides Street.

At a time when working from home still remains the norm noise by the schemes will be considerable. We have had a recent extended period of experience in relation to that while dilapidations were being undertaken to 120 Fleet Street when the noise at times was so loud that it actually made Sovereign House physically shake! Despite assurances the contractors took only limited measures to contain noise and consistently worked at anti social times of the day.

In addition, there are real concerns over the quality of air for local residents during the redevelopment phase given that 120 Fleet Street is only approximately 4m away from the windows of the flats.

Turning to the scheme itself the current proposal has a substantially higher elevation at the Fleet Street end of the building which is likely to have a considerable impact upon the daylight

entering the flats, again impacting upon the quality of life for the residents. I would therefore request that consideration is given to an amendment of the design to ensure that there is no compromise in terms of the amount of light being obtained.

I would also request that full consideration is given to the noise impact which the proposed retail units on the ground floor are likely to have, given that many flats have bedroom windows which open onto Poppins Court where noise can be a real issue at night.

Finally I do also have to express concerns over the environmental impact of the redevelopment of this building. It is my understanding that it was only constructed in 1998 yet here we are facing a major redevelopment scheme and I must question the overall impact which that will have. At a time when we should all be looking to minimise the use of resources it seems somewhat crass that a relatively new and physically sound building will be demolished rather than amended.

Notwithstanding my comments above I do welcome the greater use of the former Express Newspapers building which is an iconic part of this area of the City of London.

Yours Sincerely

Tom Street
Flat M
Sovereign House



For the attention of Kurt Gagen

120 Fleet Street London EC4A 2BE

Full Planning Permission with EIA application reference 21/00538/FULEIA

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage.

The Committee has reviewed and discussed the application documents and wishes to make the following comments so as to explain its conclusion that planning permission should be **refused**.

We endorse wholeheartedly the comments made by Historic England (HE) in its letter dated 27th July 2021 regarding the heritage impact of the proposed development. At 22 storeys, the maximum height of the new building comfortably exceeds anything else in the vicinity and therefore risks being overly intrusive and harmful to the settings of nearby Conservation Areas as well as other designated heritage assets. As the HE letter makes clear, such harm constitutes a serious issue. Similarly, the height of the new building relative to the Grade II* listed Daily Express Building would appear to be overly dominant and hence harmful to its setting, counteracting the benefits that could derive from the improved treatment of the rear of the listed building.

We note the relevance of National Planning Policy Framework paragraph 196 regarding the weighing of less than substantial harm to the significance of a designated heritage asset against the public benefits of a proposal development. A less lofty design that seeks to emulate rather than exceed the heights of the existing buildings in the vicinity would cause less harm to the settings of the Daily Express Building and nearby Conservation Areas while delivering the key project aims of new, better quality office spaces and public realm. In this regard it is noteworthy that the Design and Access Statement speculates about the 'post-pandemic workplace' (page 22), yet fails to consider surely the most important change — the reduced demand and hence need for large offices.

The Committee also has concerns regarding the environmental sustainability of the proposed development. On page 26 of the Design and Access Statement it is stated that one of the project aspirations is to 'Embed Circular Economy principles within the overall design approach, including retention of as much existing structure as possible, and reusing materials wherever feasible'. This stands in marked contrast to the suite of demolition

drawings, which show the entirety of the River Court building will be razed and replaced. Aspiration and (proposed) reality are poles apart.

The embodied carbon represented by the already very large existing building is far from negligible, and becomes an even more relevant consideration in the context of a climate emergency being declared by many public institutions. We note the goals of City of London's recently adopted Climate Action Strategy include supporting 'the achievement of net zero for the Square Mile by 2040'; planning decisions would seem to have a key role to play in making this happen. Surely elements of the River Court building, constructed no more than 30 years ago, are capable of being creatively repurposed instead of the whole building being demolished in order to be replaced by in essence a larger version of the same structure?

In conclusion, the proposed demolition of River Court and its replacement by an even larger and taller office building would result in harm being caused to the settings of the Temples and Strand Conservation Areas, as well as to the nationally-significant Daily Express Building. Furthermore, the proposed development comes across as out of step with the times when it comes to future working practices and the climate crisis. A scaled-down version of the scheme, such as proposed already by HE but perhaps also incorporating retained elements of the existing 1990s building, would deliver much the same benefits only to far less harmful effect. Planning permission therefore should not be granted for the development in its present form in order to stimulate the production of more environmentally-appropriate proposals.

Vicki Fox (Hon. Secretary)

LAMAS – Historic Buildings & Conservation Committee

11 August 2021

13th August 2021

Kurt Gagen
Case Officer
By Email:
kurt.gagen@cityoflondon.gov.uk

Dear Kurt Gagen,

REPRESENTATION ON 120 FLEET STREET (APPLICATION REF. 21/00538/FULEIA):**DEMOLITION OF EXISTING RIVER COURT AND THE ERECTION OF A NEW BUILDING COMPRISING TWO BASEMENT LEVELS AND GROUND PLUS 20 UPPER STOREYS (93.15m AOD) INCLUDING COMMERCIAL, OFFICE & SERVICE USE, CREATION OF NEW PEDESTRIAN ROUTES AND CHANGE OF USE & REFURBISHMENT OF GRADE II* DAILY EXPRESS BUILDING FROM OFFICE TO LEARNING AND NON-RESIDENTIAL INSTITUTIONS (TOTAL DEVELOPMENT COMPRISING 61,135sq.m GIA)**

We write on behalf of our client, Landsec, in respect of the above planning application. Landsec is the owner and portfolio holder of the New Street Square estate, comprising a total of 955,000sqft NIA.

A plan of the indicative extent of Landsec's surrounding assets with the proposed scheme in context is shown at **Appendix 1**.

In summary, our client is very supportive of the submitted proposals, which we consider will provide valuable regeneration benefits to the area of Fleet Street, the wider City of London and beyond.

The proposed development will seek to bring people back into the City of London following Covid-19, offering a range of veritable social, cultural and commercial uses in a heritage setting, which will act as a regional attraction and will enliven the City of London. Our client's support is offered subject to the detailed points/ clarifications required as set out within this letter, including appropriate planning conditions and heads of terms where relevant, having regard to the following themes:

- Land use;
- Height, scale & massing;
- Public realm;
- Wind & Microclimate;
- Construction impact;
- Transport & servicing;
- Vehicle routing;
- Cycle Hub; and
- Road Safety.

Further details are provided overleaf.

Land Use

The proposed land uses are welcomed and supported, including improved public access to the Daily Express Building.

It is considered that options for the use of the Express Building could be considered through consultation with local stakeholders, including the Fleet Street BID, with a marketing approach secured to maximise the opportunity and public benefits created by the refurbishment of the building. We assume that this is to be secured through the S106 agreement.

With regards to retail, Landsec strongly supports the approach to activate almost all of the frontages around the building.

It is noted that the proposals allow for power points and services to allow for the provision of a market in the future. Given the fragility of the retail sector at present, there is a need to consolidate retail uses and therefore any proposal for a market should be fully consulted on including its impact to existing retailers in and around the area, along with consultation with the Fleet Street BID.

Height, Scale & Massing

The proposed height, scale and massing is supported. Given the site's context, we consider the site is suitable for a tall building and is also a sensitive response to the local context. As such, it complies with London Plan Policy D9, 'Tall Buildings' along with adopted City of London Policy CS14 and Draft Strategic Policy S12.

Public Realm

It is noted from the proposals that the City of London has wider ambitions to remove the taxi rank from St Bride Street and pedestrianise this street and some of the surrounding area, as well as re-grade the public realm.

It is recognised that this potential future City public realm project is in its early stages of development, with details of proposals yet to be confirmed and agreed with stakeholders. Accordingly, Landsec and its tenants would want to be engaged early to ensure that its needs and requirements are factored in. It is considered that the removal of the taxi rank is likely to be a sensitive issue and as such, equivalent alternative locations need to be found in the immediate vicinity of the site, should the relocation of the taxi rank be supported by stakeholders.

It is worth noting that the lack of sufficient taxi rank facilities at New Street Square is an issue with existing office occupiers and therefore it is essential that replacement facilities are provided, so as not to dissuade office occupiers from taking space in the area.

Any re-grading of highways should be carefully considered, having regard to existing accessibility requirements and in consultation with local stakeholders. In this regard, it is noted that the City of London has adopted a Community Infrastructure Levy Neighbourhood Fund (CILNF) and

accordingly, an appropriate and proportionate level of contributions should be available proactively for the Fleet Street BID.

Wind & Microclimate

It is noted that the proposals have undergone wind tunnel testing and that the Council's guidance states that post-determination this should be reviewed. This approach is supported, along with mechanisms outside of the red line to allow for further mitigation as may be required, to ensure there is no future impact to surrounding streets including Landsec's portfolio, particularly as the thermal comfort/ wind impact is likely to be most significant at the junction of Little New Street and Shoe Lane.

We would assume that any such mechanisms in either conditions or obligations would relate to the original wind speeds and comfort levels in the original reports/ Environmental Impact Assessment, in order to be enforceable.

Construction Impact

It is noted from the planning documents that during construction, all vehicle access will be from St Bride Street, via Shoe Lane and the A40 to the north, which will involve the temporary closure of St Bride Street to pedestrians.

It is noted that this is likely to be the most sensible option to allow for the speediest construction process, and we welcome engagement on this to allow for disruption to be minimised as far as possible, including seeking to keep the closure to the shortest time possible. In this regard, in the event that the development stalls, pauses or is delayed, we would suggest that a temporary access is provided for pedestrians (as is a requirement for Landsec's 21 Moorfields development).

During construction, it is considered that the temporary relocation cycle hire station should be close to the existing site, for convenience of existing tenants and occupiers of the New Street Square area.

It is unclear how many deliveries would be made and the type of vehicles that would need to access the site during the construction period. It would be useful if this is clarified.

The use of Holborn Circus and Shoe Lane for vehicular construction access (N.B. as is proposed) is considered to be the most sensible option given that there are already a number of servicing vehicles accessing the New Street Square development from Fetter Lane, through to Pemberton Row and Printer Street.

We consider that it would be useful for the applicant to engage with Local Stakeholders prior to the submission of any Construction Logistics Management Plan to make sure it is robust as possible and minimises disruption, with a commitment to the use of this key route.

Transport & Servicing

The proposed loading bay and vehicle access is proposed to be provided via Shoe Lane, opposite the Peterborough Court development, comprising two lorry lifts (one for access and one for egress), with a Dock master managing access. On the basis that unloading/loading takes around 20 minutes per vehicle, it is noted that one bay could accommodate three vehicles per hour.

We support this approach noting there will be minimal disruption and no servicing on street. We note that 10% of vehicular servicing movements will not be consolidated and consider that this seems reasonable, based on the mix of uses proposed.

It would be useful to understand if it is the City of London's intention to restrict deliveries from Holborn Circus to Shoe Lane only as part of the operational development, noting that this has been committed to in the submitted application.

Vehicle routing

As set out in the Design and Access Statement and Transport Statement, it is noted that a comprehensive preventative maintenance contract will be in place covering all lifts and escalators, which typically provide for monthly maintenance visits supported by 24/7 callout cover.

We assume that this will be covered within the S106 to ensure that appropriate servicing arrangements and associated monitoring remain in place for the lifetime of the development so that there is no on-street disruption.

Cycle Hub

The provision of the Cycle Hub is strongly supported. In the event that occupation/ take up is not as strong as expected, it may be useful to allow for the space to be accessible to other local tenants and occupiers as appropriate, which could be something which is managed through the Fleet Street BID.

Road Safety

The proposals will optimise and intensify the use of the site and as a result, there will be significantly more pedestrian, cycle and vehicular movements as a whole (particularly with the provision of the Cycle Hub).

It is noted from Landsec's experience there are often conflicts between pedestrians, vehicles and cycles in the local area.

Therefore, Landsec welcomes the proposals to restrict daytime deliveries to non-peak times during the day but nonetheless is concerned over how enforceable the restricted times will be and that there may be an adverse impact on road safety in Shoe Lane, due to intensification of use. We note that the City of London monitors accident data and if there is compelling evidence to justify changes to delivery times or the layout of carriageway(s) in due course, this should be prioritised subject to engagement with surrounding stakeholders.

We hope these representations are useful. Please note, we are speaking with CO-RE directly in respect of the development and may update our representations accordingly, further to these discussions.

If you require any further information and would like to discuss this further, please do not hesitate to contact either Laura Jenkinson ([REDACTED]) or Ellen Moore ([REDACTED]) at these offices.

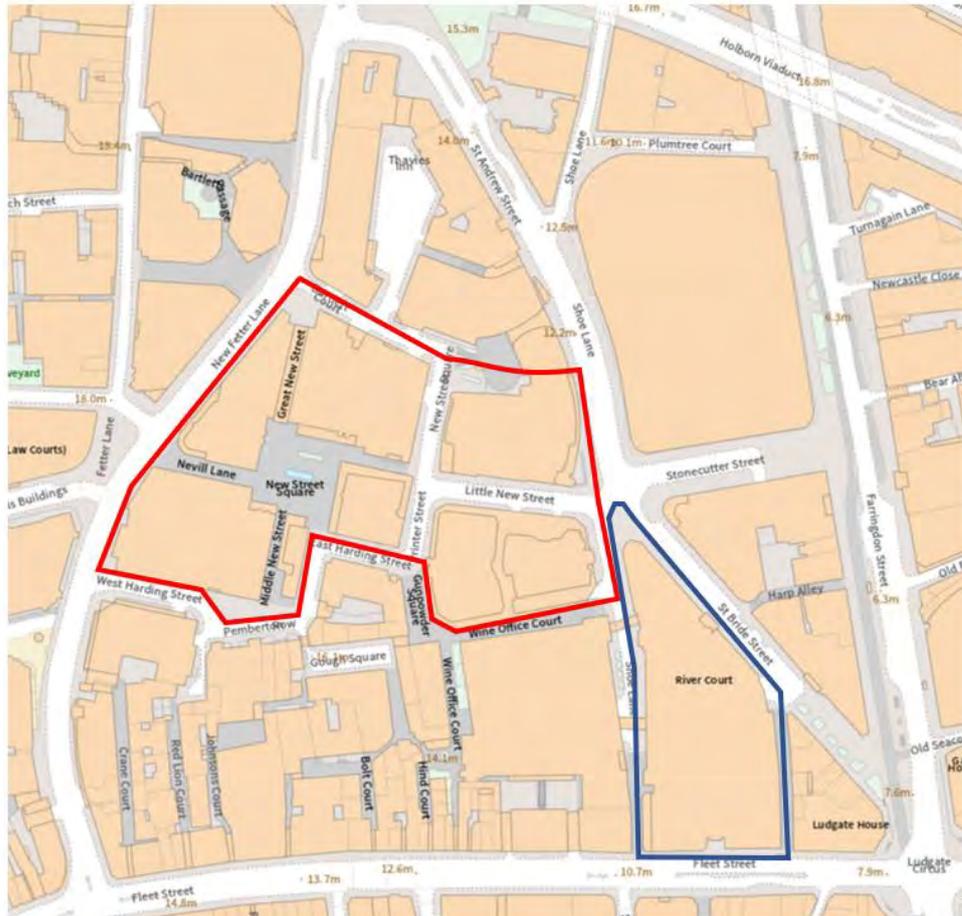
Yours sincerely



Laura Jenkinson
Director

[REDACTED]
[REDACTED]
For and on behalf of Avison Young (UK) Limited

Appendix 1 - Landsec's Land ownership within the context of the Site



- Indicative Extent of Landsec's holdings
- Indicative Extent of Proposed Development

Flat C & Flat D
Sovereign House
5 Poppins Court
London EC4A 4AX

14 August 2021

Mr K Gagen
Development Division
Department of the Built Environment City of London

By email to PLNComments@cityoflondon.gov.uk

Dear Mr Gagen

Location: 120 Fleet Street London EC4A 2BE (the “Proposal”)

Your ref: 21/00538/FULEIA

Thank you for your letter dated 22 July 2021.

Objection

I appreciate this a “David and Goliath” situation. The 252 documents for this planning permission application demonstrates the depth of resources and intent of the applicant. I have already raised these concerns set out below, with the applicant, but as they have not been addressed, all I can do is raise them again.

I **object** to the Proposal which I believe impacts 5 Poppins Court unacceptably (1) during the works for the Proposal; and (2) permanently once 120 Fleet Street is finished and in use. My various reasons are set out below.

Context

I have been a resident in the City of London for over 20 years and 5 Poppins Court is my family’s home. One of the special things about living in the vicinity of Fleet Street, is the historic significance of the area. It is difficult to imagine a 21 floor building fitting into this ceremonial street.

This year we have already suffered considerable disturbances from preliminary works in the current 120 Fleet Street building. Only once many of us had complained vociferously was anything done to mitigate the overwhelming noise and disturbance.

The redevelopment for the Proposal

Noise and vibration

I note that the Environmental Statement 11.8 states “All stages in the refurbishment, demolition and construction program are predicted to result in a **Major Adverse** effect (significant) at 5 & 6 Poppins Court.”

I am very concerned about the extreme and constant noise from the demolition and the building works for the Proposal. The vibrations expected from the works are also a real worry. 5 Sovereign House is a small old building and the preliminary works have already made the building vibrate.

It is important to note that the residents of 5 Sovereign House are very varied and range from school children to retirees and everything in between. Some people work from home, some are at home all day and some work shifts. For some, 5 Sovereign House is a buy to let investment and for others, quite simply, 5 Sovereign House is home. Therefore, at all times of the day or night, the noise and disturbance will have an impact on some of us in 5 Sovereign House and in particular on our well-being and our sleep.

Air quality

Air quality is referred to in the Environmental Statement Volume 3, Annex 1 Health Impact Assessment which notes the deconstruction and construction site of the Proposal are “considered to be high-risk”. I welcome a stringent Dust Management Plan. Asthma and respiratory problems will be exacerbated by additional dust, which is of particular concern for my family. During the summer months, not being able to open the windows because of the dust, will be intolerable.

Ability to rent out or sell property at 5 Poppins Court

If we wanted to escape the disruption for the duration of the works of this Proposal our ability to sell or rent out our flats, will be seriously inhibited.

Once 120 Fleet Street completed

Loss of light

Permanent issues for 5 Poppins Court, caused by the Proposal, are numerous and varied, however, loss of light and overshadowing is of particular concern.

Some flats in 5 Poppins Court, including mine, see 100% reduction in annual probable sunlight hours (“APSH”) during the winter months (ES Volume 3, Appendix 3, Part 9). This is characterised as “acceptable” in 11.22-11.24 in the Environmental Statement Chapter 11, if I understand it correctly, on the basis that the reduction is from one (1) hour to zero (0) hours of winter APSH once 120 Fleet Street is completed. I assume that this is as result of the Proposal being over 93 metres high. This is entirely unacceptable.

To be left with zero (0) APSH over the winter permanently, so 120 Fleet Street can roughly double in height from the current building, will affect the well-being of my family hugely. It will not surprise anyone, given the space constraints in properties generally in the City of London, that the master bedroom in question has in fact many purposes and is also used as a playroom and is where homework is undertaken.

Should we ever wish to move, the worsened position for daylight and sunlight in the master bedroom will of course impact our ability to do so.

Noise and disruption from 120 Fleet Street

Increased noise in Poppins Court due to more retail units being serviced, antisocial behaviour if pubs/bars/clubs are part of the intended use of the retail space and an increase in litter due to higher footfall are permanent issues which will all need to be mitigated and addressed. I would object very strongly to the external areas of 120 Fleet Street, such as

roof terraces and pavement level spaces, being used for pubs or bars. A permanent security and cleaning programme would go a long way to ensuring that Poppins Court and the surrounding areas are maintained to acceptable standards.

As an aside, I welcome any additional green space, which is publicly available. The constant use of the seating area at the end of St Bride's Street demonstrates the need for pleasant public green spaces. However, the amount of additional green space suggested feels disproportionately small given the overall size of the Proposal. Could the applicant not do more? In any event, this in no way makes up for the permanent and negative impact the Proposal has on 5 Poppins Court.

Thank you for putting my objection before the Planning Committee.

Yours sincerely

Susannah Bond

Flat K Poppins Court Sovereign House London EC4A4AX

Mr K Gagen
Development Division
Department of the Built Environment
City of London

By email to PLNComments@cityoflondon.gov.uk

Wednesday 18th August 2021

Dear Mr Gagen,

OBJECTIONS

Re: 120 Fleet Street and Dally Express building EC4A 2BE
Your ref: 21/00538/FULEIA

We refer to your notice of 14 July 2021. We are residents of Sovereign House at 5 Poppins Court. We have occupied Flat K for over 20 years and use it for domestic and work purposes. It is vital to us to have undisturbed occupancy and this will be threatened very seriously if this development goes ahead over the planned period.

While we recognise that there are certain benefits to the area in a development of this building and the regeneration that might accompany it, we believe that there are significant aspects of the plan which will have an adverse impact on the environment, local residents and neighbouring businesses.

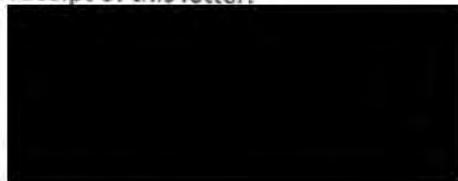
In particular, we request that there be taken into account the following points:

1. We **object** to the height of the proposed new building. Even with its stepped design, a building of 21 floors will dominate the surrounding area in this setting and be detrimental to the visual appearance of the area, particularly to St Brides Street.
2. We **object** further in that the proposed development will adversely affect the amenities of occupiers of residential properties in the vicinity through loss of light, sunlight and overshadowing because of its close proximity to Poppins Court:
 - a. Poppins Court itself will be narrowed, especially from the second to fifth floors of the proposed building.
 - b. The existing building at 120 Fleet Street (the "GS building") is 4 storeys at the Poppins Court elevation and the proposed building would increase this to six, plus a further 7 floors slightly tapering away.
 - c. The resulting loss of daylight, sunlight and overshadowing that will occur is acknowledged in the application as having a major impact (chapter 11 para. 11.13 of the ES). This will be permanent. We **object** to this. That is a very serious threat to the enjoyment and indeed value of the flats in the building. Several of the Sovereign House apartments have windows onto that elevation. Amendments to the scheme should be included to address this issue.
3. The proposed scheme will have a significant and continuing impact on local residents and businesses during the very long period of refurbishment, demolition and construction (see

- para 11.8 of the ES). No mitigation of this very serious disruption is proposed. We believe the noise and disturbance will be intolerable for resident many of whom live and work in the building, unless there is a carefully explained , monitored and regulated format to reduce and mitigate the noise dust etc. We also believe that certain basic amendments should be made to Sovereign House, which is an old building poorly equipped to deal with such a convulsive and proximate building scheme. For example, double glazing and air conditioning would go some way to mitigate noise and dust pollution.
4. While we welcome public access to the listed building, we question the proposed uses of the space; are exhibition and event spaces really viable in this predominantly commercial area of London where activity reduces substantially after business hours?
 5. Conditions should be imposed on the permitted uses of the non-commercial elements to protect the amenity of local residents. Potential uses in particular that we **object** to are:
 - a. Restaurant, café or drinking establishments should not be permitted above ground floor (for example on the roof-top green spaces)
 - b. Roof-top green spaces are planned but should not be used outside office hours for events
 - c. The inevitable increase in food retail will bring litter to Poppins Court. The scheme should incorporate a regular cleaning programme to address this.
 6. We support in principle the proposal to restore the Daily Express building. The conservation of this grade ii* heritage asset must be given great weight in the scheme and if approved it should be undertaken prior to the new building being occupied.
 7. We support the principle of urban greening but feel that 1,950sqm out of 50,550sqm is an insignificant percentage in the scheme of things.
 8. Our other fundamental concern and **objection** to the entire scheme is that our property will be impossible to rent let alone sell during the long period of works and we believe flat owners should be compensated for this block on the commercial value on their properties which many residents have bought for their investment value as well as to live and work in. Why should we all lose out financially for a long period because of this development?

Please acknowledge receipt of this letter.

Yours sincerely,



Christopher and Alison Edwards

Flat H Poppins Court Sovereign House London EC4A4AX

Mr K Gagen
Development Division
Department of the Built Environment
City of London

By email to PLNComments@cityoflondon.gov.uk

18th August 2021

Dear Mr Gagen,

OBJECTIONS

Re: 120 Fleet Street and Daily Express building EC4A 2BE
Your ref: 21/00538/FULEIA

Thank you for your notice of 14 July 2021. We are residents of Sovereign House at 5 Poppins Court. The family has occupied Flat H for over 20 years and use it for domestic and work purposes. We are very concerned that our quiet enjoyment of the premises will be threatened very seriously if this development goes ahead without at least some very strong checks and balances.

We believe that there are significant aspects of the plan which will have an adverse impact on the environment, local residents and neighbouring businesses.

In particular, we request that there be taken into account the following points:

1. We **object** to the height of the proposed new building. Even with its stepped design, a building of 21 floors will dominate the surrounding area in this setting and be detrimental to the visual appearance of the area, particularly to St Brides Street.
2. We **object** that the proposed development will adversely affect the amenities of occupiers of residential properties in the vicinity through loss of light, sunlight and overshadowing because of its close proximity to Poppins Court: our flat H which looks down over Poppins Court will be very badly affected.
 - a. Poppins Court itself will be narrowed, especially from the second to fifth floors of the proposed building.
 - b. The existing building at 120 Fleet Street (the "GS building") is 4 storeys at the Poppins Court elevation and the proposed building would increase this to six, plus a further 7 floors slightly tapering away.
 - c. The resulting loss of daylight, sunlight and overshadowing that will occur is acknowledged in the application as having a major impact (chapter 11 para. 11.13 of the ES). This will be permanent. That is a very serious threat to the enjoyment and indeed value of the flats in the building. Several of the Sovereign House apartments have windows onto that elevation. Amendments to the scheme should be included to address this objection.
3. The proposed scheme will have a significant and continuing impact on local residents and businesses during the refurbishment, demolition and construction (see para 11.8 of the ES).

No mitigation of this very serious disruption is proposed as far as we can see. We believe the noise, dust and disturbance will be intolerable for residents, many of whom live and work in the building and some of whom have children. Sovereign House is an old building poorly equipped to deal with such a building scheme. It might help if double glazing and air conditioning were installed to mitigate noise and dust pollution.

4. Conditions should be imposed on the permitted uses of the non-commercial elements to protect the amenity of local residents. Potential uses in particular that we object to are:
 - a. Restaurant, café or drinking establishments should not be permitted above ground floor (for example on the roof-top green spaces)
 - b. Roof-top green spaces are planned but should not be used outside office hours for events
 - c. The inevitable increase in food retail will bring litter to Poppins Court. The scheme should incorporate a regular cleaning programme to address this.
5. We support in principle the proposal to restore the Daily Express building. The conservation of this grade ii* heritage asset must be given great weight in the scheme and if approved it should be undertaken prior to the new building being occupied.
6. We support the principle of urban greening but feel that 1,950sqm out of 50,550sqm is an insignificant percentage.
7. Our other fundamental concern is that our properties will be impossible to rent or sell during the long period of works and we believe flat owners should be compensated for this block on the commercial potential on their properties which many residents have bought for their investment value.

Please acknowledge receipt of this letter.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Ludovica Attanasio

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Fwd: 120 Fleet Street development
Date: 19 August 2021 12:22:11

THIS IS AN EXTERNAL EMAIL

Fao Mr gagan

Further to my previous email mail I do need to flag with you again the impact this scheme will have on the quality of life for residents of Poppins Court.

The demolition on stonecutter Street has commenced today. Not only did work commence before 9am but the impact of that work is actually making sovereign House physically shake even at this early stage.

I would urge you to come and look at that first hand before the decision is made on 120 Fleet Street. If that work is making our building shake ,heaven help us when 120 Fleet Street commences, our properties will be barely habitable and it will certainly not be possible to work from home!

This is a formal note of concern for lodging with my previous correspondence.

Thank you
Tom street
Flat M
Sovereign house
Poppins Court
Lobdon

GREATER LONDON AUTHORITY

Good Growth

Mr Kurt Gagen
City of London Corporation

Our ref: GLA/2021/0784/01
Your ref: 21/00538/FULEIA
Date: 23 August 2021

Via Email

Kurt.gagen@cityoflondon.gov.uk

Dear Mr Gagen,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
120 Fleet Street, London
Local Planning Authority reference: 21/00538/FULEIA

I refer to the copy of the above planning application, which was received from you on 14 July 2021. On 23 August 2021 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority considered a report on this proposal, reference GLA/2021/0784/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not fully comply with the London Plan 2021 for the reasons set out in paragraph 91 of the above-mentioned report.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Jack Kinder, e-mail jackkinder@tfl.gov.uk.

Yours sincerely



John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Danny Calver, TfL
Agent: Mr Mike Moon - DP9 email: mike.moon@dp9.co.uk

The Daily Express Building, 120 Fleet Street

in the City of London

local planning authority reference 21/00538/FULEIA

<p>Strategic planning application stage 1 referral</p> <p>Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.</p>
<p>The proposal</p> <p>The applicant is proposing a comprehensive redevelopment of the site including the annexing of the Daily Express building and the complete demolition of the River Court building. Specifically, the works include the construction of a new 21 storey office-led building providing office floor space on the upper levels with retail, office lobby, cycle house, service area and new pedestrian links at ground level. The works also include the restoration and re-use of the Daily Express building for publicly accessible cultural and leisure uses.</p>
<p>The applicant</p> <p>The applicant is River Court Properties Limited and the architect is Bjarke Ingels Group.</p>
<p>Strategic issues summary</p> <p>Land Use Principle: The development's contribution to the wider strategic functions of the CAZ, with the delivery of new high quality office floorspace (including affordable and retail floorspace), new cultural floorspace and enhanced public realm accords with the London Plan (paragraph 16 to 24).</p> <p>Urban Design, Heritage and Views: In terms of design, GLA officers consider that the proposal will improve the visual appearance and setting of a Grade II * listed building, deliver a new building of high architectural quality and provide improved public realm and permeability throughout and around the site. The proposal will not result in harm to the significance of heritage assets or impact upon locally important or strategic views (paragraph 25 to 51).</p> <p>Transport: The car free development is welcome. However, concern is raised with the relocation of bus stops during construction. Additional details on pedestrian comfort levels, wayfinding and compliance with LCDS cycle requirements are also required. A contribution towards the upgrade of the Cycle Hire Docking Station on St Bride Street is requested. Delivery and Servicing, Pedestrian Routing Management and CLP Plans should also be secured (paragraph 52 to 75).</p> <p>Sustainability and Environment: Additional clarification is required with regards to energy commitments and requirements. Overall, and subject to securing appropriate conditions, the proposal is not likely to raise any noteworthy environmental concerns (paragraph 76 to 87).</p>
<p>Recommendation</p> <p>That the City of London Corporation be advised that the application does not yet fully comply with the Mayor's London Plan, for the reasons set out in paragraph 91 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.</p>

Context

1. On 14 July 2021, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The proposed scheme would be referable to the Mayor under the following Category of the Schedule to the Order 2008:
 - *Category 3E(xi): Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and comprises or includes the provision of more than 2,500 square metres of non-residential floorspace.*
3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal or allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's website: www.london.gov.uk.

Site description

5. The site is within London's Central Activities Zone and within London's Square Mile and is boundary by Fleet Street to the south, Shoe Lane to the west, St Bride's to the north east and Poppin's Close to the east. An existing 11 storey office building known as the River Court building is located on the site. The Grade II* Listed Daily Express also forms part of the development site. The River Court building was constructed in 1998 and is conjoined with the Daily Express building. In terms of heritage, as outlined above, the site includes a Grade II* Listed Building known as the Daily Express Building. This 'Art Deco' building was completed in 1932 and is of reinforced concrete construction with black glass facing with metal casements. The part of the site that is occupied by the Daily Express Building is also located within the Fleet Street Conservation Area. Further, the site is surrounded by many national and internationally significant heritage buildings including the Grade I Cathedral Church of St Pauls to the east. In addition to heritage, the site is within the wider setting consultation area for London View Management Framework (LVMF) view 5A.2 from Greenwich towards St Paul's Cathedral.
6. The site has a PTAL rating of 6b on a scale of 0 (poor) to 6b (excellent). The development fronts the Strategic Road Network (SRN) on Fleet Street to the south, Shoe Lane to the west, St Bride's to the north east and Poppin's Close to the east. The nearest Transport for London Road Network (TLRN) is located east on A201 Farringdon Street where TfL is the highway authority. The closest London Underground (LU) station is located 390 metres south east at Blackfriars Underground providing access to Circle, District line and wider range of LU,

London Overground, National Rail. Chancery Lane, Covent Garden and Leicester Square LU stations are located east and within walking distance of the site. Thameslink, London Overground services can be accessed via City Thameslink Station 90 metres east of the site. There are 14 bus services within walking distance of the site and directly outside the site on Fleet Street Ludgate Circus stop E.

7. Cycleway 6 (C6) is located on A201 Farringdon Street, C6 provides connections from Kentish Town to Elephant and Castle. Full Segregated Cycle route CS3 is located 345 metres south along A3211 Victoria Embankment. This provides connections from Barking to Lancaster Gate. The nearest Cycle Hire docking station is located east on St Bride's Street with 25 docking stations.

Details of this proposal

8. The proposal involves the demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement. Construction of a new building arranged over two basement levels, ground floor and 20 upper storeys comprising commercial, business and service use (Class E).
9. In addition, the proposal also includes alterations to and refurbishment of the existing Grade II* listed Daily Express Building at 120 Fleet Street, including works to physically detach the building from the River Court building with demolition of part of linking floorplate and structure from basement level 01 to level 06, and associated erection of new north façade in materials to match existing, with integrated louvres above ground level. Retention of south-east curved corner and part demolition of existing east façade from ground level to level 5 and erection of new façade with materials to match existing, including new shopfront with high-level integrated louvres. Part modification of existing main entrance doors and steps at ground level on south elevation to provide ramped entrance. Alterations to the western façade including in association with a new shopfront proposed at ground level and the installation of ventilation louvres at level 5. Demolition of existing roof and erection of new roof with associated roof garden. Demolition of level 6 landing and extension of existing oval staircase from level 6 to provide extended staircase to new roof with new core on north side incorporating new lift between roof level and basement level 01 and new staircase between roof level and basement level 2. Demolition of modern mezzanine structure at basement level 1. Removal of some modern partitions and finishes on all floors with other associated alterations.
10. All works to the Daily Express Building to be carried out in connection with a change of use to learning and non-residential institutions use (Class F1), retail purposes within use Class E (a),(b),(c), flexible learning and non-residential institutions use / commercial business and service use (Classes F1/E), flexible learning and non-residential institutions use / retail purposes / bar (Classes F1/E(a),(b),(c)/Sui Generis), and the provision of public terraces (Sui Generis). Public realm and highway works, including creation of new pedestrian routes through the site at ground floor level, access and servicing arrangements including loading bay entrance from Shoe Lane and cycle house entrance from St Bride Street, and hard and soft landscaping works. The provision of bicycle and vehicle parking, mechanical building plant, and other associated and ancillary works incidental to the development.'

11. The proposed development would result in buildings with a GEA floorspace of 77,391sqm.

Case history

12. On 3 March 2021, a pre-application meeting was held between the applicant and GLA officers to discuss a proposal for the comprehensive redevelopment of the site including the annexing of the Daily Express building and the complete demolition of the River Court building. The works also included the construction of a new 21 storey (93.15 metres) office-led building providing up to 48,659sqm of office floor space on the upper levels with retail, office lobby, cycle house, service area and new pedestrian links at ground level. Further, the works included the restoration and re-use of the Daily Express building for publicly accessible cultural and leisure uses. The pre-application note confirmed that the land use principle of the proposal was considered acceptable in strategic planning terms. With respect to design, the note indicated that the submitted visuals suggest that the architecture and new public realm would respond well to the distinctive heritage of the Daily Express building, with a simple and refined appearance. In terms of heritage and views, a town, heritage and visual impact assessment would be required to demonstrating compliance with relevant policy on heritage and strategic views.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan 2015 and the London Plan which was published and became part of the statutory development plan on 2nd March 2021.
14. The following are relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance;
 - Central Activities Zone Supplementary Planning Guidelines (March 2016); and
15. The relevant strategic issues and corresponding policies are as follows:
- Good Growth *London Plan;*
 - Opportunity Area *London Plan;*
 - Employment *London Plan;*
 - Urban design *London Plan; Character and Context SPG; Housing SPG; Play and Informal Recreation SPG;*
 - Strategic views *London Plan, London View Management Framework SPG;*
 - Heritage *London Plan; World Heritage Sites SPG;*
 - Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
 - Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
 - Transport and parking *London Plan; the Mayor's Transport Strategy;*

Land Use Principles

16. The site is located within the Central Activities Zone (CAZ) and the proposed uses, being office, retail and cultural floorspace, accord with the objectives of the CAZ. In particular, Policy SD4 (Central Activities Zone) of the London Plan encourages development within the CAZ that supports its internationally significant office function.

Employment floorspace

17. With regards to employment floor space, policies E1, E2 and E3 all seek to ensure the development and enhancement of employment floor space including the provision of affordable or low-cost workspace.
18. The development itself would provide in excess of 61,000 sqm of floorspace of employment (offices) use. The quantum of this employment floorspace in this location would support the strategic function of the CAZ and London's world city role in accordance with Policies SD4 and E1 of the London Plan 2021.
19. Policy E3 of the London Plan promotes affordable workspace in new developments, in certain situations. In this instance, the site is not located in such an area and consequently no element of affordable workspace is proposed.

Cultural and social floorspace

20. Policies HC5 and SD4 of the London Plan aim to support the continued success of London's cultural assets and encourages the enhancement of and expansion of such floor space. Although the site is not located in a specific cultural quarter of the CAZ, the use of the Daily Express building for culturally based floorspace would be strongly encouraged as it would help to enhance and expand London's cultural assets in line with the objectives of Policies HC5 and SD4 (The Central Activities Zone) of the London Plan.
21. The Daily Express Building will have a change of use to provide 5,269sqm (GIA) of floorspace consisting of new flexible leaning and non-residential institutions with some associated commercial, business, service and retail floorspace. The uses would fall within Use class F, E and Sui Generis. It is noted that the proposed cultural uses are indicative and subject to refinement as viable cultural operator / partnership opportunities develop. The indicative layout is the creation of a circa 200 seat event and exhibition space within the basement level, a rotating exhibition space within the lobby area, flexible uses (cultural or complementary to) on levels up to level four, a café/bar space with creative based retail floorspace on the fourth floor, an exhibition space on the sixth floor and a publicly accessible roof space that will be used for public events.
22. Cultural uses will be defined within a Cultural Implementation Strategy to be agreed with the Local Planning Authority and secured by S106 Agreement. Given this, the applicant considers it necessary to apply for a flexible range of planning use classes for some of the proposed cultural spaces within the Daily Express Building.

23. Policy S1 of the London Plan seeks to ensure that social infrastructure that addresses a strategic need and supports service delivery strategies should be supported, particularly in places with good accessibility to public transport and cycle and walking infrastructure. In terms of location, the site is located within an area that has excellent access to public transport and also direct frontage to London's cycle infrastructure network.

Land use principle conclusion

24. Overall, the principle of the redevelopment of the site for improved office, retail and cultural floorspace is considered acceptable in principle as it would accord with the objectives of the Mayor's policies concerning cultural and employment provision in the CAZ.

Urban design

25. The design principles of chapter three in the London Plan outline that all developments should achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality. Previous urban design comments received at pre-application have helped to inform and refine the design approach of the current scheme which is welcomed.

Architecture

26. When assessed against the design principles of chapter three of the London Plan, GLA officers are of the opinion the architecture with a modern Art Deco approach is strong and responds well to the character of the Daily Express building without detracting from its own significance. The approach to façade design and materials is supported and it is expected that the new building will sit comfortably with the setting of nearby heritage assets (Daily Express Building and Fleet Street Conservation Area) and also enhances the local streetscape. Notwithstanding this, the bespoke design will require high attention to detailing and expert use of materials. Any planning consent issued should include conditions to ensure exemplary design quality is delivered.

Scale, mass and tall buildings

27. As outlined at pre-application stage, the design-led approach to the massing is strongly supported and responds well to the contrasting character of Fleet Street and taller buildings to the north. Overall, GLA officers are of the view that the form and massing configuration responds positively to the scale of nearby buildings and would respect the setting of the listed Daily Express building.
28. Policy D9 of the London Plan relates to tall buildings and Part B of this policy states that such buildings should only be developed in locations identified as suitable in development plans. In terms of the acceptability of a tall building, the portion of the site where the new building will stand is located within the City of London where Policy CS14 of the City of London Corporation Local Plan 2015 identifies as being suitable for tall buildings. Based on this, the proposed tall building is in accordance with Part B of Policy D9 of the London Plan.

29. Notwithstanding the above assessment, all tall buildings are subject to the criteria set out in Part C of Policy D9, relating to visual, environmental, functional and cumulative impacts. In this regard, GLA officers are of the view that through the provision of relevant technical reports (including planning statement, design and assess statements, heritage, townscape and view assessments, transport assessments, micro-climate assessment, noise assessments and daylight and sunlight assessments) it has been demonstrated that all the criteria within this policy have been successfully addressed. Specific details on the developments impact upon heritage assets and strategic views have been discussed below.

Public realm

30. The introduction of new public routes with high quality landscaping and logical layout will significantly improve local connectivity through the site. Details submitted as part of the submission illustrate that the sizing and spatial quality of these new routes are likely to result in a functional new area of public realm that has been designed to accommodate expected number of pedestrians and also allows safe and convenient access for cyclists. Further, the new areas of public realm will also allow the listed Daily Express building to stand alone as originally intended and is strongly supported as it is likely to enhance the setting of the listed building which is currently compromised by the existing River Court building. Overall, GLA officers are of the view that the proposed new public realm has been well designed to create a new vibrant environment for all visitors to the site and as such meets with the objectives of Policy D8 of the London Plan.

Heritage and views

31. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the character or appearance of that area'. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm in order to comply with the statutory duties.
32. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and, the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. 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.

33. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
34. The site contains a Grade II* listed building and is partially located within the Fleet Street Conservation Area (FSCA). Further, the site is surrounded by many national and internationally significant heritage buildings. With regards to impact upon heritage, the site is located within close proximity to the Grade I listed St Paul's Cathedral to the east, the Grade I St Bride's Church (opposite the site), the Grade II 90-94 Fleet Street and The Old Bell Public House, the Grade II 9 Salisbury Court (opposite the site), the Grade II Mersey House and the Daily Telegraph Building. Given the presence of many heritage assets, a comprehensive heritage assessment (HA) and view assessment accompanied the planning application. The assessment is comprehensive and outlines the proposed development impacts on all heritage assets within 750 metres on the site in line with relevant policy including the NPPF and London Plan 2021 Policies HC1 and HC2.
35. The Daily Express building is a Grade II* listed building and occupies the south-western corner of the site fronting Fleet Street and which also sits within the FSCA. As outlined previously, the proposed works will annex this building from the remainder of the development site and include significant restoration works. In terms of use, the standalone building will be used for cultural and leisure purposes and will be publicly accessible. The submitted HA champions the proposed restoration works and change of use for cultural activities and concludes that the works will enhance both its setting within the conservation area and its significance as an important heritage asset. GLA officers agree with the conclusion of the HA and conclude that the restoration works will avoid harm to, and will conserve the heritage asset in accordance with the objectives of both the NPPF and Policy HC1 of the London Plan.
36. With regards to surrounding heritage assets, the HA identified the heritage significance of each asset within a 750 metre radius of the site including conservation areas. The assessment then considered the magnitude of impact upon these assets by determining how the proposal would change the heritage asset or its setting.
37. Part of the site is within the FSCA and the remainder is clearly visible from it. The HA notes that at present the Daily Express Building makes a positive contribution to the FSCA, however its concealed frontage has a negative impact. In terms of impact of the proposed works, GLA officers agree with the HA which concluded that during the construction period, the works would have a major effect, however once works are completed, both the refurbishment of the Daily Express Building together with the replacement of the existing River Court Building with a building of high architectural quality would result in an enhancement of the conservation area.
38. The design of the new building together with its separation would result in minimal changes to the setting of the Grade I listed St Paul's cathedral with the HA stating that the proposal would have a neutral effect. As outlined in detail below, when viewed from strategic viewpoints around the city, the proposed development will not result in harm to the setting of this important heritage asset. With regards to the other nearby heritage assets (as outlined above), the HA has

considered the impacts of the scheme on each item individually, and concluded that although the proposal would result in a noticeable physical change to setting of some of these items, overall the proposal would have either a neutral or beneficial effect on the setting of each item. With respect to impacts upon other heritage assets located within the wider area (750 metres of the site), the HA also concluded that the works would have either a neutral or beneficial effect. On balance GLA officers agree with the conclusions of the HA with regards to impacts on surrounding heritage assets.

39. Having taken into consideration the statutory duties in relation to listed buildings and conservation areas and the relevant NPPF and London Plan policies in relation to heritage assets, GLA officers are of the view that the proposal would provide an appropriate response to context and will enhance the setting of Grade II* Daily Express Building. With respect to impact upon surrounding heritage, although the new building is of greater mass and height, the high quality architecture results in a building that will have no detrimental impact upon both the setting of the closet heritage items and also on the character of the adjacent FSCA. On this basis, GLA officers are of the view that the proposal would not result in harm to surrounding heritage assets and as such the proposal accords with the objectives of Policy HC1 of the London Plan.
40. Notwithstanding the above conclusion, the proposed development will also deliver a number of public benefits which should also carry weight when undertaking a balancing exercise as required by paragraph 196 of the NPPF. These public benefits include:
 - The removal of the existing River Court building and the annexing of the Daily Express building will enhance its setting;
 - Improving the public realm and active street frontages to the listed building and around the Site;
 - The creation of a new publicly accessible cultural destination (including public roof garden);
 - Restoration of a listed building including the reinstatement of the original entrance and lobby resulting in and improved activation to the street that is likely to enhance the character of the conservation area.

Strategic (London View Management Framework – LVMF) views

41. The key objectives of Policies HC3 and HC4 of the London Plan is to preserve strategic views to and from important landmarks. Developments should therefore not be intrusive, unsightly or prominent to the detriment of the view nor should they harm the composition of the view as a whole or impact upon a landmarks silhouette. To achieve this, developments should not exceed threshold heights within viewing corridors, fit within the prevailing pattern of buildings and spaces, prevent a canyon effect and maintain the context of the landmark's surrounding environment.
42. The site falls within a number of LVMF views and as such a comprehensive Townscape Visual Impact Assessment (TVIA) formed part of the planning submission documents. This document assess the impact of the scheme on these strategic views against the objectives of Policy HC3 and HC4 of the London Plan.

43. The proposed development will be visible from a number of LVMF views to St Paul's Cathedral including LVMF 11A.1 (from London Bridge), LVMF 12A.1 (from Southwark Bridge), LVMF 13A.1 (from Millennium Bridge), LVMF 15B.2 (downstream from Waterloo Bridge), LVMF 16B.1 (from South Bank) and LVMF 17B.2 from Golden Jubilee and Hungerford Footbridges). The visual management guidance notes that St Paul's should remain dominant in these views. With respect to this, the proposed building is located away from St Paul's falling within a cluster of other commercial buildings that form part of the surrounding urban context. The proposal is of a scale similar to surrounding buildings and would therefore not be prominent, thereby allowing St Paul's to remain the principal landmark within these views.
44. The proposed building would also fall within the backdrop of LVMF 18B.1 view from Westminster Bridge towards the London Eye, County Hall and the Shell Centre. Although, the proposed building will rise higher than some of the other buildings that fall within the backdrop of this view, the building will fall in with the prevailing pattern of buildings and as such would not impact upon the dominants of the landmarks outlined above.
45. A portion of the proposed building falls within the Wider Setting Consultation Area of LVMF 5A.2 from Greenwich Park towards which provides an uninterrupted view corridor towards St Paul's. Central London, tower bridge and the Isle of Dogs (Canary Wharf) cluster are also visible from this point. In terms of impact, the proposed building would be visible, however will fall within an established cluster of buildings located to the west of St Paul's. Given the distant nature of the view, together with the existing backdrop, the proposed development is consistent with the objective of the view corridor which is to preserve the silhouette of St Paul's against the background of the view.
46. The site also falls just outside the Wider Setting Consultation Area of view 6A.1 from Blackheath. Developments should preserve or enhance the ability to recognise and appreciate St Paul's from this point. Given the distance of this view point, and the relative height of the proposal compared to other buildings within the view corridor, the proposed building would have a negligible impact upon the setting of St Paul's.
47. Although the site falls within a number of view corridors and is located immediately adjacent to a others, the height and mass of the proposed building results in only a marginal change in views. The TVIA illustrate that the height and mass of the proposed building will not result in any harm to protected vistas, nor the viewers ability to recognise and appreciate a strategically important landmark. Further, the design of the proposal is such, that it is not considered to result in an intrusive, unsightly or prominent feature in a viewing corridor to a strategically important landmark. The proposal accords with the objectives of Policies HC3 and HC4 of the London Plan.

Inclusive access

48. Policy D3 of the London Plan 2021 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design. Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing

independent access without additional undue effort, separation or special treatment; is designed to incorporate safe and dignified emergency evacuation for all building users. The proposed works include significant alterations to the public realm including the creation of new routes through the site. These changes, together with other proposed public realm improvements will enhance accessibility for all throughout and around the site. As such, the works are expected to accord with the requirements of Policy D3 of the London Plan.

Fire safety

49. Policy D12 of the London Plan states that major applications should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further to the above, Policy D5 (B5) of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users, with fire evacuation lifts suitable to be used to evacuate people who require level access from the buildings.
50. No Fire Safety Statement has been provided. To ensure that the scheme accords with Policy D5 of the London Plan, a Fire Safety Statement must be provided prior to determination and Council must confirm that appropriate Fire Safety considerations have been agreed and that compliance is secured by way of condition or legal agreement.

Transport

51. In terms of transport, the proposal has been assessed against the relevant transport policies within the London Plan. Particular regard has been made to Policy T1 (Strategic Approach to Transport), Policy T2 (Healthy Streets), Policy T3 (Transport Capacity, Connectivity and Safeguarding), Policy T4 (Assessing and Mitigating Transport Impacts), Policy T5 (Cycling), Policy T6 (Car Parking) and Policy T7 (Deliveries, Servicing and Construction).

Healthy streets transport assessment

52. Policy T2 of the London Plan 2021 requires that all developments proposed should support the Mayor's Healthy Streets approach. In response to this, the application was accompanied by a Transport Assessment (TA) which follows the Transport for London (TfL) Healthy Streets best practice template which is welcomed.
53. With regards to the Active Travel Zone (ATZ) assessment, the routes selected are considered appropriate. As demonstrated through Vision Zero analysis undertaken, killed or seriously injured (KSI) clusters can be identified on all key routes assessed as part of the ATZ assessment. It is therefore disappointing that the applicant does not commit to the delivery of any of the improvements identified within the streetscape that would reduce vehicle dominance in line with the Vision Zero Action Plan and Policies T2 and T4 of the London Plan. A highways improvement plan should therefore be secured, the scope of which should be discussed further with both the City and TfL.

Trip Generation

54. The trip generation exercise undertaken for the office use has used data from only one site. The applicant should clarify why other sites have been deselected and include the output data for all comparison sites selected for the office, retail or cultural uses.
55. It is accepted that based on the multi-modal trip generation data provided, the additional trips generated by the scheme are unlikely to have a specific adverse impact upon the strategic transport network.

Pedestrian Comfort Levels (PCL)

56. The proposal development is supported by a PCL assessment. Although broadly acceptable, the PCL exercise should be updated to take account of nearby cumulative development and its impact on footway capacity to the 'proposed peak hour PCLs'.
57. It is acknowledged that development proposals including the introduction of new pedestrian routes through the site, and the revised building footprint and footway decluttering will enhance PCL levels. The assessment demonstrates that PCL levels are further enhanced when proposed improvements to St Brides Street including the reduction in taxi and vehicle parking, restricting vehicle movements and footway widening/ carriageway narrowing are allowed for. Given the expected increase in pedestrian trips and the direct benefit employees and new visitors to the development would experience through these public realm improvements, the applicant, in addition to the applicants of other development in the vicinity should contribute towards these works and approvals required in line with London Plan Policies T2, T4 and D8. These improvements should be secured through s106 agreement, and/or s278 agreement.

Site access and design

58. Proposals to increase permeability through the site by introducing new pedestrian routes connecting Shoe Lane, St Bridge Street and Fleet Street are welcomed and are in line with London Plan Policies T2 and D8. Design measures have also been implemented to address level changes across the site, which is welcomed. Access to the public should be secured by condition or section 106 agreement.
59. The primary access point for cyclists to the east of the site on St Bride Street is prominent and aligns well with existing cyclist desire lines running north-south along St Bride Street and CS6 on Farringdon Street. However, the applicant should clarify how cyclists would navigate the proposed routes and access the Cycle House entrance from St Bride Street. This route for cyclists should not be impeded by street furniture, outdoor dining areas, or by agreement with the management company.
60. Wayfinding for walking and cycling to nearby destinations and public transport nodes should be provided. The Applicant should incorporate the use of Legible London signs within the site, including the updating of the Legible London sign on St Bride's Street. This should be secured through s106 agreement.

Vehicular access and parking

61. The proposed development is car-free except for two blue badge spaces at basement level accessed via Shoe Lane, which accords with London Plan policy T6. Active charging points must be provided for both blue badge spaces in line with London Plan Policy T6.

Cycle parking

62. The quantum of long and short-stay cycle parking complies with London Plan Policy T5 minimum standards which is welcomed. Cycle parking must be designed and laid out in accordance with the London Cycling Design Standards (LCDS).
63. The provision of extensive end of journey facilities for cyclists are strongly supported in accordance with London Plan Policy T5 requirements. Access to the concierge should be ensured for the duration of building's opening hours to ensure that short-stay cycle parking remains available for visitors to the site.
64. The Cycle Hire docking station on St Brides Street would be suspended during the construction phase of development. This docking station is one of the on network and therefore any relocation must ensure continuous operation. This development will also increase demand for cycle hire and therefore generates the need to upgrade and increase capacity. The Applicant should therefore identify an alternative location in consultation with the City of London, should cover the cost which is estimated at £45,000 and contribute proportionately towards further docking station capacity.

Delivery and servicing

65. A Delivery and Servicing Plan (DSP) has been submitted alongside this application in line with London Plan Policy T7. Measures proposed to reduce road danger, noise and emissions generated by freight trips to the site include the use of an on-site consolidation centre, retiming of deliveries outside peak highway, pedestrian and cyclist movement time periods and the promotion of deliveries by cargo-bike, all of which are welcomed. The plan should be secured by way of condition.

Construction logistics

66. An outline Construction Management Plan (CMP) has been submitted alongside the application. A commitment to FORS and the Direct Vision Standard (DVS) is welcomed as it is imperative that road safety measures are incorporated, and preventative measures delivered through the demolition and construction phases of the development. A Construction Logistics Plan (CLP) in full should be secured by condition.
67. Primary access during the construction phase is proposed via St Bride Street and it is noted through the swept path exercise that this arrangement will require the removal of existing taxi drop-off, car and motorcycle spaces as well as the temporary relocation of the Santander Cycle Hire docking station, considered above.

68. It is noted that the proposal for the introduction of a vehicle pit lane along Fleet Street and that this will require the relocation of the bus stop located outside the site. Insufficient justification has been provided for the need for access from Fleet Street including a review of alternatives. The relocation of bus stop and reduction in carriageway space is likely to negatively impact upon bus journey times. Fleet Street is part of the London Central Bus Grid, where the objective is to enhance bus journey speeds. It is therefore important that construction logistics do not negatively impact upon bus services in this location.
69. The CMP has also failed to consider how the operation of a pit lane in this location would impact upon pedestrian, cyclist and bus operations along Fleet Street. Further discussion with both TfL and the City of London will be required to establish the details of construction logistics proposals and to determine their acceptability.
70. A pedestrian routing management plan should be produced, clearly outlining which routes will be temporarily closed during construction and for what duration. Alternative wayfinding will need to be clearly and comprehensively presented and retained for both pedestrians and cyclists at decision points away from the site across the local area to enable alternative routes to be established.
71. The CMP should be further developed to coordinate with surrounding development proposals to actively minimise cumulative construction impact in the area, including Stonecutter Court which will require coordinated logistics and shared access via St Bride Street.

Travel Plan

72. The development should be supported by a Travel Plan that is in line with the TfL guidance. The Travel Plan should focus on increasing the cycling mode share in line with the Mayor's Transport Strategy cycling mode share target for central London.
73. It is requested that a commitment be made within the Travel Plan which requires further measures to be identified should three- and five-year mode shift targets not be achieved.

Sustainability and Environment

Energy Strategy

74. Policy SI2 of the London Plan relates to minimising greenhouse gas emissions and sets out energy strategy requirements for major development proposals, Policy SI3 sets out requirements for energy infrastructure and Policy SI4 sets out requirements to manage heat risk.
75. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.
76. The energy strategy submitted is generally compliant with London Plan energy policies. However, additional information regarding the following is required:

- GLA carbon emission reporting spreadsheet;
 - Supporting modelling outputs;
 - Details of heating strategy including details of heat pumps and centralised energy centre;
 - Futureproofed District Heating Network connection drawings;
 - Roof layout and details of PV;
 - Be Seen monitoring commitment; and
 - Whole Life-Cycle Carbon
77. The proposal would result in the requirement of a carbon offset payment calculated using the GLA's recommended carbon offset price of £95 per tonne. This should be secured within a s106 agreement.
78. Detailed comments have been forwarded under separate cover and these will outline specific measures which should ensure compliance.

Air Quality

79. Policy SI 1 (Improving Air Quality) of the London Plan states that any development proposal should not lead to further deterioration of existing poor air quality and not be located or operated in a manner that would subject vulnerable people to poor air quality. An air quality assessment was submitted as part of the submission documents. A review of the assessment indicates that the scheme is broadly compliant with London Plan air quality policies. Notwithstanding this, with regards to backup generators, alternatives to the proposed diesel-fuelled backup generator are recommended, such as hybrid, battery or fuel cell technology. Such alternatives would assist in the scheme meeting with the objectives Part B and C of London Plan Policy SI1 and the City of London's Air Quality SPD. Further, on-site plant must meet the NRMM Low Emission Zone standards for the CAZ in accordance with Part D of London Plan Policy SI 1 and to mitigate impacts during construction an Air Quality and Dust Management Plan (AQDMP) should be secured by condition.

Circular Economy

80. In line with Policy SI 7 of the London Plan, a Circular Economy Statement has been submitted as part of the planning documentation. The document outlines how the scheme aims to minimise the quantities of materials used (conserve resources), responsibly sourcing materials, minimise waste, increase re-use and recycling in order to attempt to achieve net zero-waste. The assessment states that a building circularity calculation would be 51% and that no less than 95% of demolition waste will be recycled. The minimum aim is to divert 90% (by tonnage) of the non-demolition waste and 95% (by tonnage) of the demolition waste from going into the landfill in line with BREEAM. A resource efficiency and site waste management plan will also be implemented on site to minimise waste generation and then manage waste responsibly. Further, an operational waste strategy will also be implemented to ensure municipal waste is managed sustainably. Tenants will be provided with a recycling facility and separate food and glass bins. The statement concludes that the project is committed to the objectives of Policy SI7 of the London Plan. The Council should ensure that those initiatives outline with the statement to reduce waste and encourage reuse are secured.

Flood risk and drainage

81. Policy SI 12 of the London Plan states that all developments should ensure that flood risk is minimised and mitigated and that residual risk is addressed. The site is located within Flood Zone 1 which represents a low risk of flooding. Notwithstanding this, given the scale of the development, a Flood Risk Assessment (FRA) which considered the requirements of the London Plan has been submitted as part of the planning documents. The FRA confirms that the site would not be affected by and tidal breach flood events up to the year 2100, the site has a very low surface water flood risk, the site has a moderate risk of groundwater flooding however there is a low likelihood of groundwater emergence within the site. Further, the FRA concluded that there are no other significant sources of flooding at the site and that safe access/egress to the site would be available for the operational lifetime of the development.
82. A drainage strategy has also been prepared for the development. It is proposed to use below ground geo-cellular tanks to provide attenuation storage for the site which will discharge into the combined sewer in the adjacent highways. Surface water discharge will be limited to the greenfield runoff rate of 2.91 l/s which represents a 98% reduction on the existing 1 in 100 year rate of 163.0 l/s.
83. The Council should ensure that appropriate conditions or legal agreements are secured to ensure that the scheme accords with the objectives of Policy SI 12 of the London Plan.

Biodiversity and urban greening

84. Policy G6 of the London Plan states that development proposals should aim to secure net biodiversity gain and that those proposals that create new or improved habitats that result in positive gains in biodiversity should be considered positively. A Preliminary Ecological Assessment was submitted as part of the submission and confirms the scheme would achieve net gain on site which is welcome.
85. In terms of urban greening, the proposal is subject to London Plan Policies G1 (Green infrastructure) and Policy G5 (Urban Greening). In accordance with these policies, the applicant has calculated the Urban Greening Factor (UGF) as 0.30 when calculated using the London Plan calculation table which meets with the target set by Policy G5 of the London Plan. The target has been achieved through substantial planting on the terraces and extensive green roofs. Although the proposed development presents a well-considered and innovative approach to integrating green infrastructure and urban greening across the scheme, it is noted that no green roofs are proposed on the tallest roofs. The applicant should consider the potential of including green roofs on all available roof space.

Local planning authority's position

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

Legal considerations

87. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless directed otherwise, Councils are required to consult the Mayor again under Article 5 of the Order if they subsequently resolve to make a draft decision on an 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, there is no need to refer the application back to the Mayor.

Financial considerations

88. There are no financial considerations at this stage.

Conclusion

89. London Plan policies on CAZ uses, offices, urban design, heritage, strategic views, environment and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan:

- **Land Use Principle:** The development's contribution to the wider strategic functions of the CAZ, with the delivery of new high quality office floorspace (including affordable and retail floorspace), new cultural floorspace and enhanced public realm accords with the London Plan.
- **Urban Design, Heritage and Views:** In terms of design, GLA officers consider that proposal will improve the visual appearance and setting of a Grade II * listed building, deliver a new building of high architectural quality and provide improved public realm and permeability throughout and around the site. Further, GLA officers are of the view that the proposal will not result in harm to the significance of heritage assets or impact upon locally important or strategic views.
- **Transport:** The car free development is welcome. However, concern is raised with the relocation of bus stops during construction. Additional details on pedestrian comfort levels, wayfinding and compliance with LCDS cycle requirements are also required. A contribution towards the upgrade of the Cycle Hire Docking Station on St Bride Street is requested. Delivery and Servicing, Pedestrian Routing Management and CLP Plans should also be secured.
- **Sustainability and Environment:** Additional clarification is required with regards to energy commitments and requirements. Overall, and subject to securing appropriate conditions, the proposal is not likely to raise any noteworthy environmental concerns.

For further information, contact GLA Planning Unit (Development Management Team):
Scott Schimanski, Principal Strategic Planner (case officer)
email: scott.schimanski@london.gov.uk

Matt Christie, Team Leader – Development Management

email: matt.christie@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

Devlia, Neel

From: BCTAdmin@thameswater.co.uk
Sent: 24 August 2021 08:39
To: PLN - Comments
Subject: 3rd Party Planning Application - 21/00538/FULEIA - Amended Response

THIS IS AN EXTERNAL EMAIL

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 69160
Your Ref: 21/00538/FULEIA - Amended Response

24 August 2021

Dear Sir/Madam

Re: 120, FLEET STREET, LONDON, EC4A

Waste Comments

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

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581338601%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C1000&data=kGZS9%2BXwTtP9hXDKp7OvkJXX9zA5czKOhq0ExVvk8zYA%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be>

8%7C1%7C0%7C637653875581343591%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C1000&data=kTJht8629I0jKuOdGzSobMntwNRm%2BWa2K8hq5o%2BgRDo%3D&reserved=0.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581343591%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C1000&data=19aH92PVEwHxI0Lw%2BgsRVIf267q5dqSNqekZBOG6rZQ%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581343591%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C1000&data=kTJht8629I0jKuOdGzSobMntwNRm%2BWa2K8hq5o%2BgRDo%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Water Comments

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

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to

check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581343591%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C1000&sd=kJht8629I0jKuOdGzSobMntwNRm%2Bwa2K8hq5o%2BgRDo%3D&reserved=0>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581348588%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C1000&sd=irkkXJNvXw2ca7ihC8pElmhrHyT8NbQkB6hPGV3xb00%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

Following further information regarding the proposed drainage for this site, Thames Water have been able to review their position and can confirm that the conditions relating to foul and surface water are no longer sought. All other comments remain the same.

Yours faithfully
Development Planning Department

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

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon.team@thameswater.co.uk Visit us online

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581348588%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C1000&sd=9dfX3r1Zf%2B0x8Z9w9KyAlm2V3tfb43DKT%2F5tUQIIVww%3D&reserved=0>, follow us on twitter

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581348588%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C1000&sd=6fkFM146tFF7dUb1cM8TByHs8XuHzb%2FA1QpYIj5c9hI%3D&reserved>

=0 or find us on

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581348588%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C1000&sdata=q4J7NYTLci4cTKEul8PkRev8wI05%2BTzldhLi0JH9JuY%3D&reserved=0>. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Dr Kirsty Mann

Address: Flat 19 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I am the owner of Flat 19, 6 Bolt Court, EC4A 3DQ.

I object for 3 reasons:

Firstly, due to a lack of any restrictions of use for the proposed outdoor terraces. Given the amount of terrace space, there could be a substantial noise disturbance to residents if no restrictions are

imposed. I refer to local policy:

Local Plan Policy DM 21.3:

"The amenity of existing residents within identified residential areas will be protected by: Resisting other uses which could cause undue noise disturbance.

Draft Plan Policy HIC3:

"A noise assessment will be required where they may be an impact on noisesensitive uses. The layout, orientation and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noisesensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces." I am not aware of any noise assessment having been carried out.

Secondly, your daylight and sunlight report concludes there will be increased overshadowing of my building. This is also contrary to local policy:

Draft Plan Policy HIC3

Developers must consider the noise and lighting impacts of their development.

Local Plan Policy DM 21.3

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."

Third, the building is excessively tall and not in keeping with the surrounding Conservation Area.

I respectfully request the following changes are made to the plan:

- Impose restrictions on the use of roof terraces so they cannot be used outside of office hours or for any social gatherings with live music or sale of alcohol.
- Reduce the overall height of the new building to minimise over shadowing to residential buildings in the vicinity.

Tel: 020 8921 5222



Mr Kurt Gagen
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
21/2630/K
Your Ref:21/00531/FULEIA
27 August 2021

**Directorate of Regeneration,
Enterprise & Skills**
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

DECISION NOTICE - RAISE NO OBJECTION

Dear Mr Gagen,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site: 120 Fleet Street, London, EC4A 2BE

Applicant:

Proposal: 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.

Change of use of Daily Express Building from office (Use Class E) to learning and nonresidential 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 façade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new façade and shopfront and associated works.

(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 nonresidential 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.)

Drawings

Consultation Letter from City of London dated 14th July 2021.

I refer to your letter dated 14 July 2021 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully

Assistant Director

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Mr Alexander Scurlock

Address: Flat 23 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am writing to object to the proposed planning application. As an owner in the adjacent building at 6 Bolt Court, I am concerned about the use of the proposed terraces and the noise/loss of privacy which will result. In addition the size of the proposed development risks dominating our residential building overshadowing the property. Yours A Scurlock

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Mrs Henrietta Fudakowski

Address: 3 Colville Place Colville Place London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am the owner of a flat in Bolt Court which will be impacted by this development. Morning sun light will be much diminished and the new balconies have the potential to be very noisy. The quiet character of Bolt Court will be severely impacted. Smoking terraces have a detrimental impact on neighbours both in terms of noise and air quality.

Flat R
Sovereign House
5 Poppins Court
London
EC4A 4AX

1 September 2021

Mr K Gagen
Development Division
Department of Built Environment
City of London

By email: PLNComments@cityoflondon.gov.uk

Dear Mr Gagen

Location: 120 Fleet Street London EC4A 2BE

Your reference: 21/00538/FULEIA

Please be advised that I object to this development on grounds that it will impose a significant cost to my immediate family and me:

- ◆ in the form of quality of life reduction;
- ◆ potentially, and very likely, through negative impacts on our health;
- ◆ potentially, and very likely, in pecuniary terms.

Background

I live full time with my wife and daughter in our flat. We have no other property to which we can escape.

I am in my 60's, my spouse her late 50's. I am retired and neither I nor my wife have an office to go to during weekdays.

Quality of Life Considerations

The noise, dust and vibrations will be a source of great distress. The proposed development is only 6 yards away from our bedroom.

In the summer it may become unbearable. London becomes very hot and humid and we tend to have the windows open almost 100% of the time. The works associated with stripping the current building, which have been underway for some time now, have been causing me a great deal of distress when the windows are open (though much improved since the sound dampening measures were put in place). **This disturbance would go up by an order of magnitude should the proposed development go ahead.**

The noise will be very bad even with the windows shut, but in the summer months the choice will be (a) to absolutely swelter with considerable noise, or (b) to be cooler but be subject to excruciating levels of noise and to allow the dust to enter unimpeded.

Dust will be a source of personal inconvenience in that it will ruin bedding, soft furnishings and blinds and much additional cleaning and maintenance will be required.

Being on the fourth floor of our building, we currently get a surprising amount of natural light into our flat, including direct sunlight at times. With the proposed building being very tall indeed, my understanding is that our light and direct sunlight will reduce. This will reduce our quality of life after the building has been constructed. The public square with seating and plants in St Brides Street, immediately adjacent to our building, will also suffer a loss of light and sunlight.

Health

The dust is likely to cause respiratory problems. Furthermore I suffer from tinnitus. This combined with the noise will likely cause a deterioration in my mental health.

Pecuniary Aspects

Our building was built long before the advent of reinforced concrete buildings and is a simple brick structure. I'm not convinced it can withstand the constant shaking that will accompany the works and I am concerned that the building will

deteriorate possibly to a significant extent. If this happens it is likely that I and all other owners of flats in Sovereign House will bear the associated losses that will emanate from this deterioration. The losses would result from remedial works needed (some may be needed in the short term; some may only emerge a long time after the works have been completed) and possibly loss in market value on any future sales of our flats.

We have no assurances on being compensated for such losses. Any verbal or written assurances would be of little value as any dispute will put the burden of proof on me and the other owners, not the developers. Furthermore the developers may go out of business or be reconstituted in a way that the current business entity no longer exists with assets being transferred to other entities. This would leave us without any possibility of recompense.

We normally go away for holidays in the British winter. The works are likely to force us to holiday, or to find alternative accommodation, in the summer to get away from the noise, dust and vibrations. This would be expensive.

We may need to upgrade windows to make them better sealed to keep out dust and be more soundproofed to keep out noise. This would be expensive. It also won't solve the problem of needing to open windows during hot weather.

Conclusion

The works will place a heavy burden on my and my family's lives. This is likely to be for 3 or more years and construction works are notorious for overrunning, so probably longer.

For me this means that optimistically 20% to 30% of my remaining life is going to be severely impacted by these works.

Essentially I am being asked to pay a very significant price for someone else's commercial benefit.

I therefore object in the strongest possible terms.

I thank you for your consideration of this submission.

Yours sincerely,

Allen White

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Mr Timothy Parker

Address: Flat 21, 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: This proposal is fundamentally incompatible with §130(c) of National Planning Policy Framework, which requires that planning decisions "are sympathetic to local character and history, including the surrounding built environment and landscape setting..." The proposed 21-story development is fundamentally at odds with both the character and user of the surrounding neighbourhood. It would detract substantially from the charming and sleepy character of the small

laneways to the north of Fleet St / east of Fetter Ln.

I am also very concerned about noise disturbance local residents will suffer from the change of user (cf. Local Plan Policy DM 21.3), particularly given the proposal for various open terraces.

The proposed height and aspect of the new building would, if allowed, overshadow the surrounding area, cutting off sunlight to my building and those of other residents in the area (contrary to Local Plan Policy DM 21.3). It will also result in a considerable diminution of privacy.

The imposing structure of the proposed development will dominate - and diminish - the significance of the historic monuments very nearby, including St Paul's Cathedral, Temple, and other major London landmarks, and intrude on lines of sight from much further afield.

The plan should not be approved in its current form. Restrictions on height and overall size should be imposed, limiting redevelopment to the current scale. Moreover, restrictions on user (particularly as regards any outdoor spaces / terraces) are necessary to prevent noisy activities (including preventing the use of such spaces for noise generating activities such as dining or the consumption of alcohol) from diminishing the quality of life of area residents and workers. Absent such conditions, permission to proceed must be refused.

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Mr Allan O'Neill

Address: Flat 15 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The proposed new buildings will overshadow neighbouring buildings which I would like to object to.

Also I would like to strongly object to the fact that there are restrictions on alcohol use on the outdoor terraces which could affect the privacy of the local area.

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Dr Rosemarie Hutchinson

Address: Flat 4 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:1. The redevelopment of River Court to a height of 20 aboveground storeys is excessive. This will have a detrimental effect on the historic environment of Fleet Street. A building of this height, that stretches for a considerable length of the street, will dominate the skyline to the detriment of the existing historic buildings and overwhelm the narrow courts off Fleet Street. The height of new buildings should be no higher than the existing ones to protect the historic character

2. The Fleet Street Conservation Area is under considerable threat. A recent planning approval to demolish some of the historic buildings will undeniably detract from the historic nature of the street. A 20 storey modern building will certainly also have an adverse effect. The area is at risk of fundamental change as the precedents are set for demolition of historic buildings and replacement with modern and inappropriately high buildings which may dominate the character of the conservation area.

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [Priest, Henrika](#); [Gagen, Kurt](#)
Subject: Objection to proposed 120 Fleet Street development
Date: 02 September 2021 09:56:49

THIS IS AN EXTERNAL EMAIL

Dear Sir,

I am the owner of Flat B , Sovereign House , 5 Poppins Court . I have been made aware of the recent planning application of 120 Fleet Street .

Sovereign House is a residential building & the proposed building work spanning over 5 years (May be more) would create intolerable disruption to its inhabitants. Currently my flat is tenanted & it has already reduced its value due to the noise level & disruption.

It will be virtually unusable with the proposed new building plans without any mitigating considerations re: noise , pollution , access to our residential block of flats .

For such a long period of development of such proportion so close to city residents without any due consideration to their daily life can never be a successful one in the end .

Please allow extensive discussion as to how during building work a reasonable approach could be taken without imposing a major disruptive circumstances in the residents' daily life. Seeking early cooperation from resident neighbours would make things viable on both sides .

Thanks
Mrs Palit
(Flat B Sovereign House 5 Poppins Court)

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Subject: 21/00538/FULEIA - 120 Fleet Street - Objection
Date: 02 September 2021 18:34:08

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I am the owner occupier of Flat 3, 2 Bride Court, EC4Y 8DU and am writing to object to the current 120 Fleet Street redevelopment plans (Ref 21/00538/FULEIA) on the following grounds.

The proposed building height and consequent scale of the building is not in keeping with the surrounding conservation area and will dwarf the surrounding Fleet street area.

The skyline view from my terraces is the same direction as the view from St Bride's Church courtyard which will be severely impacted due to the height of the building and subject to night time light pollution and day time solar glare.

The number and height of the proposed roof terraces will impact my right of privacy as the Fleet street terraces will look down into my main living area and both bedrooms.

The principle of redeveloping 120 fleet street is welcome but the current design, in particular the sheer height of the building, is unsympathetic to the historic character of the area.

Thank you for your consideration.

Stuart Atkinson
Flat 3
2 Bride Court
EC4Y 8DU

From: [REDACTED]
To: [PLN - Comments](#)
Subject: 120 Fleet Street Development Ref: 21/00538/FULEIA - Objection
Date: 02 September 2021 18:49:11

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I am the owner of Flat A Sovereign House, 5 Poppins Court, EC4A 4AX, and am responding to the planning application for 120 Fleet Street. Ref: 21/00538/FULEIA

I previously resided in the property for 11 years, and now rent the property to professional tenants and am concerned that, as Sovereign House is a residential home, the proposed development is going to be significantly detrimental in terms of impact. My concerns and basis of objection as follows:

1/ During the period of development, which I understand could be for up to 5 years, it will be unbearable in terms of noise and disruption given the very close proximity to Sovereign House, which is only a few meters from the perimeter of the development site. Already Sovereign House has experienced noise and vibrations from preparatory works, during unsociable hours and without any notice or adequate mitigations to control the noise and vibration impacts. I am concerned that ongoing works will also put at risk the integrity of Sovereign House (e.g. vibrations and construction works causing structural damage to our period building), as well as making the property unbearable to live with the noise, pollution and access disruptions over an extended period. This will directly impact the rental value and demand for the property which will reduce the level of income on which I rely. The appropriate mitigation of the disruptions and compensation options to residential owners needs to be addressed.

2/ Sovereign House is directly next door to the proposed development so the significant increase in height of the building will reduce the amount of light into my property which faces onto both Poppins Court and St Brides Street. The height of the building seems unnecessarily tall and completely out of character for the direct surrounding conservation area. The height of the proposed development is a major concern and needs to be reviewed to be more in keeping with the conservation area and nearby historical buildings (e.g. St Brides Church).

3/ Related to the size of the building expanse of glass being proposed, I am also concerned about the lack of privacy from the development into my property. My bedroom and main living area faces onto Poppins Court, so windows from the development which face towards Sovereign House will look directly into my property and privacy will be of concern. The privacy into residential neighbours needs to be adequately addressed.

4/ With the inclusion of roof terraces, this provides potential for ongoing noise nuisance from social events, in addition the increase in leisure units (e.g. restaurants, bars) will exacerbate the number of local establishments that already cause noise saturation and unsociable behaviour from late night drinking. Clarity on what the terraces will be used for, and with appropriate restrictions to ensure neighbours are not adversely impacted from the leisure units, needs to be addressed.

I do agree that Fleet Street is in need of regeneration and would welcome sympathetic

redevelopment and investment, but the overall 120 Fleet Street development is just not in keeping with the area, in particular the sheer size needs to be scaled back to be more appropriate for the direct surrounding area.

Thank you for your consideration of my concerns.

***Please note:** The comments from Mrs Santwana Palit from Flat B Sovereign House have been uploaded to the COL website as being from Flat A. Please can you amend so it is clear Mrs Palit's comments are for Flat B Sovereign House.

Vanessa Roguska
Flat A Sovereign House, 5 Poppins Court, EC4A 4AX

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Mrs Sarah Field

Address: Flat 22 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: We are worried about noise from social gatherings and would request restrictions on the use of roof terraces - we would not want any music or alcohol licenses to be granted. This would impact our enjoyment of our flat hugely. We currently enjoy a quiet environment and are obviously keen for this to continue. We would also wish for the height of the proposed building to be significantly reduced so that neighbouring residential properties are not overshadowed or overlooked. Thank you.

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Mr Toby Brown

Address: 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: Dear Sir/Madam

I write as a long term local resident in the City, where I have lived and worked (as a barrister) for many years.

The proposed development is very close to my apartment, and I am concerned about it for a number of reasons.

First, it is completely out of character for this historic area, both in design and because of its abnormal height. The Corporation will be aware of the importance of maintaining the historic look and feel of the Fleet Street and St Paul's area.

Second, the proposal development fails to take into account the impact on local residents, and where I live is one of the few protected areas in the City. This is even more of a factor when more residents are likely to live in the City post pandemic.

From my experience, open terraces are likely to create significant noise disturbance during the day and evening.

I therefore ask that the Corporate refuse planning permission for the proposal. If it is to proceed, it should be modified into a design that accords with the local historic area, and with a significantly lower height, and with terraces removed or at least planning restrictions imposed on their use.

Many thanks for considering my objection. I would like to attend any planning meeting to make my objections orally.

Yours sincerely,

Toby Brown

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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.

(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 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.)

Case Officer: Kurt Gagen

Customer Details

Name: Mr Darren shapland

Address: Flat 11 - Gough House 6 Bolt Court City of London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The building height is excessive and will overlook all other buildings and change the look of the area which is famous and historical.

If a bar or similar is allowed at upper levels of the building this will cause excess noise and disturbance to our building and potentially impact values of properties in the area which are used

for residential use.

Application ref: 2021/3443/P
Contact: Patrick Marfleet
Tel: 020 7974 1222
Email: Patrick.Marfleet@camden.gov.uk
Date: 7 September 2021

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk/planning

Kurt Gagen
City of London

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
120 Fleet Street
London
EC4A 2BE

Proposal:

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.

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.

Drawing Nos: Cover letter dated 14 July 2021 ref 21/00538/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Informative(s):

1 Reasons for no objection-

The overall size and scale of the proposed development and relatively significant distance from the borough boundary would ensure that no harm is caused to the character and setting of the nearby Bloomsbury Conservation Area to the north. Similarly, the proposals are not considered to cause harm to the residential amenities or transport conditions in the borough of Camden. The application should be therefore be determined under City of London's relevant planning policies.

Yours faithfully



Daniel Pope
Chief Planning Officer

City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

17th September 2021

Dear Sir/Madam,

At its meeting on 2nd September 2021 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

**C.88 21/00538/FULEIA - 120 Fleet Street, London EC4A 2BE
Fleet Street Conservation Area/Castle Baynard Ward. No Ward Club rep.**

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.

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.

(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 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.)

The Committee had no objections to the change of use, but objected strongly to the proposal considering it to be excessively large and out of proportion and denigrated the importance of the listed Daily Express building in the street scape. The Members considered that the scale and style of the building was inappropriate in this location as it would be twice the height of the proposed Central Criminal Court building and that the proposed façade was incongruous in this location and would detrimentally affect the character and appearance of the Conservation Area.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

Mrs. Julie Fox
Secretary

SOUTHWARK COUNCIL

LBS Registered Number: 21/OB/0047

Date of issue of this decision: 22/09/2021



www.southwark.gov.uk

LBS Reg. No.: 21/OB/0047

Date of Issue of Decision: 22/09/2021

Your Ref No.:

Applicant Mr Kurt Gagen
 City of London Corporation

With reference to your consultation on the following development:

Request for observations from City of London in respect of proposal 21/00538/FULEIA for:

"1. 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.

2. Change of use of Daily Express Building from office (Use Class E) to learning and nonresidential 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. [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 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.]"

The application documents can be viewed on the City of London's Public Access for Planning register at:
<https://www.planning2.cityoflondon.gov.uk/online-applications/>

At 120 Fleet Street London EC4A 2BE

DECISION NOTICE

LBS Registered Number: 21/OB/0047

Date of issue of this decision: 22/09/2021



www.southwark.gov.uk

In accordance with your letter received on 19 July 2021 and supporting documents.

The Council's formal response is

1. Southwark Council would like to comment as follows:

The proposal does not affect any of the LVMF views where Southwark Council is a Statutory Consultee. The proposal is visible from certain locations on the Southbank including from the Oxo Tower and the Sea Containers part of the River Walk but does not affect the viewer's ability to recognise and appreciate any of the Strategic Landmarks in these views. No objection is raised.

Signed: *Stephen Platts*

Director of Planning and Growth

Site address: 120 Fleet Street London EC4A 2BE

Reference: 21/OB/0047

Planning Division
Southwark Council
Chief Executive Department
PO Box 64529 London SE1 5LX

Planning.applications@southwark.gov.uk ;

Kurt Gagen

Department Of The
Built Environment
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

24th September 2021

RE: REQUEST FOR OBSERVATIONS

Dear Kurt Gagen

**DECISION NOTICE
TOWN AND COUNTRY PLANNING ACT 1990.**

REQUEST FOR OBSERVATIONS

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 21/02947/OBS Date of Application: 19.07.2021 Date of Decision 24.09.2021

Proposed Development At:
Adjoining Borough Observations Within The Corporation Of London

For: Observations on a proposed development within the adjoining Borough of City of London at 120 Fleet Street, London EC4A 2BE for: 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.

Change of use of Daily Express Building from office (Use Class E) to learning and nonresidential 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

andshopfront and associated works.

(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 nonresidential 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.)

Approved Plans

Conditions

Notes to Applicant:

1 LB Lambeth raises no objection to the development but would draw the City of London's attention to the potential impacts on the appreciation of view towards the City from Lambeth.

From Queen's Walk promenade on the South Bank between Festival Hall and Bernie Spain Garden's, St Bride's Church can be appreciated against the sky and with no neighbouring buildings of height to compete with the spire on the skyline. The proposal may appear in the backdrop of the spire particularly from the east of the riverfront promenade and from Bernie Spain Gardens.

The South Bank is one of the main vantage points towards St Bride's Church and the proposal may represent a harmful impact on the setting of the listed building. The proposal is visible in locally designated view NE from The National Theatre terrace to St Pauls Cathedral.

Lambeth's local views policy (Q25) recognises the view of the Cathedral which the proposal will not interrupt. However, the proposal will affect the wider skyline, diminishing the impact of the City's historic spires. Specifically, the foreground skyline will be negatively impacted. Until recently, historic stone spires have continued to dominate the river edge and foreground skyline with taller buildings being limited to the City cluster. This proposal will introduce a new, tall massing amongst the cluster of historic spires. This impact will be felt from various public vantage points along the South Bank

Yours sincerely

Rob Bristow

Assistant Director Planning, Transport & Development
Growth, Planning and Employment Directorate

Date printed: 24th September 2021

24th September 2021

Kurt Gagen
Principal Planning Officer
Environment Department
City of London
Guildhall
London EC2V 7HH

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
facsimile 020 7004 1790

www.dp9.co.uk

120 FLEET STREET – RESPONSE TO HERITAGE CONCERNS

Dear Kurt,

We write in relation to consultation responses received from Historic England, the 20th Century Society, the Conservation Area Advisory Committee (CAAC), and the Ancient Monuments Society in relation to planning application 21/00538/FULEIA for the Proposed Development at 120 Fleet Street.

Setting of Daily Express Building and Fleet Street Conservation Area

The responses are conflicting in their view of the Proposed Development's impact on the setting of the Daily Express Building. The Twentieth Century, whilst welcoming the proposals for the Express building itself, argue that the design of the new 120 Fleet Street building will lessen the impact of the Daily Express Building by continuing its Art Deco inspired design, reducing its standalone visual prominence as a result. The CAAC are of the view the Proposed Development will harm the setting of the Daily Express building and the Fleet Street Conservation Area due to its size and scale, going on to say the incongruous design of the façade would have a detrimental effect on the latter.

In contrast, Historic England and the Ancient Monuments Society share the view that the proposed development will enhance the setting of the Express. In their letter from the 27th July 2021, Historic England state *'The proposals would enhance the significance of the Grade II* listed former Daily Express Building by detaching it from the large office development behind, and by providing it with a separate cultural use and associated public access. The public realm in this part of the City could also be much enhanced through the provision of new routes through the site and better connectivity'*.

The Ancient Monuments Society *'welcome the proposed separation of the Grade II* listed former Daily Express Building from the adjoining development'* which they label *'a positive outcome that will enhance both the significance and appearance of this important heritage asset.'* Despite this, the Society do raise concerns over the increase in size and scale of the new building and the impact this would have on the setting of the Daily Express Building.

In response to these concerns, we would highlight that the Proposed Development occupies almost the same footprint as the existing River Court building, with the principal difference being that it has been reduced in extent around the Daily Express building. This change allows the Daily Express building to



stand on its own (enhancing its significance as noted above) and allows new pedestrian routes to be created through the Site (as advocated by Historic England).

The massing of the Proposed Development steps away from the listed building and the Conservation Area, enhancing the significance of the Fleet Street Conservation Area with a built frontage to Fleet Street of a significantly greater quality than the existing building. The restrained high-quality design at street level will ensure the principal focus will be the views into the revealed Art Deco upper foyer of the Daily Express Building, enhancing its significance and prominence.

Although the Art Deco façade of the 120 Fleet Street building will create less contrast with the Daily Express Building than the existing building, the setting back of the building will allow the Daily Express building to achieve greater prominence and significance than it does currently. The GLA share this view, stating *'GLA officers are of the opinion the architecture with a modern Art Deco approach is strong and responds well to the character of the Daily Express building without detracting from its own significance.'*

Given the reasons set out above, we are of the view that the concerns raised by Historic England, the Twentieth Century Society, the CAAC and the Ancient Monuments Society are adequately addressed.

LVMF view 16B.1 The South Bank: Gabriel's Wharf viewing platform

Historic England and the Ancient Monuments Society have raised concerns regarding the impact of the Proposed Development on LVMF view 16B.1. Historic England believe the Proposed Development will cause harm *'in the middle of the less than substantial spectrum'* referring to both the Strand and Temple Conservation Areas.

Firstly, the Strand Conservation Area is not visible in view 16B.1 and the Proposed Development would not appear in its backdrop.

The Townscape and Visual Impact Assessment submitted in support of the application demonstrates that the massing of the Proposed Development has been carefully articulated to sit comfortably within both its local and wider context, including within LVMF view 16B.1. The building will be seen in the backdrop of the view, beyond the Temple Conservation Area, as 6 New Street Square and Peterborough Court can be seen today (as well as the Barbican towers beyond the Whitefriars Conservation Area to the east). As noted in the London View Management Framework, the scale of development in this view gradually increases from west to east with *'the more recent institutional and commercial developments around Fleet Street and Ludgate in the City'*. The Proposed Development continues this pattern. There will be no effect on the viewer's ability to appreciate St Paul's Cathedral or the Temple Conservation Area in the view.

This view is shared by the GLA, who state *'the proposed building is located away from St Paul's falling within a cluster of other commercial buildings that form part of the surrounding urban context. The proposal is of a scale similar to surrounding buildings and would therefore not be prominent, thereby allowing St Paul's to remain the principal landmark within these views.'*



We hope you find the above helpful in setting out our response to the comments that have been raised.
Yours faithfully

DP9 Ltd.

DP9 Ltd.

Committee:	Date:
Planning and Transportation	26 October 2021
Subject: 120 Fleet Street London EC4A 2BE 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, demolition of level 06 landing and extension to existing oval staircase to provide access to new roof with new core on north side incorporating new lift between roof top level and basement level 01, installation of new staircase between rooftop level and basement level 02, demolition of mezzanine at basement level 01, removal of internal partitions and associated works.	Public
Ward: Castle Baynard	For Decision
Registered No: 21/00524/LBC	Registered on: 16 June 2021
Conservation Area: Fleet Street	Listed Building: No

Summary

For full report please see 21/00538/FULEIA

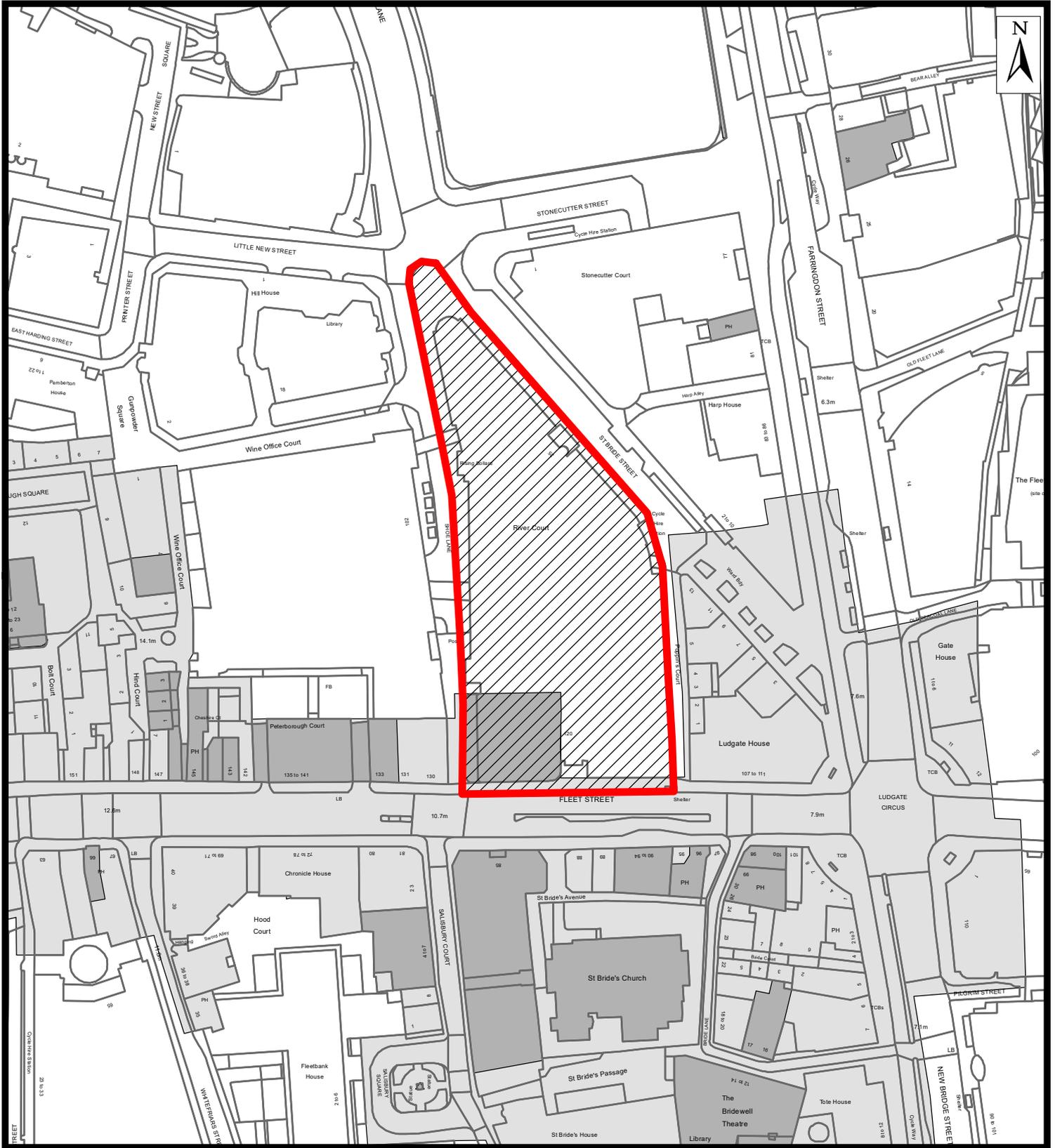
Recommendation

1. That Listed Building Consent is 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 Highways Act 1980 in respect of those matters set out in the report, the decision notice not be issued until the Section 106 obligations have been executed.

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

Site Location Plan



© Crown copyright and database rights 2021 OS 100023243

ADDRESS:
120 Fleet Street

CASE No.
21/00524/LBC

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





Image 1: View of existing listed Daily Express Building and Rivercourt southern elevation's, fronting Fleet Street



Image 2: View looking south from St Bride Street, with the existing Rivercourt building on the right



Image 3: View looking south from halfway down St Bride Street With the existing River Court building and Poppins Court on the right and Ludgate Circus in the distance



Image 4: View looking south from Shoe Lane, with the Listed Daily Express building to the left and Fleet Street in the distance



Image 5: Shoe Lane looking south

Main Report

For report please see 21/00538/FULEIA

Appendix A

Background Papers – 21/00524/LBC:

Comment City of London Police 20/07/2021
Letter Historic England 27/07/2021
Email Mr Chris Rogers 04/08/2021
Letter Twentieth Century Society 04/08/2021
Letter Historic England 11/10/2021

Application Documents – 21/00524/LBC:

Design and Access Statement, 16/06/2021, Bjarke Ingels Group
Environmental Statement Vol. 3 (Listed Building Heritage Report),
16/06/2021, Bjarke Ingels Group
Cover Letter, 16/06/2021, DP9
Drawing Schedule, 16/06/2021, Bjarke Ingels Group

Appendix B

Relevant London Plan Policies

Policy HC1 Heritage conservation and growth

Relevant Draft City Plan 2036 Policies

HE1 Managing change to heritage assets

S11 Historic environment Relevant Local Plan Policies

Relevant Local Plan Policies

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

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

Relevant Local Plan Policies

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement

building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

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

SCHEDULE

APPLICATION: 21/00524/LBC

120 Fleet Street London EC4A 2BE

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, demolition of level 06 landing and extension to existing oval staircase to provide access to new roof with new core on north side incorporating new lift between roof top level and basement level 01, installation of new staircase between rooftop level and basement level 02, demolition of mezzanine at basement level 01, removal of internal partitions and associated works.

CONDITIONS

- 1 The works hereby permitted must be begun before the expiration of three years from the date of this consent.
REASON: To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 2 Notwithstanding the details shown on the approved plans, before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details and shall retained thereafter:
 - (a) particulars and samples of the materials to be used on all external faces of the building to be inspected on site;
 - (b) details of the proposed new internal and external elevations including details of new fenestration and entrances at all levels;
 - (c) details of replacement Vitrolite, including sample;
 - (d) details of proposed ground floor elevations;
 - (e) details of all ground floor entrances;
 - (f) details of soffits, handrails and balustrades;
 - (g) details of all alterations to the existing facades;
 - (h) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;
 - (i) details of plant and ductwork to serve the development;
 - (j) details of ventilation and air-conditioning for the development;
 - (k) details of all ground level surfaces including materials to be used;
 - (l) details of external surfaces within the site boundary including landscaping;
 - (m) details of planting and screens at roof terrace level;

(n) details of interior fit our proposals for entrance, lobby and reception in relation to historic fabric, including identification of exhibition space;
(o) details of floor finishes to the main public circulation spaces including historic staircase, reception and lobby;
(p) door and joinery schedule for the entire building;
(q) lighting proposal to the public amenity space, including roof terrace, historic staircase, reception and lobby;
(r) irrespective of the approved demolition plants, details are required of the internal doors leading to the main floor stair core which are to be retained and refurbished

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory internal and external appearance in accordance with the following policies of the Local Plan: DM12.3.

- 3 Within 3 months after the commencement of demolition a pre-construction services contract or series of contracts in preparation for the carrying out of substantial works of redevelopment have been made and planning permission has been granted for the development for which the contracts provide. Such contracts shall include the commencement of procurement of all foundations, above ground framework and floor structures. Works of demolition may be permitted after 3 months and prior to the completion of the contract(s) if the Local Planning Authority is satisfied that the site is required for archaeological investigation and the developer has submitted evidence to show that development will proceed upon completion of the investigation.

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

- 4 Before any works thereby affected are begun, details shall be provided covering a detailed schedule of works for the refurbishment and fit out of the main lobby, stair core, basement and a typical upper floor.

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

- 5 No part of the building(s) shall be demolished (unless otherwise permitted by the Local Planning Authority in the circumstances identified in this condition) before a demolition contract has been made and planning permission has been granted for the development for which the contract provides. Works of demolition may be permitted prior to the completion of the contract(s) if the Local Planning Authority is satisfied that the site is required for archaeological investigation and the developer has submitted evidence to show that development will proceed upon completion of the investigation.

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

- 6 The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur to be necessary.
REASON: To ensure the stability of the structure to be retained in accordance with the following policy of the Local Plan: DM12.3.
- 7 All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.
REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 8 Before any works thereby affected are begun details shall be provided of the proposed protective measures for retained historic fabric and features for the duration of works on site 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 and so retained thereafter.
REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 9 Notwithstanding the details shown on the approved plans, before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details:
a) specification, methodology and samples for repairs, cleaning and reinstatement of the external elevations, the development shall then be undertaken only in accordance with this method statement;
b) specification, methodology and samples for repairs; cleaning and reinstatement of the historic interiors, floors, doors and the staircase and the development shall then be undertaken only in accordance with this method statement.
c) the above works in a) and b) shall be completed in full and inspected by the Local Planning Authority prior to occupation
REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 10 The works hereby approved are only those specifically indicated on the drawing(s) referred to in conditions to this consent.
REASON: In order to safeguard the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

- 11 Prior to commencement to the relevant part of the work
 (a) 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; and
 Post installation:
 (b) Details of final lux levels for all external lighting, including a test light glare assessment on site attended by the Local Planning Authority officers with adjustments to be agreed in writing All works and management measures pursuant to this consent shall be carried out, put in place 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: DM12.3
- 12 Prior to the commencement of the relevant works a full Signage strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of design, location, fixing and lighting. The Applicant should note that separate advertising consent may be required.
 REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 13 The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this consent:
- PA-10-001 Existing Daily Express Location Plan
 - PA-10-010 Existing Basement 02 Floor Plan
 - PA-10-011 Existing Basement 01 Floor Plan
 - PA-10-012 Existing Basement 01 Mezzanine Daily Express
 - PA-10-013 Existing Ground Level Floor Plan
 - PA-10-014 Existing Upper Ground Level Floor Plan
 - PA-10-015 Existing Level 01 Floor Plan
 - PA-10-016 Existing Level 02 Floor Plan
 - PA-10-017 Existing Level 03 Floor Plan
 - PA-10-018 Existing Level 03 Mezzanine Daily Express
 - PA-10-019 Existing Level 04 Floor Plan
 - PA-10-020 Existing Level 05 Floor Plan
 - PA-10-021 Existing Level 06 Floor Plan
 - PA-10-022 Existing Level 07 Floor Plan

PA-10-023 Existing Level 08 Floor Plan
 PA-10-024 Existing Level 09 Floor Plan
 PA-10-025 Existing Roof Plan
 PA-10-100 Existing N-S Section
 PA-10-101 Existing E-W Section
 PA-10-200 Existing Fleet Street Elevation
 PA-10-201 Existing St. Bride Elevation
 PA-10-202 Existing Shoe Lane Elevation
 PA-10-210 Existing Daily Express North Elevation
 PA-10-211 Existing Daily Express East Elevation
 PA-10-212 Existing Daily Express South Elevation
 PA-10-213 Existing Daily Express West Elevation
 PA-30-B2 Demolition Daily Express Basement Level 02 Plan
 PA-30-B1 Demolition Daily Express Basement Level 01 Plan
 PA-30-B1M Demolition Daily Express Basement Level 01 Mezzanine
 Plan
 PA-30-000 Demolition Daily Express Ground Level Plan
 PA-30-001 Demolition Daily Express Upper Ground & Level 01 Plans
 PA-30-002 Demolition Daily Express Level 02-03 & 04 Floor Plans
 PA-30-003 Demolition Daily Express Level 05 & 06 Floor Plans
 PA-30-004 Demolition Daily Express Terrace Level & Roof Plans
 PA-30-100 Demolition Daily Express N-S Section
 PA-30-101 Demolition Daily Express E-W Section
 PA-30-200 Demolition Daily Express Fleet Street Elevation
 PA-30-201 Demolition Daily Express Shoe Lane Elevation
 PA-80-B2 Proposed Daily Express Basement Level 02 Plan
 PA-80-B1 Proposed Daily Express Basement Level 01 Plan
 PA-80-000 Proposed Daily Express Ground Level Plan
 PA-80-001 Proposed Daily Express Upper Ground & Level 01 Plans
 PA-80-002 Proposed Daily Express Level 02-03 & 04 Floor Plans
 PA-80-003 Proposed Daily Express Level 05 & 06 Floor Plans
 PA-80-004 Proposed Daily Express Terrace Level & Roof Plans
 PA-80-100 Proposed Daily Express N-S Section
 PA-80-101 Proposed Daily Express E-W Section
 PA-80-200 Proposed Daily Express North Elevation
 PA-80-201 Proposed Daily Express East Elevation
 PA-80-202 Proposed Daily Express South Elevation
 PA-80-203 Proposed Daily Express West Elevation
 PA-90-001 Daily Express Building Typical Facade Detail

8353-PL-GA-101 Landscape General Arrangement - Terrace levels
 8253-DE-SD-308 Soft landscape details - Terrace sections

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.

This page is intentionally left blank



Mr Kurt Gagen

Direct Dial: -

City of London Corporation

PO Box 270

Our ref: **W**: L01433583

Guildhall

London

EC2P 2EJ

27 July 2021

Dear Mr Gagen

Arrangements for Handling Heritage Applications Direction 2021

120 FLEET STREET, LONDON, EC4A 2BE
Application No. 21/00524/LBC

Thank you for your letter of 14 July 2021 regarding the above application for listed building consent. On the basis of the information available to date, we do not wish to offer any comments. We suggest that this application should be determined in accordance with national and local policy guidance and that you seek the views of your specialist conservation adviser.

We have drafted the necessary letter of authorisation (attached) for your authority to determine the application as you see fit and referred the case to the National Planning Casework Unit (NPCU). You will be able to issue a formal decision once NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Allison Sharpe

Allison Sharpe

Business Officer

E-mail: Allison.Sharpe@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



From: [REDACTED]
To: [PLN - Comments](#)
Subject: OBJECTION to both 21/00524/LBC and 21/00538/FULEIA
Date: 04 August 2021 10:47:35

THIS IS AN EXTERNAL EMAIL

Please log the below against each application, and confirm when done. Thank you.

As an architectural historian, author and lecturer with a special interest in and knowledge of the City, I object to this development. My principal concern is that the façade treatment of the 'Proposed New Building' – described in the application as showing “some reference to” and taking “inspiration” from the Daily Express building – is in fact far too similar to the Daily Express building in materials, form and colour and so will, when combined with the sheer scale of the Proposed New Building, have the effect of diminishing the appearance of the Daily Express building in its urban context and thus harming a Grade II*-listed heritage asset as a result.

The application specifically accepts that the Daily Express building is currently the “most noticeable [...] presence on this stretch of the street” and “a singular building in this context, of unique design and materiality”. It also correctly remarks that the existing River Court building, constructed in 1998-2000 next to the Daily Express building, “sought to re-express the distinctiveness of [the latter’s] original frontage” by using stone rather than glass and thus “providing a counterpoint” to the Daily Express building.

Despite these admissions, the proposed scheme ignores the accepted principle that new insertions in historic architecture should be distinct visually from the existing fabric and it is apparent from the computer-generated imagery provided that if the application is granted visual confusion will arise between

- the alternating, horizontal layers of clear and very dark opaque glass, thinly framed in metal and curved in plan at the corners, of the Proposed New Building and
- the alternating, horizontal layers of clear and very dark opaque glass, thinly framed in metal and curved in plan at the corners, of the Daily Express building.

It is therefore impossible to understand how the application can claim to “enhance the setting of the listed building”, or allow it to “truly stand alone” and “‘go solo’ rather than remaining a mere appendage to a more substantial neighbour”, since the exact opposite would be the case – the Daily Express building would be not merely an appendage to but actually subsumed within ‘a more substantial neighbour’, namely a vastly over-scaled (more than twice the size of the existing River Court) pastiche of itself.

This approach is justified by stating that this is the only option that permits “a unified and coherent façade treatment” that is “capable of resolving the differing scales and characters of surrounding buildings. This is simply not the case as other material and form choices are available that could achieve this aim without producing a weak copy of the Daily Express building. It is also unclear to me how the Proposed New Building can be claimed to have “its own distinct character” and “its own identity”.

It should be recorded that the River Court scheme was specifically designed to centre and celebrate the Daily Express building by removing a previous weak copy of it, Aitken House, and using stone cladding on the replacement, this last with clear direction from Corporation planners. The current application thus turns the clock back as if the previous twenty years had not happened.

The application also shows a poor understanding of and respect for the Daily Express building overall, notwithstanding the Built Heritage report. The “sensitive addition of a small area of ramped access at the Fleet Street steps to afford inclusive access to the lobby” is proposed, along with a vertical extension of the original staircase, yet no illustration of either appears. Contrary to the stated desire to restore the lobby, a significant portion of it to the south east is to be permanently walled off and used for

retail. That the same report states the building's cladding was "made possible by the use of Vitrolite panels -- a material that resembles glossy stone, but has properties more akin to glass" is highly concerning, since of course Vitrolite IS glass.

In summary, the applicant says "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." The applicant concludes that "Section 5 of [the Built Heritage report] provides this clear and convincing justification, in our view" but it does not in mine and nor, I hope, in officers' and members' in light of the facts I have outlined.

The application should be rejected.

Chris Rogers



Kurt Gagen
City of London Corporation
Guildhall
Gresham Street
London, EC2V 7HH

Sent by email: PLNComments@cityoflondon.gov.uk

04 August 2021

Our ref: 98 10 08

Dear Kurt Gagen,

21/00524/LBC and 21/00538/FULEIA - DAILY EXPRESS BUILDING, FLEET STREET, THE CITY, LONDON

The Twentieth Century Society has been notified of the above applications for Listed Building Consent and Full Planning Permission for alterations and refurbishment of the Grade II* listed Daily Express to facilitate its change of use from office to learning and non-residential institutions use, retail, flexible learning and non-residential institutions and commercial use, and for the demolition of the neighbouring River Court Building and erection of a new building comprising two basement levels and ground floor plus 20 upper storeys for retail, commercial, office and service use. The Society was consulted on the scheme at pre-application stage and provided feedback based on the comments of its advisory Casework Committee which met to review the proposals on the 17th May 2021. It appears that the pre-application scheme was not revised in response to our letter and so we repeat here some of the comments we made in May.

Background

The Daily Express was built in the early 1930s in a streamlined Art Deco style by (Sir) Owen Williams, with interiors created by Robert Atkinson. It was commissioned by the owner of the Express William Maxwell Aitken (first Baron Beaverbrook) to provide the paper with new offices and printing works. When completed in 1932, the building's east side abutted a 19th-century newspaper office. In the late 1970s, buildings on the site were demolished to allow the Express to be extended to the north and east. Known as 'Aitken House', this extension was designed in an imitation Art Deco style. In 1997-8, a new scheme was carried out by John Robertson Architects (JRA) which saw the demolition of Aitken House and construction of the existing commercial office known as 'River Court'. River Court is attached and linked internally to the Express.

The Express is of 6 storeys with a basement, and its upper 3 floors are set back on its principal elevation (its 6th floor was originally open but was internalised in the 1990s/early 2000s). In the 1990s, its black Vitrolite and clear glass cladding was largely replaced, its interiors refurbished and its extravagant 1930s entrance foyer restored. Surviving internal fixtures include original doors on the upper office levels, the principal stair (with original light fittings), landings and passenger lifts, and entrance lobby with its Eric Aumonier-designed relief sculptures representing 'Britain' and 'Empire'. River Court is restrained and stripped-back in its design and is built from stone to contrast with, and complement, the Express. It is several storeys taller than the Express but its upper storeys respectfully step back from the road elevation.

The Twentieth Century Society
70 Cowcross Street, London EC1M 6EJ



The Daily Express was Grade II* listed in 1972 and falls within the Fleet Street Conservation Area. River Court sits just outside this conservation area.

Policy

The local authority should note paragraphs 199 and 200 of the National Planning Policy Framework (NPPF) 2021 which relate to designated heritage assets:

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) (paragraph 199)

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 (paragraph 200)

Comments

The Twentieth Century Society welcomes the proposals to facilitate the reuse of the Daily Express and has no objections in principle to the redevelopment of the neighbouring River Court Building.

However, the Society is concerned that the proposed design for the new building will harm the setting of the Express. We consider the design to be too overbearing with its stepped elevation projecting out into the street and across the arcade space towards the listed building. The Society believes the existing stone River Court building provides an appropriate counterpoint to the Express stylistically and materially. The proposed Art Deco-inspired design will, the Society believes, lessen the impact of the Express, which stands out in terms of both style and materials as a striking streamlined curtain-walled building within an otherwise quite architecturally conservative area.

The Daily Express Building is designated Grade II* which puts it within the top 8% of listed buildings. The conservation of the building and its setting should therefore be of the utmost importance. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 advises the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses".

In the Society's opinion, the new development will also have a detrimental impact on the nearby Fleet Street Conservation Area. The Fleet Street Conservation Area Strategy states that the Express provides a "powerful visual statement", being so different in character to other buildings in the conservation area. The existing River Court building is noted in the Fleet Street Conservation Area Strategy for its "well-detailed stone-clad street frontage of proportionate scale to its neighbours". The new development will be visible from within the conservation area and we believe it will have a harmful impact on its character and significance.

The City of London's Local Plan (2015) outlines the council's commitment to good design, by "Ensuring 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." and by "Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces." (Core Strategic Policy CS10: Design).

Summary

While the Twentieth Century Society welcomes the proposals for the Grade II* Express Building, it believes that the proposed neighbouring development will harm the building's setting and will have a detrimental impact on the nearby Fleet Street Conservation Area. We therefore encourage the local authority to refuse the current application for the new building (ref: 21/00538/FULEIA) and



urge the architects to reduce the proposed building's massing and height and to revise its design to be more sympathetic to its sensitive historic environment.

We hope that these comments are of use to you. Please don't hesitate to contact us if you have any questions.

Yours sincerely,



Coco Whittaker
Caseworker
Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.





Mr Kurt Gagen
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: -

Our ref: L01433583

27 July 2021

Dear Mr Gagen

Arrangements for Handling Heritage Applications Direction 2021

Authorisation to Determine an Application for Listed Building Consent as Seen Fit

120 FLEET STREET, LONDON, EC4A 2BE
Application No 21/00524/LBC

Applicant:	River Court Properties Limited
Grade of building(s):	II*
Proposed works:	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, demolition of level 06 landing and extension to existing oval staircase to provide access to new roof with new core on north side incorporating new lift between roof top level and basement level 01, installation of new staircase between rooftop level and basement level 02, demolition of mezzanine at basement level 01, removal of internal partitions and associated works.
Drawing numbers:	Drawings as approved by the Local Planning Authority
Date of application:	16 June 2021
Date of referral by Council:	14 July 2021
Date received by Historic England:	14 July 2021
Date referred to CLG:	27 July 2021



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





You are hereby authorised to determine the application for listed building consent referred to above as you think fit.

Yours sincerely

Allison Sharpe

Allison Sharpe

Business Officer

E-mail: Allison.Sharpe@HistoricEngland.org.uk

NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.

Officials have considered the information given above on behalf of the Secretary of State, and do not intend to require the application concerned be referred.

Signed

Date 11/10/2021



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



This page is intentionally left blank

Committee(s): Planning and Transportation Committee	Dated: 26/10/2021
Subject: 31 Bury Street – Reasons for Refusal	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	12
Does this proposal require extra revenue and/or capital spending?	N – not at this stage
If so, how much?	£N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: The Chief Planning Officer and Development Director and Comptroller and City Solicitor.	For Decision

Summary

This report recommends reasons for refusal to reflect the views of your Committee in resolving, at your Committee’s meeting of 5 October 2021, that it would refuse the application for planning permission under application ref: 20/00848/FULEIA for Bury House, 31 Bury Street, London EC3A 5AR.

Recommendation(s)

That the Decision Letter gives the following reasons for refusal to be included in the decision letter (subject to notification to the Mayor of London and the Mayor of London being content for the City to determine the application) be as follows:

1. The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue, contrary to Local Plan Policy CS10.1 (ensuring buildings are appropriate to the setting and amenities of surrounding buildings and spaces); Local Plan Policy CS12 (conserving or enhancing the significance of the City’s heritage assets and their settings and providing an attractive environment to the City’s communities) and London Plan Policy GG1 (Building strong and inclusive communities, promoting fairness, inclusivity and equality)

2. The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVFM view 10A.1 from the Tower Bridge North Bastion and the resulting harm to the Outstanding Universal Value of the World Heritage Site (which harms would not be outweighed by the public benefits of the proposal) contrary to Local Plan Policy CS12 (conserving or enhancing the significance of the City’s heritage assets and their settings and providing an attractive environment to the City’s heritage assets and their settings and providing an attractive environment to the City’s communities); Local Plan Policy CS13 (protecting

and enhancing significant views of important buildings); London Plan Policies D9e; HC2, and HC3 (protecting the significance of the Tower of London)

Main Report

Background

1. At its meeting of 5 October 2021 the Planning and Transportation considered an application for planning permission for Bury House 31 Bury Street (planning application ref: 20/00848/FULEIA). The Committee resolved by 14 votes to 7 to refuse the planning application (subject to the Mayor of London being given 14 days to decide whether to allow the City to determine the application) and instructed officers to report to the next meeting of the Committee regarding reasons for refusal. This report provides reasons in accordance with the Committee's instructions.

Current Position

2. During the debate on the application Members of the Committee explained their views on the application and, of those Members who considered the application should be refused, the majority explained their reasons.
3. Based upon the views expressed by Members, reasons for refusal have been prepared to reflect the opinion of the Committee as a whole. (Some other points were made by some Members, but they were not echoed by the majority of Members voting to refuse the application, and are not therefore included as reasons for refusal, noting that the reasons should reflect the views of the Committee as a whole).
4. Following your Committee's decision on the reasons for refusal, this will be notified to the Mayor of London together with other relevant information. The Mayor of London will then have 14 days to notify the City whether he is content for the City to determine the application in accordance with the proposed refusal. (If no notification is received from the Mayor of London within 14 days the decision notice may be issued by the City.¹)

Proposed Reasons

5. The proposed reasons are as set out in the Recommendation.

Conclusion

6. The proposed reasons are recommended.

Background Papers

¹ Article 5 Town and Country Planning (Mayor of London) Order 2008

- Report and background papers to 5 October 2021 meeting of the Planning and Transportation Committee – 31 Bury Street, London, EC3A 5AR – 20/00848/FULLEIA
- Draft minutes of the 5 October 2021 meeting of the Planning and Transportation Committee.

This page is intentionally left blank

Agenda Item 7

Committee(s): Policy & Resources Committee – For Information	Dated: 14 October 2021
Planning & Transportation Committee – For Information	26 October 2021
Subject: Recovery Taskforce – Final Report	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	2, 5, 6, 7, 8, 9 and 10
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Douglas Trainer, Deputy Town Clerk	For Information
Report author: Giles French, External Affairs Director, Innovation & Growth	

Summary

This is an update of the implementation of the recommendations of the Recovery Taskforce report, *Square Mile: Future City*, published in April 2021. The Recovery Taskforce was initiated by Members of the Policy & Resources Committee and the Planning & Transport Committee in November 2020, to recommend the actions to be taken to ensure the medium-term economic recovery of the City of London.

Members of the Policy & Resources Committee and the Planning & Transportation Committee will receive quarterly updates on the implementation plan for the rest of 2021.

Recommendation(s)

Members are asked to:

- Note the progress made on the implementation of the recommendations of the Recovery Taskforce report, *Square Mile: Future City*.

Main Report

Background

1. The Recovery Taskforce (RTF) was commissioned by the Policy & Resources Committee and the Planning & Transportation Committee in November 2020. Its task was to identify objectives and actions to ensure the Square Mile remains internationally competitive and locally vibrant. The mission of the RTF is to ensure the Square Mile is the world's most innovative, inclusive and sustainable business ecosystem, an attractive place to work, live and visit.
2. The Policy and Resources Committee and the Planning & Transportation Committee received a report in April 2021 detailing the RTF's recommendations. The final report, *Square Mile: Future City*, was published on 27 April 2021.
3. The project has been led by a small core team from Innovation & Growth (IG), Department of the Built Environment (DBE), Cultural Services, Corporate Strategy & Performance, and Chamberlain's.
4. The Recovery Taskforce has built on existing work from the City Corporation including the Culture and Commerce Task Force; the Climate Action Strategy; the draft City Plan 2036; the Transport Strategy and the report *London Recharged*, published in October 2020. The RTF focuses on three dimensions:
 - i. World-class business ecosystem (i.e. thriving businesses with innovation and growth opportunities)
 - ii. Vibrant offer (leisure offer, i.e. retail, hospitality, culture, tourism and recreation)
 - iii. Outstanding environments (i.e. the right workspaces, environment, and infrastructure)
5. For each of the three dimensions we identified six 'Big Moves' to guide our priorities:
 - a. World-Class business ecosystem:
 - i. Enable high-potential businesses to start, adapt and grow
 - ii. Open London's opportunities to everyone
 - iii. Curate thriving innovation ecosystems in strategic sectors
 - b. Vibrant Offer:
 - i. Create and sustain a vibrant and engaging City offer
 - c. Outstanding Environments:
 - i. Shape the future City
 - ii. Provide world-class streets and public spaces
6. The recommendations of the RTF are not an exhaustive list of all actions being taken by the City Corporation to ensure the continued attractiveness of the Square Mile. They are the priority actions required to deliver the vision and attract and retain the talented people we want to work in the City.

7. This report is to update Members on the progress made since Committee meetings in July 2021.

Current Position

World Class Business Ecosystem

8. The socio-economic diversity taskforce, which aims to improve socio-economic diversity at senior levels in UK financial and professional services, continues apace. The three workstreams are progressing to plan: Workstream 1, focused on industry consultation, has developed its hypothesis and is planning to test through a series of roundtables, in partnership with several sector bodies; Workstream 2 has conducted over 50 interviews and held a series of roundtables to explore the services needed by a peer network; and Workstream 3, focused on productivity, has developed a gap analysis of existing data, productivity principles and questions to inform a baseline survey.
9. The taskforce will soon be issuing a baseline survey, asking employees across the financial and professional services sector to share their socio-economic background and level of seniority, on an anonymous basis. This will be important to monitor the long-term impact of the taskforce.
10. Earlier this year, the City Corporation and the Financial Conduct Authority signed an agreement to collaborate on a second phase of the Digital Sandbox. Applications to the Digital Sandbox cohort were open between early September and mid-October. This is a unique collaboration between the City Corporation and the Financial Conduct Authority to support innovation and accelerate solutions that address current challenges across financial services. It is the first of its kind in Europe, providing access to novel technical features such as data and a development platform, as well as a collaboration network that reflects the wider ecosystem.
11. This cohort will focus on three challenges relating to ESG (Environmental, Social and Governance) data and disclosures, to aid in the transition to a net zero economy. These challenges look across supply chains, automated assurance, and consumer understanding and were developed after extensive engagement with industry. The Digital Sandbox is best aimed at early stage or initial prototyping companies. Last year its features accelerated teams anywhere between 3 – 18 months in their journey, helping them create minimum viable products and get to market
12. For non-tech companies, there are other ways to get involved including observing the solutions develop, mentoring the teams, or hosting collaboration events (e.g. workshops, roundtables, industry groups) during the cohort.
13. IG recently published, *‘Connected & Collaborative – The Changing Landscape of Tech in the Square Mile’*. This report highlights the growing presence of tech companies in the Square Mile and the value this contributes to competitiveness

and economic growth of London's ecosystem. It also applies an innovation lens to consider the future role of tech in civic and business functions. The report gives leading examples of tech activity in the Square Mile, such as unicorns and high growth scale-ups, and encourages investment in the sector and wider tech adoption and innovation. The report also explains some of the ways the City Corporation is supporting tech innovation in the Square Mile by building capacity for 5G and the Cyber Griffin project.

14. The City of London Corporation, TheCityUK and EY have developed a new joint report "Global Mobility Scorecard". The report aims to assess the UK's new immigration system eight months after its launch and to understand business priorities in a world changed by the impacts of COVID-19 on global mobility.

15. This exercise has allowed us to identify clear examples of where the Home Office has successfully implemented practical and forward-looking policy changes supported by business and which, in many ways, put the UK at the forefront of developing labour mobility policies. The project also identifies some areas where the UK could do more to lead on building a world class flexible, inclusive and sustainable visa regime, particularly around short-term business travel and cross border remote working. We have engaged with government officials to share our views on these areas to try to ensure financial and professional services maintain access to international talent.

Vibrant Offer

Marketing

16. Since your last update, marketing to domestic visitors has continued to take centre stage. This has included:

- a. [Picture the City](#) – a photography competition which achieved 2,000 entries, a reach of 81.5k on Instagram and significant press coverage including in [The Londonist](#).
- b. A bus-stop poster campaign advertising City product across 180 sites in Zones 2-6 from 31 May to 13 June, achieving a total 18.61 million impressions.
- c. A Magic and Kiss radio campaign promoting the City's hospitality and family offers (across two ads) and delivering 24,029 impacts over 4 weeks in May and June.
- d. City content in the Central London Alliance's *#LondonLoveAffair* campaign which, at the end of June, recorded 31 million impressions nationally with the City's total share of voice being 34%.

17. Planned domestic marketing activity over the next quarter includes:

- a. The launch of a new app by the City's BIDs and Business Partnerships (joint funded with the City Corporation) targeting workers with discounts and offers.
- b. Delivery of a River Marketing Alliance with Visit Greenwich and South Bank Employers Group, as well as a commercial travel operator, to drive visits through river travel at destinations using bookable packages.

18. In terms of marketing to workers to excite a return to the office, commissioned research has been completed with Opinium and a creative route agreed with the appointed agency AF Oliver. It is anticipated that the campaign will have launched by the date of your meeting with a strong build anticipated over the coming months, notably through paid-for media channels and the use of a campaign “toolkit” which will be promoted to City businesses for use in communications with their workforce. The campaign is funded by your Covid Recovery Fund.

Strategic destination review

19. A strategic destination review has been commissioned with appointed consultants Danny Lopez and Kate Keating. Consultation with stakeholders is currently underway with a completion date expected to be in early 2022. The review will deliver a vision for the Square Mile to become the world’s most attractive destination for workers, residents and visitors along with a strategy that enables officers to achieve that vision. The review was detailed in a report submitted to your September P&R meeting.

Creative activations

20. Since launching the 2021 Outdoor Arts Programme (OAP) on Sunday 13 June with *Inside Out* on Tower Bridge (reported as part of last update), events and activations in the City have attracted audiences of 20,232 (excludes outdoor exhibition programmes) and external funding totalling £525k. This funding figure covers events that have passed as well as the many planned for the coming months.

21. Diversity and sustainability have featured heavily across activations noting these have been both cross-cutting themes within your recovery taskforce strategy and for the programme itself. This has included performances and from a diverse portfolio of artists including a co-production with Greenwich+Docklands International Festival of [Black Victorians](#), black-led circus company Upswing Circus delivering *Circus in the City* in Aldgate Square and a co-commission with the London International Festival of Theatre of Sonia Hughes live-art installation [I am from Reykjavik](#). In addition, internationally focused community events have taken place, including a Latin American Festival and a Spanish Fiesta in Guildhall Yard.

22. Other highlights over the reporting period include:

- a. The Outdoor Arts Programme partnering with *Sculpture in the City* (SiTC) and Whitechapel Art Gallery to deliver *Nocturnal Creatures*; a free late night arts festival across east London which extended into the City in Aldgate and the Eastern City Cluster.
- b. *Lunchtime Streets* in Cheapside and Carter Lane which launched in August, delivering a weekly alfresco dining and entertainment experience for workers during their lunchbreaks and a twice weekly lunchtime concert series in Aldgate Square which will be running until the end of September.

23. Sadly, a number of events scheduled to take place over the last three months have been cancelled due to low ticket sales and footfall in the City during the summer; this includes the August Guildhall Yard lunchtime market and evening food market, the Guildhall Yard Outdoor Cinema and *Carnival City*. These events were being organised by external third-party operators at their own financial risk with your officers facilitating and, although cancellation left a gap in the programme, the City Corporation has suffered no financial loss.
24. For the autumn season the programme continues with a 'lite' edition of *City Beerfest* offering food, beer and live music to workers; a Bengali celebration – *Mela in the City* – in Aldgate Square (both September); and installation of the *Asphalt Art* programme throughout September, October and November across four sites in the City; including the opportunity for the public to help paint one of the streetscape murals during the London Design Festival.

Leisure sector Support

25. Under the commitment to deliver leisure sector support, your Culture & Commerce Taskforce (C&CT) has been delivering the suite of projects outlined in its action plan [Fuelling Creative Renewal](#) (approved by your P&R and CHL Committees). The C&CT concludes at the end of September and will be undertaking a series of *One Year On* activities to share the impact, learning and legacy. These include a reception for City, London-wide and national stakeholders, a film and a final publication.
26. Activity under the C&CT since the last update includes:
- a. University of the Arts graduates exhibiting final degree pieces in 30 sites across the City in partnership with the Cheapside Business Alliance and EC Partnership
 - b. A community-built public garden in the City offering free workshops and events on sustainability (spearheaded by Play Nice in partnership with property developer Dominvs Group with support from Culture Mile)
 - c. A summer holiday workshop for young people from City schools learning about creative careers from partners such as Deloitte's creative design team (led by the City Corporation in partnership with Foundation for Future London)
 - d. Delivery of a co-mentoring pilot between creatives and business entrepreneurs (a partnership between Culture Mile and the Company of Entrepreneurs)
 - e. The opening of NDT Broadgate with 20,000 ft sq of space being used for free by creative freelancers (a partnership between British Land and New Diorama Theatre with the City Corporation partnering)
 - f. Be Offices hosting Culture Mile's summer workspace hub at their Central Point site on Beech Street.
27. Also, under the leisure sector support theme:

- a. The City has subscribed as a Challenge Partner for the Creative Cities Challenge in the Global Innovation Collaborative Cities programme led by the GLA. The submitted applications are now being assessed.
- b. The City Venues Group is developing a new initiative with London & Partners around the establishment of a City MICE offer (MICE = Meetings, Incentives, Conferences, and Exhibitions). The programme will aim to further position the City as a leading meetings and events destination.
- c. Your officers in the Innovation and Growth (Culture) and Environment departments have been supporting the Aldgate Connect (BID) which has won a £20k High Streets For All grant from GLA for Middlesex Street “Supporting a unique London street by building on an existing public realm modernisation programme and well-established community engagement strategy, to develop a more inclusive high street” – the focus is Petticoat Lane.

Outstanding Environment

28. Activities under the Outstanding Environment workstream are being delivered across a range of services including Planning, City Transportation, City Public Realm, Open Spaces and the City Property Advisory Team. An Outstanding Environment Delivery Group has been established to coordinate activity and identify opportunities for collaboration.
29. Recent planning decisions for innovative and sustainable development that provides new public, community and cultural facilities, include resolutions to grant permission for:
 - a. A BREEAM Outstanding building at 100 Fetter Lane that provides additional grade A office floorspace together with enhanced accessible walking routes and public realm.
 - b. A highly sustainable and heritage led scheme at the old police station at 5 Snow Hill. This will deliver a new hotel providing much needed overnight accommodation in the Culture Mile area. The scheme also includes a new visitor experience that provides publicly accessible exhibition spaces charting the history of the old police station and local landmarks and provides public access to view this heritage asset.
30. Public consultation on Finsbury Circus Gardens concluded in July and the planning application for the project submitted on 1 September.
31. Six projects have been identified as pilot sites for the Cool Streets and Greening programme. These projects will trial climate resilience measures such as sustainable drainage (SuDS) and climate resilient planting. Designs are progressing and monitoring will be put in place to identify the measures that are most effective at combatting climate risks (flooding, overheating, water shortages, biodiversity loss and emerging pests and diseases). A Resilience Measures Catalogue has been developed to inform the designs and ensure that a range of measures are tested.

32. Analysis of the public consultation for All Change at Bank was completed over the summer and a report prepared for Committees in September.
33. The first stage of the City Public Realm Guidance Review has been completed and Streets and Walkaways Sub Committee agreed to proceed with Stage Two in July. Outputs from this work will include a public realm visions and outcomes, an updated Public Realm Supplementary Planning Document (SPD) and a Design Toolkit. The SPD and Toolkit will include consideration of how best to accommodate opportunities for exercise within the public realm.
34. Following Committee approvals in July, work is progressing to deliver additional temporary seating and greening measures as part of the City Streets Covid-19 recovery programme. New locations include Finsbury Circus (western arm), Tudor Street and Breems Buildings. This programme has also been expanded to incorporate the 'asphalt art' initiative. Delivery of these additional elements is expected in the autumn.
35. We are continuing to work with the City Corporation's wireless concession partner, Cornerstone, with technology partner Freshwave to develop new 4G/5G shared infrastructure that can be utilised by all four mobile network operators to support existing 4G and new 5G network coverage across the Square Mile. Subject to contract, installation of infrastructure for the initial pilot is expected to begin shortly. The pilot will run to March 2022, which if successful will see full deployment across the Square Mile in 200 plus locations by Q2 2023.
36. The City Corporation has been participating in the London trial of rental e-scooters since July. This trial will help us to better understand how e-scooters can be used safely in the Square Mile and inform future policy on and management of e-scooters. The trial includes a series of steps to ensure that anyone using a rental e-scooter rides safely and follows the rules of the road as well as guidance from the rental operator.

Corporate & Strategic Implications –

37. Strategic Implications - The RTF is focused on delivering the [Corporation Plan \(2018-23\)](#) ambition of having a vibrant and thriving City. Specifically, it aims to impact the following corporate outcomes:
 - Outcome 3: People have equal opportunities to enrich their lives and reach their full potential.
 - Outcome 5. Businesses are trusted and socially and environmentally responsible.
 - Outcome 6. We have the world's best legal and regulatory framework and access to global markets.
 - Outcome 7. We are a global hub for innovation in finance and professional services, commerce and culture.
 - Outcome 8. We have access to the skills and talent we need.
 - Outcome 9. We are digitally and physically well-connected and responsive.
 - Outcome 10. We inspire enterprise, excellence, creativity and collaboration.

38. Resource and financial implications – The RTF has been designed to be delivered within existing resources. However, some potential parts may require additional funding if they go ahead, including promotional activities, events and marketing. Consideration may need to be given to the terms in which commercial workspace is offered to potential occupiers.
39. Legal Implications – No legal implications have been identified.
40. Risk Implications – No risk implications of the RTF project. Risk is if no action is taken and the City fails to remain an attractive place for workers, residents and visitors.
41. Equalities Implications – No equalities risks have been identified in relation to the recommendations in this report. A major strand of work of the RTF will be to widen access to the City.
42. Analysis of responses to the public survey shows that female workers (especially female City Corporation workers) and persons of minority religions and BAME groups were intending the most significant shift to working fewer days in the Square Mile. If this were to happen, it would have a negative impact on the diversity of people in the Square Mile. This could impact negatively on career progression within these groups and on diversity of the talent pipeline. As stated in paragraph 12, these insights will be used to inform the implementation of the RTF's recommendations.
43. Climate Implications – The RTF is fully in line with the City Corporation's Climate Action Strategy and provides an additional catalyst to progress this programme of work.
44. Security Implications – No new security implications identified by the RTF. We will continue to work with the City of London Police to ensure safety and security as people return to the Square Mile.

Giles French

External Affairs Director, Innovation & Growth

E: giles.french@cityoflondon.gov.uk

This page is intentionally left blank

Agenda Item 8

Committee	Dated:
Planning and Transportation Committee	26/10/2021
Subject: Transport Strategy Update: Quarter 1 2021/22	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1 People are safe and feel safe 2 People enjoy good health and wellbeing 9 We are digitally and physically well-connected and responsive 11. We have clean air, land and water and a thriving and sustainable natural environment 12 Our spaces are secure, resilient and well-maintained
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	Various
Has this Funding Source been agreed with the Chamberlain's Department?	Y
Report of: Executive Director Environment	For Information
Report author: Samantha Tharme/Averil Pittaway, Transportation and Public Realm, Environment Department	

Summary

Members have requested quarterly updates on progress with delivering the City of London Transport Strategy. This report covers Quarter 1 of 2021/22 (April – June 2021).

An update on Delivery Plan projects is provided in Appendix 1. While progress continues to be made, some projects and activities are experiencing programme delays due to funding.

Transport for London (TfL) are still unable to award usual Local implementation Plan (LIP) funding due to their financial constraints. In July we received approval for cycle scheme funding but no funding is available through the LIP until at least December 2021.

Progress with projects and activities to deliver Vision Zero and help mitigate the CR20 - Road Safety corporate risk include:

- Progress on the All Change at Bank project with public consultation being undertaken between March and May 2021.

- Promotion of cycle training, with Sustrans and TfL helping to promote training and online cycle skills, resulting in greater uptake when compared with previous years.
- The commencement of the Charterhouse School Streets experimental scheme in April.

Additional activities in Quarter 1 included:

- TfL commenced the trial of the rental e-scooter scheme in June, with the City of London joining the trial in July.

Recommendation

Members are asked to note the report.

Main Report

Background

1. The City of London Transport Strategy was adopted in May 2019. The Strategy sets the framework for the design and management of transport and streets in the Square Mile over the next 25 years.
2. The Transport Strategy is supported by a three-year Delivery Plan. This provides details of projects to deliver the Transport Strategy and will be updated on an annual basis. The 2020/21 – 2022/23 Delivery Plan has been prepared and was brought to this Committee in September 2020.
3. Members have requested quarterly updates on progress with delivering the Transport Strategy. This report covers Quarter 1 of 2021/22 (April – June 2021).

Q1 Update

4. The quarterly update on progress with Delivery Plan projects is provided in Appendix 1, which includes a RAG status. The RAG status assumes project dates were reset after the COVID-19 lockdown period and work has resumed on most projects.
5. Progress during the first quarter of 2021/22 includes:
 - A public consultation was undertaken on the approved option on the All Change at Bank project from March to May 2021.
 - The St Paul's gyratory removal project has been re-started with dialogue on-going with the developers in the area.
 - A new Pedestrian Priority Programme has been initiated with approval of the prioritisation methodology and the identification of year 1 streets for scheme development.
 - Several Public Realm projects have been substantially completed including at 55 Moorgate, 22 Bishopsgate and 150 Bishopsgate.
 - Outline design proposals have been prepared for Phase 1 of the City Cycle Network.

- TfL commenced the trial of the rental e-scooter scheme in June, with the City of London joining the trial in July.
- Work to prepare Lunchtime Streets events at Carter Lane and Cheapside, to be held over the summer.
- Agreement to close additional streets for al fresco dining, to support reopening and recovery.

6. The following projects have an amber RAG status, reasons are noted in Appendix 1:

- All Change at Bank
- Moorgate Crossrail Integration
- St Paul's gyratory removal
- The West Smithfield Public Realm and Transportation measures
- Riverside Walkway Globe View section
- Healthy Streets minor schemes
- Barts Close public realm improvements
- 100 Minorities public realm improvements
- Mansion House Station Environs
- Middlesex Street Area: Artizan St
- Public Realm SPD and Technical Manual update
- EV infrastructure provision

7. Progress with projects and activities to deliver Vision Zero and help mitigate the CR20 - Road Safety corporate risk includes:

- The commencement of the Charterhouse School Street experiment
- A very strong uptake of cycle training, for both adults and children. Online cycle skills courses have been accessed as well as in person training. The numbers provided in the table below show the activity for this quarter and for the 12-month period to June 2021. Training was stopped due to pandemic restrictions in some months, we have however had higher numbers of adults and children taking up training this year than any other year in the last 3 years prior to the pandemic.

Activity	Q1 2021/22	12 months to June 2021
Adult 1:1 cycle skill sessions delivered	83	148
Number of pupils receiving Bikeability training	35	35
Number of schools receiving Bikeability training	2	2
Sign-ups to TfL's free online cycle skills course	33	207
Bike security marking by the City of London Police	381	697
Exchanging Places by the City of London Police	0	170

Bikes safety checked and tuned up	0	49
People receiving maintenance training	0	221
People receiving positioning and posture training	0	45
People receiving inner tube replacement training	0	18

Financial Implications

8. Transport for London (TfL) are still unable to award usual Local implementation Plan (LIP) funding due to their financial constraints. In June we submitted a bid in line with the priority funding TfL indicated. In July we received approval for cycle scheme funding, but no funding is available through the LIP until at least December 2021. Liveable Neighbourhoods funding of £3m for the City Cluster has also been put on hold. We have been able to fund some projects and activities through Local Risk budgets. It remains uncertain what funding is likely to be available for the forthcoming financial year.

Corporate & Strategic Implications

9. 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.
10. Delivery of the Transport Strategy helps mitigate corporate risks CR20 – Road Safety, CR21 – Air Quality and CR30 – Climate Action.
11. Delivery of the Transport Strategy supports sustainable growth and the delivery of the City Corporation’s Climate Action Strategy.
12. Delivery of the Transport Strategy supports delivery of the Outstanding Environments dimension of the Recovery Taskforce.

Conclusion

13. Delivery of the Transport Strategy is progressing well, but several projects are currently experiencing programme delays, partly due to funding constraints.

Appendices

- Appendix 1: Progress update on Transport Strategy Delivery Plan Q1 2021/22

Background Papers

- [City of London Transport Strategy](#)
- [2021/22 Local Implementation Plan Funding](#) (link to committee report 20 July 2021 Planning & Transportation)

Samantha Tharme, Strategic Transportation
Department of the Environment

Samantha.Tharme@cityoflondon.gov.uk

Tel: 07542 228918

Appendix 1: Progress update on Transport Strategy Delivery Plan Q1 2021/22

Note: The project RAG status reflects updated programme dates that have been revised due to COVID-19, rather than original programme dates, on projects where this is applicable.

Major Projects				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
Bank Junction and surrounding streets 'All Change at Bank' Walking and public realm improvements	2013/14	2022/23	A	Reviewing the findings of the public consultation, which ran from March to May 2021. The consultation findings report has been delayed until September due to the volume of the response requiring longer to analyse.
Moorgate Crossrail Integration Walking improvements to junction and surrounding public realm (in conjunction with Crossrail)	2019/20	2025	A	Approval to progress request to July committee as follows: Ropemaker Street junction improvements developed; Moorgate corridor prioritisation exercise leading to indicative highway layouts for further testing. Decisions on changes to London Wall junction are on hold until outcomes of Beech St and Bishopsgate restrictions are clearer as they have an impact on network resilience.
St Paul's gyratory Traffic management measures to remove St Paul's gyratory system and Museum of London roundabout and associated public realm improvements.	2013/14	2025	A	Project has re-started, and a dialogue is on-going with the developers of London Wall West and 81 Newgate Street. The design has been revised to accommodate the LWW building footprint. It is likely that both developers will make s278 contributions to the project, but an overall funding shortfall is likely to necessitate central capital funding.
Liverpool St Crossrail Integration Improvements to the public realm, and in particular the pedestrian environment, to	2019/20	Phase 1 – late 2020/21,	G	Phase 1 - Largely complete.

Major Projects				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
accommodate the new Crossrail Station on Liverpool Street.		Phase 2.1 - late 2021, Phase 3 2021/22		Phase 2 – Signal cycle times at the two junctions on London Wall are now operating at 60s cycle times, an improvement of 13s. Surveys and detailed design work for tangible highway improvements are being progressed before a committee report in late 2021. Phase 3 – Draft area objectives and ToR being developed by officers and stakeholders prior to committee in late 2021 (same report as above).
Fleet Street Area Healthy Streets Plan Traffic management study and improvement required for Fleet Street between Chancery Lane and Ludgate Circus (scheme development only, implementation beyond Delivery Plan period – 2025-2040)	2020/21	2021/22 (2025-2040)	G	Engagement has been delayed to allow for people to return to work and is planned to take place in late 2021/early 2022. It is not thought that this will impact the overall programme for the development of the HSP.
Pedestrian Priority Programme Series of street improvements to manage pedestrian priority, including traffic access restrictions and pavement widening	2021/22	2024/25	G	Phase One Interventions GW 2 report approved April Streets and Walkways Sub-Committee, identifying the following streets: Cheapside (east of Bread Street) Old Jewry King Street King William Street & Abchurch Lane Threadneedle Street / Old Broad Street (S) Chancery Lane
1 – 2 Broadgate Public realm improvements to accommodate new pedestrian desire lines and increased pedestrian footfall	2020/21	2023/24	G	Dialogue with the developer is continuing re. S256 land swap but is progressing very slowly.

City Cluster Area Programme

Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
Traffic Reduction and Pedestrian Priority Programme				
Healthy Streets Plan	2019/20	2021/22		The Healthy Streets Plan is now complete and to report to Streets & Walkways in July 2021.
St Mary Axe Pedestrian priority and traffic access restrictions	2021/22	2022/23	G	Work has recommenced on developing an experiment for pedestrian priority and traffic access restrictions on St Mary Axe.
Leadenhall Street Traffic access restrictions	2021/22	2024/25		Work has commenced on initiating a project for Leadenhall Street traffic access restrictions, with a G1/2 going to committee in July.
Wellbeing and Climate Change Resilience Programme	2020/21	2024/25	G	Designs are being developed for the 7 projects, including engagement with stakeholders
Activation and Engagement Programme	2020/21	2024/25	G	Initial activation measures programmed for July. Further measures being developed with the EC Partnership

Smithfield and Barbican Area Programme				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
West Smithfield Public Realm and Transportation measures Implementation of public realm and transport measures improvements to support Culture Mile and Museum relocation. Incorporates Smithfield section of Barbican & Smithfield - Healthy Streets Plan.	2019/20	2026	A	Transport modelling continues. However, the Museum of London is finalising options for the phased development of its new site and is continuing negotiations regarding the availability of this new site. The programme for the public realm and highway improvements will be confirmed once there is greater certainty regarding the Museum development programme.
Beech Street Transport and Public Realm Improvements Air quality and public realm enhancements. Incorporates Barbican and Golden Lane section of Barbican & Smithfield - Healthy Streets Plan.	2018/19	2023/24	G	Measures to develop a permanent scheme had to be put on hold due to a second Judicial Review. Future measures for the area will be considered withing the development of the Healthy Streets Plan. A report to commence this process will be brought to Streets and Walkways Sub-committee in October.
Barbican & Golden Lane Zero Emission Zone	2020/21	2021/22	G	Future measures for the area including vehicle emission controls, will be considered withing the development of the Healthy Streets Plan. A report to commence this process will be brought to Streets and Walkways Sub-committee in October.

Minor Schemes Programme				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
Healthy Streets minor schemes Small scale interventions at targeted locations to reduce road danger, improve	2019/20	Ongoing	A	TfL funding to deliver Healthy Streets schemes for the period of Mar – Dec 2021 has not been made available.

Minor Schemes Programme				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
accessibility, enhance the walking and cycling experience, and/or deliver bus priority, people walking.				Feasibility work is still being progressed and a bid for City capital funding will be made. Charterhouse School Streets experiment started on 26 April 2021. Monitoring on the experiment is on-going.
Riverside Walkway Globe View section. Reinstatement and improvement of Thames path for public access	2019/20	2021/22	A	The section of riverside walkway along the Queensbridge House Hotel is now complete. The Globe View Walkway programme has been delayed by two months due a change in City's internal procedures, however work is recommencing in Autumn 2021. A completion date will be finalised shortly but is expected to be early 2022.

Cycling Programme				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
<p>City Cycle Network Phase 1 scheme implementation:</p> <p>Route 1: CS1 to Monument via Bank (subject to funding confirmation from TfL)</p> <p>Route 2: Aldgate to Blackfriars via Bank (including improvements at Mansion House junction with TfL)</p>	2019/20	2022/23	G	<p>Outline design proposals have been produced for Route 1 and Route 2. The initial outline designs are under-going internal/external comments and design iterations.</p> <p>TfL has confirmed funding is available FY21/22 to progress with the Cycleways.</p>
<p>City Cycle Network Phase 1 scheme development:</p> <p>Route 3: Duke's Place to St Paul's Gyratory</p> <p>Route 4: Bank to Holborn</p>	2021/22	2024/25	G	<p>Outline design proposal for Duke's Place to Camomile Street has been issued for internal consultation.</p> <p>TfL have been consulted regarding the delivery timescale and notification process for the scheme</p>
<p>City Cycle Network</p> <p>Bevis Marks</p> <p>Queen Victoria Street</p> <p>Protected cycle lane provision</p>	2021/22	2021/22	G	<p>Projects have been installed on a temporary basis as a response as part of the Covid-19 response. Funding secured from TfL in Q1 will allow schemes to be retained and enhanced.</p>
<p>Cycle Parking implementation of additional space for standard and dockless cycles</p>	2020/21	2020/21	G	<p>The conversion of the Dockless Cycle Hire bays to a shared parking bays with E-scooters was completed in June 2021</p>

Public Realm Programme				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
Moor Lane – Meanwhile project followed by permanent public realm enhancements	2021/22	2022/23	G	Design for the permanent scheme has been updated and will be consulted on in November 2021. Work ongoing to agree design for the s278 works related to 21 Moorfields.
Mark Lane area – public realm and walking improvements	2020/21	2020/21	G	Works are currently underway. This is being delivered in phases. New London Street works have begun. Works on Mark Lane to follow in the winter of 21/22.
Barts Close public realm improvements	2017/18	2020/21	A	Progress of the project has been delayed as a result of a change to the City's internal processes, which has now been resolved. The project will soon be able to progress to completion.
55 Moorgate – public realm and walking improvements	2020/21	2020/21	G	Works are substantially completed with resurfacing of a section of carriageway and tree planting to follow. A GW6 report has been submitted for committee Sept 21
Creed Court – public realm improvements	2020/21	2021/22	G	G5 report has been approved. The start date for implementation has now been moved to Q1 2022, with works completion scheduled for July 2022.
22 Bishopsgate public realm improvements	2020/21	2021/22	G	Works have been substantially completed and G6 report is being drafted for October's committees, seeking to complete the southernmost section of Undershaft once construction at 6-8 Bishopsgate ceases.
150 Bishopsgate public realm improvements	2020/21	2021/22	G	Works have been substantially completed. Snagging and minor works to Devonshire Row, in an area of the site entrance are being undertaken. G6 report planned for November 2021.

Public Realm Programme				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
100 Minorities public realm enhancements	2019/20	2021/22	A	Ph1: Discussions ongoing with developer and payment of S278 funds is awaited. Negotiations delayed by 12 months following change of site ownership. Programme is delayed as a result. Ph2: Designs being developed to incorporate more climate resilience measures. Issues report planned for later this year
Mansion House Station Environs walking and public realm improvements, including routes to rail stations	2019/20	2021/22	A	The programme has been delayed following lengthy negotiations with the developer on the Queensbridge House Hotel S278 site. The negotiations have now concluded and a report to Chief Officer is being prepared to confirm next steps.
Middlesex Street (Petticoat Lane Market) Public realm improvements to support a rejuvenated market and increase pedestrian priority at key locations	2020/21	2021/22	G	Detailed designs have been finalised, with works being scheduled to start in late 2021/22.
Middlesex Street Area: Artizan St Phase 1: Landscaping Phase 2: New entrance canopy, signage and improvements	2017	2022	A	Phase 1 is complete. Phase 2 was on hold in order to await the outcome of a building assessment by housing. However, now this has been resolved it can recommence. Architects to be appointed to conclude designs after which works to be managed by Housing team as part of wider programme of works to the estate.

Public Realm Programme				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
Public Realm SPD and Technical Manual update	2020/21	2021/22	A	Stage one report approved in July. A delay of approximately 8 weeks as a result of internal procedures has impacted the overall programme but has now been resolved and stage 2 will commence shortly.

Strategic Transport Programme				
Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
Future Transport Programme	2019/20	Ongoing	G	A new dockless bike operator was appointed to begin operations in May 2021. E-scooter trial launched in the City July 2021. Future Transport Programme partnership under development.
City Wide 15 mph speed limit Schemed development; implementation and education programme	2019/20	2022/23	G	Application to DfT has been progressed although delays due to reprioritisation on COVID-19 projects. This is due to be submitted in September.
Sustainable logistics centre Co-location major suppliers including, waste collection, courier services, (feasibility and scheme development; implementation to follow by 2030)	2020/21	2030	G	A brief for a feasibility study has been developed and informal engagement has been undertaken with consultants. Invitation to tender is programmed for August/September 2021/22
COLSAS audit and delivery plan	2021/22	2021/22	G	Tool was completed in June with full report and pilot testing completed. Work to commence an audit of streets during 2021/22 is planned subject to sufficient funding.
Sustainable Servicing Programme policy and guidance working with TfL	2019/21	2022/23	G	No activity in this quarter. TfL has delayed initial guidance. Some exploratory work has commenced with researchers at UCL
Shared use Review for walking and cycling - Policy and design guide	2022/23	2022/23	G	The review has been rescheduled to 2022/23 owing to resources
Last mile delivery hubs Two 'last mile' logistics hubs in underutilised City Corporation assets by 2022. A further three hubs by 2025	2019/20	2022/23	G	Contract awarded for London Wall site, stakeholder engagement completed and agreement on works with contractor and City Surveyors completed. Committee consideration for planning permission anticipated in Autumn 2021. The programme for a further two sites

Strategic Transport Programme

Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
				has been extended to extend into 2022/23 given delays in 2020 from COVID-19
<p>Kerbside Review Comprehensive review of on-street parking and loading activity</p>	2019/20	2021/22	G	Commencement of Action Plan, with agreed tasks being taken forward. Quick wins are already underway, including identification of motorcycle bay locations where signage indicating close proximity of City Car Parks. An assessment of on-street disabled parking provision has also begun.
<p>EV Infrastructure Action Plan Assessed demand for infrastructure completed with a number of actions during 2020/21 to assist with delivering sufficient new charging capacity; including innovative projects</p>	2019/20	2022/23	A	<p>Baynard House EV charge points have been installed, the new ventilation system installation is progressing through design stages and procurement stages, and work on site commenced in Q1. The completion date is approximately 4 months over the programme for 2021 (now Nov/Dec 2021) this has been due to contractor management problems and identification of additional preparatory work once the contractor was on site. The lead in time to supply some materials has been much longer than standard.</p> <p>Work to implement residential charge points is being taken forward by DCCS for Corporation estate sites at the Barbican and Middlesex Street.</p>

Events and Campaigns

Project description	Start date	End date	Q1 RAG	Progress Update Q1 2021/22
<p>Sculpture in the City annual programme Temporary public art installations in the City Cluster area</p>	2019/20	2022/23	G	<p>10th edition launched in June 2021. Associated initiatives including the education workshops, Aldgate Square commission and Bloomberg Connects reflections tracks are to be progressed in late 2021 / 2022.</p> <p>Planning for future editions of the project have commenced.</p>
<p>Lunchtime Streets City Cluster and Chancery Lane Carter Lane and Cheapside.</p>	2019/20	Ongoing	G	<p>Plans for activity in 2021 finalised with events planned for Carter Lane and Cheapside to run through August and September with good support from the BIDS. Additional work to introduce temporary closures for al fresco dining has been undertaken during 2020/21.</p> <p>Chancery Lane has benefitted from closures as a response to Covid-19 traffic management measures.</p>
<p>Road Danger Reduction Campaigns Behaviour change and community engagement, (including working with City of London Police)</p>	2019/20	Ongoing	G	<p>Cycle training at two of the schools has been undertaken in Q1, with two lots of week long training sessions and an after school club, training 35 children.</p> <p>Planning for lunchtime streets activity has allowed us to plan further roadshows with the City of London Police which have been focussing on cycle safety and security.</p>

STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Friday, 10 September 2021

Minutes of the meeting of the Streets and Walkways Sub (Planning and Transportation) Committee held at Committee Room 3 - 2nd Floor West Wing, Guildhall on Friday, 10 September 2021 at 10.30 am

Present

Members:

Graham Packham (Chairman)
Shravan Joshi (Deputy Chairman)
Randall Anderson
Peter Bennett
Marianne Fredericks
Sheriff Christopher Hayward
Deputy Jamie Ingham Clark
Oliver Sells QC
Deputy Barbara Newman (Ex-Officio Member)

Officers:

Ian Hughes	- Department of the Built Environment
Olumayowa Obisesan	- Chamberlain's Department
Gillian Howard	- Department of the Built Environment
Leah Coburn	- Department of the Built Environment
Shani Annand-Baron	- Town Clerk's Department
Kristian Turner	- Department of the Built Environment
Patrick Hegarty	- Open Spaces Department
Tom Noble	- Department of the Built Environment
Maria Herrera	- Department of the Built Environment
Emmanuel Ojugo	- Department of the Built Environment
Jayne Moore	- Town Clerk's Department
John Cater	- Town Clerk's Department

1. APOLOGIES FOR ABSENCE

Apologies were received from Deputy Alastair Moss, William Upton QC, and Paul Martinelli.

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

There were no declarations.

3. **MINUTES**

A Member made a correction to the list of Apologies received in respect of the meeting of 08 July 2021.

RESOLVED – That the minutes of the meeting held on 08 July 2021 be agreed as a correct record, subject to a single correction to the list of Apologies.

4. **BANK JUNCTION IMPROVEMENTS: ALL CHANGE AT BANK**

The Sub Committee heard a presentation on the ‘All Change at Bank’ project covering an outline of the proposals as consulted; the consultation survey data; the overall consultation themes with Officer comments and responses; and the recommendations.

Members noted that the written comments of local businesses and organisations submitted independently of the survey were shown in Appendix 8.

A Member expressed the view that safety had not come through strongly in the presentation and asked for further clarification on the project’s safety implications, particularly in respect of pedestrians and cyclists sharing the road with buses.

Members heard that traffic tended to slow down when travelling along narrower carriageways, and that the widening of pavements and removal of excess carriageway was likely to result in improved safety for pedestrians and cyclists, with cyclist traffic light sequences set to enhance the safety of cyclists.

It was pointed out that some licensed premises in the Bank junction area had been denied an outdoor seating licence for safety reasons.

A Member asked what had happened to previous proposals for a taxi (black cab) rank outside or opposite The Ned (to be funded by The Ned) and whether those plans had been taken forward. The Member expressed support for a taxi rank at The Ned for safety reasons.

Members heard that those proposals were still on the table and had been costed out. Those proposals had been sent to The Ned and no response had yet been received from The Ned on those specific proposals, though the taxi rank issue had been raised via the current proposed project. The pandemic was likely to have affected any response.

A Member sought clarification on whether, given Bank junction’s importance on the Lord Mayor’s Show ceremonial route, the Pageantmaster for the Lord Mayor’s Show had been consulted on the changes - particularly in respect of the narrowing of Princes Street and the impact of that on the spectacle of the Lord Mayor’s Show.

Members heard that the Pageantmaster had been consulted on the changes in respect of the ceremonial route and that some changes had been made in the

light of that consultation, including a reduced narrowing of Princes Street. The relevant interested parties were confident that the ceremonial route should work well with the new proposals.

A Member sought clarification on the survey methodology, including whether there were enough survey responses for each mode to result in a statistically significant response.

Members heard that the survey response rate had not been representative of expectations (in terms of modal use), with relatively low response rates from some users including bus passengers and service vehicle drivers. The objective had been to set out views taking into account the large volume of responses from taxi/private hire drivers and passengers. Members heard that consideration had been given to weighting the responses to reflect modal use, but that such weighting had been discarded as it was felt that it would over-complicate the analysis and generate uncertainty.

A Member commented that the general trend was to be supportive of the proposed changes to the road pattern. The Member raised concerns around the credibility of the way taxi/private hire driver and passenger responses had been dealt with, commenting that there were safety implications around taxis (black cabs) being allowed through the changed Bank junction area arrangements. Members heard that allowing taxis (black cabs) through the Bank junction area was a significant decision and that taxis accounted for a large proportion of the traffic in the Bank junction area (with varying levels of occupancy). It was recommended that the issue of taxis (black cabs) being allowed through the Bank junction area be handled as a separate issue.

A Member commented that the views of taxi/private hire drivers and users were important, and queried the blocking out of King William Street. The Member expressed the view that extensions of restrictions into the evening and further extensions were unwelcome given that the economy of the area appeared to be picking up well, and that there appeared to be a demand for taxis (black cabs) in the evening in the area.

In response to a Member's question on whether taxi volumes had been modelled – and the impact of that on risk mitigation – the Sub Committee heard that taxi (black cab) vehicle volumes had been modelled at Poultry, Cornhill and King William St as part of the proposals within the last 12 months. Traffic modelling was based on 2019 traffic flows, and there had been a significant drop in the number of licensed London taxi vehicles (from 18K in 2019 to 13K in late 2020) so it might not be appropriate to take that modelling forward given the uncertainty around future traffic flows. Implications around access and the sense of place were also being taken into account, and the current data was largely pre-pandemic.

A Member pointed out that the London hackney carriage trade viewed itself as a public transport provider and therefore viewed itself as entitled to be treated as such. Safety was the key reason for the project's continuing existence, and it was important for planners to build safety into future plans. The Member

expressed support for extending the timings to encompass the weekend given the increased visitor figures to the City at the weekends, which would also reduce confusion and therefore accidents. The Member asked about the impact of a trial in which taxis (black cabs) would be allowed to use the Bank junction area as a public transport option, and the impact of that on safety and pollution if there was an extension to cover 7 days a week.

A Member commented that it was defensible to seek clear advice around taxis (black cabs) being given special status in the traffic mix, commenting that black cabs are not necessarily suitable for use by some disabled people.

Members were generally supportive of a review within a fixed period of time of the measures being put in place given the post-pandemic uncertainty, the need for businesses to have some certainty, and the need to ascertain whether there were any safety implications. Members were generally supportive of a thorough review to include the impact of the carriageway reduction and its effect on traffic elsewhere, bus routes, and the introduction or otherwise of black cabs.

A Member also raised the issue of scooters not being allowed to use the Bank junction area and whether restrictions on electric scooters were being clearly articulated.

Members heard that specific Bank junction areas had been geo-fenced by the electric scooter hire companies, and that private electric scooters continue to be illegal.

RESOLVED – That the Streets & Walkways Sub Committee:

1. Note the contents of the report and the key themes of the consultation response, Officers' response to the key findings and the design changes proposed (paragraphs 161-229)
2. Approve the proposed way forward:
 - a. to continue to Gateway 5 with the proposed changes to motor vehicle movements on Threadneedle Street, Princes Street and Queen Victoria Street (which would be operational at all times) outlined in Paragraph 240
 - b. to continue to Gateway 5 with the proposed restrictions on Poultry, Cornhill and King William Street remaining as buses and cycles only, Monday to Friday 7am to 7pm.
 - c. to continue to develop the public realm design to Gateway 5 taking into account consultation comments received.
 - d. to maintain pace of programme, agree that the traffic orders reflecting a and b can be drafted and issued for statutory consultation ahead of the Gateway 5 report.
3. Approve the proposal to review the timing and traffic mix for the Poultry, Cornhill and King William Street arms 12 months from completion. (see paragraphs 173-175)

4. Note that a Costed Risk Provision of £93,000 was approved in July 2021 and is still required.

5. **MILLENNIUM BRIDGE HOUSE**

Members considered a report of the Director of the Built Environment on an improvement project within the immediate perimeter and streets in the wider vicinity of the approved Millennium Bridge House development at 2 Lambeth Hill.

Members heard that the area attracts a lot of skateboarders and learned that further skateboarding would not be facilitated - to include installing high seating, which also benefits the elderly.

Members heard that the City of London School would be kept informed of the project.

RESOLVED – That the Streets & Walkways Sub Committee approve the initiation of the project:

- Approve the budget of **£50,000**, that forms the legally agreed Section 106, Design and Evaluation Fee Payment for the project to reach the next Gateway;
- Note the total estimated cost of the project at **£150K-300K** (excluding risk);
- Note that at the next reporting stage, any proposed Cost Risk Provision is to be delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman of Streets & Walkways sub-Committee and Projects sub-Committee.
- Authorise officers to negotiate and enter into a Section 278 agreement, in accordance with the requirements of the Section 106 agreement.

6. **CITY STREETS TRANSPORTATION RESPONSE TO SUPPORT COVID-19 RECOVERY PHASE 3 – 23 JULY 2021**

Members received the report of the Projects Sub Committee of 23 July 2021: 'City Streets Transportation Response to support Covid-19 Recover Phase 3'.

Members agreed that the points raised in the report were common to the Streets & Walkways Sub Committee.

Members agreed that updates and developments on the matter would be added to the Sub Committee's Outstanding References.

RESOLVED – That the Streets & Walkways Sub Committee note the contents of the report from the Projects sub-committee of 23 July 2021.

7. **OUTSTANDING REFERENCES**

The Sub Committee received a list of outstanding references and the following points were made:

Dockless vehicles: HumanForest (the second operator) began operating in early September 2021 on a trial basis.

A Member commented that a Lime bike has been seen at the staircase at Breton House (Barbican) for several weeks and queried the effectiveness of the company's bike tracking process. Members heard that the matter would be raised and the findings reported back.

A Member commented that e-scooters were often used on pavements especially in the evening, and raised concerns around the inappropriate use of bikes and e-scooters, and around the level of education in respect of the appropriate use and parking of hired bikes and e-scooters. Members heard that the geo-fencing capability may not be sufficiently precise to prevent pavement use.

Beech Street: the outcome of the judicial review challenging the legality of the experiment (delivered on 10 August 2021) found in favour of the City of London, meaning that the 18-month experiment was considered meaningful and that it could continue. The experiment is to expire on 18 September 2021, and street notices have been posted to explain that. A safety audit on the central reservations for accessing car parks from either direction has resulted in those staying in place. Data is being collected via cameras for traffic modelling purposes to inform future decisions on a permanent scheme at Beech St. That information is being shared with the Barbican Association, and discussions are being held with the Association on a fortnightly basis as part of the Healthy Streets plans. A Gateway 1 - 2 report is expected to be presented to the Sub Committee in October 2021 for the Barbican – Golden Lane Healthy Streets Plan. Subject to the Sub Committee's approval, a permanent scheme to address air quality issues and make public realm improvements for Beech St is expected to be presented to the Sub Committee in December 2021, with any public consultation period in respect of that to run till the end of January 2022 with a permanent scheme potentially in place by summer 2022.

A Member asked whether any traffic analysis of right-turning vehicles had been undertaken following a safety analysis of that.

Members heard that the information had been considered as part of the safety audit and that numbers entering the car park are low, but the situation will be continue to be monitored.

Use of central medians: dialogue is under way between the Department of the Built Environment and the City of London Police in the context of a potential re-design of some of the checkpoints. Further reports are likely to be presented to the Sub Committee.

RESOLVED, that the issue of central medians be removed from the list of Outstanding References.

8. **REPORT OF ACTION TAKEN BETWEEN MEETINGS**

The Sub Committee received a report of action taken between meetings: approval by delegated authority from the Town Clerk of a Gateway 2 report in respect of highway and public realm works in the vicinity of 40 Leadenhall Street.

RESOLVED - that the Sub Committee note the report.

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

A Member commented that signage needed to be improved in respect of some of the roads that had been closed off during the pandemic, including at Old Jewry Poultry junction, given that some minicabs were struggling to navigate the area appropriately. Members heard that a review is currently under way.

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

No other business was raised.

11. **EXCLUSION OF THE PUBLIC**

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

No matters were raised.

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

No other business was raised.

The meeting ended at 12.20 pm

Chairman

Contact Officer: Jayne Moore
Jayne.Moore@cityoflondon.gov.uk

This page is intentionally left blank

PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	18 March 2019 2 April 2019 30 April 2019 24 May 2019 18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019 28 Jan 2020 18 Feb 2020 6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021	<p align="center"><u>Daylight/Sunlight – Alternative Guidelines</u></p> <p align="center">Chief Planning Officer and Development Director</p> <p>A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight, and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.</p>	UPDATE (20 July 2021) – see action 1a)

	30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021		
1a)	5 March 2020 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021	<p style="text-align: center;"><u>Radiance Studies</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>A Member referred to a training session that had taken place for the Committee earlier this morning, and in which a consultant had expressed a view that radiance studies were the best way for laymen to assess the impact of developments on daylight where there was a genuine concern about this issue. The consultant felt that, in appropriate cases, the applicant should be asked to provide a radiance study.</p> <p>In view of this, the Member asked Officers to undertake, when future applications were received in which daylight will be an issue, to ask the applicant to prepare a radiance study to be provided to this Committee so that Members could make an informed assessment of the issue.</p>	<p>UPDATE (21 September 2021) - The Chief Planning Officer and Development Director underlined that, ultimately, Officers would be producing a planning advice note in order to create more clarity on the methodology and that they were still working through this with the BRE and other stakeholders to deliver this. He added that, to date, Officers had not had any pushback from the industry when requiring the provision of radiance studies for relevant planning applications.</p> <p>To be completed: Further report to Committee setting out/providing updates on these points by Winter 2021.</p>
2	18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019 12 Dec 2019	<p style="text-align: center;"><u>Construction Works</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>A Member referred to the many construction sites within her Ward that were causing noise/disturbance issues. She asked if officers</p>	<p>UPDATE (7 September 2021) – Officers undertook to bring forward a report to the October meeting of this Committee setting out work now taking place to better coordinate forthcoming construction work in the City and to liaise with residents on these from an early stage,.</p>

	<p>28 Jan 2020 18 Feb 2020 6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 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 7 Sept 2021 21 Sept 2021</p>	<p>could look at how this matter might be improved and more effectively controlled and questioned whether any restrictions could be placed on construction when applications were first approved/granted consent.</p> <p>The Chair reiterated that Members had also requested, at the last meeting of this Committee, that Officers consider what powers, if any, might be used with regard to construction time periods and how construction in any given area might 'dovetail'.</p>	<p>To be completed: October 2021</p>
3	<p>6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021</p>	<p style="text-align: center;"><u>Member Training</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director / Director of the Built Environment</p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local authorities offered more extensive training and induction for Planning Committee members and</p>	<p>UPDATE: (17 November 2020): Members were of the view that more formal training should be offered by the Department to any newly appointed members of the Committee in line with the principles of the Planning Protocol.</p> <p>To be completed: Training offering for new Members to be considered in 2021 with a view to implementing this for the new municipal year.</p>

	<p>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 7 Sept 2021 21 Sept 2021</p>	<p>also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning & Transportation Committee are expected to undertake regular training.</p>	
4	<p>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 7 Sept 2021 21 Sept 2021</p>	<p><u>Barbican and Golden Lane Conservation Area SPD</u></p> <p>Chief Planning Officer and Development Director</p> <p>A Member highlighted that a Conservation Management Plan was still awaited for this area in the form of a Supplementary Planning Document. He added that this was originally approved by this Committee in October 2018 and that he had requested an update on progress on several occasions since. He asked that this also now be included within the list of Outstanding Actions so that it was not lost sight of entirely.</p>	<p>UPDATE (7 September 2021) - The Chief Planning Officer and Development Director reported that a significant number of consultation responses had been received, some of which were very detailed and would now require additional meetings with stakeholder. The final document would then have to be presented to the three Barbican Committees for input before being finalised by this Committee.</p> <p>The Chair stressed the need for and importance of proper consultation on this piece of work.</p> <p>To be completed: Amended draft document to Committee for final approval by February 2022.</p>

Committee(s)	Dated:
Planning and Transportation	26 th October 2021
Subject: Delegated decisions of the Chief Planning Officer and Development Director	Public
Report of: Chief Planning Officer and Development Director	For Information

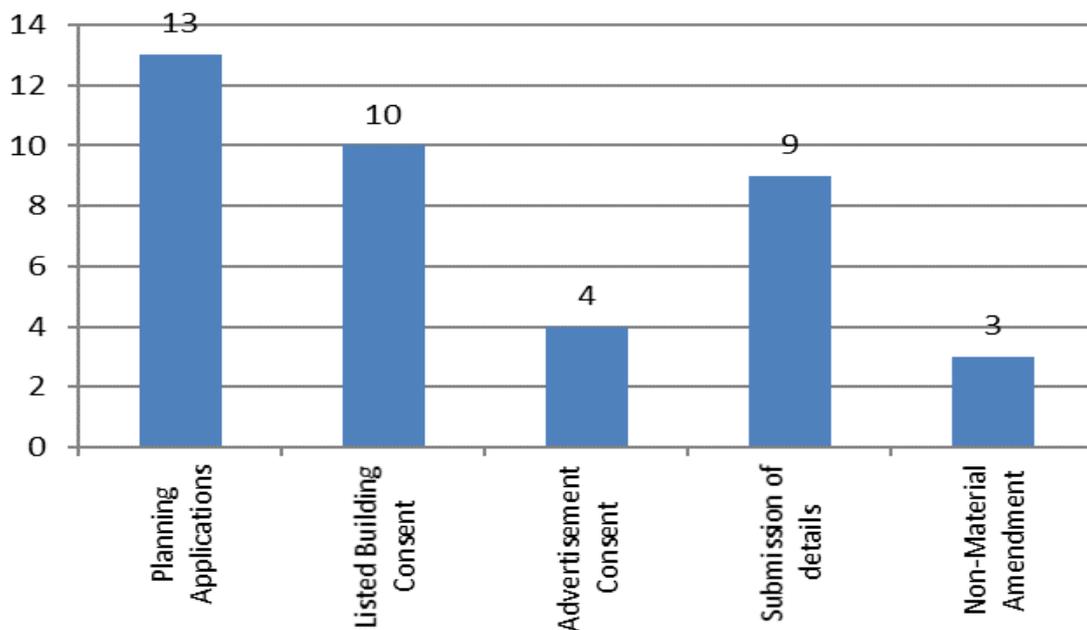
Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since my report to the last meeting.

In the time since the last report to Planning & Transportation Committee Thirty Nine (39) matters have been dealt with under delegated powers. Ten (10) relate to works to Listed Buildings, Four (4) applications for Advertisement Consent, Nine (9) relate to conditions of previously approved schemes, and Three (3) applications for Non-Material Amendments.

Thirteen (13) Full applications for development have been approved including Two (2) change of use and 201sq.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.

Details of Decisions

Registered Plan Number & Ward	Address	Proposal	Decision & Date of Decision	Applicant/ Agent Name
21/00651/FULL Aldgate	6 Lloyd's Avenue London EC3N 3AX	Installation of one new external condenser unit within the lightwell of the building.	Approved 07.10.2021	CLS Lloyds Avenue Limited
21/00652/LBC Aldgate	6 Lloyd's Avenue London EC3N 3AX	(i) Removal of existing modern internal partitions and erection of new replacement glazed internal partitioning to the rear right unit of the ground floor; (ii) Installation of two new internal air conditioning units inside the building and one new external condenser unit within the building lightwell.	Approved 07.10.2021	CLS Lloyds Avenue Limited
21/00201/LBC Bassishaw	65 - 65A Basinghall Street London EC2V 5DZ	Alteration of 65/65a Basinghall Street to allow for the removal of the existing walkway bridge over Basinghall Street and the installation of new City Walkway bridge to be delivered as part of the redevelopment of 55 Basinghall/40 Basinghall Street (associated reference 21/00116/FULMAJ).	Approved 29.09.2021	Knighton Estates Ltd

18/00418/ADVT Billingsgate	3 Minster Court London EC3R 7DD	Retention and display of (i) two internally illuminated fascia signs measuring 0.83m high by 3.5m wide and located at a height of 3m above pavement level and; (ii) two internally illuminated projecting signs measuring 0.71m high by 0.61m wide and located at a height of 3m above pavement level on the south elevation.	Approved 28.09.2021	Brewdog Bars Ltd
21/00167/PODC Bishopsgate	Site Bounded By Stone House And Staple Hall Bishopsgate Devonshire Row London EC2	Submission of the Ballroom Management Plan pursuant to Schedule 1 Paragraph 22.1 of the Deed of Variation dated 27 July 2018 (Planning Application Reference: 11/00905/FULL as amended by 14/01151/FULL and 17/00623/FULL).	Approved 23.09.2021	UOL Group Ltd
21/00075/MDC Bishopsgate	1 - 2 Broadgate London EC2M 2QS	Details of the proposed sanitation system within the building and the proposed sewer vent connection systems below ground pursuant to condition 38 of planning permission 18/01065/FULEIA dated 28/03/2019.	Approved 21.09.2021	Bluebutton Properties UK Limited
21/00388/FULL Bishopsgate	Sun Street Passage London EC2A 2JN	Installation of a platform lift and enclosure at Sun Street Passage and associated works.	Approved 30.09.2021	Bluebutton Developer Company (2012) Limited

21/00424/PODC Bishopsgate	150 Bishopsgate London EC2M 4AF	Submission of the Estate Management Strategy pursuant to Schedule 1 Paragraph 10 of the Deed of Variation dated 01 February 2017 (Planning Application Reference: 11/00905/FULL as amended by 14/01151/FULL, 17/00623/FULL and 21/00061/FULL).	Approved 23.09.2021	UOL Development (UK) Ltd And Pan Pacific Hotel Limited
21/00611/MDC Bishopsgate	186 - 190 Bishopsgate London EC2M 4NR	Acoustic Report specifying the materials and constructional methods to be used to limit noise levels in the upper floor bedrooms attributable to the Class A use, pursuant to Condition 3 of planning permission 19/01359/FULL dated 28.01.2021	Approved 21.09.2021	Five Guys JV Ltd.
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, as set out in the Town and Country Planning (Use Classes)	Approved 28.09.2021	Pan Pacific London Hotel Ltd

		(Amendment) (England) Regulations 2020).		
21/00743/NMA Bishopsgate	186 - 190 Bishopsgate London EC2M 4NR	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 19/01359/FULL dated 28.01.2021 to enable an amendment to the details of the external extract duct.	Approved 28.09.2021	Five Guys JV Ltd
21/00774/NMA Bishopsgate	Exchange House 12 Primrose Street London EC2A 2EG	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) on planning permission 21/00052/FULL dated 25/05/2021, to extend the existing lift core in lieu of the consented platform lift, removal of fixed seating to allow for flexible space, increase in planting around edge of terrace, introduction of servery, and removal of BMU steels. Proposed removal of condition 4(a) relating to the platform lift and condition 4(f) relating to the access stair, and addition of details of servery and access gate to condition 4(c).	Approved 05.10.2021	Bluebutton Properties UK Limited

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.	Approved 05.10.2021	Mitsubishi Estates London Limited
21/00413/FULL Bridge And Bridge Without	33 - 39 Eastcheap London EC3M 1DT	Change of use of the basement unit at 37-39 Eastcheap from restaurant (Use Class E) to drinking establishment (Sui Generis) and amalgamation with the basement unit at 33-35 Eastcheap resulting in the creation of a single unit for a restaurant (Use Class E) at the ground floor (part) unit at 37-39 Eastcheap.	Approved 21.09.2021	Qualibest Eastcheap Ltd
21/00414/LBC Bridge And Bridge Without	33 - 39 Eastcheap London EC3M 1DT	Internal alterations to 33-35 Eastcheap at ground and basement levels including the demolition of an internal wall and stair and the amalgamation with the basement unit at 37-39 Eastcheap and associated works.	Approved 21.09.2021	Qualibest Eastcheap Ltd
21/00285/FULL Broad Street	83 Old Broad Street London EC2M 1PR	Installation of two new extract grilles and renovations to existing shopfront for a new colour scheme.	Approved 21.09.2021	Greggs Plc

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.	Approved 07.10.2021	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.	Approved 21.09.2021	Dorrington Plc
21/00355/LBC 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.	Approved 21.09.2021	Dorrington Plc
21/00760/MDC Castle Baynard	Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y	Submission of Scheme of Protective Works Management Plan pursuant to condition 18 of planning permission 20/00997/FULEIA dated 25th August 2021.	Approved 05.10.2021	City of London Corporation
20/00977/MDC Coleman Street	21 Moorfields London EC2Y 9AE	Submission of details of a Construction Environmental Management Plan pursuant to condition 9 (in part) of planning application dated 04/05/2018 (app. no. 17/01095/FULEIA).	Approved 28.09.2021	LS 21 Moorfields Development Management

<p>21/00290/LBC Coleman Street</p>	<p>1-5 London Wall Buildings London Wall London EC2M 5PG</p>	<p>Application under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) to vary condition 7 (approved plans) of listed building consent dated 24/09/2020 (19/01346/LBC) to incorporate minor material amendments comprising: (i) reconfiguration of the existing floorplate to partially infill lightwell 05 from basement to level 08; (ii) partial infill of extension of lightwell 04 from level 02-08; (iii) relocation of plant at level 07 and 08; (iv) demolition and remodelling from the existing chimney to core 05; (v) restoration of the balustrade and reconstruction of the dormer window to the southern facade; (vi) extension of the roof terrace and creation of additional terraces at roof level and in the base of the lightwell; (vii) installation of a new treatment to lightwell 05 facade and a mansard roof system; (viii) reconfiguration of access to cycle storage and facilities, including relocation of lifts; and (ix) provision of additional</p>	<p>Approved 28.09.2021</p>	<p>AG EL LWB B.V.</p>
--	--	---	--------------------------------	---------------------------

		amenities inclusive of cycle parking, showers, lockers and waste storage.		
21/00272/FULMAJ Coleman Street	1-5 London Wall Buildings London Wall London EC2M 5PG	Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 2 (approved floorspace figures), 29 (cycle parking) and 49 (approved plans) of planning permission dated 24/09/2020 (19/01345/FULMAJ) to incorporate minor material amendments comprising: (i) reconfiguration of the existing floorplate to partially infill lightwell 05 from basement to level 08; (ii) partial infill of extension of lightwell 04 from level 02-08; (iii) relocation of plant at level 07 and 08; (iv) demolition and remodelling from the existing chimney to core 05; (v) restoration of the balustrade and reconstruction of the dormer window to the southern facade; (vi) extension of the roof terrace and creation of additional terraces at roof level and in the base of the lightwell; (vii) installation of a new treatment to lightwell 05 facade and a mansard roof system; and (viii) provision of	Approved 28.09.2021	AG EL LWB B.V.

		additional amenities inclusive of cycle parking, showers, lockers and waste storage.		
21/00318/MDC Coleman Street	21 Moorfields London EC2Y 9AE	Submission of details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation pursuant to condition 27 of planning permission dated 04/05/2018 (app. no. 17/01095/FULEIA).	Approved 28.09.2021	LS 21 Moorfields Development Management
21/00587/LBC Cripplegate	332 Ben Jonson House Barbican London EC2Y 8NQ	Internal refurbishment including installation of full height and dwarf height partition walls; installation of suspended ceiling	Approved 21.09.2021	Mr Alex Bultitude
21/00620/MDC Cripplegate	Former Richard Cloudesley School Golden Lane Estate London EC1Y 0TZ	Submission of Fire Safety Management Plan and Fire Strategy Report pursuant to condition 48 of planning permission 17/00770/FULL dated 19th July 2018.	Approved 30.09.2021	ISg
21/00648/LBC Cripplegate	21 Cromwell Tower Barbican London EC2Y 8DD	Refurbishment and redecoration including strip out and replacement of kitchen and bathroom units, fixtures and fittings, replacement of existing internal doors, removal of existing partition walls, installation of new partition walls,	Approved 07.10.2021	Dr. James O'Brien

		suspended ceiling and electrics.		
21/00494/ADVT Dowgate	64 Cannon Street London EC4N 6AE	Installation and display of: i) three non-illuminated fascia signs, measuring 0.59m (w) by 0.19m (h); ii) one externally illuminated fascia sign, measuring 0.59m (w) by 0.19m (h); iii) one externally illuminated projecting sign, measuring 0.6m by 0.6m, at a height of 2.8m above the pavement.	Approved 23.09.2021	Retail Design Solutions Ltd
21/00495/FULL Dowgate	Cannongate House 60-64 Cannon Street London EC4N 6AE	Repositioning of main entrance on Cannon Street, replacement grilles to Cannon Street elevation, new entrance doors on College Hill and Cloak Lane, and other minor works.	Approved 07.10.2021	Planning Potential Ltd
20/00700/FULL Farringdon Within	26-30 Morley House Holborn Viaduct London EC1A 2AT	Application under Section 73 of the Town & Country Planning Act 1990 to vary Condition 41 (Approved Plans) of planning permission dated 17th August 2020 (Ref. 17/00165/FULMAJ) to enable minor material amendments to the approved scheme including: (1) Amended hotel entrances on Holborn Viaduct; (2) Internal reconfiguration of hotel layout; (3) Internal reconfiguration to	Approved 23.09.2021	MH Viaduct LP Acting Through Its General Partner

		provide an internalised access link between the ground floor of the hotel and the office workspace in the lower levels of City Temple; (4) Internal reconfiguration on ninth floor from hotel guestrooms to hotel Restaurant / Bar (private guest only); (5) Alterations to address design development changes to ceiling heights, parapets and roof plant areas; (6) associated amendments to facades; (7) the introduction of a Phasing Plan to allow a phased approach to the development and (8) a revised energy strategy.		
21/00487/LBC Farringdon Within	54 Farringdon Street London EC4A 4BD	Installation of: (i) one non illuminated projecting sign; (ii) two wall lights; (iii) one illuminated menu board; and (iv) one Victorian retractable awning; and Removal of: (v) illuminated fascia sign behind shopfront glazing; and (vi) associated surface mounted cabling.	Approved 23.09.2021	54Farringdon Limited
21/00507/ADVT Farringdon Within	54 Farringdon Street London EC4A 4BD	Installation and display of one internally illuminated menu board of 0.49m high by 0.367m wide by 0.04m deep.	Approved 23.09.2021	54Farringdon Limited

21/00512/FULL Farringdon Within	Apartment 6.1 50 Little Britain London EC1A 7BR	Proposed single storey extension of 3.06m height to the terrace on the west side of flat 6.1 at sixth floor level, providing an additional 32m2 GIA living space.	Approved 23.09.2021	Mrs. Svetlana Landsberg
21/00551/LBC Farringdon Within	Flat 16 & 17 St Bartholom ew House 58 West Smithfield London EC1A 9DS	The creation of an opening (1500mm wide x 2300mm high) through an internal wall between flats 16 & 17 and other internal works associated with the amalgamation of flats 16 and 17 to create a single residential unit.	Approved 05.10.2021	Keith Dawkins
21/00721/NMA Farringdon Within	Stationers Hall Stationers Hall Court London EC4M 7DD	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission ref. 20/00686/FULL dated 9 March 2021, to remove the requirement to submit details under Condition 2 (details for enclosure) and to amend Condition 8 (approved drawings) to reflect alterations to the enclosure, the roof and plant units.	Approved 21.09.2021	The Worshipful Company of Stationers
21/00400/LBC Farringdon Without	Poultry Market East Poultry Avenue London EC1A 9LH	Works associated with the East and West Poultry Avenue canopies including (i) temporary reinstatement of a covered walkway over East Poultry Avenue; (ii)	Approved 07.10.2021	City of London Corporation

		dismantling of a concrete gutter and flat roof area on East Poultry Avenue, (iii) dismantling of a concrete gutter on West Poultry Avenue and (iv) works of making good to the west elevation of the Central Market.		
21/00688/ADVT Farringdon Without	311 - 313 High Holborn London WC1V 7BN	Installation and display of: (i) one internally illuminated fascia sign measuring 0.406m high by 1.041m wide at a height above ground of 2.91m; (ii) two non-illuminated fascia signs measuring 0.275m high by 1.932m wide at a height above ground of 3.835m.	Approved 07.10.2021	Pegasus Planning Group Ltd
21/00725/MDC Queenhithe	Millennium Bridge House 2 Lambeth Hill London EC4V 4AG	Submission of details of foundation and piling configuration pursuant to condition 9 of the planning permission dated 8 March 2021 (application number 20/00214/FULMAJ)	Approved 23.09.2021	AG Beltane MBH B.V.
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) (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.	Approved 23.09.2021	City of London Corporation

This page is intentionally left blank

Agenda Item 12

Committee(s)	Dated:
Planning and Transportation	26 th October 2021
Subject: Valid planning applications received by Department of the Built Environment	Public
Report of: Chief Planning Officer and Development Director	For Information

Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development applications received by the Department of the Built Environment since my report to the last meeting.

Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk.

Details of Valid Applications

Application Number & Ward	Address	Proposal	Date of Validation	Agent/Applicant Name
21/00843/FULL Aldgate	6 Lloyd's Avenue, London, EC3N 3AX	Installation of a new an external condenser unit within the lightwell of the building to replace an existing unit in the same location.	30/09/2021	CLS Lloyds Avenue Limited
21/00799/FULL Bassishaw	1 London Wall Place, London, EC2Y 5AU	Installation and display of two illuminated sculptures for a temporary period between 29.10.2021 and 30.01.2022.	21/09/2021	London Wall Place LP
21/00775/FULL Billingsgate	43 - 45 Eastcheap, London, EC3M 1JA	Enlargement of window opening and installation of new sliding/folding doors in association with internal fitting out	13/09/2021	Fit Kitchen Ltd.

		to ground floor and basement restaurant unit.		
21/00759/FULL Bishopsgate	201 Bishopsgate, London, EC2M 3AB	Removal of wind mitigation screen and making good of facade to match existing.	09/09/2021	Broadgate PHC 2010 Ltd
21/00752/FULL Bishopsgate	Woodins Shades Public House, 212 Bishopsgate, London, EC2M 4PT	Installation of new glazing to entrance doors and new folding windows to replace existing windows.	29/09/2021	Mitchells & Butlers PLC
21/00812/FULL Broad Street	60 London Wall, London, EC2M 5TQ	Installation of a sliding door to the eastern terrace at 9th floor level.	24/09/2021	Mondrian Investment Partners
21/00803/FULL Candlewick	68 King William Street, London, EC4N 7HR	Installation of two retractable awnings to 9th floor external seating areas.	22/09/2021	Maven Leisure LTD
21/00837/FULL Candlewick	Yarnwicke Building, 119- 121 Cannon Street, London, EC4N 5AT	Formation of roof terrace, including the installation of decking; new toilet facilities; new plant equipment and relocated plant equipment and associated enclosures; balustrades; access enclosures; replacement doors; and other associated works.	30/09/2021	UK Properties Specialist Ltd
21/00783/FULL Castle Baynard	St Brides House , 10 Salisbury Square, London, EC4Y 8EH	Refurbishment and extension of the building including the: i) creation of an additional storey	14/09/2021	RREEF St. Brides Limited

		<p>at level six and additional part storey at level seven (Class E); ii) creation of accessible terraces at levels five, six and seven; iii) installation of projecting balconies to the northern elevation at levels one to four; iv) creation of infill extensions at ground floor level; v) reconfiguration of the office entrance; vi) reconfiguration of the loading bay; vii) new hard and soft landscaping and other ancillary works.</p>		
21/00798/FULL Castle Baynard	Northcliffe House, 26-30 Tudor Street, 16-22 Bouverie Street, London, EC4Y 0AY	<p>Application under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to vary condition 6 of Listed Building Consent (application no. 20/00582/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 information.</p>	21/09/2021	DWS Grundbesitz GmbH

21/00788/FULL Cheap	107 Cheapside, London, EC2V 6DN	Alterations to the main building entrance comprising: (i) installation of new revolving door and pass doors; (ii) installation of new glazing, cladding and paving; and (iii) installation of lighting within the recessed entrance.	30/09/2021	Cheapside SARL
21/00705/FULL Coleman Street	Salisbury House , 31 Finsbury Circus, London, EC2M 5SQ	Alterations at ground floor level, including: (i) creation of new covered entryway way within an existing lightwell and repositioning of existing entrance gates to London Wall; (ii) replacement of two rooflights and three external windows (two windows to become doors) within an existing lightwell; and (iii) installation of new external services within an existing lightwell.	17/08/2021	Workspace
21/00751/FULL Coleman Street	55 Moorgate, London, EC2R 6BH	Change of use of part ground floor and first floor to Use Class E, with associated internal works, minor external alterations including the introduction of louvers to the ground floor northern facade,	08/09/2021	Cleveland Clinic London Ltd

		the temporary removal and replacement of one window within the eastern elevation, and additional roof plant.		
21/00815/FULL Coleman Street	City Point, 1 Ropemaker Street, London, EC2Y 9AW	Temporary installation of sculptures for a temporary period between 29th November 2021 and 16th January 2022.	28/09/2021	Brookfield Properties
21/00836/FULL Cordwainer	3 Queen Victoria Street, London, EC4N 4TQ	Installation of benches and temporary installation of planters within the arcade for a further 12 month period.	30/09/2021	DP9 Ltd
21/00779/FULL Cripplegate	905 - 906 Frobisher Crescent, London, EC2Y 8HD	Replacement of one fixed semi-circular window with new openable window at tenth floor.	05/10/2021	Amanda Chorn
21/00778/FULL Farringdon Within	4 Lindsey Street, London, EC1A 9HP	Installation of Metal frame pergola with louvres to existing roof terrace.	14/09/2021	Bytedance
21/00313/FULMAJ Portsoken	55 - 56 Aldgate High Street, London, EC3N 1AL	Demolition of existing building at 55-56 Aldgate High Street and erection of replacement ground plus 13-storey mixed-use building comprising; 287 sqm (GIA) of office floorspace (Use	27/09/2021	H Company 3 Limited

		Class E) at basement, ground and first floor levels; 41 no. residential units (Class C3); office terrace at first floor level; residential balconies, landscaping and cycle parking, and associated works.		
21/00669/FULL Tower	60 Fenchurch Street, London, EC3M 4AD	Alterations to the facade to create new and amended entrances including new service entrance to lift to cycle and refuse store.	01/09/2021	Royal London UK Real Estate Fund
21/00826/FULMAJ Tower	Boundary House, 7 - 17 Jewry Street, London, EC3N 2EX	Demolition of the building and the erection of a basement, ground plus 14 storey building comprising of a 311 bedroom hotel with a roof top restaurant and associated facilities (Use Class C1) and the delivery of commercial floorspace at part ground and part first floor (Use Class E) with ancillary community uses, and associated landscaping, cycle parking and associated works.	30/09/2021	RP Assets Limited

By virtue of paragraph(s) 6b of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank